

MONDAY, 29 NOVEMBER 2021

TO: ALL MEMBERS OF THE CABINET

I HEREBY SUMMON YOU TO ATTEND A **VIRTUAL MEETING** OF THE **CABINET AT 10.00 AM, ON MONDAY, 6TH DECEMBER, 2021** FOR THE TRANSACTION OF THE BUSINESS OUTLINED ON THE ATTACHED AGENDA

Wendy Walters

CHIEF EXECUTIVE

Democratic Officer:	Martin S. Davies
Telephone (direct line):	01267 224059
E-Mail:	MSDavies@carmarthenshire.gov.uk

Wendy Walters Prif Weithredwr, *Chief Executive*,
Neuadd y Sir, Caerfyrddin. SA31 1JP
County Hall, Carmarthen. SA31 1JP

CABINET

MEMBERSHIP - 10 MEMBERS

Councillor	Portfolio
Councillor Emlyn Dole	Leader Corporate Leadership and Strategy; Chair of Cabinet; Represents Council at WLGA; Economic Development Represents the Council on the Swansea Bay City Region; Collaboration; Marketing and Media; Appoints Cabinet Members; Determines Cabinet Portfolios; Liaises with Chief Executive; Public Service Board
Councillor Mair Stephens	Deputy Leader Council Business Manager; Human Resources; Performance Management; Wales Audit; Training; I.C.T.; T.I.C. (Transformation, Innovation and Change); Strategic Planning
Councillor Ann Davies	Communities and Rural Affairs Rural Affairs and Community Engagement; Community Safety; Police; Counter-Terrorism and Security Act 2015; Tackling Poverty; Wellbeing of Future Generations; Third Sector Liaison; Equalities, Climate Change Strategy
Councillor Glynog Davies	Education and Children Schools; Children's Services; Special Education Needs; Safeguarding; Respite Homes; Regional Integrated School; Improvement Service; Adult Community Learning; Youth Services; School Catering Services, Lead Member for Children and Young People; Youth Ambassador
Councillor Hazel Evans	Environment Refuse; Street Cleansing; Highways and Transport Services; Grounds Maintenance; Building Services (excluding housing stock); Emergency Planning; Flooding, Public Rights of Way
Councillor Linda Evans	Housing Housing – Public; Housing – Private, Housing Maintenance and repairs & Ageing Well.
Councillor Peter Hughes Griffiths	Culture, Sport and Tourism Town and Community Councils Ambassador; Development of the Welsh Language; Theatres; Sports; Leisure Centres; Museums; Libraries; Country Parks; Tourism.
Councillor Philip Hughes	Public Protection Trading Standards; Environmental Health. Environmental Enforcement; Planning enforcement; Unlicensed Waste; Parking Services; Bio diversity
Councillor David Jenkins	Resources Finance & Budget; Corporate Efficiencies; Property/Asset Management; Caretaking & Building Cleaning; Procurement; Housing Benefits; Revenues; Statutory Services (Coroners, Registrars, Electoral, Lord Lieutenancy); Armed Forces Champion Contact Centres and Customer Service Centres
Councillor Jane Tremlett	Social Care & Health Adult Social Services; Residential Care; Home Care; Learning Disabilities; Mental Health; NHS Liaison/Collaboration/ Integration; Care Home Catering Services, Carers' Champion; Dementia Care Champion; Disability Ambassador

A G E N D A

1. **APOLOGIES FOR ABSENCE**
2. **DECLARATIONS OF PERSONAL INTEREST**
3. **TO SIGN AS A CORRECT RECORD THE MINUTES OF THE MEETING OF THE CABINET HELD ON THE 22ND NOVEMBER 2021.** 5 - 10
4. **QUESTIONS ON NOTICE BY MEMBERS**
5. **PUBLIC QUESTIONS ON NOTICE**
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13. **ANY OTHER ITEMS OF BUSINESS THAT BY REASONS OF SPECIAL CIRCUMSTANCES THE CHAIR DECIDES SHOULD BE CONSIDERED AS A MATTER OF URGENCY PURSUANT TO SECTION 100B(4)(B) OF THE LOCAL GOVERNMENT ACT, 1972.**

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Cabinet

Monday, 22 November 2021

PRESENT: Councillor E. Dole (Chair)

Councillors:

C.A. Davies, G. Davies, H.A.L. Evans, L.D. Evans, P.M. Hughes, P. Hughes-Griffiths, D.M. Jenkins, L.M. Stephens and J. Tremlett

Also in attendance:

Councillor D.M. Cundy

The following Officers were in attendance:

W. Walters, Chief Executive

J. Morgan, Director of Community Services

R. Mullen, Director of Environment

G. Morgans, Director of Education & Children's Services

L.R. Jones, Head of Administration and Law

P.R. Thomas, Assistant Chief Executive (People Management & Performance)

R. Hemingway, Head of Financial Services

S. Rees, Simultaneous Translator

L Morris, Senior Press Officer

L. Jenkins, Executive Board Support Officer

C. Ferguson, Countryside Access Officer

M. Evans Thomas, Principal Democratic Services Officer

E. Bryer, Democratic Services Officer

S. Hendy, Member Support Officer

K. Thomas, Democratic Services Officer

Virtual Meeting - 10.00 - 10.26 am

1. APOLOGIES FOR ABSENCE

There were no apologies for absence.

2. DECLARATIONS OF PERSONAL INTEREST

Councillor	Minute Number	Nature of Interest
L.M. Stephens	3 – To sign as a correct record the minutes of the meeting of the Cabinet held on the 8 th November, 2021	Minute no 13 – Empty Property Plan - Has an empty residential property
Mr J Morgan – Director of Community Services	8 – Establishment of a new Regional Education Partnership	Wife works for the regional service

3. TO SIGN AS A CORRECT RECORD THE MINUTES OF THE MEETING OF THE CABINET HELD ON THE 8TH NOVEMBER 2021

(NOTE: Councillor L.M. Stephens having previously declared an interest in this item, re-declared that interest and remained in the meeting during its consideration)

UNANIMOUSLY RESOLVED that the minutes of the meeting of the Cabinet held on the 8th November, 2021 be signed as a correct record.

4. QUESTIONS ON NOTICE BY MEMBERS

The Chair advised that no questions on notice had been submitted by members.

5. PUBLIC QUESTIONS ON NOTICE

The Chair advised that no public questions had been received.

6. COUNCIL'S REVENUE BUDGET MONITORING REPORT

The Cabinet considered the revenue budget monitoring report which provided the latest budgetary position as at 31st August 2021, in respect of 2021/2022.

Overall, the monitoring report forecasted an underspend for the year at departmental level of £869k with a forecasted underspend on the Authority's net revenue budget of £399k. It was reported that, at a high level, this was due to a combination of additional COVID-19 related costs and lost income which was largely refunded under the Welsh Government hardship scheme, some services were either paused or impacted by lockdown measures and social distancing during quarter 1 together with the proposed utilisation of some capital financing underspends due to some significant pressure points on in-year capital project budgets, to be considered as part of a separate reports.

Cabinet Members noted that in respect of the April-June budgets, additional expenditure and income loss of approximately £6 million had been claimed under the Welsh Government hardship scheme.

The Housing Revenue Account reported a predicted underspend of £1,159k for 2021/22 details of which were provided within Appendix B appended to the report.

UNANIMOUSLY RESOLVED that:

10.1 The Budget Monitoring report be received, and consideration given to the budgetary position and appropriate corrective action.

10.2 Chief Officers and Heads of Service critically review options available to them to limit the forecasted overspend of budgets, whilst recognising the pressure Covid-19 had placed on the Authority's overall budget.

7. REINSTATEMENT OF PUBLIC ACCESS AT GILFACH IAGO

The Cabinet considered a report on proposals for the Council to take responsibility from Celtic Energy to undertake all public access reinstatement works across the former Gilfach Iago opencast site.

The Cabinet noted that in order for the proposal to be progressed, the Authority would need to apply to the Magistrate's Court for the reclassification of three unclassified roads across the former site (not presently navigable) to bridleway status which could then be diverted as necessary 'in-house' by the Countryside Access team to better 'fit' with the restored layout of the land and connect with existing footpaths. Authority would also be required to accept the financial settlement offered by Celtic Energy, in the sum of £320k, on a without prejudice basis, to fund the reinstatement of public access across the site. If accepted, whilst the settlement offered would cover a significant proportion of the projected costs, additional funding of £130k would be required to deliver the project in full, including grant bids.

UNANIMOUSLY RESOLVED TO RECOMMEND TO COUNCIL:-

- 7.1 To approve the proposal to apply to the Magistrate's court for reclassification of three unclassified roads to bridleway status;**
- 7.2 To accept the financial settlement offered by Celtic Energy to take responsibility for, and to undertake all public access reinstatement works across the former opencast site.**

8. ESTABLISHMENT OF A NEW REGIONAL EDUCATION PARTNERSHIP

(NOTE: Mr J. Morgan – Director of Community Services, having earlier declared an interest in this item left the meeting during its consideration)

The Cabinet considered a report, together with a draft legal agreement, on the proposed establishment of a new regional partnership to deliver a new model of education provision within the South West Wales footprint between the local authorities of Carmarthenshire, Pembrokeshire and the City and County of Swansea to be known as the 'Partneriaeth'.

It was noted that, if approved, while the partnership would replace the former educational partnership provided by ERW, the ERW Joint Committee would remain in force to wind up its business and establishing all outstanding liabilities. At that point in time, all remaining partners in ERW would withdraw on one week's notice and ERW would dissolve with the ERW Joint Committee legal agreement being varied to provide for those termination provisions. As part of that deed of variation, it had been agreed that all outstanding ERW liabilities should be divided among the existing partners calculated on a pro rata basis, having first taken account of and deducted any liability of Neath Port Talbot and Ceredigion councils pursuant to clauses 15.2 and 15.4 of the ERW agreement.

Appreciation was extended to all the staff involved with establishing the Partneriaeth and setting up the legal agreement.

UNANIMOUSLY RESOLVED:

- 8.1 To approve the creation of a Joint Scrutiny Councillor Group**

- on the basis of the terms of reference set out in the legal agreement, as amended from time to time;
- 8.2 To approve the draft legal agreement (attached at Appendix A) to establish a joint committee for a new regional education partnership known as PARTNERIAETH to support the delivery of school improvement;
- 8.3 To approve the appointment of the Leader as a member of the joint committee;
- 8.4 To delegate to the Joint Committee those functions necessary to support the delivery of school improvement within the Council's area and the region, acknowledging and accepting that the Council and the other local authorities in the region, will each retain statutory responsibility for school performance, together with the responsibility for the exercise of statutory powers, of intervention and organisation of schools in their respective areas;
- 8.5 To delegate authority to the Director of Education in conjunction with the Leader, the Cabinet Member for Education and Children's Services and Head of Administration and Law to make any further necessary amendments to the legal agreement and authorises the Chief Legal Officer to enter into the agreement on behalf of the Council together with any ancillary legal documentation necessary to facilitate the creation and operation of the new partnership;
- 8.6 To approve the provision of services by the Partneriaeth to councils who are not parties to the legal agreement, namely Neath Port Talbot County Borough Council, Ceredigion County Council and Powys County Council in accordance with the clause 14 of the legal agreement with authority delegated to the Partneriaeth Joint Committee to agree the terms upon which such services are to be provided;
- 8.7 To approve the creation of a Joint Scrutiny Councillor Group on the basis of the terms of reference set out in the legal agreement, as amended from time to time.
9. **TO NOTE THAT THE LABOUR GROUP HAS NOMINATED COUNCILLOR ROB JAMES TO REPLACE COUNCILLOR BILL THOMAS ON THE CORPORATE PARENTING & SAFEGUARDING AND THE SCHOOL IMPROVEMENT PANEL**
- UNANIMOUSLY RESOLVED** to note the Labour Group's nomination for Councillor Rob James to replace Councillor Bill Thomas on the Corporate Parenting and Safeguarding Panel and the School Improvement Panel.
10. **ANY OTHER ITEMS OF BUSINESS THAT BY REASONS OF SPECIAL CIRCUMSTANCES THE CHAIR DECIDES SHOULD BE CONSIDERED AS A MATTER OF URGENCY PURSUANT TO SECTION 100B(4)(B) OF THE LOCAL GOVERNMENT ACT, 1972.**

The Chair advised that there were no items of urgent business.

CHAIR _____

DATE _____

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Cabinet 6th December 2021

HIGHWAYS ASSET MANAGEMENT PLAN (HAMP) MAINTENANCE MANUAL

Purpose:

To adopt the Maintenance Manual in support of the Highway Asset Management Plan adopted in 2018. The Maintenance Manual forms Part 4 of the HAMP and is being developed as a portfolio of specific manuals covering the management of a range of highway asset categories.

The first four sections brought forward at this time cover:

- **Part 4.1 Highway Maintenance Management**
- **Part 4.2 Highway Network Hierarchy**
- **Part 4.3 Highway Inspection and Repair Regime**
- **Part 4.4 Road Condition Assessment and Investment Prioritisation**

Further sections will be brought forward in future years.

Recommendations / key decisions required:

Recommendations / key decisions required: Adoption of the Maintenance Manual parts 4.1 to 4.4 as detailed.

Reasons: To ensure the highway network is maintained in accordance with statutory duties, supports corporate objectives and complies with the revised national code of practice '*Well Managed Highway Infrastructure*'. The revised manual introduces changes to the inspection and maintenance of highways recommended by the County Surveyor's Society Wales to provide consistency across Wales.

Relevant scrutiny committee to be consulted:

Environment and Public Protection Committee 25th November 2021

Cabinet Decision Required YES

Council Decision Required NO

CABINET MEMBER PORTFOLIO HOLDER:- Councillor Hazel Evans, Cabinet Member for Environment

Directorate: Steve Pilliner Report Author: Richard Waters Darren King Chris Nelson	Designations: Head of Service: Highways & Transportation Highways & Transportation Services Manager Highway Services Manager Highways Asset Manager	Email addresses: SGPilliner@cararthenshire.gov.uk rwaters@cararthenshire.gov.uk dking@cararthenshire.gov.uk CNelson@cararthenshire.gov.uk
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EXECUTIVE SUMMARY

Cabinet

6th December 2021

Highway Asset Management Plan: Maintenance Manual

BRIEF SUMMARY OF PURPOSE OF REPORT.

In 2018 Council resolved to adopt the Highway Asset Management Plan which ensures that the County Council manages and maintains the highway network in accordance with its statutory duties and to comply with best practice.

The HAMP is in line with national codes of practice and adopts a risk-based approach which targets limited resources to areas where they are most needed and where our investment will derive greatest value. This does mean that difficult decisions have to be made and the HAMP sets out the overarching policies and methodology to ensure that those decisions are evidence led and based on an equitable and objective analysis aimed at reducing the authority's exposure to risk and achieving best value for the long-term integrity of the highway asset. There are four parts to the HAMP:

- Part 1 of the HAMP explains the supporting role of the highway network in the wider policy context.
- Part 2 sets out the highway network policies which are in place or being developed and our objectives adopted in managing the highway network.
- Part 3 of the HAMP informs on the condition of the asset and is reported as an Annual Statement.
- Part 4 is a Maintenance Manual consisting of a portfolio of topic specific manuals setting out how we manage particular elements of the highway asset in line with the risk-based approach.

This report concerns Part 4 of the HAMP which is being drafted in accordance with an all-Wales approach being coordinated by the County Surveyors Society Wales (CSSW). Although there is the opportunity for each authority to depart from CSSW guidance to recognise local conditions, the overarching intention is to bring a consistent approach across Wales.

Part 4 will consist of a portfolio of individual manuals which will be brought forward over time to provide a comprehensive document setting out how the maintenance of the highway asset will be managed. There are four particular sections brought forward within this report and a provisional timetable is included setting out subsequent manuals to be drafted in the next two years. Each section of the Manual has been drafted with reference to CSSW guidance and include:

- Part 4.1. Highway Maintenance Management.
- Part 4.2. Highway Network Hierarchy

- Part 4.3. Highway Inspection and Repair Regime.
- Part 4.4. Road Condition Assessment and Investment Prioritisation.

An overview of these sections of the Manual is provided below with a full copy of the relevant sections attached.

Part 4.1 Highway Maintenance Management

This section introduces the document, provides an overview of the structure of the Manual and a proposed timetable for bringing forward other sections of the Manual in future years. Part 4.1 also outlines a number of aspects to managing the maintenance of the highway including:

- Key legislation
- Risk Management
- Customer engagement
- Asset registration
- Roles & responsibilities
- Finance & budgeting
- Streetworks
- Performance management
- competencies
- Procurement
- Traffic management

Part 4.2 Highway Network Hierarchy

This Part builds on the Highway Network Hierarchy classification system developed by CSSW and adopted by the County Council within the HAMP document in 2018. Each road within our highway network has since been evaluated and classified in accordance with the following table:

CHSR	Trunk roads and some principal ‘A’ class roads between primary destinations
CH1	Major urban network and Inter-Primary Links.
CH2	B and C class roads and some unclassified urban routes carrying bus HGV and local traffic with frontage access and frequent junctions.
CH3	Roads linking between the main and secondary distributor network with frontage access frequent junction's
CH4	Roads serving limited numbers of properties carrying only access traffic
CH5a	Little used roads serving very limited numbers of properties
CH5b	Minor routes and low used tracks that provide access to isolated properties
CH5c	Lanes and tracks that are generally unsuitable for vehicle traffic
CH5d	Unmetalled tracks that are unrecognisable as a road

The specific classification of individual roads within Carmarthenshire are presented on the County Council Geodiscoverer mapping system: <http://geodiscoverer/>

Part 4.2 also summarises the lengths and percentages of the highway network within each class of hierarchy, discusses cross-boundary issues and how roads will be reviewed and their classification updated.

Part 4.3 Highway Inspection and Repair Regime

Inspections

A revised approach to highway inspections has been developed by the CSSW to guide Welsh authorities. Although each authority will determine and adopt its own specific inspection regime, there are benefits to a consistent approach across Wales which provides a uniform standard within the highway maintenance sector, consistent levels of asset management for road users and a uniform policy for assessing and defending third party claims against the authority.

This section of the Manual discusses the types of inspection, the highway assets included within the inspection and of particular importance, the frequency of scheduled routine inspections.

The frequencies of scheduled routine highway inspections are determined by road hierarchy as are defect definitions and repair regimes. This replaces the current *Code of Practice for Highway Safety Inspections in Carmarthenshire* adopted by the County Council in 2008. An overview of the HAMP routine highway inspection frequencies for highways is presented in the table below along with the current policy which they will replace.

HAMP Maintenance Manual			Highway Inspection Frequencies	
			Carmarthenshire Policy since 2008 (to be replaced)	
Carriageway Hierarchy	HAMP Inspection (to be adopted)	CSSW Recommendation	Environment	Frequency
CHSR	Monthly	Monthly	Town Centres (Llanelli, Carmarthen and Ammanford)	1 month
CH1	Monthly	Monthly	All Class 'A' Roads	1 month
CH2	Every 3 months	Every 3 months	All Class 'B' and 'C' Roads	3 months
CH3	Every 6 months	Every 6 months	Residential estates and other Urban Unclassified Roads	6 months
CH4	Annual	Annual or 2 yearly dependent on condition	Rural Unclassified Roads & Adopted Back Lanes	1 year
CH5a	Annual	Reactive		
CH5b	Annual	Reactive		
CH5c	Reactive	Reactive		
CH5d	Reactive	Reactive		

Footway Inspections are currently undertaken at the same frequency as carriageway inspections apart from the town centres and busier sections. The council will develop in 2022/23 a hierarchy for footways to follow a similar risk-based approach adopted for carriageway management with walked inspections of high use routes.

The inspection of highway structures is also summarised within this section with a detailed section programmed for development in 2022/23.

Repairs

Potential highway defects are recorded either through routine inspection or third party notification and prioritised for repair based on the Inspector's judgement of the risk they pose.

The HAMP response criteria and current policy are summarised below with full details available in the attached reports.

Timescales for Repairs			
Hamp Maintenance Manual (to be adopted)		Carmarthenshire Policy since 2008 (to be replaced)	
Critical defect	2 hours	Category 1 – immediate risk requiring prompt repair	Priority 1 – requires 2-hour response.
Safety defect	By end of Next Working Day (CHSR,CH1,CH2)		Priority 2 – requires a 24-hour response.
	Within 5 working days (CH3,CH4,CH5)		
Maintenance defect	30 Days (CHSR,CH1,CH2) 90 days (CH3,CH4,CH5)	Category 2 – defects which do not present an immediate or imminent hazard	
Programmed repairs	To be programmed.	To be programmed.	

Critical defects are those judged by the inspecting officer to present a risk high enough to require immediate action. Typically, this will include incidents such as highway collapse with a high risk to road users, unstable overhead wires or trees and missing manhole covers.

The inspecting officer will record Safety and Maintenance defects based on an assessment of risk associated with each individual defect and will use criteria detailed in Part 4.3 as a guide. This guidance accords with CSSW recommendations for an all-Wales approach with the key points summarised in the table below.

HAMP Policy - Safety Defect (to be adopted)				
Carriageway	Pothole	CHSR, CH1 and CH2	>50mm	Maximum horizontal dimension greater than 150mm
	Pothole	CH3, CH4 and CH5	>75mm	Maximum horizontal dimension greater than 150mm

Footway	Pothole / crack / gap	All footways	> 40mm	Maximum horizontal dimension greater than 75mm
	Trip	All footways	> 40mm	Maximum horizontal dimension greater than 75mm
	Rocking slab	All footways	> 40mm	N/A
HAMP Policy – Maintenance Defect (to be adopted)				
Carriageway	Pothole	CHSR, CH1 and CH2	> 40mm	Maximum horizontal dimension greater than 150mm
	Pothole	CH3, CH4 and CH5	> 50 mm	Maximum horizontal dimension greater than 150mm
	Crowning / depression	All roads	> 100mm	< 2M Length
Footway	Pothole	All footways	25mm - 40mm	Maximum horizontal dimension greater than 75mm
	Crack or Gap	All footways	25mm - 40mm	Maximum horizontal dimension greater than 75mm
	Trip	All footways	25mm - 40mm	Maximum horizontal dimension greater than 75mm

These defect guidelines replace the current guidelines adopted in 2008 by the *Code of Practice for Highway Safety Inspections in Carmarthenshire* and the key points of the Code being replaced are summarised below.

Carmarthenshire Policy since 2008 (to be replaced)			
Carriageway	All roads	Potholes	>40mm
		Depressions or ridges	>40mm over a 1m length
		Vertical faces	>40mm
Footways	All footways	Potholes	>20mm
		Depressions or ridges	>40mm over a 1m length
		Vertical faces	>25mm over a 0.6m length

These changes in the frequency of inspections, timescales for response and intervention levels follow the national code of practice risk-based approach and the recommendations from the County Surveyor's Society Wales for an all-Wales approach and are necessary to manage the highway asset with the resources available.

Part 4.4 Road Condition Assessment and Investment Prioritisation

This section of the Manual details how our main roads are subject to condition assessments through SCANNER, Scrim and visual assessments and the criteria used to prioritise funding for remedial works to our roads and structures to target areas of greatest need.

DETAILED REPORT ATTACHED?	YES
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IMPLICATIONS

I confirm that other than those implications which have been agreed with the appropriate Directors / Heads of Service and are referred to in detail below, there are no other implications associated with this report:

Signed: **Steve Pilliner** Head of Service Highways & Transportation

Policy, Crime & Disorder and Equalities	Legal	Finance	ICT	Risk Management Issues	Staffing Implications	Physical Assets
NONE	YES	YES	NONE	YES	YES	NONE

2. Legal

The County Council has a statutory duty under the Highways Act 1980 Section 41 to maintain the highway and to keep them safe for public use. Through the adoption of the HAMP and its associated Maintenance Manual the County Council will be ensuring that it discharges this statutory duty and maintains the highway asset in a safe and reasonable manner.

The adoption of standards which are consistent with other local authorities across Wales will also help to ensure that road users enjoy a consistent standard of maintenance irrespective of authority boundaries.

3. Finance

The budgets available to local authorities for highway maintenance have been under pressure for many years and the impact of this is detailed in our HAMP Annual Statement.

The HAMP adopted a risk-based approach to ensure the resources available to maintain our highways are targeted towards the areas of greatest need to ensure the safety of the travelling public.

The Maintenance Manual continues to build on this approach by targeting resources proportionally towards areas of greatest risk.

5. Risk Management Issues

The HAMP and Maintenance Manual adopt risk management as a core theme. This approach is in accordance with national codes of practice and adopts standards recommended by the County Surveyors Society Wales for a consistent approach across Wales.

6. Staffing Implications

The adoption of the elements of the Maintenance Manual included within this report will not have a direct impact on staff numbers but will change aspects of how services are currently delivered and improve efficiency. The Maintenance Manual accommodates a more planned approach to highway maintenance which will improve efficiency.

CONSULTATIONS

<p>I confirm that the appropriate consultations have taken in place and the outcomes are as detailed below</p> <p>Signed: Steve Pilliner Head of Highways & Transportation</p>		
<p>1. Scrutiny Committee – Environment and Public Protection Scrutiny Committee 25th November 2021</p> <p>2. Local Member(s) - Not applicable</p> <p>3. Community / Town Council – Not applicable</p> <p>4. Relevant Partners - County Council’s insurers.</p> <p>5. Staff Side Representatives and other Organisations - not applicable.</p>		
<p>CABINET MEMBER PORTFOLIO HOLDER(S) AWARE/CONSULTED</p> <p>Yes</p>	<p>Include any observations here</p>	
<p>Section 100D Local Government Act, 1972 – Access to Information</p> <p>List of Background Papers used in the preparation of this report:</p>		
<p>Title of Document</p>	<p>File Ref No.</p>	<p>Locations that the papers are available for public inspection</p>
<p><i>Code of Practice for Highway Safety Inspections in Carmarthenshire</i> adopted by the County Council in 2008.</p>		<p>Electronic copy available from report authors</p>

Highway Asset Management Plan

Part 4:

Highway Maintenance Manual (V1.1)



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This manual is based upon a template produced by CSSW Wales under the CSSW Highway Asset Management Planning (HAMP) project. CSSW has developed a risk-based approach for highway management under the HAMP project that is intended to enable a nationally consistent response to the Code of Practice. The template has been used to create a manual specific to Carmarthenshire Council with amendments where the CSSW proposed minimum standards have been exceeded by the Council.

Document Control

Version Number	Amendments Made	Date
V1.0	Nil – Original	25 th August 2021
V1.1	Updates following CMT 2 nd September 2021	6 th September 2021
Next Review Due		October 2023

Council Approval

Version Number	Council Committee	Date
v1	Cabinet	25 th October 2021

Responsibility for the Manual

The responsibility for the delivery of and updating of this plan are shown below

Council Officer	Responsible for
Richard Waters – Highways and Transportation Manager	Setting direction and strategy for the Division to support the HAMP objectives
Darren King – Highways Services Manager	Ensuring compliance with the Manual, developing policy
Chris Nelson – Highways Asset Manager	Preparing the Manual and developing policy

4.1 Highway Maintenance Management

4.1.1 Introduction

The purpose of the Maintenance Manual is to set the policy and the standards of maintenance of the highway asset and ensure the Council meets its statutory obligations. The Maintenance Manual documents the methods used to manage the highway asset and ensure that the risks to users are appropriately monitored and managed.

The HAMP underpins and defines the management, prioritisation and service levels for highway maintenance and infrastructure investment. The HAMP supports the Council's Well-being objectives and the principals of the Well-being of Future Generations (Wales) Act 2015.

The Maintenance Manual will address many areas of service delivery and will be developed over a 3-5 year period, setting out key policies and technical processes for a risk based delivery of the highway maintenance service. The authority will need to adapt to changing demands, resources and technology and continuously implement best asset management practices. The authority will continually update and review the Maintenance Manual over time. Major updates or policies will be submitted for corporate approval. We will work closely with neighbours and other local authorities in a collaborative manner and with engagement through the County Surveyors Society Wales (CSSW) asset management project. The CSSW have engaged with insurers and risk managers in the development of this recommended practice and additional consultation has taken place with the County Council's own insurers and legal counsel in the development of this Manual..

The Maintenance Manual manual will comprise a portfolio of individual sections which focus on specific elements of the highway asset brought forward to comply with CSSW recommendations and National Codes of Practice in accordance with the provisional timetable below. It will bring together specific maintenance strategies and policy into a linked suite of documents, with a focus in 2021 to update our Highway Safety Policy in response to the updated National Codes of Practice.

Highway Maintenance Manual (HAMP)

Part 1 – Policy and Strategy – Adopted October 2018

Part 2 – Highway Asset Management Framework – Adopted October 2018

Part 3 – Annual Statement and Options Report – Annual report to Exec board

Part 4 – Highway Maintenance Manual – Executive board review 25th October 2021

4.1.2 Timetable for Maintenance Manual

The proposed timetable for the development of the manual is:

Year	
2021-22	<ul style="list-style-type: none"> • 4.1 Highway Maintenance Management • 4.2 Highway Network Hierarchy • 4.3 Highway Inspection and Repair Regime • 4.4 Road Condition Assessment and Investment Prioritisation
2022-23	<ul style="list-style-type: none"> • Routine Highway Maintenance including: <ul style="list-style-type: none"> ▪ Cyclic (scheduled) maintenance ▪ Surface repairs ▪ Signs ▪ Road Markings and Cats Eyes ▪ Gully cleansing ▪ Sweeping and cleansing • Footway and Cycleways Hierarchy and Maintenance regime • Emergency response • Highway Structures • Highway Drainage • Geotechnical management • Public Lighting • Traffic Signals/Crossings • Winter Service/Adverse Weather plan
2023-24	<ul style="list-style-type: none"> • Road restraint systems • Boundary interfaces • Soft estate (Trees and Verges) • Inventory and data management plan • Technical approval procedures • Asset adoption • Streetworks and licencing • Lifecycle planning • Roadside memorials

4.1.3 Scope

The Maintenance Manual describes how the council maintains the road network under its control as the Highway Authority. It details the procedures used to plan and execute all works and functions associated with the management, operation and maintenance of the highway asset including how the activities are monitored to ensure compliance with council policies and to meet out statutory obligations.

4.1.4 Legal Requirements

As the Highway Authority the council has a duty to meet the requirement of the following legislation:

- **The Highways Act 1980:** This places a duty upon Highway Authorities to maintain highways, adopted as maintainable at public expense, and to keep them safe for public use. Key duties are set out in Appendix A.
- **New Roads and Street Works Act 1991:** This places a duty upon Highway Authorities to co-ordinate all works in the highway for the purposes of ensuring safety, minimising inconvenience to highway users, and protecting the highway and apparatus in it.
- **The Traffic Management Act 2004:** This places a duty on Highway Authorities to ensure the expeditious movement of traffic on their road network and networks of surrounding authorities.
- **Well-being and Future Generations (Wales) Act 2015** equires public bodies in Wales to think about the long-term impact of their decisions, to work better with people, communities and each other, and to prevent persistent problems such as poverty, health inequalities and climate change.
- **Environment (Wales) Act 2016:** this requires local authorities to secure healthy, resilient, and productive ecosystems for the future whilst still meeting the challenges of creating jobs, housing and infrastructure.



4.1.5 National Guidance

To assist authorities in meeting their duties the methods adopted in the Maintenance Manual are based upon the following National Guidance.

- [“Well-Managed Highway Infrastructure: A Code of Practice, UK Roads Liaison Group, 2016”](#)
- [“Risk Based Approach: Method”, 2019, CSSW, 2019](#)
- [“Highway Inspection Defect Recording Manual”, CSSW, 2019](#)

4.1.6 Relevant Council Plans and Documents

The Highway Asset Management Plan consists of a suite of documents and provides a comprehensive guide setting out the Council’s approach to managing the highway asset. The key documents are;

- [Highway Asset Management Plan – Parts 1 and 2](#)
- [Annual Status Reports - Part 3](#)
- [Highway Maintenance Manual - Part 4 \(includes Highway Data Improvement Plan \(2023-24\)\)](#)

4.1.7 Roles, Responsibilities and Competencies

The roles, responsibilities and competencies required of those involved in managing the council's highway asset are defined below.

Role	Responsibility
Councillors	Approve the use of this document as council policy.
Director of Environment	Ensure the Directorate's policies and strategies follow and support the attainment of Council objectives
Head of Service	Ensure the Highways & Transportation Service's policies and strategies support Directorate and Council objectives.
Highways and Transportation Manager	Develop Highways & Transportation policies and strategies to support Directorate and Council objectives, ensure their effective implementation, monitor the results, and undertake an annual risk assessment update.
Highway Services Manager	Develop Highway policies and standards to be used, ensure their effective implementation, monitor the results and ensure the 2 yearly risk review is carried out.
Highways Asset Manager	Develop Highway policies and standards, ensure their effective implementation, monitor the results, review, and update the HAMP suite of documents in line with recommended practice. Participate in CSSW HAMP workgroups/projects and disseminate best practice/guidance. To review software and asset management systems to support delivery in line with agreed policy.
Public Lighting Manager	Support in developing policy and standards for public lighting and electrical assets.
Asst Area Managers	To implement the operational and inspection service within Highways in line with the maintenance manual.
Highway Inspectors / Structures Inspectors	Carry out inspections as per the highway inspection regime, recording the appropriate data for input into the AM system including recording works completed.
Works Gangs	Carrying out highway repairs as per the repair regime and record the required data for input into the AM system.
Contractors	Carry out repairs as highway instructed as instructed and record the required data for input into the AM system.

Competencies and Training

CSS Wales manages a competency confirmation scheme covering a range of highway management functions. The scheme has been used to enable the competency of authority staff in key areas to be confirmed. The scheme covers the following areas:

- Visual Condition Assessment (Carriageways)
- Visual Condition Assessment (Footways)
- Bridge /Structures Inspection
- Highway Inspections

Those who are accredited by these schemes are listed in the [Competency Register](#).

4.1.8 Asset Register and Inventory

The asset register defines the roads that are maintainable at public expense by the council as the highway authority. The inventory of the highway assets is based on the asset register and contains the detailed information required to manage the asset. The information includes amount, size, construction material, current condition etc. where data is available.

Asset Register

The definitive record of the roads that are the councils responsibility including the full list of adopted streets is located on the Highway Searches map register. Details are also held for operational management in the Highway Asset Management System. The local street gazetteer is held on the Streetworks database. The authority has an on-going exercise to ensure the data in each repository is aligned and updated, however the 'Searches' register remains the definitive record.

Inventory

A data assessment model is programmed to be developed in 2023/24 as a live record of inventory and data and to ensure management and control of accurate data. The spreadsheet records the specific inventory held for each highway asset. The quality of the inventory details held is recorded on the data assessment spreadsheet. The data is held for each asset in the following software systems:

- Carriageways and Footways – Highway Management system, Pavement Management System
- Structures - Structures Management System
- Drainage – Highway Management System, QGIS Mapping system
- Street Lighting and Traffic Signals – Lighting Management System

4.1.9 Data and System Improvement

On completion of the [data assessment spreadsheet](#) the quality of the inventory details held shall be reviewed every two years. A plan for improvements to data shall be recorded in the [Highway Data Improvement Plan](#). The division is currently reviewing the software management systems in place across the division and plans to modernise and rationalise its systems to support effective asset management and operational service delivery whilst ensuring the ability to adapt to improvements in technology and support better ways of working.

4.1.10 Risk Management

The risks associated with maintaining the highway are managed using the methods described below. This includes how the methods comply with the risk based approach required by the Code of Practice.

Code of Practice

A revised Code of Practice (the code) for Highways “Well Managed Highway Infrastructure” was published in October 2016 providing guidance that authorities are expected to follow and may rely upon when defending themselves against third party claims. Specific duties with regards to highway maintenance are contained within section 41 of the Highways Act 1980 with a specific defence available to highway authorities under section 58 (see extracts in Appendix A).

The most significant change to the previous guidance, proposed by the new CoP, is the introduction of a risk based approach to all decision making to be undertaken by each authority individually.

CSSW have developed a method in response to the code that it recommends authorities adopt. The method includes development of Network Hierarchy, Inspection Regime and Repair Regime for the highway assets, along with recommended minimum standards for inspection and defect repair. In Carmarthenshire this replaces our Code of Practice for Highway Safety Inspections in Carmarthenshire which was adopted in 2008.

Use of the CSSW Risk-Based Approach

The Highways and Transportation Service have carried out risk assessments as detailed in the “CSSW Highways Asset Management Framework Recommended Practices - Recommended Practice 1 Risk Review with the results being recorded in the [“RP1 Risk Assessment – Spreadsheet”](#)

The details of the asset hierarchy, inspection and repair regimes adopted by the council and where they differ from (exceed) the CSSW recommended standards is detailed later in this document.

Carmarthenshire County Council Corporate Risk Management

The council manages risk via the Risk Management & Contingency Planning Strategy 2018-2022. An electronic copy of this document can be found at: [risk management and contingency planning strategy \(llyw.cymru\)](#)

The authority maintains a Corporate and Directorate Risk Registers to manage any significant risks that have been identified. Where appropriate these will be included within the Annual Statement Report.

Third Party Claims

Third party claims are made against the council when members of the public believe that negligence on the part of the council, has resulted in injury or property damage. The risk based approach adopted within the HAMP aims to minimise the authority’s exposure to risk from claims of negligence.

4.1.11 Finance and Budget Allocation

The budget for highway maintenance is set annually by the council. Status reports are provided to assist the council in establishing the overall budget. The highway maintenance budget is allocated between asset groups and work types in accordance with the method set out below.

Annual Status Reporting

Annual Status Reports (ASRs) are provided annually detailing the current condition of the asset.

Options Reports (ORs) detail the options available for its future maintenance/management based on differing budget scenarios and are provided prior to the updating of the HAMP.

Annual Budget Setting

The budget for highway maintenance is set by Council following the review of annual status and options reports (ASRs and ORs) in coordination with the Head of Service, Highways and Transportation manager and the Highways Services manager.

The Capital budgets are established in a 5 year programme across the authority and are reviewed annually. Once determined by Council, the budgets allocated for Highway and Structures maintenance are prioritised using a risk and needs based approach each year.

The revenue maintenance budget for Highway maintenance is determined as part of the authorities annual Corporate budget setting and funds allocated to the Department. The Highway Services manager sets out nominal budgets proportionately against the various asset types and work functions. Budgets are based on best available data for Asset extent and service demands. Draft allocations are reviewed by the Highways and Transportation Manager and Head of Service.

The impact on service standards, works programme summaries and any budget pressures are detailed in the Annual Status Report on an annual basis as required.



Cost Recording

The cost of the activities required to maintain the highway are recorded to enable them to be monitored and managed. Both planned and actual expenditure is categorised to support cost analysis and inform the investment strategy. The coding used to record costs is shown below.

Cost Coding

Highway maintenance costs can be allocated to one of the following categories.

Cost Category	Activity
Planned Maintenance - Preventative	Planned maintenance activities that are designed to ensure that more expensive future repairs may not be needed.
Planned Maintenance - Corrective	Planned maintenance activities that correct the condition of the asset, and which would not cost significantly more if delayed.
Routine Cyclic Maintenance	Scheduled works consisting of activities that are based on a prescribed time interval.
Routine – Reactive Maintenance (Emergency)	Reactive repair of potentially dangerous defects identified from inspection or customer complaint / notification.
Routine - Reactive Maintenance (Non-Emergency)	Other less urgent minor repairs
Routine – Inspection and Survey	Cost of specialist inspection and surveys
Operating Costs	Costs of operating elements of the asset
Overhead	Internal costs associated with the management of the asset. NB it is accepted that these costs may not be available at an asset group level
Loss	Money expended that is effectively “lost” to the council from which no benefit to the asset or user is gained.
Improvements	Works that add new infrastructure to the asset.

Reviewing and Reporting of Costs

Outturn cost information is used for status reporting (HAMP Part 3 - Annual Status Report) including reporting if sustainable levels of investment are being made in each asset and for the reporting of future funding needs.

4.1.12 Procurement

Detail of how maintenance works for each asset are procured are shown below. Works are procured using a combination of internal and external resources.

Principle

Day to day highway maintenance is mainly undertaken by in house council resources. Where specialist skills are required external contractors are employed. How the service is delivered for each asset is shown below.

Asset	Work Type	In-House or Contractor	Contract Details
Carriageway	Routine and Reactive	In-house work teams	
	Planned	Resurfacing – Contractor	Surfacing framework
		Surface Dressing – Contractor	Surface dressing Tender
Footways	Routine and Reactive	In-house work teams	
	Planned	Reconstruction – In-house work teams	
		Resurfacing – In-house work teams	
		Slurry Seal – Contractor	Separate tender exercise
Highway Structures	Routine and Reactive	In-house work teams	
	Planned	In-house work teams / contractor	Construction framework contractors

Contract Reviews

Contracts are reviewed and monitored by the Commissioning and Contracts Officer and the procurement section.

4.1.13 Performance Monitoring Regime

To ensure that the standards set out in this manual are adhered to the council operate a performance monitoring regime as set out below.

Operational Performance Measures

A series of operational performance measures are used to monitor ongoing activities such as inspections and routine and reactive repairs.

The operational measures are designed to enable the service manager to take corrective action if performance has fallen below the required standards. As such the reporting of these measures is undertaken at frequencies within the year i.e., monthly, quarterly etc.

- Inspection performance – reported quarterly with monthly operational reports
- Safety Defects – monthly reports detailing completion performance for recorded safety defects

Performance Indicators

CSSW has developed a suite of performance measures designed to enable authorities to monitor the performance of their highway assets. The Performance measures are detailed in Carmarthenshires Performance & Improvement Monitoring System (PIMS) The council has adopted the recording and reporting of these PIs in order to enable review of progress in meeting condition targets set in the asset management plan and to facilitate appropriate comparison with peer authorities.

- 3-year Capital Investment programme monitoring
- 3-year programme of bridge strengthening and replacement schemes

Benchmarking

The council participates in appropriate benchmarking activities using the data recorded for appropriate OPMS and PIs. This benchmarking is facilitated via the CSSW HAMP project. It is recognised that some of the measures are a direct result of council choice in terms of standards and targets adopted and as such comparison with other authorities may not be appropriate. There are elements of performance however where understanding equivalent performance in similar authorities will enable the authority to share and learn from good practice and to implement improvements. The council actively pursues this via collaboration facilitated by CSSW and the various committees and groups that CSSW support.

4.1.14 Decarbonisation

Carmarthenshire County Council is committed to tackling climate change and to become a net zero carbon authority by 2030. The County Council was the first in Wales to publish a Net Zero Carbon Action Plan which was approved by full Council in February 2020:

<https://www.carmarthenshire.gov.wales/home/council-democracy/net-zero-carbon/>

The County Council has adopted a pragmatic approach towards becoming a net zero carbon local authority by 2030 with an initial focus on the measurable carbon footprint. The Council has also recognised that it has legal duties and responsibilities to fulfil and this will include a duty to maintain the public highway. However, in developing the HAMP Maintenance Manual we will review our operations with the aim of reducing our carbon emissions through improving our operational efficiency, ensuring effective outcomes, and using low carbon materials and techniques wherever practical and feasible.

There is a significant backlog of maintenance works required to bring our highways up to standard and the adopted risk-based approach recognises this and ensures resources are directed to areas where they are most urgently needed. This Maintenance Manual also adopts, where affordable, a planned and preventative approach to highway maintenance to improve operational efficiency and a 'fix first time' methodology to reduce repeat visits for repair works. This directly supports the reduction of whole life carbon impacts.

4.1.15 Customer Engagement

The authority operates a central contact centre with out of hours provision throughout the year. When service requests have been received these are automatically allocated to the highway inspector based on the geographical location. This allows the request and appropriate response to be prioritised and the customer advised of the action taken.

Scheme Notification and Roadworks reports

For all major works undertaken on the highway the highway service provide a pre-works notification to residential properties and businesses affected by the works.

Public frustration can stem from delays caused by roadworks. To provide the public and others with information on where disruption to road traffic can be expected, the authority notifies all major works in advance via the streetworks noticing system (ETON) and one.network. This information is also available via the council's web site <https://www.carmarthenshire.gov.wales/home/council-services/travel-roads-parking>

The web system gives details of works being undertaken on all classified routes, including the nature and anticipated duration of the works, and the method of traffic management being employed. Additional publicity is

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provided where exceptionally severe traffic delays are anticipated with advance warning signs on major routes.

4.1.16 Streetworks

The condition and management of the highway is affected by third party works. The management of these third-party activities is governed by legislation (Highways Act 1980 - see Appendix B), New Roads and Street Works Act (NRSWA) 1991, and Traffic Management Act 2004). The manner in which the council complies with its duties under this act is set out below.

All notified utility activity undertaken on the council's highway network is co-ordinated by the Street Works Team and recorded within the Streetworks Register. The Street Works Team ensure that all statutory undertakers comply with the New Roads and Street Works Act (NRSWA) 1991 and all amendments as notified in the Traffic Management Act 2004, to ensure that all works undertaken on the highway are completed to the required standards and are programmed to achieve the least disruption to members of the public.

Procedures

The detailed procedures are used for undertaking this work including procedures for;

- **street works notices;** all statutory undertakers and works promoters have a legal duty to provide advance notification of their intention to work on any highway maintainable at public expense. Emergency works must be notified by 10am on the next working day. Please note that statutory undertakers have a right to lay apparatus in the highway and do not require permission to do so.
- **street works register;** the register kept by the council that records where and when utilities / works promoters are working or have worked on the highway and records the size of reinstatements.
- **S58 restrictions on works;** preventing works being carried out on roads that have been recently resurfaced for a period after completion of those works
- **co-ordination of works;** coordinating works in an appropriate sequence and at appropriate intervals where more than one organisation needs to work on the same street, or promote collaborative working
- **designation of protected streets,** where the council can assign a protection on specific streets being used by utilities
- **re-instatement categories;** nationally agreed specification for what the standards of reinstatement should be for each category based on proven usage of road including materials and depths etc.
- **apparatus affected by highway works:** where the council notifies utilities where road works are planned to ensure that provision is made for the protection or diversion of the existing utility apparatus

Copies of the procedures used can be found in the Standard Codes of Practice Manuals located on [Documents \(whauc.com\)](http://whauc.com)

Statutory undertakers works have a significant effect upon the condition of the highway and the users perception of it. In the future ASR (Annual Status Reports) reporting will reference the number of openings made and the standards of reinstatement being achieved such that a true picture of condition and its causes are known.

4.1.17 Traffic Management

The council as local traffic authority has a duty to manage the road network to secure the expeditious movement of traffic on the network and facilitate the same on road networks for which another authority is the traffic authority. The duties are set out in the Traffic Management Act 2004 and the arrangements that the council has in place to meet these duties is detailed below.

Full details of the arrangements put in place for managing traffic on the counties roads can be found in the Traffic Management Act 2004 and Code of Practice for Co-ordination of Street Works & Works for Road Purposes & Related Matters both of which can be found on the following Welsh HAUC (Highway and Utilities Committee) website page [Documents \(whauc.com\)](http://www.whauc.com)

Traffic Sensitive Streets

The county contains several streets that due to the amount or make up of traffic that use them have been designated as traffic sensitive and have working time restrictions placed upon them. The list of traffic sensitive streets is contained in the National Street Gazetteer.



4.2 Highway Network Hierarchy

The highway assets have been divided into network hierarchy categories that reflect the use and function of the component parts of the network. This enables the inspection and repair regimes to be related to their associated risk. Carmarthenshire developed its hierarchy which was discussed at the Council's Environment and Public Protection Committee and subsequently adopted by the Council's Executive Board in 2018. Following adoption the hierarchy has been further developed to follow guidance from CSSW and to ensure a consistent approach across Wales. The hierarchy details are tabulated below and set out in ["RP1 Risk Assessment – Spreadsheet"](#). The categorisation of individual highway links in the network in accordance with the Network Hierarchy are displayed on [GeoDiscoverer \(add the Network Hierarchy layer\)](#).

CSSW Category	Description	Type of road General Description	Description
M	1. Motorway	Limited access -motorway regulations apply	Routes for fast-moving long-distance traffic. Fully grade separated and restrictions on use
CHSR	2. Strategic Route	Trunk and some Principal 'A' class roads between Primary Destinations	Routes for fast-moving long-distance traffic with little frontage access or pedestrian traffic. Speed limits are usually in excess of 40 mph and there are few junctions. Pedestrian crossings are either segregated or controlled and parked vehicles are generally prohibited.
CH1	3a. Main Distributor	Major Urban Network and Inter-Primary Links. Short - medium distance traffic	Routes between Strategic Routes and linking urban centres to the strategic network with limited frontage access. In urban areas speed limits are usually 40 mph or less, parking is restricted at peak times and there are positive measures for pedestrian safety
CH2	3b. Secondary Distributor	B and C class roads and some unclassified urban routes carrying bus, HGV and local traffic with frontage access and frequent junctions	In residential and other built-up areas these roads have 20 or 30 mph speed limits and very high levels of pedestrian activity with some crossing facilities including zebra crossings. On-street parking is generally unrestricted except for safety reasons. In rural areas these roads link the larger villages, bus routes and traffic generators to the Strategic and Main Distributor Network.
CH3	4a. Link Road	Roads linking between the Main and Secondary Distributor Network with frontage access and frequent junctions	In urban areas these are often residential or industrial interconnecting roads with 20 or 30 mph speed limits, random pedestrian movements and uncontrolled parking. In rural areas these roads link the smaller villages to the distributor roads. They are of varying width and not always capable of carrying two-way traffic.
CH4	4b. Local Access Road	Roads serving limited numbers of properties carrying only access traffic	In rural areas these roads serve small settlements and provide access to individual properties and land. They are often only single lane width and unsuitable for HGVs. In urban areas they are often residential loop roads or cul-de-sacs.
CH5a	5a. Minor Road	Little used roads serving very limited numbers of properties.	Locally defined roads
CH5b	5b. Lane	Minor routes and low use tracks that provide access to isolated properties	In rural areas these often-narrow roads serving isolated agricultural buildings or properties. In urban areas these are often metalled lanes serving garages or the rear of properties
CH5c	5c. Green Lane or track	Lanes and tracks that are generally unsuitable for vehicular traffic	Lanes and tracks that are unsuitable for vehicular traffic but may be used as a footpath, part of a Cycle Trail or by horse riders, generally for leisure purposes
CH5d	5d. Disused track	Unmetalled tracks that are unrecognisable as a road	Roads that have become unusable having fallen into disuse through regression or agricultural use

4.2.1 Establishing the Network Hierarchy

The network hierarchies have been derived in accordance with the the Code of Practice “Well-Managed Highway Infrastructure: A Code of Practice, UK Roads Liaison Group, 2016” and the CSSW “Risk Based Approach: Method”. Details of how the hierarchies were derived is held in the “RP1 Annual Highway Asset Risk Review 2018”. The methodology is set out in [CSSW Risk based approach – Method 2019 v1](#).

4.2.2 Network Hierarchy Categories

Details of the CSSW recommended hierarchies for the seperate highway asset groups can be found in Appendix B. The details of the hierarchy allocated to each individual asset are held in the council’s Highway Management System, Structures management system and Lighting managemnt system. Carmarthenshire is developing individual hierarcies for other asset groups following adoption of the main road network hierarchy.

Carmarthenshire’s road network hierarchy is broken down as follows (subject to update):

Network Road Class	Length by Hierarchy (km)									Total
	CHSR	CH1	CH2	CH3	CH4	CH5a	CH5b	CH5c	CH5d	
A & B	168	118	294		1					581
C		2	140	458	656	27	0			1284
U (Rural u-c)			3	82	49	1014	9	76	25	1258
W (Urban u-c)			17	63	136	137	33	0		387
Total (km)	168	121	454	603	842	1179	42	77	25	3510
%	5	3	13	17	24	34	1	2	1	

4.2.3 Regional Consistency

CSSW recommends that to achieve regional consistency consultation is undertaken with neighbouring authorities to enable consistent hierarchies to be allocated to assets which cross boundaries. At this time the consultation process is yet to be completed, however on completion, the results will be recorded in the [“RP1 Risk Assessment – Spreadsheet”](#).

4.2.4 Update and Review

The hierarchies are reviewed on an ongoing basis where changes to the asset occur and or significant changes in use happen (e.g. significant changes in traffic volume). As a minimum the hierarchy will be reviewed and confirmed every 2 years. Records of the review will beheld in the “Carmarthenshire County Council RP1 Annual Highway Asset Risk Review”. Any resultant recommended changes to the hierarchy will be undertaken in line with the approved methodolgy.

4.3 Highway Inspection and Repair Regime

To monitor the condition and repair needs of the asset the council deploys a regime of inspection and repair of varying types and frequencies which adopts a risk-based approach.

4.3.1 Types of Inspection/Assessment

The council undertakes the following types of inspection:

1. **Reactive Inspections/Response:** inspections undertaken in response to the notification to the authority of potential defects by other sources (council employees, members of the public, emergency services etc.).
2. **Planned/Routine Inspections:** A regime of planned inspections the purpose of which is to identify defects that have the potential to cause harm to users and to identify defects that require repair in order to prevent escalation of deterioration and increased (avoidable) maintenance needs.
3. **Condition Surveys:** A regime of condition surveys that record the condition of components of the asset such that a programme of renewal/replacements can be derived. Condition surveys can be visual or machine based and may include testing where such is appropriate for the asset type.

4.3.2 Highway Inspections

Planned routine inspections are a combination of:

- **Driven Inspections:** inspections of the highway undertaken by a Highway Inspector with a driver (high speed roads only – typically CHSR, CH1 and CH2). Inspections of road classes CH3, CH4 and CH5 are carried out by Highway inspector only from a slow-moving vehicle with high visibility markings to Chapter 8 and at a speed appropriate to the road conditions.
- **Walked Inspections:** inspections undertaken by a Highway Inspector on foot where the footway and carriageway are assessed.



4.3.3 Inspected Assets

The assets inspected during the routine inspections by the highway inspector include (but are not limited to) the following:

<ul style="list-style-type: none"> • Carriageways 	<ul style="list-style-type: none"> • Kerbs, Edgings and Channels
<ul style="list-style-type: none"> • Footways 	<ul style="list-style-type: none"> • Highway Structures (safety only)
<ul style="list-style-type: none"> • Covers, Gratings & Frames (inc. Statutory Undertakers apparatus) 	<ul style="list-style-type: none"> • Highway Drainage systems (above ground)
<ul style="list-style-type: none"> • Highway Culverts (below 900mm – reactive inspections only) 	<ul style="list-style-type: none"> • Traffic Systems, Controlled Crossings, Illuminated Bollards and Cabinets (safety only)
<ul style="list-style-type: none"> • Guardrails, Fencing and Restraint Systems 	<ul style="list-style-type: none"> • Signage / bollards
<ul style="list-style-type: none"> • Verge, Trees and Hedges 	<ul style="list-style-type: none"> • Road Studs and markings
<ul style="list-style-type: none"> • Street furniture (safety only) 	<ul style="list-style-type: none"> • Street Lighting (safety only)
<ul style="list-style-type: none"> • Embankments and Cuttings (safety only) 	<ul style="list-style-type: none"> • Cattle Grids (Safety only)
<ul style="list-style-type: none"> • Cleanliness and Weed Growth (Invasive and injurious weeds) 	<ul style="list-style-type: none"> • Cycleways (on road/highway only - see note below)

Note: Off road cycleways / cycle trails are inspected by the Public Rights of Way Team.

4.3.4 Inspection Frequencies

Reactive Inspections

Where a “safety” defect is notified to the council by a third party an inspection of the reported defect will take place by the end of the next working day and action will be taken as per the Council’s repair regime.

Where a “maintenance” defect is notified to the council by a third party an inspection of the defect will take place within 30 days and action will be taken as per the Council’s repair regime

Routine Inspection Frequencies

Routine Inspection frequency is based on the Network Hierarchy. It has been determined using the CSSW Highway Asset Risk Review Method and is reviewed every 2 years. The frequency of routine inspections is set out below along with the CSSW minimum recommended standards. Carmarthenshire either meets or exceeds the minimum recommended standards.

Carriageway: Routine Inspection Frequencies				
Carriageway Hierarchy	Inspection Interval	Inspection Method	Inspection Frequency Tolerance	CSSW Recommended Minimum
CHSR	Monthly	Driven - 2 person	10 working days	Monthly
CH1	Monthly	Driven - 2 person	10 working days	Monthly
CH2	Every 3 months	Driven - 2 person	10 working days	Every 3 Months
CH3	Every 6 months	Driven – 1 person	3 months	Every 6 Months
CH4	Annual	Driven – 1 person	3 months	Annually or 2 yearly Dependant on condition
CH5a	Annual	Driven – 1 person	3 months	Reactive Only
CH5b	Annual	Driven – 1 person	3 months	Reactive Only
CH5c	Reactive	Driven/Walked – 1 person	NA	Reactive Only
CH5d	Reactive	Walked	NA	Reactive Only

4.3.5 Inspection Tolerance

Due to the effect of adverse weather, unplanned incidents etc. and to allow for sickness or leave, a tolerance in frequency of inspections is permitted as set out in the table above. The respective Assistant Area Manager is responsible for ensuring inspections are undertaken within permitted tolerances.

4.3.6 Inspection Schedule

Inspection routes in compliance with the regime above are held in the council's highway asset management system. The asset management system contains details of the inspection regimes, the inspections undertaken and the date of the next scheduled inspection. Inspections are scheduled on a monthly basis and downloaded from the asset management system. The use and character of a road will be considered when scheduling inspections. Best endeavours will be made to ensure that the timing of the inspection enables defects to be identified effectively. Weather conditions and traffic volumes will also be considered to support safe and effective inspections.

4.3.7 Recording of Inspection Records

Records of the inspection and the resulting observations are recorded using tablet computers and the results transferred by the inspectors into the highway management system as soon as possible on completion of the inspection.

4.3.8 Repair Regime

Repairs identified via inspection or by 3rd party notification, are prioritised for repair based upon the risk that they pose to users. The methods used to categorise a response are set out below.

4.3.9 Defect Categories

The defect categories are established during routine or ad-hoc highway inspections. Defect categories prioritise making safe or undertaking repairs using the defect response times shown below.

Defect Categories	Description	Response Time
Critical Defect	A situation where the inspecting officer considers the risk to safety high enough to require immediate action, e.g. Collapsed cellar, missing manhole/gully cover, fallen tree, unprotected opening	2 Hours*
Safety Defect	Service requests or defects requiring a response as soon as possible to remove a potential risk of injury to users	By end of Next Working Day (CHSR, CH1, CH2) Within 5 working days (CH3, CH4, CH5**)
Maintenance Defect	Defects that warrant treatment to prevent them deteriorating into a safety defect prior to the next scheduled inspection	30 Days (CHSR, CH1, CH2) 90 days (CH3, CHJ4, CH5**)
Programmed repairs	Defects that warrant treatment, in order to prevent them deteriorating to such an extent that additional works or costs are incurred	As per the local works programme. Subject to resources.

*Response time for critical defects refers to the time to attend site from the time the defect is inspected/categorised, make safe or repair will then be asap thereafter. Making safe may constitute displaying warning notices, coning off or fencing off to protect the public from the defect.

** Defect triggers on CH5 roads are to be considered an investigatory level. An investigatory level does not automatically trigger a response. It will be incumbent upon the inspector to assign an appropriate response to each defect based upon its type, size, location, and the level of use of the road. CH5 roads are low use roads and defects will frequently present low risk to users and can be responded to accordingly.

4.3.10 Defect Types and Intervention Levels

Details of the defect types and the intervention levels that have been prescribed for each defect type i.e. Critical Defects, Safety Defects and Maintenance Defects, are set out below.

Critical Defects

Asset Type	Defect	Magnitude	Hierarchy	Road Character	Response Time
All	A situation where the inspecting officer considers the risk to safety high enough to require immediate action, typically include items such as; Carriageway / footway / cycleway collapse with high risk of accidents / loss of control; Critically unstable overhead wires, trees, or structures; Exposed live wiring; Isolated standing water with high risk of loss of control; Missing or seriously defective ironwork with high probability of injury to highway users.	Not Applicable. Critical defects are defined by their potential to cause immediate injury not by defect size	All	Not Applicable. Critical defects are defined by their potential to cause immediate injury not by defect size	2 hours

The response time for a critical defect is the time until the site is made safe, this may be achieved by closing all or part of the road or coning off the hazard. In some instance a repair may be immediately possible but in many instances the defect will be made safe, and a permanent repair will occur later.

Safety Defects

Asset Type	Defect Type	Hierarchy	Dimensional Criteria		CSSW National Minimum Standard	
			Depth/Height	Extent	Depth/Height	Extent
Carriageways	Pothole	CHSR, CH1 and CH2	>50mm	As CSSW	> 50mm	Maximum horizontal dimension greater than 150mm
	Pothole	CH3, CH4 and CH5**	>75mm	As CSSW	>75mm	Maximum horizontal dimension greater than 150mm
Footways	Pothole	All	As CSSW	As CSSW	> 40mm	Maximum horizontal dimension greater than 75mm
	Crack or Gap	All	As CSSW	As CSSW	> 40mm	Maximum horizontal dimension greater than 75mm
	Trip	All	As CSSW	As CSSW	> 40mm	Maximum horizontal dimension greater than 75mm
	Rocking Slabs	All	As CSSW	As CSSW	> 40mm	N/A
Kerbing	Dislodged, Loose, Missing, Damaged - Causing a trip hazard	All	As CSSW	As CSSW	> 40mm	N/A

Maintenance Defects

Asset Type	Defect Type	Hierarchy	Dimensional Criteria		CSSW National Minimum Standard	
			Depth/Height	Extent	Depth/Height	Extent
Carriageways	Pothole	CHSR, CH1 and CH2	As CSSW	As CSSW	> 40mm	Maximum horizontal dimension greater than 150mm
	Pothole	CH3, CH4 and CH5	As CSSW	As CSSW	> 50 mm	Maximum horizontal dimension greater than 150mm
	Crowning / Depression	All	As CSSW	As CSSW	> 100mm	< 2M Length
Footways	Pothole	All	As CSSW	As CSSW	25mm - 40mm	Maximum horizontal dimension greater than 75mm
	Crack or Gap	All	As CSSW	As CSSW	25mm - 40mm	Maximum horizontal dimension greater than 75mm
	Trip	All	As CSSW	As CSSW	25mm - 40mm	Maximum horizontal dimension greater than 75mm
	Rocking Slabs	All	As CSSW		25mm - 40mm	N/A
Kerbing	Dislodged, Loose, Missing, Damaged - Causing a trip hazard	All	As CSSW		25mm - 40mm	N/A

**Defect triggers on CH5 roads are to be considered an investigatory level.

Note: The standards in the preceding tables are a guide only. [Reference should be made to the CSSW Highway Inspection Defect Recording Manual](#) . It is an essential part of the authorities' inspection regimes that inspectors are appropriately trained. In doing so inspectors can complement application of the standard with their own risk assessment of individual defects, which may result in a different response time.

4.3.11 Footways and Cycleways

The council will develop a footway hierarchy in 2022/23 utilising a risk-based approach in accordance with CSSW recommendations. Higher usage footways will be identified and a schedule of footways requiring walked inspections will be documented. The footway inspection regime as set out in the 2008 Code will continue until superseded, but the revised defect categorisation detailed in Part 4.3.2 below will apply in association with the revised carriageway defects.

Where adjacent carriageways and footways are inspected during the same inspection the higher frequency level is applied. The sections subject to monthly walked are listed at [Schedule of Monthly Walked inspections](#)

The general condition of footways are observed during the highway inspection and the information recorded by the highway inspector is used to address individual defects and determine priorities for remedial work programmes. Separate Visual condition assessments are not currently undertaken on footways.

On road cycleways are currently inspected as part of the highway inspection regime by the highway inspection team. The road hierarchy recognises national and higher usage on-road cycling routes. Off-road cycling trails are inspected and maintained by the public rights of way (PROW) maintenance team.

4.3.12 Structures

An individual Maintenance Manual section on Highway Structures will be developed in 2022/23 but an overview of current inspection regimes is set out below:

Highway Structures consist of:

- Bridges
- Retaining Walls
- Cattle Grids
- Footbridges
- Culverts (900mm or above)
- (1500mm and above)

Structures are inspected as follows:

- i. General Inspections (GIs); GIs are visual inspections, with some hands-on and basic assessment e.g., hammer tapping and measurements where necessary. Carmarthenshire Structures Inspectors undertake general inspections on a 2-yearly frequency. The extent and severity of observed defects are recorded on the Council's Structures Management System.
- ii. Principal Inspections (PIs); PIs are a more detailed visual inspection, with hands-on assessment of most/all elements plus detailed assessment e.g., hammer tapping, half-cell, chloride measurements etc. Principal inspections are only undertaken on a limited number of key structures on a frequency ranging from 6 to 10 years following a risk-based assessment process. Detailed reports are recorded within the Council's Structures Management System.
- iii. Special Inspections: Reactive inspections as a result of adverse weather, or due to damage or in

advance of abnormal loads.

- iv. Reactive inspections following complaints or third-party reports.

Inspections are undertaken using the Inspection Manual for Highway Structures for guidance and following Design Manual for Roads and Bridges standard CS 450. Details are recorded on hand-held devices and immediately loaded into the Structures Management System and the data used to record a bridge condition score (bci).

The results of inspections are used to generate condition scores for individual structures, or the entire structures stock. Condition scores can be reported at structural element level and are used to prioritise works programmes. Bridge condition score data is also used for performance management and benchmarking purposes.

4.3.13 Works Ordering

Works orders are generated using the council's asset management system following the input of the inspection records.

4.3.14 Recording of Repair Records

On completion of recorded defects, the repair details are recorded in the asset management system including the date/time of repair. These details are available to monitor performance and respond to third party claims.

Part 4.4 Road Condition Assessment and Investment Prioritisation

The road or 'carriageway' is the most significant highway asset in terms of value and the cost of essential preventative and corrective maintenance. Maintaining all road surfaces in 'as new' condition is not feasible across the entire 3500km network and the timely intervention of maintenance is key to delivering maximum value from our investments. Monitoring the condition of each part of the network is critical when prioritising investments, increasingly so as budgets are under pressure and demands on the network increase. Prioritising investment using the Network Hierarchy and best available condition information supports our risk-based approach.

4.4.1 Condition Assessments

In addition to routine inspections, the authority undertakes the following condition assessments on its highway assets. The frequency of condition assessment for carriageways is set out below.

Carriageway Annual Inspection Coverage		
Road Class	SCANNER	SCRIM
A Roads	100% (one direction)	100% (both directions)
B Roads	100% (one direction)	100% (both directions)
C Roads	50% (one direction)	

Carriageways

SCANNER (Surface Condition Assessment of the National Network of Roads)

SCANNER is a machine condition survey undertaken from a vehicle moving at traffic speeds. The results of the survey are held in the highways asset management system PMS module (Pavement Management System)..

The SCANNER survey collects a range of data using high speed vehicle mounted lasers. The data includes measurements of:

- Wheel track rutting
- Cracking
- Edge deterioration
- Longitudinal profile (3m,10m and 30m)
- Texture depth

Each of these datasets is aggregated and summarised in accordance with nationally agreed standards to

assess condition levels in a consistent manner. This data is used to produce the Road Condition indicator figures and provides network wide condition ratings to assist with Asset Valuation and deterioration modelling. SCANNER surveys are not currently undertaken on the unclassified road network.

The scanner results inform overall condition of the highway network and assist in prioritising investment. The results are also required to provide PAM 20 (Public Accountability Measures) on Class A, B and C roads.

SCRIM (Sideway-force Coefficient Routine Investigation Machine)

The SCRIM survey measures wet road skidding resistance and is stored in the highways asset management system.

The approach outlined within HD28 has been adopted to help manage the risk of skidding accidents in wet conditions so that this risk is broadly equalised across the county road network. This is achieved by providing a level of skid resistance that is appropriate to the nature of the road environment at each location on the network. The appropriate level of skid resistance is determined from a network accident analysis plus local judgment of site-specific factors.

The initial output from the survey is used to identify parts of the road network requiring further investigation. These investigations consider accident history and network characteristics to arrive at a recommendation for any further action. Carmarthenshire routinely allocates a fixed sum to fund remedial treatments to prioritised locations each year, subject to funding.

SCANNER and SCRIM surveys are procured via a central contract managed by the Welsh Government.

Visual Condition Assessment

A visual condition survey of all roads has been undertaken in 2020 using video survey technology. The carriageway condition has been assessed by AI (artificial intelligence) to produce coarse visual inspection data in accordance with national standards. The carriageway visual condition information is stored in the Vaisala database for review and CVI (Coarse Visual Inspection) data exported into the highway asset management system.

Assets that are identified as in need of substantial repair or replacement are included on a works programme of potential schemes and prioritised using a risk-based approach. The prioritisation will vary according to the asset and available data with a focus on use of the hierarchy and areas of highest use.

4.4.2 Carriageways Rolling Programme

A list of schemes is maintained on a rolling programme as surveys and inspections identify the need for surface treatment either from resurfacing or other measures including surface dressing. A 3 year programme is developed and subject to review each year. The annual programme is produced to meet the standards, strategies & budgets for each asset and treatment type as detailed in the Highway Asset Management Plan (HAMP). This rolling programme contains significantly more schemes than it is possible to fund and the risk-based prioritisation process is critical in ensuring investment is targetted in the appropriate areas.

4.4.3 Scheme Prioritisation

The carriageway prioritisation uses the following categories:

- Hierarchy (traffic/usage)
- Scanner data (rutting, Texture, 3m profile, 10m profile) RCI
- Visual condition (video survey analysis)
- Area and local network priorities
- Defect levels
- Age of construction

The structures prioritisation uses the following categories:

- Hierarchy
- Condition
- Means of access/Alternative routes
- Network impact
- Safety status

Using the above criteria scheme bids are objectively scored and prioritised to ensure the funding available is targeted towards the areas of greatest need and benefit.



Appendix A: Extract from highways Act 1980

As the highway authority the council is subject to legal requirements that include:

The 1980 Highways Act,

- Section 41; to maintain those roads, footways and cycle tracks that are '*Highways maintainable at public expense*'.
- Section 58 ; states that a statutory defence against third party claims is provided where the Highway Authority can establish that reasonable care has been taken to 'secure that the part of the highway to which the action relates' to a level commensurate with the volume of ordinary traffic such that it 'was not dangerous to traffic'.

Section 41 - Duty to maintain highways maintainable at public expense

(1)The authority who are for the time being the highway authority for a highway maintainable at the public expense are under a duty, subject to subsections (2) and (4) below, to maintain the highway.

(2)An order made by the Minister under section 10 above directing that a highway proposed to be constructed by him shall become a trunk road may, as regards—

(a)a highway to which this subsection applies which becomes a trunk road by virtue of the order, or

(b)a part of a highway to which this subsection applies, being a part which crosses the route of the highway to be so constructed,

contain such a direction as is specified in subsection (4) below.

(3)Subsection (2) above applies to—

(a)any highway maintainable at the public expense by a local highway authority, and

(b)any highway other than a highway falling within paragraph (a) above or a highway maintainable under a special enactment or by reason of tenure, enclosure, or prescription.

(4)The direction referred to in subsection (2) above is—

(a)in a case where the highway or part of a highway falls within subsection (3)(a) above, a direction that, notwithstanding subsection (1) above, it shall be maintained by the highway authority for that highway until such date, not being later than the date on which the new route is opened for the purposes of through traffic, as may be specified in a notice given by the Minister to that authority ; and

(b)in a case where the highway or part of a highway falls within subsection (3)(b) above, a direction that, notwithstanding subsection (1) above, the Minister is to be under no duty to maintain it until such date as aforesaid.

(5)Where an order under section 10 above contains a direction made in pursuance of subsections (2) to (4) above, then, until the date specified in the notice given by the Minister pursuant to the

direction, in accordance with subsection (4) above, the powers of a highway authority under sections 97, 98, 270 and 301 below as respects the highway to which the direction relates are exercisable by the highway authority to whom the notice is required to be given, as well as by the Minister.

Section 58 : Special defence in action against a highway authority for damages for non-repair of highway.

(1) In an action against a highway authority in respect of damage resulting from their failure to maintain a highway maintainable at the public expense it is a defence (without prejudice to any other defence or the application of the law relating to contributory negligence) to prove that the authority had taken such care as in all the circumstances was reasonably required to secure that the part of the highway to which the action relates was not dangerous for traffic.

(2) For the purposes of a defence under subsection (1) above, the court shall in particular have regard to the following matters:—

- a) the character of the highway, and the traffic which was reasonably to be expected to use it;
- b) the standard of maintenance appropriate for a highway of that character and used by such traffic;
- c) the state of repair in which a reasonable person would have expected to find the highway;
- d) whether the highway authority knew, or could reasonably have been expected to know, that the condition of the part of the highway to which the action relates was likely to cause danger to users of the highway;
- e) where the highway authority could not reasonably have been expected to repair that part of the highway before the cause of action arose, what warning notices of its condition had been displayed;

but for the purposes of such a defence it is not relevant to prove that the highway authority had arranged for a competent person to carry out or supervise the maintenance of the part of the highway to which the action relates unless it is also proved that the authority had given him proper instructions with regard to the maintenance of the highway and that he had carried out the instructions.

The New Roads & Street Works Act 1991 imparts a duty on Statutory Undertakers to maintain their apparatus in the Highway, but it has been established in Case Law that they can rely on the Highway Authority's Safety Inspection regime to some extent when defending Claims.

The Council can avoid being held jointly liable for defective apparatus by issuing a Section 81 Notice - New Roads & Street Works Act 1991 to the Utility Company whenever a defect is identified by the Authority within the Highway.

Appendix B: County Surveyor Society Wales Recommended Asset Hierarchy Categories

Carriageways	
Category	Description (approximate daily traffic volume)
CHSR	Route enabling travel between locations of regional significance (NA, Strategic routes are identified based on their importance regionally rather than their traffic volume)
CH1	Travel between locations (traffic volume 10,000 - 20,000)
CH2	Travel between locations (5,000 - 10,000)
CH3	Travel between locations (1,000 - 5,000)
CH4	Access to housing (200 – 1,000)
CH5a	Access to properties (housing and farms) (< 200)
CH5b	Access to isolated properties <20
CH5c	Unsuitable for vehicles
CH5d	Disused/impassable

Footways	
Category	Description (approximate daily footfall)
FHVHU	> 10,000 (15,000 used for calculations)
FH1	High use pedestrianised zones and footways in town centres (5,000 – 10,000)
FH2	Footways outside busy public building such as train/bus stations, hospitals, schools and colleges or small parade of shops etc. that generate significantly higher levels of use than the adjacent footways (1,000 – 5,000)
FH3	Footways that link housing estates and industrial estates to other centres /routes (500 – 1,000)
FH4	Footways in housing areas (<500)
FH5	Rural footways used very infrequently (<100)

Structures	
Category	Description
Vital Structure	A structure that is vital to the network i.e., if restricted or out of service it would cause a significant adverse effect such as major traffic delays and a lengthy diversion route with the potential to affect other important services or community severance
Important Structure	A structure that is important to the functioning of the network, i.e., if restricted out of service would have an adverse effect on the operation of the network
Standard Structure	All other structures

Street Lighting Hierarchy

The hierarchy for street lighting assets managed by Carmarthenshire County Council is at a single level. All assets are inspected at the same frequency and repaired within the same response time. The nature and extent/impact of the fault determines the priority rather than the location.

Traffic Signals Hierarchy

Traffic Signals Hierarchy	
Category	Description
Vital Junction	A junction the operation of which is vital to the operation of the network i.e. its failure would cause major traffic disruption
Important Junction	A junction that is important to the operation of the network, the failure of which would cause traffic disruption
Standard Junction	A signalised junction on the network
Pedestrian Crossing	Pedestrian crossing

Details of the hierarchy allocated to each individual asset are held in the asset management systems.

CABINET 6th December 2021

CARMARTHENSHIRE COUNTY COUNCIL (CCC) ELECTRIC VEHICLE CHARGING INFRASTRUCTURE STRATEGY – DECARBONISING TRANSPORT

Purpose: To formally adopt the proposed Electric Vehicle Charging Infrastructure Strategy for the Council. The strategy will support the future development of electric vehicle charging infrastructure across the county to support the delivery of carbon reduction targets.

To consider and comment on the following :

Adoption of the CCC Electric Vehicle Infrastructure Strategy.

Reasons:

Carmarthenshire County Council is committed to de-carbonisation and has set a net zero target by 2030, having declared a climate emergency in 2019. Transport is one of the larger contributors to greenhouse gas emissions. Decarbonising the transport sector is fundamental to achieving the net zero targets. There is an increasing growth in the Electric Vehicles sector (EVs) to help reduce emissions and improve air quality. Electric vehicles will be part of the mix, hydrogen is also emerging as one of the options for the future. There is also a UK Government commitment to ban the sale of new petrol and diesel vehicles by 2030. An EV Infrastructure Strategy for Carmarthenshire is required to support the development of infrastructure to meet future demand.

Relevant scrutiny committee consulted

Environment and Public Protection Scrutiny Committee considered the report and strategy on the 25th November 2021 and voted to adopt the strategy.

Cabinet Decision Required	YES
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CABINET MEMBER PORTFOLIO HOLDER:- Cllr. Hazel Evans, Environment.

<p>Directorate:</p> <p>Name of Head of Service: Stephen Pilliner</p> <p>Report Author: Thomas Evans</p>	<p>Designations:</p> <p>Head of Transportation and Highways</p> <p style="text-align: center;">Transport Planner – Strategy & Infrastructure</p>	<p>Tel: 01267 228150</p> <p>Email addresses: SGPilliner@Carmarthenshire.gov.uk</p> <p>Tel: 01267 228258</p> <p>Email addresses: tjevans@Carmarthenshire.gov.uk</p>
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**EXECUTIVE SUMMARY
CABINET
6th DECEMBER 2021**

**Carmarthenshire County Council (CCC) Electric Vehicle
Charging Infrastructure Strategy- Decarbonising Transport**

The report sets out the proposal to adopt an Electric Vehicle Charging Infrastructure Strategy for Carmarthenshire to help deliver net zero carbon. Electric vehicles will be part of the mix in future , hydrogen powered vehicles are also emerging as one of the options for the future.

The strategy is the first step to establishing the requirements for Carmarthenshire's EV infrastructure network and provides an evidence base & recommendations to deliver a convenient, reliable, and accessible charging network that instils confidence amongst users. The County Council cannot deliver the strategy on its own. There is an important role for National Governments, the private sector, other public sector bodies and the County Council.

The strategy and development of the infrastructure aims to encourage the uptake of EVs for businesses, residents, and visitors.

Adoption of the strategy will allow for a structured evidence-based network to be created that will demonstrate a commitment to meeting net zero targets by 2030 and 2050. It will help demonstrate that Carmarthenshire is at the forefront of EV commitment within Wales.

Should the authority decide not to adopt the strategy it would leave the county vulnerable to losing out on future funding from Welsh Government and inhibit the delivery against the net zero carbon objective. With no strategy in place for this fast-moving area and with the ban of petrol and diesel cars in 2030 there is a real danger of not being able to facilitate and encourage a charging network that will support all residents, businesses and visitors.

It would also be a step back in terms of the considerable groundwork that has already been done to push Carmarthenshire forward in this field. The strategy contains 13 key policies specific to Carmarthenshire:

- **EV1** Facilitate the Provision and Delivery of Public EV Charge Points;
- **EV2** Maintain Parking Management Policies Supportive of EVs;
- **EV3** Encourage EV Charge Points at Key Employment Centres, and transport interchanges.;
- **EV4** Encourage the Use of EVs in the Fleet;
- **EV5** Trial New Technologies and Encourage Innovation;
- **EV6** Investigate ways to Encourage Charge Point Provision through the Planning Process;
- **EV7** Investigate incentives for Private Developers and Landowners to Provide Charge Points on Existing Developments and explore the potential for the use of S106 contributions.
- **EV8** Encourage Taxis and Public Transport Providers to Upgrade to EVs;

<ul style="list-style-type: none"> • EV9 Provide Publicly Available Information About EV Charging Options; • EV10 Inform Businesses and Residents about opportunities to upgrade to EVs and develop a comms plan to support the EV Infrastructure Strategy. • EV11 Encourage Electric Car Clubs; • EV12 Work in Partnership with Other Organisations; • EV13 Continually Review and Refresh This Strategy . 	
DETAILED REPORT ATTACHED?	YES

IMPLICATIONS

I confirm that other than those implications which have been agreed with the appropriate Directors / Heads of Service and are referred to in detail below, there are no other implications associated with this report:

Signed: **S.G.Pilliner**

Head of Transportation and Highways

Policy, Crime & Disorder and Equalities	Legal	Finance	ICT	Risk Management Issues	Staffing Implications	Physical Assets
YES	NONE	YES	NONE	NONE	YES	None

1. Policy, Crime & Disorder and Equalities

The strategy will enable and encourage the development of EV charging infrastructure and associated resources across the county to help achieve carbon reduction targets. This will help to reduce inequalities in terms of infrastructure provision and help to enable transition to EVs for those, for example, without off street parking.

2. Finance

No internal funding implications, however, the strategy can be used to support external funding applications to Welsh Government, Office for Zero Emissions vehicles etc.

6. Staffing Implications

The strategy is a live strategy and will be continually reviewed given the fast-moving changes to both policy and direction from Welsh Government.

Staff will be expected to update the strategy or secure funding to achieve this.

CONSULTATIONS

I confirm that the appropriate consultations have taken in place and the outcomes are as detailed below

Signed: S.G.Pilliner

Head of Transportation & Highways

1. Scrutiny Committee

Environment and Public Protection Scrutiny Committee considered the report and strategy on the 25th November 2021 and voted to adopt the strategy.

2. Local Member(s) Not applicable.

3. Community / Town Council Not applicable

4. Relevant Partners Not applicable

5. Staff Side Representatives and other Organisations Not applicable.

**CABINET MEMBER PORTFOLIO
HOLDER(S) AWARE/CONSULTED**

YES

Cllr. Hazel Evans and Cllr. Ann Davies support the report.

**Section 100D Local Government Act, 1972 – Access to Information
List of Background Papers used in the preparation of this report:**

There are none.

Electric Vehicle Charging Infrastructure Strategy

2021



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DRAFT

Executive Summary

Between 31 October - 12 November 2021, Glasgow is hosting the 26th United Nations (UN) Climate Change Conference of the Parties (COP26) to accelerate action towards the goals of the Paris Agreement and the UN Framework Convention on Climate Change¹. Carmarthenshire County Council and the Welsh Government are committed to delivering net zero targets by 2030 and 2050 respectively, having both declared climate emergencies in 2019. As one of the larger contributors to greenhouse gas emissions and as set out in Llywbr Newydd decarbonising the transport sector is fundamental to achieving environmental ambitions. With increasing emphasis placed upon more sustainable forms of travel, the role of Electric Vehicles (EVs) to reduce emissions and improve air quality, alongside commitments to ban the sale of new petrol and diesel vehicles by 2030², a regional EV Infrastructure Strategy for Carmarthenshire is required to ensure the EV charging infrastructure fulfils future demand. Hydrogen is also emerging as an energy source for the vehicle sector as are other interventions such as car sharing and electric bikes.

As the first step to establishing the unique requirements for Carmarthenshire's EV infrastructure network, this strategy provides an evidence base and recommendations for a convenient, reliable, and accessible charging network that instils confidence amongst users. It also aims to encourage uptake of EVs for businesses, residents, and visitors by demonstrating the availability of a strategic infrastructure network when and where needed Carmarthenshire's Vision is as follows:

“to develop and promote a network of electric charging points, that provides for and encourages future growth in EV use, and in doing so future proofs our transport network and contributes to local and global pollution reductions”

The strategy is structured into three sections:

- baseline,
- forecasting, and
- recommendations.

It complements recent publications, such as Welsh Government's 'EV Charging Strategy for Wales'³ (March 2020), drawing upon regional forecasts and taking into account projected infrastructure requirements.

The baseline section reviews relevant national and local policies to highlight key commitments and references broader UK policies for context. It also presents an EV Charge Point (EVCP) assessment of the current number, type and location of

¹ <https://ukcop26.org/>

² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf

³ <https://gov.wales/sites/default/files/publications/2021-03/electric-vehicle-charging-strategy-wales.pdf>

EVCPs already installed using publicly available data, analyses EV uptake to date and presents a grid capacity assessment from available data/engagement with the distribution network operator (DNO), Western Power Distribution (WPD).

The forecasting section is based on Welsh government forecasts for projected EVCP requirements as well as integrated market research. 'Fast charger dominant' and 'rapid charger dominant' scenarios are extracted from the Welsh Government EV Charging Strategy to ascertain specific forecasts for Carmarthenshire.

The final section entails recommendations for the strategy, including developing solutions based on three 'use-cases': (1) Residential, (2) Destination and (3) Strategic Road Networks (SRN). Residential charging focuses on domestic (on, and off-street) charging, where EV owners will typically use a slow charger to charge their vehicles over a long period of time. Destination charging refers to charging facilities for customers which may act as a means of improving customer experience, commonly using fast charging points that at locations such as gyms, supermarkets, public parks, tourist locations and even workplaces. SRN charging refers to chargepoints used to top up vehicles during long journeys along Carmarthenshire's SRN. A typical charging location along the SRN would be motorway service stations. Options for procurement and operating models are detailed, as well as 'complimentary measures' (i.e. non-EVCP interventions such as EV car clubs or partnerships with organisations). A key recommendation is to review and refresh this strategy continually in order to keep it relevant. The following recommendations are made to facilitate realisation of Carmarthenshire's vision for accelerated uptake of EVs throughout the region:

- EV1 - Facilitate the Provision and Delivery of Public EV Charge Points
- EV2 - Maintain Parking Management Policies Supportive of EVs
- EV3 - Encourage EV Charge Points at Key Employment Centres, and transport interchanges.
- EV4 - Encourage the Use of EVs in Their Fleet.
- EV5 - Trial New Technologies and Encourage Innovation
- EV6 - Investigate ways to Encourage Charge Point Provision through the Planning Process
- EV7 - Investigate incentives for Private Developers and Landowners to Provide Charge Points on Existing Developments and explore the potential for the use of S106 contributions.
- EV8 - Encourage Taxis and Public Transport Providers to Upgrade to EVs
- EV9 - Provide Publicly Available Information About EV Charging Options
- EV10 - Inform Businesses and Residents about opportunities to upgrade to EVs and develop a comms plan to support the EV Infrastructure Strategy.
- EV11 - Encourage Electric Car Clubs
- EV12 - Work in Partnership with Other Organisations
- EV13 – Continually Review and Refresh This Strategy

Vision Statement

This Strategy sets out a vision, supported by relevant policies, to encourage and promote the development of infrastructure necessary to enable employees, residents, communities, visitors, businesses and other organisations to use EVs as part of their everyday routine/use. It will also outline ways in which Carmarthenshire County Council (CCC) will encourage and enable EV use across all sectors.

EV users in Carmarthenshire should be confident that they will be able to recharge their vehicles easily and quickly at convenient locations. The uptake of EVs will lead to improvements in air quality in Carmarthenshire, as well having wider benefits such as helping mitigate climate change through decarbonisation of transport.

Vision: “To develop and promote a network of electric charging points, that provides for and encourages future growth in EV use, and in doing so future proofs our transport network and contributes to local and global pollution reduction targets”

With the increasing number of EVs being sold and national policies set to increase uptake further, it is important we work towards and support the introduction of more charging points across the County. This strategy is the first step in encouraging this and illustrates our commitment as a Council to raising the profile of EVs and their many benefits.

Supporting the deployment of EV infrastructure is an important part of future proofing Carmarthenshire’s transport network and sustaining resilient communities. The Council introduced a number of pool cars to its fleet when EVs were far less commonplace and will continue to work to advance the EV transition in the area.

In doing so, the Council’s actions fit in with the Well-being of Future Generations Act which requires public bodies in Wales “to think about the long-term impact of their decisions, to work better with people, communities and each other, and to prevent persistent problems such as poverty, health inequalities and climate change.”

This EV strategy in particular aligns with:

- A Globally Responsible Wales,
- A Healthier Wales,
- A Resilient Wales, and
- A More Equal Wales.



Figure 1 Seven Well-Being Goals of Welsh Government's 'Well-being of Future Generations Act' (Source: <https://gov.wales/well-being-of-future-generations-wales>)

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1. Background

Overview

Carmarthenshire is in Southwest Wales and as well as having an established agricultural economy, it has administrative and economic hubs in its three major towns, Llanelli, Carmarthen and Ammanford. Llanelli is the largest town in the county; however, Carmarthen has been an important centre since Roman times and remains the administrative centre. In 2017, the county was estimated to have a population of 188,771⁴, with a significant proportion of the population being in rural regions.

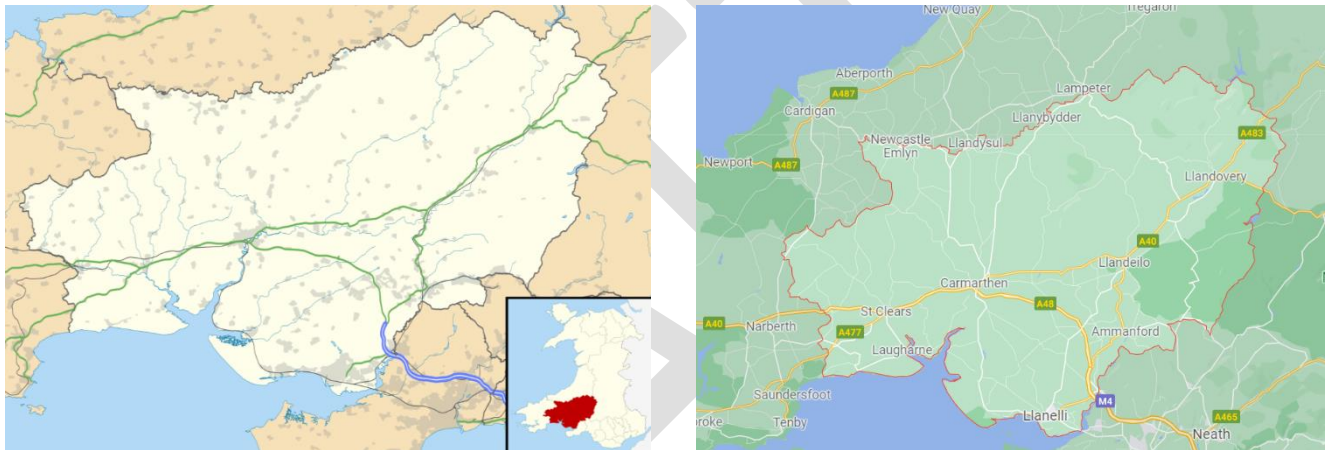


Figure 2 - Situation of Carmarthenshire

Carmarthenshire is bordered by Pembrokeshire, Ceredigion, Swansea, Neath Port Talbot, with three of these combining with Carmarthenshire to comprise the Swansea Bay City Region. Swansea is a regional centre for Southwest Wales with most employment now in the service sector, developing from its industrial heritage.

Carmarthenshire is undertaking strategic action to support the economic recovery and growth of rural towns across the County through the ‘Ten Towns⁵’ Initiative. Developing economic growth plans to drive forward an agenda for change for each of the respective towns and their wider hinterland. The ‘Ten Towns’ Initiative focuses upon the following areas: Cross Hands, Cwmaman, Kidwelly, Laugharne, Llandeilo, Llandovery, Llanbydder, Newcastle. Emlyn, St. Clears and Whitland.

Carmarthenshire County Council are also delivering the Pentre Awel⁶ development at a site along the Llanelli coastline. Bringing together business, research, education, community healthcare and modern leisure facilities, Pentre Awel aims to create 1,853 jobs and training/apprenticeship opportunities. It is expected to boost the local economy by a £467million over the next 15 years.

⁴ <https://www.carmarthenshire.gov.wales/home/council-democracy/research-statistics/census-information#.YTIkG45KiUI>

⁵ <https://www.carmarthenshire.gov.wales/home/business/development-and-investment/ten-towns/#:~:text=Our%20Ten%20Towns%20initiative%20is%20to%20support%20the,recommendation%20to%20support%20the%20regeneration%20of%20rural%20Carmarthenshire.>

⁶ <https://www.carmarthenshire.gov.wales/home/business/development-and-investment/pentre-awel/>

The aim of this EV Charging Infrastructure Strategy is to aid in the transition to EV's for the population of Carmarthenshire as well as visitors and those travelling through the county via the strategic road network. This Strategy will ensure there is a focus on these strategic routes, the three major towns, as well as considering more rural and remote communities. This document is important as it provides a delivery roadmap to ensure that an EV charging network will be available when and where it is required.

Carmarthenshire also has a large tourism industry, enticing visitors with its outdoor activities, beaches, and rich heritage.

Purpose of this EV Strategy

This EV Strategy has been created to provide a plan and technical evidence base that supports the transition to zero emission vehicles for Carmarthenshire's residents, organisations, businesses, and visitors. The aims of the strategy include:

1. To support the County Council with existing EV infrastructure planning and delivery work. The strategy will also provide an evidence base for future investment decision-making by Government, The Council and the private sector
2. To develop and promote a network of electric charging points, that provides for and encourages future growth in EV use, and in doing so future proofs the transport network and contributes to local and global pollution reductions.

In achieving these aims, the EV strategy will contribute to broader Welsh Government goals of carbon neutrality in the public sector by 2030. As stated in The Welsh Public Sector Net Zero Carbon Reporting Guide (2021)⁷:

'The aim of this guide is to develop a universal guide set of instructions for use by Welsh public bodies, to estimate baseline emissions, identify priority sources and to monitor progress towards meeting the target collective ambition of a carbon neutral public sector by 2030'.

In February 2019, Carmarthenshire County Council declared a Climate Emergency and made a commitment to becoming a net zero carbon local authority by 2030. Carmarthenshire County Council was also the first local authority in Wales to publish a net zero carbon action plan.

Analysing the current network, high-level demand forecasts and a review of the Welsh Government EV Strategy projections, as well as base and future grid capacity, this strategy delivers a comprehensive update to the existing roadmap, identifying milestone objectives for 5- and 10-year periods. The strategy provides recommendations for the implementation of an infrastructure programme based on best practice review, including technological, procurement, delivery and maintenance options. The report further outlines a series of recommendations for policy

⁷ https://gov.wales/sites/default/files/publications/2021-05/welsh-public-sector-net-zero-reporting-guide_1.pdf

development, strategic investment priorities and complementary measures for public sector investment.

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2. Electric Vehicles in Context

Uptake

EVs sales are set to increase in the UK due to the national targets set by the government. Whilst car ownership is typically lower in dense urban areas than it is in rural areas due to higher public transport or active travel use, the conversion from petrol/diesel to EV is still likely to be quicker in urban areas due to easier access to chargepoints. We are already seeing this happening with the city of London having an electric car ratio of one for every 20 cars, which is 10 times the national average⁸. Also, as they have higher population densities the amount of people purchasing new cars will be higher.

In addition, due to the uptake of EVs there will be a subsequent increase in charging infrastructure at locations of high footfall. Strategic road networks and highways which may be more rural are also set to see an uptake in charging infrastructure due to their role in ensuring that vehicles can recharge for long distance journeys or for people who live far from local communities. Carmarthenshire is predominately rural, with around 60% of its residents living in rural areas⁹, therefore encouraging the strategic deployment of charge points is particularly important to ensure that residents of more deprived and/or rural areas have access to charging infrastructure. EV

Environmental Benefits

As an EV is run on electrical power it has no exhaust emissions like that of a conventional combustion vehicle. This presents a key benefit to EVs as they operate in harmony with the wider environment and can improve the quality of air in which people across our cities, towns and villages breath. Following the Paris Agreement that necessitates 'Net Zero' greenhouse gas emissions, the UK have set an ambitious target to become Net Zero by 2050, such a target will see significant change to the transport industry where the sale of new petrol and diesel vehicles is to be banned in the Wales by 2035.

EVs are not only a cleaner mode of transport than combustion vehicles but they are more efficient at converting energy into motion also¹⁰, and as such have a lower carbon footprint than conventional vehicles, even when charging from mains electricity¹¹. Due to new advanced energy generation, EVs can now be charged from renewable energy sources within the power grid, or directly from renewable sources on your home or on local charging hubs such as solar PV. Due to this greenhouse gas emissions can be reduced even further, presenting the opportunity for a clean mode of transport to use a clean form of power.

Running Cost Benefits

⁸ Electric Vehicle Adoption in the UK | comparethemarket.com

⁹ <https://www.carmarthenshire.gov.wales/media/1214849/corporate-strategy-18-23.pdf>

¹⁰ <https://fueleconomy.gov/feg/evtech.shtml>

¹¹ https://www.carbonfootprint.com/electric_vehicles.html

Although EVs are currently more expensive to purchase than a petrol or diesel vehicle, EVs are cheaper to run from a day-to-day perspective. Typical running costs are 3-4p per mile compared to 12-15p per mile for combustion vehicles¹². They are cheaper to maintain than combustion vehicles and the cost to service, maintain and repair is cut by more than half¹³. This is because EVs have fewer components that require regular maintenance which is inherently down to the reduced number of moving parts in the vehicle itself as well as improved vehicle technology.

Range Anxiety

The driving range is typically lower than fossil fuel vehicles and charging time that is longer. New EVs are also more expensive to buy than fossil fuel vehicles. However, the driving range is increasing and the range of an electric car in the UK now is typically between 100 to 300 miles¹⁴.

Increases in the average distance travelled per person per year occurred in the three decades 1970 to 2000, for personal travel. This was largely due to increases in average trip lengths since the 1970s, which rose over 50% to 7 miles in 2014. However, since the early 2000s average distance and trip length have levelled off.

Charging times are reducing as charging technology improves, and as more charge points are installed, using EVs becomes more practical.

As the number of EV users increases, having enough chargepoints in an area will not only help aid the issues associated with range anxiety but will also ensure different charging areas stays economically competitive, socially equitable in terms of access to services and furthermore encourage more visitors to the area. As well as these benefits they can also provide an additional income to the chargepoint host and demonstrates the areas commitment to the environment, innovation and future trends, which supports the Swansea Bay City Deal vision “To place the region at the forefront of energy innovation and establish the region as a globally significant player in the production and storage of energy”¹⁵.

Range anxiety has a major impact on large scale public uptake of EV's. To ease this anxiety, investment is needed to construct a comprehensive high quality EV charging network. The public need to be confident in the fact that on their journey they will be able to find an appropriate EV charger in close proximity. EV uptake depends heavily on a step change in current mobility practices and to support this the public need to be confident the infrastructure is in place to allow this.

Cost Comparison

To provide an overview regarding the shape of the current EV market a cost comparison has been conducted, this analysis also includes an overview of EV battery capacities and ranges which have evolved over the last few years. Data has

¹² <https://www.zap-map.com/electric-vehicles/ev-benefits/>

¹³ <https://www.consumerreports.org/car-repair-maintenance/pay-less-for-vehicle-maintenance-with-an-ev/>

¹⁴ <http://www.carbuyer.co.uk/reviews/recommended/best-electric-cars>

¹⁵ <http://www.swanseabaycitydeal.wales/>

been collected from the EV Database (<https://ev-database.uk/>) as this takes several sources into account to provide an industry-wide view of vehicle costs, battery size and typical range. The analysis on vehicle range can vary depending on driving style and climate, therefore a combined average of both city and highway travel has been selected under mild conditions to reflect that of the Carmarthenshire County.

All non-2021 EV prices presented are based on second-hand vehicles available to purchase in the current UK market. Prices are based on market availability from websites such as Autotrader during October 2021.

The cost provided was the 10th lowest price vehicle. This is to exclude any potential outliers (cars that are in poor condition) so to give a fair representation on the average price of the second-hand car from that specified year.

Second-hand vehicles have been presented as they represent a likely purchase option for a large proportion of general public ownership. If there is to be a large uptake in EVs based on government targets, it is unlikely that these will be made up of a significant number of second-hand models due to their affordability in the current market. Note inflation is not accounted for in price comparison.

The analysis conducted presents an overview of the following three EVs: Renault Zoe, Tesla Model 3 & the Nissan Leaf. Table 1 – 3 present this analysis.

Renault Zoe (Supermini)

Table 1 - Renault Zoe Model Development

Model Year	Range (miles)	Battery Size (kWh)	Retail Price (GBP)
2018	180	44.1 kWh	£14,490 ¹⁶
2021	220	52 kWh	£27,595 ¹⁷

Tesla Model 3 (Standard)

Table 2 - Tesla Model 3 Model Development

Model Year	Range (miles)	Battery Size	Retail Price (GBP)
2019	190	50 kWh	£39,500 ¹⁸
2021	250	55 kWh	£40,990 ¹⁹

¹⁶ <https://www.autotrader.co.uk/> as of 04/10/2021

¹⁷ <https://www.renault.co.uk/electric-vehicles/zoe.html> as of 04/10/2021

¹⁸ <https://www.autotrader.co.uk/> as of 04/10/2021

¹⁹ https://www.tesla.com/en_gb/model3 as of 04/10/2021

Nissan Leaf (Standard)

Table 3 – Nissan Leaf Model Development

Model Year	Range (miles)	Battery Size	Retail Price (GBP)
2015	120	30 kWh	£9,500 ²⁰
2018	160	40 kWh	£25,995 ²¹

As is evident from the tables above, vehicle range and battery are consistently increasing over time²². This is including improvements in vehicle where the newer model has a more advanced user interface and all-round aesthetic build.

Despite some EVs still being relatively expensive to date, research does show that brand new EVs are set to become cheaper to make than petrol or diesel vehicles by 2027²³. Research also suggests that some segments of EV production and sales may achieve price parity by 2026. Due to economies of scale, as well as battery technology improvements, costs are envisaged to come down further in real terms. Given BloombergNEF projections about costings, the forecasts made assumed that vehicles will become more affordable which will trigger an increase in EV uptake.

Accessibility of Chargepoints

The predicted uptake of EVs across Wales provides an indication of the scale that Carmarthenshire will have to match in terms of the availability of charging infrastructure. Rural local authority areas such as Carmarthenshire will require comparatively high numbers of charging units to be deployed (compared to urban areas such as Cardiff and Swansea) as Carmarthenshire is set to see the 3rd largest uptake of EVCPs in Wales according to figures presented in the official EV Charging Strategy for Wales (2021). As such, substantial planning, resources and investment will be required across the public and private sector to deliver the charging needs of the county.

Carmarthenshire will roll out its own charging strategy that will be broken down into three groups: Residential, Destination and Strategic. Further information on these categories has been presented in Table 3.

Residential charging presents the most likely form of EV charging, as EV owners will have the opportunity to plug into a dedicated domestic EV charging unit whenever required. Commonly EV charging could commence after work where a daily EV recharge could be conducted overnight. The Welsh Government will introduce requirements for new homes to implement charging infrastructure through changes to building regulations. Encouraging or incentivising the uptake of EVCPs on a residential basis will play an integral part in ensuring the availability of

²⁰ <https://www.autotrader.co.uk/> as of 04/10/2021

²¹ <https://www.nissan.co.uk/vehicles/new-vehicles/leaf.html> as of 04/10/2021

²² <https://ev-database.uk/#sort:path~type~order=,rank~number~desc|range-slider-range:prev~next=0~600|range-slider-bijtelling:prev~next=0~600|range-slider-acceleration:prev~next=2~23|range-slider-fastcharge:prev~next=0~1100|range-slider-lease:prev~next=150~2500|range-slider-topspeed:prev~next=60~260|paging:currentPage=0|paging:number=9>

²³ Price parity for electric cars and vans within 'five years' | Electric fleet news

infrastructure within Carmarthenshire, whilst reducing the demand public charging points. Residential charging is less feasible for residents without off-street parking, but there are various options for on-street parking that will be considered, such as public parking charging bays, rising changepoints and lamppost chargepoints.

Destination charging is installed at many different types of locations (workplaces, supermarkets, gyms etc.). This form of charging infrastructure will become increasingly important for all EV owners in the future, particularly those unable to or choosing not to charge at home. These chargers are publicly available, and therefore sufficient infrastructure needs to be provided to keep pace with rising levels of demand.

Strategic charging is a very important part of Carmarthenshire's EV infrastructure plans as there is a key Strategic Route Network which covers the county. These routes can be viewed in Figure 10. Ensuring that there is charging infrastructure available in strategic routes will facilitate the commuting and business needs in the region, including work-purpose EV cars and small vans or for tourists, travelling longer distances with confidence of overcoming range anxiety. The chargepoints within this purpose will most likely be Rapid or Ultra-Rapid to ensure that users spend less time recharging and can continue their journey after a short break.

The EV Charging Strategy for Wales highlighted that much of the charging infrastructure installed to date has not been designed with the needs of disabled users in mind. Specific issues include heavy cables and difficult connectors presenting problems for those with mobility and dexterity impairments. One in five people in the UK have a disability and there are indications that EV uptake amongst disabled customers has been limited to date²⁴. Therefore, ensuring an equal opportunity for disabled users to have ease of accessibility to EV charge points must be considered in accordance with the Disability Discrimination Act 1995 (DDA), and all chargepoints should be DDA compliant.

Table 3 Table 3 describes the different types of charging locations discussed, including their likely target users, challenges and the advantages associated with each one.

²⁴ ²⁴ <https://www.motability.org.uk/about/news/electric-vehicle-charge-points-lack-accessibility>

Table 3 - Description of different types of charging infrastructure and their likely target users and challenges.

Types of Chargers	Description	Likely Target Users	Challenges	Advantages
Residential (Off-Street Charging)	Personal charge point located within the user's residential property.	Users with off-street parking availability.	Onus is on the user to arrange installations.	Flexibility to charge when suits. Confidence in the quality of the charge point. Prevents congestion.
Residential (On-street Charging)	Stand-alone pillars, typically 'fast' chargers. Kerbside charging points developed to avoid trailing cables.	Users with no off-street parking e.g., terraced housing. Visitors to destinations where on-street parking is available.	Managing parking to ensure access and others don't block spaces when not charging. Funding and arranging installation can be time consuming. Any obstructions (cables or pillars) in the footway will have an adverse impact on disabled access and will reduce usability as active travel routes. Standalone pillars also raise liability issues should damage or electrocution occur. Any on street charging scheme needs to be CCC promoted and controlled scheme.	Incentivises the purchase of EV's for those who do not have access to off-street parking.
Destination Charging	Fast charging is provided at destinations such as gyms and shopping centres. Hotels may take advantage of overnight charging.	Destination visitors.	Not strategically planned or managed – based on individual investment decisions at destination.	Customers are motivated to stay for longer. Demonstrates environmental commitment and supports brands values. Increases convenience of charging for EV users.
Strategic Charging (including SRN)	Used to top up midway through a journey e.g., motorway services. Predominantly along the SRN.	Business travel users, private leisure users, freight and logistics.	Market segmentation, resulting in incompatibility across charging equipment and supporting payment and data infrastructure. Sufficient grid capacity must be available to accommodate high powered charging.	Demonstrates environmental commitment and supports brands values. Increases convenience of charging for EV users.

Car Clubs

With their relatively low running costs, EVs lend themselves well to car clubs. These can allow residents who do not own their own vehicle or have limited access to public transport, to travel to other areas more frequently. The shared ownership

aspect of car clubs can encourage communities in living more cooperatively, working together towards a low carbon, low-cost future. Rural communities can become isolated if there is limited public transport and access to amenities, and young people leaving to study often may struggle to return as residents. Providing shared cars may help with this.

3. Policy Context

Most transport responsibilities are devolved within Wales and as such the Welsh Government has a responsibility for transport policy, planning, and delivery. A summary of relevant policies and strategies are listed below:

Welsh Government Policy

Welsh Government has the ambition for the public sector in Wales to be carbon neutral by 2030²⁵, and expects ultra-low emission vehicles to have a key role in achieving this.

The latest plan from Welsh Government²⁶ states:

- Where practicably possible, all new heavy goods vehicles in the public fleet are ultra-low emission by 2030.
- All new cars and light goods vehicles in the public sector fleet are ultra-low emission by 2025.

Wales Transport Strategy

A new Wales Transport Strategy has been published in 2021 with commitments to EV infrastructure and Taxis/Private Hire Vehicles. The strategy states that over the next 5 years, the Welsh Government will:



Upgrade, improve and future-proof the road network, addressing congestion pinch points and investing in schemes that support road safety, journey reliability resilience, modal shift and electric bike, motorbike and vehicle charging.



Deliver the Welsh EV Charging Strategy and encourage the use of motorbikes and powered light vehicles instead of cars where there are no other transport choices.



Work with the sector to move all taxis and PHVs to zero-emission and make certain that the required infrastructure is in place to support the transition to zero-emission taxis.

The strategy notes that the proposed Climate Change Committee carbon reduction pathway for Wales means emissions from surface transport must be roughly halved between 2020 and 2030 from 6 to 3 million tonnes CO². Welsh Government note that

²⁵ https://gov.wales/sites/default/files/publications/2021-05/welsh-public-sector-net-zero-reporting-guide_1.pdf

²⁶ <https://gov.wales/welsh-public-sector-be-carbon-neutral-2030>

whilst EVs may provide the biggest emissions savings, this is unlikely to be the main source of savings until the late 2020s and possibly later and thus other measures need to be considered.

EV Charging Strategy for Wales: Facilitating the Transition to Net Zero

As alluded to in the Wales Transport Strategy (2021), the Welsh Government published a specific EV Charging Strategy for Wales²⁷ in 2021 with key action points. The strategy covers the period until 2030 yet recognises the urgency of taking action now to ‘put us (Wales) on the right path by setting the vision for 2025’.

The Strategy outlines the current situation regarding EV ownership and associated infrastructure in Wales, with 105 EVs licensed per 100,000 of population (2020) and 21 chargepoints per 100,000 of population (2020). There are approximately 320 workplace chargers installed in Wales, at least 145 on-street chargers, approximately 300 destination chargers at around 150 locations and approximately 130 rapid chargers at 70 ‘on-route’ locations. The vision is that by 2025, all users of electric cars and vans are confident that they can access EV charging infrastructure when and where they need it.

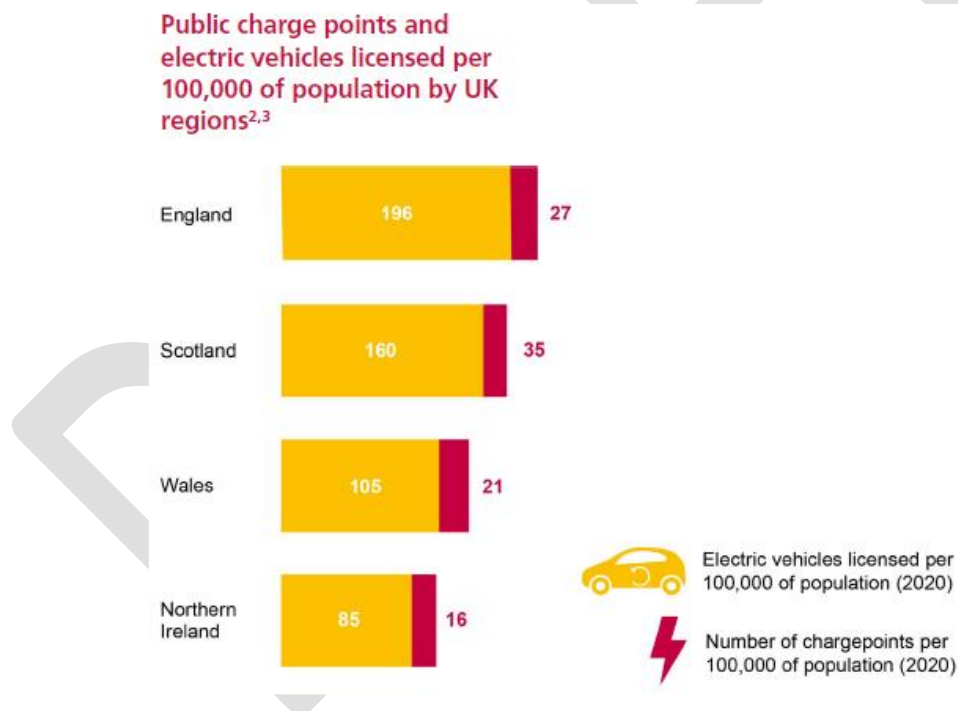


Figure 3 - Public Chargepoints and EVs licensed per 100,000 of population by UK regions (source: Welsh Government)

Based on the scenarios modelled for EV uptake, the following conclusions are made to be taken forward in action planning:

1. The need for a substantial increase in the number of slow, fast and rapid/ultra-rapid chargers available in Wales. Meeting the need for up to 55,000 fast chargers in Wales, alongside home charging, will be a key area of focus to promote equality of access to charging.

²⁷ <https://gov.wales/sites/default/files/publications/2021-03/electric-vehicle-charging-strategy-wales.pdf>

2. The need for better quality charging, to improve the user experience for electric cars and vans Desirable quality outcomes include contactless debit/credit card payment and associated app-based system, information about charging on main roads to help drivers choose where/when to charge, reliable infrastructure with high availability and clear pricing information).
3. To work within the current regulatory framework with these stakeholders to plan for the decarbonised grid network (including heat, renewable electricity generation and transport) so that the needs of charging will be met in a way that is efficient for network management incorporating smart technology.

An action plan from the aforementioned strategy conclusions was scheduled to be published in June 2021, with the Welsh Government recognising its enabling role in delivering this charging infrastructure through the use of regulatory and planning levers, land use planning guidance, use of public land and resources, funding, and targeted support programmes. The strategy further states that targeted action planning will be undertaken to meet the rapidly growing need for charging to ensure that a lack of EV charging infrastructure does not become a barrier to transitioning to electric cars and vans.

The Welsh Government has set out its legal commitment to achieve net zero emissions by 2050 and are passing regulations in 2021 to set interim targets for 2030, 2040 and 2050, against carbon budgets (2021-25 and 2025-2030). To be transposed into Welsh Building Codes, the Energy Performance Buildings Directive signal the requirement for all new homes with associated parking be ready for EV charging. The same obligation is placed on any refurbishment scheme covered by the Code. The following outcomes to develop into the forthcoming EV action plan have been identified regarding infrastructure:

Table 4 - Charging Infrastructure in Relation to Welsh Government Policy Commitments

Slow Charging (3.6kW AC)	(a) All new homes with an associated car parking space will be ready to have EV charging installed.
	(b) Homeowners and occupiers with off-street parking in Wales will be supported to charge at home.
	(c) Home charging will be 'smart enabled' for value and efficiency.
Fast Charging (7kW - 22kW AC)	(a) need to have between 30,000 and 55,000 fast chargers available for use by 2030 (currently have less than 1% of this installed).
	(b) New non-residential buildings with more than 10 parking spaces will have a charge point provided by 2025.
	(c) Business provides charging facilities at places of work for the use of staff and visitors.
	(d) Destinations provide charging facilities for the use of customers which may act as a means of improving customer experience.
	(e) On-street charging and in car parks will be encouraged in villages, towns and cities throughout Wales; with a view to installing on average one charge point for one in every three EVs that cannot charge at home.
	(f) Charging hubs, including out of town park and ride, and supporting active travel will feature in enabling decarbonised multi-modal journeys across Wales.
Rapid Charging (43kW AC)	(a) predicted that up to 4,000 rapid/ultra-rapid chargers will be needed in Wales over the next ten years (currently have less than 3% of this installed).

& (50kW - 120kW DC)	(b) By 2025, a rapid charging network will be provided across the strategic trunk road network of Wales, providing charging at a distance of approximately 20 miles.
	(c) In urban centres taxis and private hire vehicles will have extensive access to charging facilities by 2025.

The strategy also comments on quality outcomes for EV users such as charging facilities to be available to everyone, including those with accessibility needs and payment platforms to be simple, accessible and easy to use with clear pricing information available.

Sustainable outcomes, notably, where possible, EV charging should be installed at locations that complement other modes of sustainable transport, including the use of public transport, walking, and cycling. Consideration will be given to allowing sufficient additional spare capacity and cableways to meet anticipated need for EV charging.

Welsh Government Policy Commitment Summary:

1. Upgrade, improve and future-proof the road network, addressing congestion pinch points and investing in schemes that support road safety, journey reliability resilience, modal shift and electric bike, motorbike and vehicle charging.
2. Deliver the Welsh EV Charging Strategy and encourage the use of motorbikes and powered light vehicles instead of cars where there are no other transport choices.
3. Work with the sector to move all taxis and PHVs to zero-emission and make certain that the required infrastructure is in place to support the transition to zero-emission taxis.
4. Need for a substantial increase in the number of slow, fast and rapid/ultra-rapid chargers available need for a substantial increase in the number of slow, fast and rapid/ultra-rapid chargers available in Wales.
5. Need for better quality charging, to improve the user experience for electric cars and vans and to work within the current regulatory framework with these stakeholders to plan for the decarbonised grid network

Net zero carbon status by 2030: A route map for decarbonisation across the Welsh public sector

Accelerating the rollout of EV charging infrastructure constitutes a specific component in the routemap to achieve Welsh Public Sector net zero greenhouse gas emissions by 2030. As part of the 'Mobility and transport' priority area for action identified in the routemap, EV policy commitments are present in action points across the three distinct phases plans. The three phases of action the routemap identifies for achieving net zero ambitions by 2030 are as follows:

- 'Moving Up A Gear' (2021-22) - understanding the context and what needs to be done and where action needs to accelerate.
- 'Well on our way' (2022-26) - where there is an expectation that low

carbon is becoming the norm and the Welsh Public Sector are definitely on the way to net zero status.

- 'Achieving our goal' (2026-30) - where choosing zero carbon has become routine, culturally embedded and self-regulating.

As part of the 'Moving Up a Gear' phase of action, the policy document highlights the Welsh Government will: (1) understand the nature and use of our fleet, future patterns of usage, and a feasible technological pathway for an ultra-low emission transformation, (2) accelerate the roll-out of EV charging infrastructure and our staff will be offered the opportunity to test ultra-low emission vehicles, and (3) commit to fleet transformation plans (considerable upscaling of ULEV uptake). As part of the 'Well On Our Way' phase of action points, all new cars and light goods vehicles in the public sector fleet are set to be ultra low emission by 2025. Where possible, all new Heavy goods vehicles in the public fleet are ultra low emission by 2030, as part of the final 'Achieving Our Goal' phase of this plan.

Welsh Government Policy Commitment Summary:

1. We will understand the nature and use of our fleet, future patterns of usage, and a feasible technological pathway for an ultra-low emission transformation.
2. We will accelerate the roll-out of EV charging infrastructure and our staff will be offered the opportunity to test ultra-low emission vehicles.
3. We commit to fleet transformation plans and there is a considerable upscaling of ULEV uptake.
4. All new cars and light goods vehicles in the public sector fleet are ultra low emission by 2025.
5. Where practicably possible, all new Heavy goods vehicles in the public fleet are ultra low emission by 2030.

Southwest Wales Policy

The Joint Local Transport Plan for Southwest Wales (2015 - 2020)²⁸ provides a consistent policy which is applied across the four councils in Southwest Wales: Carmarthenshire County Council, City and County of Swansea, Neath Port Talbot County Borough Council and Pembrokeshire County Council. It lists EVs as an emerging trend and outlines an EV Charging Network scheme "to investigate and implement a network of EV charging points across Southwest Wales. This will seek to draw together fragmented existing provision and install new sites at strategic locations using standardised technology." It also mentions the Sustainable Travel Centres scheme in Carmarthenshire, which helped fund the Rapid charger at Nant y Ci.

Work is due to commence on the next version of the Regional Transport Plan. This EV Charging Infrastructure Strategy will inform the process. Feeding into regional

²⁸ <https://www.swansea.gov.uk/localtransportplan>

plans that will translate into an integrated Metro system for Southwest Wales, this Charging Infrastructure strategy will also inform development of the South West Wales Metro²⁹.

The Economic Regeneration Strategy for the Swansea Bay City³⁰ region whilst not specifically covering EVs, includes in its strategic aims to “keep a strong eye on the emerging market and technology trends” and “Nurture and support our emerging growth sectors”.

South West Wales Policy Commitment Summary:

1. An EV Charging Network scheme “to investigate and implement a network of EV charging points across South West Wales. This will seek to draw together fragmented existing provision and install new sites at strategic locations using standardised technology”.

Carmarthenshire County Council Policy

Route towards becoming a Net Zero Carbon Local Authority by 2030

Carmarthenshire County Council’s ‘Route towards becoming a net zero Carbon Local Authority by 2030’ is an important local policy driver for this EV strategy. On the 20th February 2019, Carmarthenshire specifically declared a ‘notice of Motion’ entailing the following:

1. Declare a climate emergency.
2. Commit to making Carmarthenshire County Council a net zero carbon local authority by 2030.
3. Develop a clear plan for a route towards being net zero carbon within 12 months
4. Call on Welsh and UK Governments to provide the necessary support and resources to enable effective carbon reductions.
5. Work with Public Services Board and Swansea Bay City Deal partners to develop exciting opportunities to deliver carbon savings.
6. Collaborate with experts from the private sector and Third sectors to develop innovative solutions to becoming net zero carbon.”

The Council was the first local authority in Wales to have EVs in 2010, and currently has 10 EV cars, 1 EV van, and hybrid vehicles too and is aiming to increase its electric fleet as an alternative to existing diesel-powered vehicles. Grant funding from the Office for Low Emission Vehicles (OLEV) was secured to install 26 electric charging points for public use throughout the County. The Council has reduced carbon emissions from its fleet mileage by 19% between 2012-2019. The Council has reduced carbon emissions from its business mileage by over 36% between 2012-2019.

The Council will adopt a pragmatic approach for the route towards the Council becoming a net zero carbon local authority by 2030 in recognition that this approach

²⁹ <https://gov.wales/swansea-bay-and-west-wales-metro>

³⁰ <https://www.swansea.gov.uk/swanseabaycityregioneconomicregenerationstrategy>

needs to be sufficiently flexible to accommodate changing circumstances, including the reporting requirements yet to be introduced by Welsh Government as part of its ambition for a carbon neutral public sector by 2030. The Council will review the most appropriate fuel powered vehicles for each of the Council's Services and develop appropriate carbon reduction target for the Council's fleet mileage as part of an annual review. This Council will also undertake a review of the Council's pool cars to identify opportunities for carbon reduction, finalise this EV strategy for the County and develop appropriate carbon reduction targets for the Council's business mileage as part of an annual review.

Carmarthenshire County Council Existing Policy Commitment Summary:

1. Review the most appropriate fuel powered vehicles for each of the Council's Services and develop appropriate carbon reduction target for the Council's fleet mileage.
2. Undertake a review of the Council's pool cars to identify opportunities for carbon reduction, finalise this EV strategy for the County and develop appropriate carbon reduction targets for the Council's business mileage.

Other Carmarthenshire Policies / Strategies

EVs and related issues are already covered in several Carmarthenshire Council policies; the document Carmarthenshire County Council Moving Forward in Carmarthenshire: the next 5-years³¹ states that the Council plans to "improve the infrastructure for the use of EVs especially in rural areas"

Carmarthenshire County Councils Corporate Strategy³² outlines the need to invest in infrastructure to support more sustainable journeys.

As part of Carmarthenshire County Council's commitment to increase the supply of affordable housing, EV points are included in all council new build developments.

Carmarthenshire County Council has three Air Quality Management Areas, in Carmarthen, Llanelli and Llandeilo, as shown in the maps in Annex A. Whilst not providing the full solution to improving air quality issues it is recognised that wider EV use in these areas could make a positive impact on air quality.

The Taxi Licencing team have Licence Conditions for Hackney Carriages and Private Hire Vehicles in Carmarthenshire, which includes a minimum size of 1200cc, but they have an exemption for electric cars which are fully compliant with all Conditions of Licence to have an Engine Capacity of below 1200cc.

The Carmarthenshire Parking Strategy 2018 includes several proposals relating to EVs, including:

³¹ <https://www.carmarthenshire.gov.wales/media/1212982/moving-forward.pdf>

³² <https://www.carmarthenshire.gov.wales/media/1214849/corporate-strategy-18-23.pdf>

- Increase the use of iconography on the County Council website to promote car park facilities such as; electric charging points, public transport connectivity, cycle parking, opening times and tariffs.
- To facilitate increased use of EVs appropriate charging facilities and parking spaces will be provided for EVs.
- Consideration should be given to parking spaces at new developments for EVs with associated infrastructure.
- Where appropriate, provide electric charging facilities and spaces to short term parking for EVs.

The current Local Development Plan³³, adopted December 2014, does not specifically cover EVs but states that it “looks to tackle the causes and effects of climate change within our communities”, and describes how Transport takes up a sizable proportion (28%) of the overall figure for the County’s carbon footprint.

The emerging Local Development Plan includes a Sustainability Appraisal³⁴, which has amongst its objectives:

1. To maintain/reduce the levels of the UK National Air Quality pollutants (objective 3.1).
2. To reduce the emission of greenhouse gases (objective 4.1).
3. Improve the integration of different modes of transport (objective 6.5).
4. Promote the use of more sustainable modes of transport (objective 6.6).

Carmarthenshire County Council Existing Policy Commitment Summary:

1. Plans to improve the infrastructure for the use of EVs especially in rural areas. Review the most appropriate fuel powered vehicles for each of the Council’s Services and develop appropriate carbon reduction target for the Council’s fleet mileage by March 2021.
2. Carmarthenshire undertake a review of the Council’s pool cars to identify opportunities for carbon reduction, finalise this EV strategy for the County and develop appropriate carbon reduction targets for the Council’s business mileage
Taxi licensing team exemption for electric cars which are fully compliant with all Conditions of Licence to have an Engine Capacity of below 1200cc.
3. Parking Strategy proposals - parking spaces will be provided for EVs during periods of charging.
4. Consider the appropriateness of promoting powered light vehicles.

This will allow us to reference EV provision as part of the ongoing development process.

³³ <https://www.carmarthenshire.gov.wales/home/council-services/planning/planning-policy/local-development-plan-2006-2021/#.W32HsfIKgdU>

³⁴ <https://www.carmarthenshire.gov.wales/media/1215165/sa-scoping-non-technical-summary-final.pdf>

UK Policy

Building upon previous UK strategy documents for low emission vehicles and related infrastructure³⁵, the 2021 publication of 'Decarbonising transport - A Better, Greener Britain'³⁶ and 'HM Transitioning to zero emission cars and vans: 2035 delivery plan'³⁷ provide important action points to decarbonise transport by 2050. The main commitments of each policy are summarised below, to which Carmarthenshire County Council's EV strategy will compliment.

Decarbonising Transport - A Better, Greener Britain

Although transport policy is devolved and responsibility rests with the Welsh Government (the proposals in this plan apply to England only), it is useful to understand the direction UK Government is moving towards in terms of EV policy and strategy.



By law, the UK's Emissions must now be net zero by 2050. The Government have committed to remove all emissions from road transport:

2030 - end sale of new petrol and diesel cars and vans

2035 - all new cars and vans must be 100% zero emission at the tailpipe

2035- all new L-category vehicles to be fully zero emissions at the tailpipe.

2040- End the sale of all non-zero emission HGVs.

Given the crucial role that local authorities must play in supporting the roll-out of charging, and to navigate the complexities involved, the Government will publish an EV infrastructure guide for local authorities later this year. For those households unable to charge at their home, the On-Street Residential Scheme supports local authorities in installing EV infrastructure on-street and in public car parks and the workplace Charging Scheme/EV Homecharge scheme are committed to continue.

The Government will further regulate to ensure that all new home and workplace chargepoints have smart capability by the end of this year and through regulation by Ofgem, network operators must ensure that they provide connecting customers with the cheapest option that meets their requirements.

³⁵ E.g. Department for Transport's 'Road to Zero' (2018)

<https://www.gov.uk/government/publications/reducing-emissions-from-road-transport-road-to-zero-strategy>, 'Government Vision for England's Rapid Chargepoint Network' (Department for Transport, 2020) <https://www.gov.uk/government/publications/government-vision-for-the-rapid-chargepoint-network-in-england/government-vision-for-the-rapid-chargepoint-network-in-england> and 'Decarbonising Transport – Setting the Challenge' (Department for Transport, 2020) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/932122/decarbonising-transport-setting-the-challenge.pdf

³⁶https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf

³⁷https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005301/transitioning-to-zero-emission-cars-vans-2035-delivery-plan.pdf

UK Policy Commitment Summary:

1. 2030 - end sale of new petrol and diesel cars and vans
2. 2035 - all new cars and vans must be 100% zero emission at the tailpipe
3. £2.8 billion to support the switch to clean vehicles across the UK, through a range of funding packages.
4. UK's Emissions must be net zero by 2050.

HM Transitioning to zero emission cars and vans: 2035 delivery plan

 HM Government

Transitioning to zero emission cars
and vans: 2035 delivery plan



Whereas the 'Decarbonising Transport' strategy is holistic, encompassing multi-modal action points, the 'HM 2035 Delivery Plan' expands upon specific commitments made regarding zero emission cars/vans.

The 2035 delivery plan states: 'our commitment to transitioning to zero emission vehicles is for the whole of the UK. The grants for plug-in cars and vans, as well as the grants for home, workplace and on-street chargepoints are all available UK-wide. Where funding is provided for England-only programmes, the devolved administrations will receive additional funding through the Barnett formula'.

Figure 4 is taken from the 2035 delivery plan and visualises the forthcoming government guidance as well as funding to realise ambitions around net zero cars and vans³⁸.

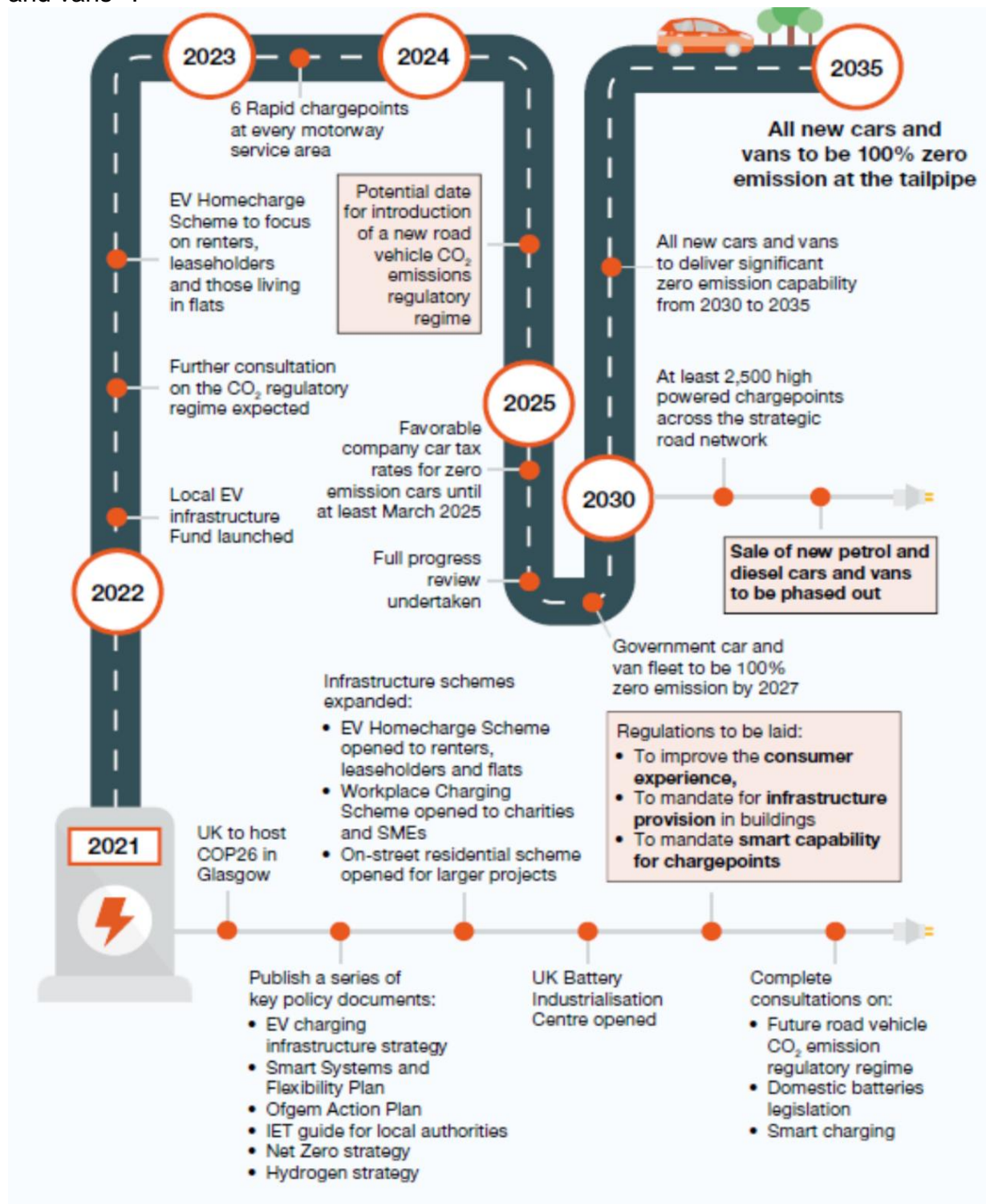


Figure 4 - Timeline of Key deliverables (source: HM Government)

³⁸ Note, not all initiatives on the roadmap apply to Wales/are available funding sources (e.g. Local EV Infrastructure fund).

Table 5 below summarises the main commitments across three broad areas of the delivery plan.

Table 5 - Commitments Summary - Transitioning to zero emission cars and vans: 2035 delivery plan

Increasing uptake of zero emission vehicles	Accelerating infrastructure roll-out	A Sustainable Transition
Aim to introduce a new road vehicle CO ² emissions regulatory regime in 2024.	Publish an EV Infrastructure Strategy in 2021.	Published our smart charging consultation response and later this year will legislate to mandate that all private chargepoints must be smart.
Continue to fund the plug-in van grant until at least 2022/23.	Support provision of on-street chargepoints until at least 2024/25.	Publish with Ofgem a second phase of the Smart Systems and Flexibility Plan (SSFP) in 2021 to set out reforms needed to secure flexibility across the energy system, including EVs.
Review the Category B derogation in 2021.	Ofgem is considering changing the way charges for connecting to the electricity network are allocated. It has recently published a consultation proposing that all network reinforcement costs should be socialised across energy bill payers in future. This should often reduce the costs of connecting EV chargepoints to the network. Any changes are expected to come into force in 2023.	In conjunction with Ofgem, publish a plan to maximise the contribution of EV flexibility in 2022.
Accelerate Government fleet commitment - 100% of our car and van fleet will be fully zero emission at the tailpipe by 2027.	Shift the support of the EV Homecharge Scheme (EVHS) to focus on leaseholders, renters and those living in flats from April 2022.	Publish a call for evidence for Vehicle-to-everything (V2X) technologies in a net zero energy system.
We will work closer than ever with local authorities, to encourage uptake of central government funding and ensure more widespread action in the transition to ZEVs.	Continue to fund EVHS until at least 2024/25	Publish a consultation on domestic batteries legislation in 2021 to ensure we have an appropriate legal framework governing the increasing numbers of EV batteries
	Continue to fund the Workplace Charge Scheme until at least 2024/25	Publish a Net Zero Strategy including the recommended actions of the Green Jobs Taskforce in 2021.

Carmarthenshire County Council are looking to provide and encourage the installation of relevant infrastructure to help meet these targets.

UK Policy Commitment Summary:

1. Continue to fund the plug-in van grant until at least 2022/23.
2. Support provision of on-street chargepoints until at least 2024/25.
3. Continue to fund EV Home Scheme until at least 2024/25.
4. Continue to fund the Workplace Charge Scheme until at least 2024/25.
5. Accelerate Government fleet commitment - 100% of our car and van fleet will be fully zero emission at the tailpipe by 2027.

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4. Baseline Context

Introduction

A baseline assessment has been conducted to understand Carmarthenshire's existing position in relation to EV uptake, the EV network, and the existing grid capacity. Additionally, the baseline includes a review of the existing EV and EVCP technologies currently in the market.

The baseline of this EV strategy provides a key role in determining the starting off point and in turn influences forecasting, EVCP recommendations/ complimentary measures and the ambitions and targets set and upheld via policy.

Types of EV

Battery EVs (BEV) or simply EVs (EV)

These are fully EVs with no Internal Combustion Engine. Electricity is stored within battery packs usually under the car and the power is used to run the electric motor. EVs are charged via electricity from an external source usually at home, work or via a public charge point.

Hybrid EVs (HEV)

Hybrid vehicles are powered by both petrol/diesel? and electricity. The electricity is usually powered by 'regenerative braking' or in newer 'self-charging' the petrol engine generates electricity whilst in use.

Plug in Hybrid EV (PHEV)

Plug in vehicles can recharge battery via 'regenerative braking' or can be plugged in to an external source. PHEV models usually have around 10-40 miles on one charge.

Baseline EV Registrations

Vehicle registrations for Ultra Low Emission Vehicles (ULEVs), (broken down into Battery EVs (BEVs) and Plug-in Hybrid EVs (PHEVs)) in Carmarthenshire County Council study area have been analysed to establish a baseline position from which EV uptake scenarios can be developed.

The data used can be found in the Department for Transport (DfT) dataset (VEH01) (subset dataset VEH0132)³⁹.

ULEVs are vehicles that reported to emit less than 75g of carbon dioxide (CO₂) from the tailpipe for every kilometre travelled. In practice, the term typically refers to BEVs, PHEVs and fuel cell EVs. For clarity and to assist further analysis of EV uptake in the future (Section 4), the data presented in this section exhibits separate totals for ULEV, PHEV and BEV registrations.

³⁹ <https://www.gov.uk/government/statistical-data-sets/all-vehicles-veh01>

Details of ULEV registrations for Carmarthenshire were taken from the DfT dataset VEH0132. This dataset provided the total number of ULEV registrations, BEV registrations and PHEV registrations at the end of each quarter (Q) from 2011 Q4 to 2020 Q4 for the UK, Wales and Carmarthenshire.

Vehicles are allocated to a local authority according to the postcode of the registered keeper. This is the keeper's address for privately owned vehicles or the company's registered address for company owned vehicles. The address does not necessarily reflect where the vehicle is located. This is especially true for large fleets kept by companies involved with vehicle management, leasing or rentals. Significant changes in the number of vehicles from year to year can often occur when these companies change their registered address.

Registrations can be assumed to be a minimum as due to some major dealerships being based outside of the Carmarthenshire boundary, some vehicles will be registered outside the boundary and used within Carmarthenshire. Therefore, the registered vehicles can be assumed to be conservative.

An initial analysis has been undertaken to gauge the level of ULEV uptake as a proportion of total vehicles registered. This has been conducted for the UK, Wales and Carmarthenshire. The figure below illustrates the level of ULEV uptake in relation to the total vehicles registered within the respective defined geography. It can be seen that the UK has a higher proportion of ULEVs, reaching 13% at the end of 2020.

Carmarthenshire's ULEV uptake is in line with the level of ULEV uptake in Wales, whereby the proportion of ULEVs out of the total vehicles registered follow a similar trajectory.

This highlights that Carmarthenshire's rate of adoption is in line with Wales with regards to the number of ULEV in proportion to the total vehicles registered.

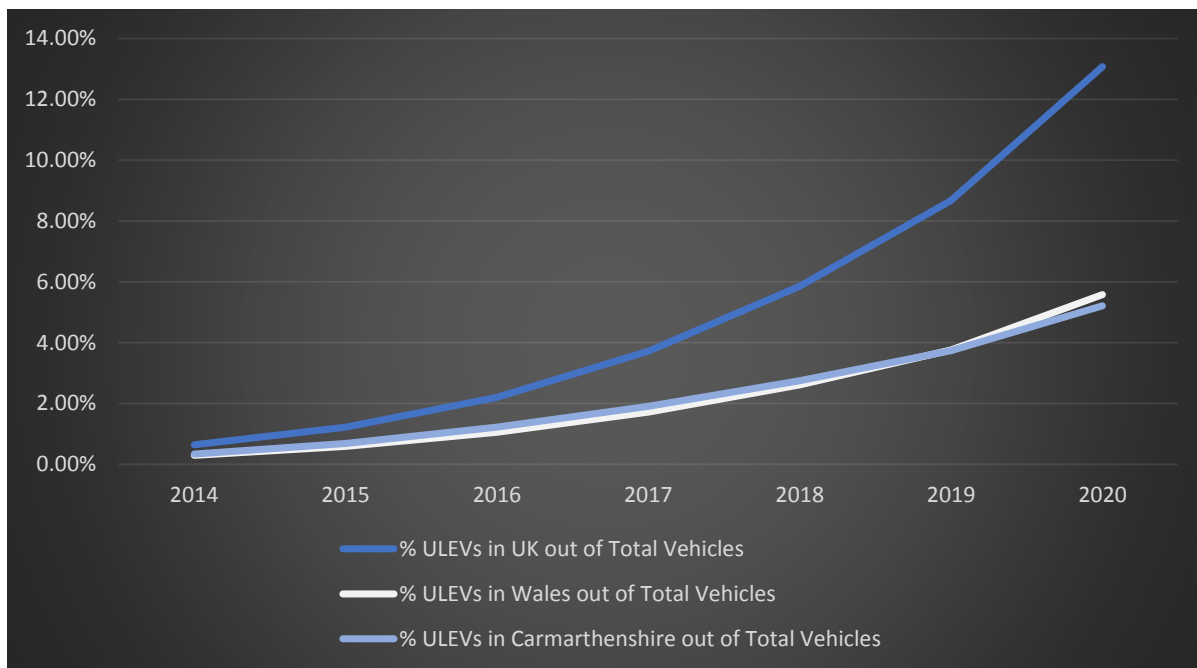


Figure 5 - % of ULEV Uptake out of Total Vehicles Registered for the UK, Wales and Carmarthenshire (2014 – 2020)

Figure 5 illustrates ULEV uptake in Carmarthenshire and in Wales from 2011 Q4 to 2020 Q4 to convey both the rate of increase and the number of ULEVs that have been registered in Carmarthenshire which contributes to the national uptake. This dataset has been presented on a cumulative basis, highlighting the total number of ULEVs by the end of each quarter whilst considering the average life span of a vehicle. For the basis of this analysis, it has been assumed that all registered ULEVs will remain within Carmarthenshire and in Wales.

By the end of 2020 Q4, the level of ULEV uptake in Carmarthenshire, cumulatively, accounted for 6% (5,852 ULEVs) of the registered ULEVs across Wales, illustrated in Figure 6 below. For context, the DfT dataset for ULEV registrations for Cardiff reveals that the capital city accounts for approximately 10% (10,211 ULEVs) of the registered ULEVs in Wales.

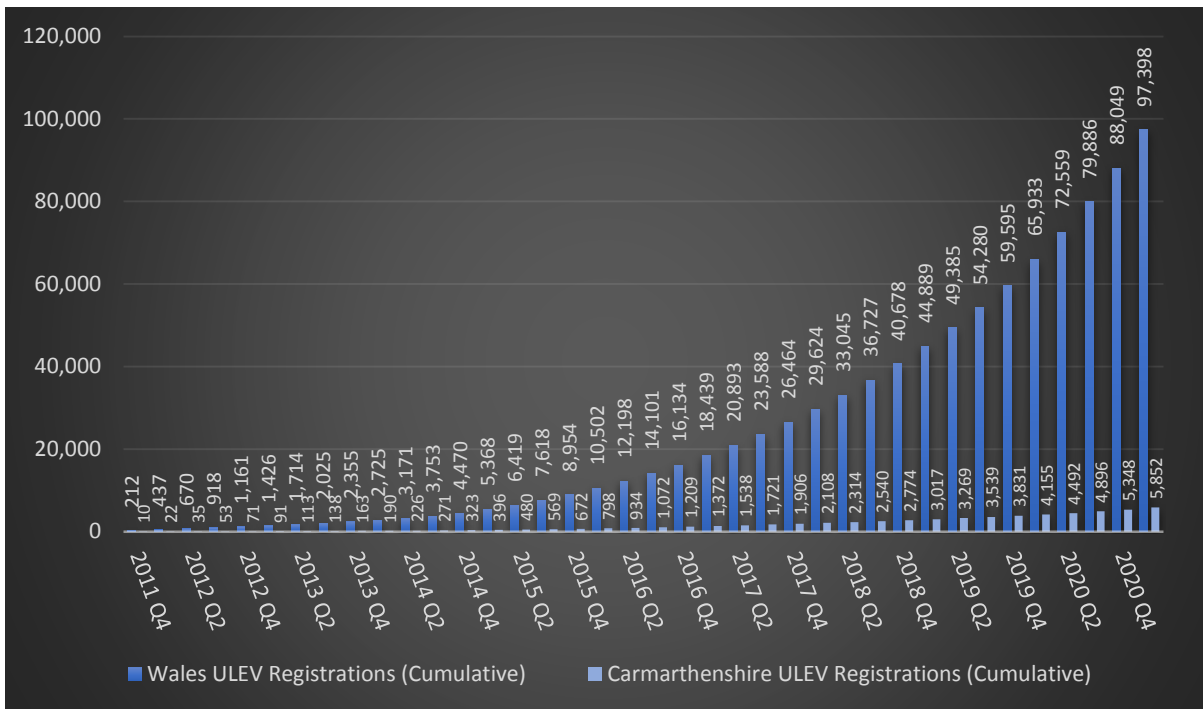


Figure 6 - ULEV Registrations for Wales and Carmarthenshire (Cumulative) (2011 Q4 – 2021 Q1)

A breakdown of ULEV registrations by BEV and PHEV has been illustrated for Carmarthenshire between 2011 Q4 and 2021 Q1, shown in Figure . Between 2011 Q4 and the end of 2014 Q1, it is shown that there were early adopters for BEVs, whilst zero presence of PHEV uptake. From 2014 Q2 to 2019 Q2, a rise in PHEV emerged, from 5 registered PHEVs to 128, respectively, for said quarter. However, following 2019 Q3, a sharper uptake of BEVs can be evidenced (129 BEVs registered in 2019 Q3 in contrast to 291 BEVs registered in 2021 Q1, an increase of 126%), a result of clear policy, market forces, funding and increase in charging infrastructure.

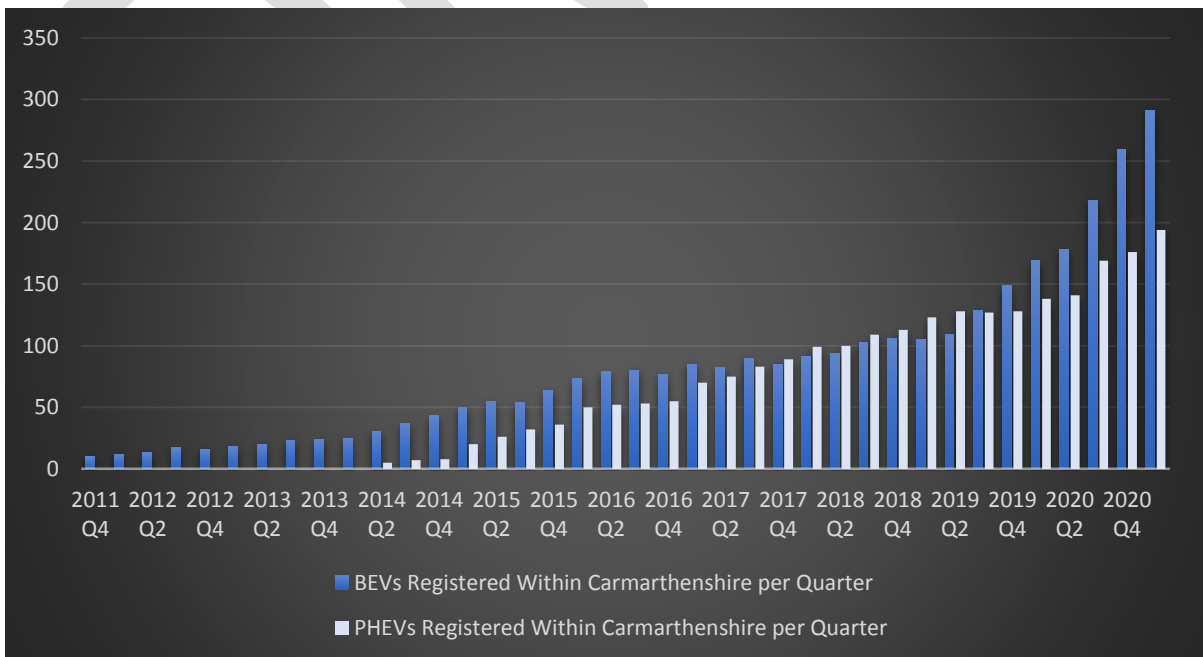


Figure 7 - BEV vs PHEV Registrations Within Carmarthenshire (2011 Q4 – 2021 Q1)

Figure highlights ULEV uptake by type within Carmarthenshire from 2011 Q4 to 2021 Q1. With regards to the data series for “% ULEV of Total Vehicle Registration”, this has been illustrated from 2012 Q3 to capture a cumulative total amount ULEV registrations which cover 4 quarters, which can then be used to take as proportion for total number of vehicles registered for 2012. Due to the granularity of total vehicle registrations (on a yearly basis) it has been assumed that each quarter the number of total vehicle registrations stay the same for that year.

The data displays progressive increase in the number of EV’s registered in the County over this time from 10 ULEV registrations by 2011 Q4, to 504 ULEV registrations by 2021, Q1.

As a percentage of total vehicle registrations, there is an increase from 0.06% in 2012 to 5% in 2020, highlighting an increase of 4.94% in terms of the proportion of total vehicles registered to be ULEV. Although total ULEVs in Carmarthenshire is shown to be a minimal 5% of total vehicle registration, it is very likely that the projections for ULEV % will increase at a rapid rate, due to charging infrastructure investment (reducing range anxiety), innovation within BEV technology, defined policy targets and increased awareness on the environmental benefits of EV adoption.

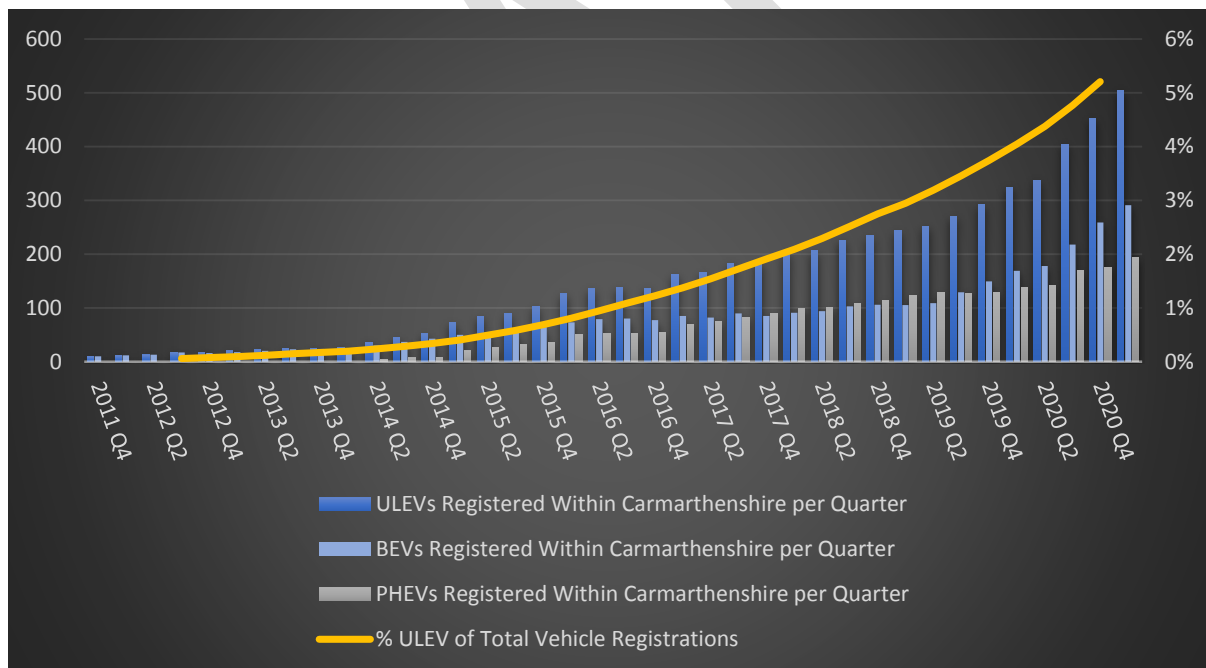


Figure 8 - ULEV Registrations by Type Within Carmarthenshire and Proportion of ULEVs in Relation to Total Vehicles Registered (2011 Q4 – 2021 Q1)

EV Charging

Whilst EVs can be charged via a normal household plug socket, charging with this method takes a long time. EVs are usually charged via dedicated charge points. There are three main EV charger types described in Table 6 below; the times given are estimates.

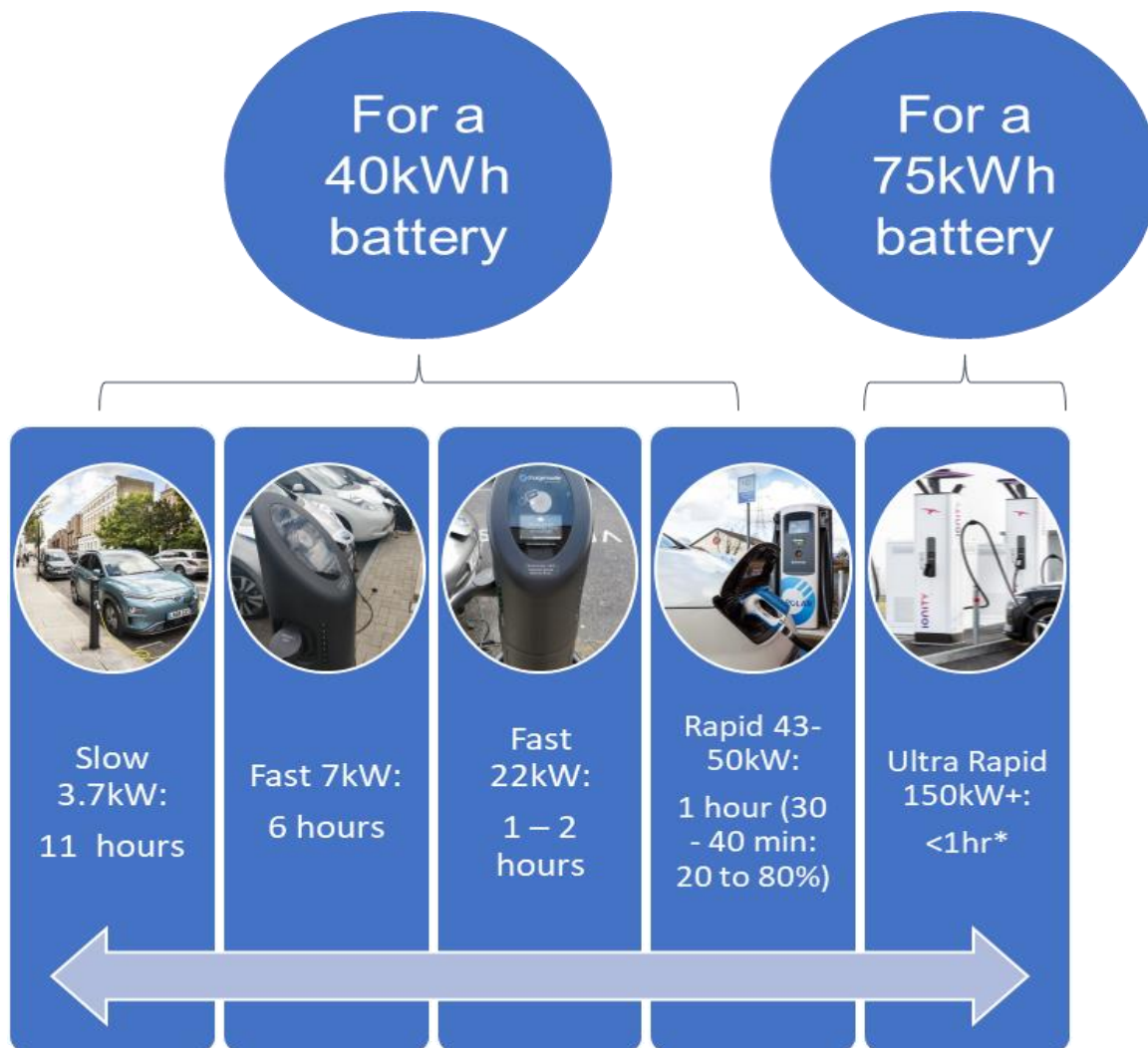
Table 6 - Charger Types and Times

Charger Type	Typical use case	Power	Typical Charging Time	Comment
Slow	Residential	3.6kW	6-12 hours	Time given is to fully charge. Slow charging is equivalent to charging via a mains socket.
Fast	Destination	7kW – 22kW	3-6 hours	Time taken to achieve a full charge.
Rapid	Destination & SRN	43kW, 50kW, 120kW	20 minutes – 1 hour	Time given is to 80% charge where the unit's power output will reduce to preserve battery life and maximise charging levels.
Ultra-Rapid	SRN	150kW	10 – 20 Minutes	Due to high current via this charging method incurs, many older vehicles cannot handle the charge due to thermal impacts on the battery, therefore this form of charging is more common in modern vehicles with larger battery capacities.

Using the power outputs stated in Table 6 this has been applied to a 40kWh battery and a 75kWh battery, shown in Figure 9 to highlight an approximate charge time based on battery size^{40 41}. The 75kWh battery has been included to showcase the charge time for an Ultra Rapid chargepoint.

⁴⁰ <https://pod-point.com/guides/driver/how-long-to-charge-an-electric-car>

⁴¹ <https://www.projectev.co.uk/ev-fast-charging-all-you-need-to-know>



*Charging time based on the Tesla Model S (2019)

Figure 9 - Charging Technology – Defined Power Output and Charging Duration (Based on a 40kWh and a 75kWh Battery)

EV Charging and the Highway Network

Data provided by Zap-map⁴² gives the total number of publicly available connectors in the UK as over 21,000 (Jan '19) across almost 7,500 different locations. This has increased from just over 13,000 connectors in November 2017. However, in Wales there are only 655 connectors.

Carmarthenshire has over 60 active chargepoints, the majority being Fast chargepoints, with a small number of Rapid chargepoints, with plans to facilitate the delivery of more. Some of these are available to any member of the public at any time, however others are only available some of the time or are for eligible customers of the charge point owner only.

CCC Corporate Strategy⁴³ describes how Carmarthenshire has the second largest highway network in Wales, covering 3,536 Kilometres, more than double the Welsh

⁴² <https://www.zap-map.com/statistics/#region>

⁴³ <https://www.carmarthenshire.gov.wales/media/1214849/corporate-strategy-18-23.pdf>

average of 1,566 Kilometres. EV charge points should be available to destination and through traffic, at specific destinations as well as for residents.

Figure below shows the location of existing publicly available EVCP infrastructure across Carmarthenshire in August 2021. Clusters are shown around the three largest towns, Carmarthen, Llanelli and Ammanford. Fast chargers are the most common, with them accounting for 51 out of 62 chargers in Carmarthenshire. Rapid chargers currently account for 5 of the EVCP's,

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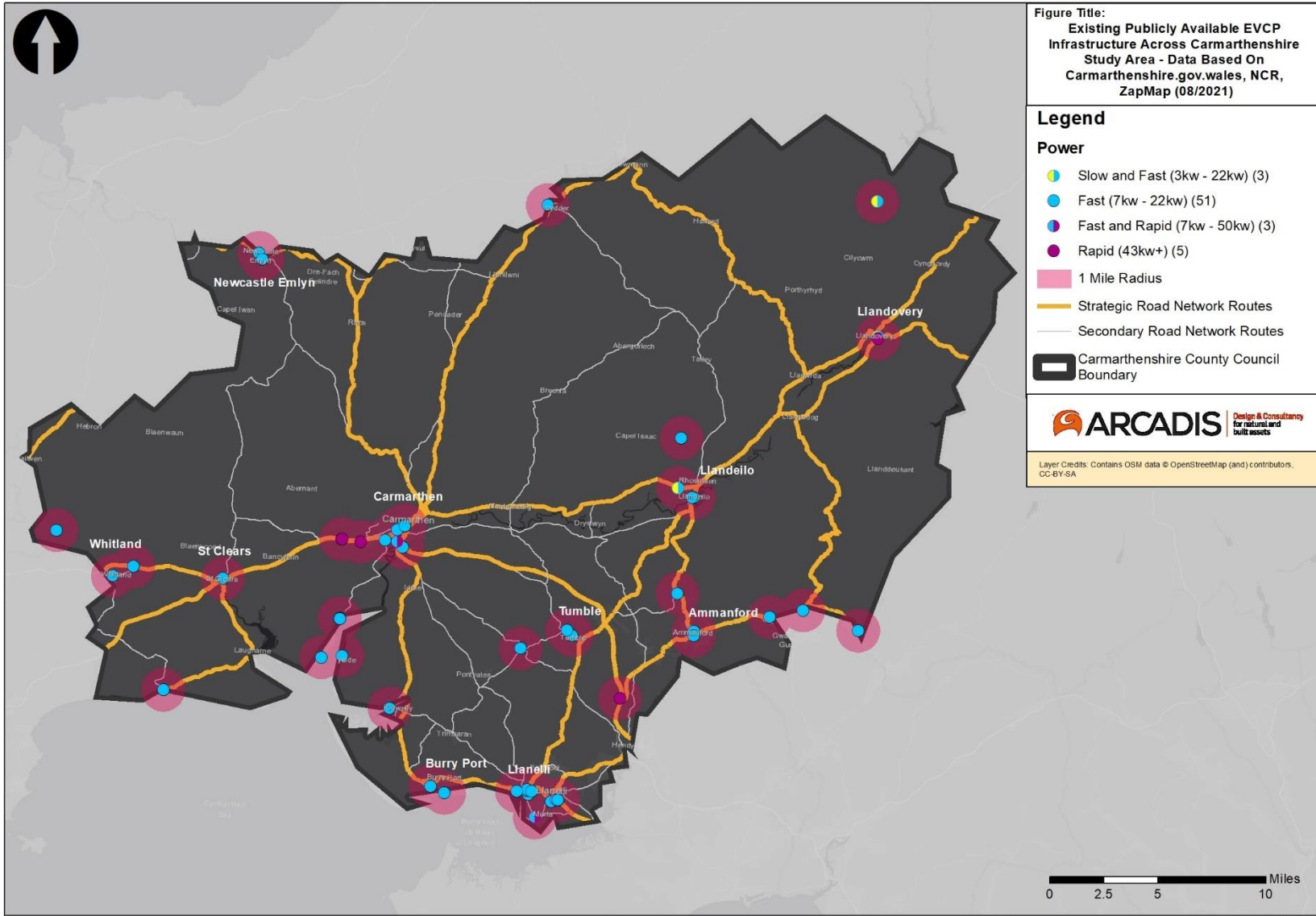


Figure 10 - Existing EVCP Infrastructure Across Carmarthenshire Study Area (08/2021)

Grid Capacity

For EVs to be charged, the delivery of power from the grid network must be in line with network capacities. This is particularly important during peak demand times which can be subjective depending on the area of EVCP operation. To assess available network capacity a nominal use case scenario was applied to each substation in the Carmarthenshire area.

Use case scenario

The selected use case scenario for Carmarthenshire simulates the implementation of Rapid EV chargers. This scenario was simulated to develop a baseline energy analysis of primary substations (33kV/11kV) and the demand headroom across the Carmarthenshire area.

The Swarco C63 ONE 43kW AC EV charger, with a power factor of 0.98 for accurate capacity analysis was used. This charger was selected as it provides a power output adequate to provide a full recharge (0% to 100%) for most EVs in little over an hour. Furthermore, this style of charging station is more cost effective than that of DC charging stations and can be integrated directly with the AC network.

The demand headroom for all primary substations was calculated based on 'Firm Capacity' and 'Measured Peak Demand' gathered via the Western Power Distribution online energy database. It should be noted that due to the usage of Firm Capacity opposed to Max Capacity/Ratings of the substations, a more general/universal analysis was conducted. However, for a more subjective analysis of individual substations in the future, the usage of Max Capacity/Ratings is advised.

Based on this baseline analysis all substations with available headroom in the Carmarthenshire area, and within 2km of the border, were evaluated and broke down into a Red, Amber, Green (RAG) categories. The RAG categories were based on the number of chargers that could be implemented within each substations connected network for this particular use case. The RAG Key can be viewed in Table 7 below.

Table 7 - RAG Key for Primary Substations

RAG Status	Number of Chargers	Infrastructure
Green	>100	No upgrades required to install over 100 rapid chargers
Amber	10-100	Upgrades required to install over 100 rapid chargers
Red	<10	Upgrades required to install over 10 rapid chargers

Analysis concluded that the Carmarthenshire grid network is currently in a healthy condition to facilitate a large uptake of EVCPs. The network at this point will require

no upgrades to primary substation capacities but may require upgrades regarding the connection of new charging sites as per the standard process. Further analysis may be conducted at distribution level (11kV/400V) to assess headroom, as and where required, for the development of EVCPs in the future at lower voltage levels for more specific site plans.

Figure presents a mapped analysis of the RAG rating and locations of all primary substations in the Carmarthenshire area with available headroom. It should be noted that when referring to the north/northeast of Carmarthenshire within the map, there may be considerably large areas that appear to be without a primary substation in close proximity. This is as these areas are particularly rural and will not rely on a large primary substation for power but will instead use secondary substations which will provide sufficient power to the area. This would however require further investigation upon delivery.

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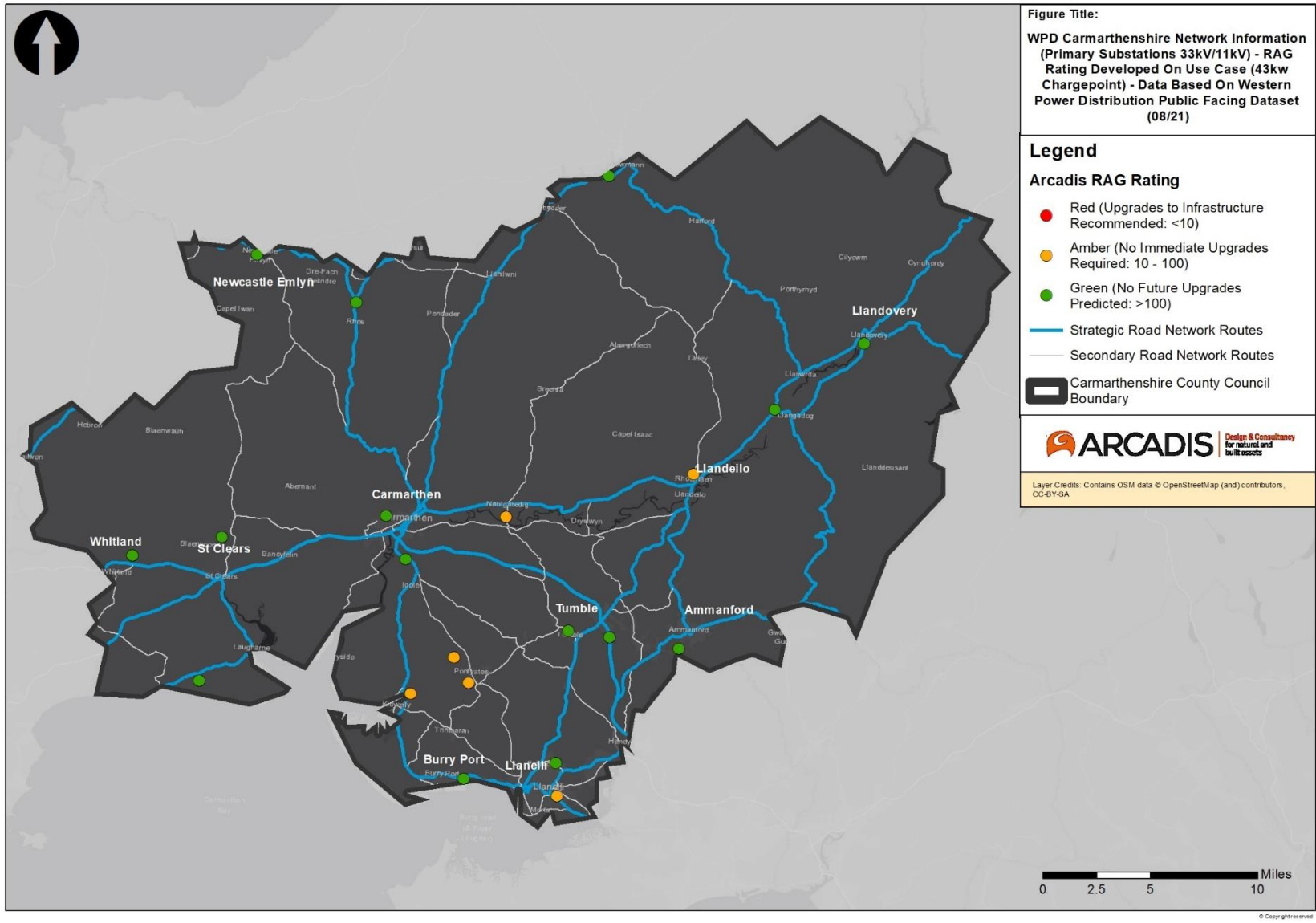


Figure 11 - RAG Assessment for Primary Substations

5. Forecasting

EV Expansion

According to the IEA report, Global EV Outlook 2018⁴⁴, sales of new electric cars worldwide surpassed 1 million units in 2017, a record volume which represents a growth in new electric car sales of 54% compared with 2016. The same report also lists how in the UK the total electric car stock (including hybrids) went from 86,440 in 2016 to 133,670 in 2017, with a UK target of 396,000 to 431,000 electric cars by 2020.

The growth in EVs is set to continue, and The Future Energy Scenarios⁴⁵ document produced by the National Grid in July 2018, predicts that in the UK there could be as many as 11 million EVs by 2030 and 36 million by 2040.

The report Roll-out of Public EV Charging Infrastructure in the EU by Transport and Environment⁴⁶ finds that “Despite the considerable emphasis on the importance placed on public recharging to drive EV acceptance, the data shows that public chargers are only used for about 5% of charging events. Furthermore, as the market matures this share is expected to decline with a preference for more fast charging over slow kerbside sites. The visibility of public recharging may however be important in encouraging existing drivers of conventional cars to switch to electric options although public chargers are rarely used.”

This reiterates evidence from trials and pilots that exposure to EVs and EV infrastructure results in an increase in uptake in EVs and EV infrastructure usage. Examples of this include EV taxis / private hire, EV rental or hire vehicles, and EV public service vehicles.

Leadership from both national and local governments is therefore vital in the strategic deployment of public chargepoints needed to facilitate and encourage the uptake of EVs.

There are a number of potential funding sources for chargepoint installation, some of which are listed in Annex G.

EVCP Forecast Modelling (EV Charging Strategy for Wales, 2021)

To develop an EVCP forecasting model that presents the trends regarding the uptake of EVCPs in Carmarthenshire, the official ‘EV Charging Strategy for Wales’ has been used to represent Carmarthenshire, which is projected to have the second largest uptake of EVCPs in all of Wales, second to that of Cardiff. A breakdown of EVCP uptake on a local authority basis for 2025 and 2030 is presented in

⁴⁴ <https://webstore.iea.org/global-ev-outlook-2018>

⁴⁵ <http://fes.nationalgrid.com/fes-document/>

⁴⁶ <https://www.transportenvironment.org/publications/roll-out-public-ev-charging-infrastructure-eu>

Figure respectively, as presented in the associated strategy. The strategy itself can be reviewed in further detail via the footer link⁴⁷.

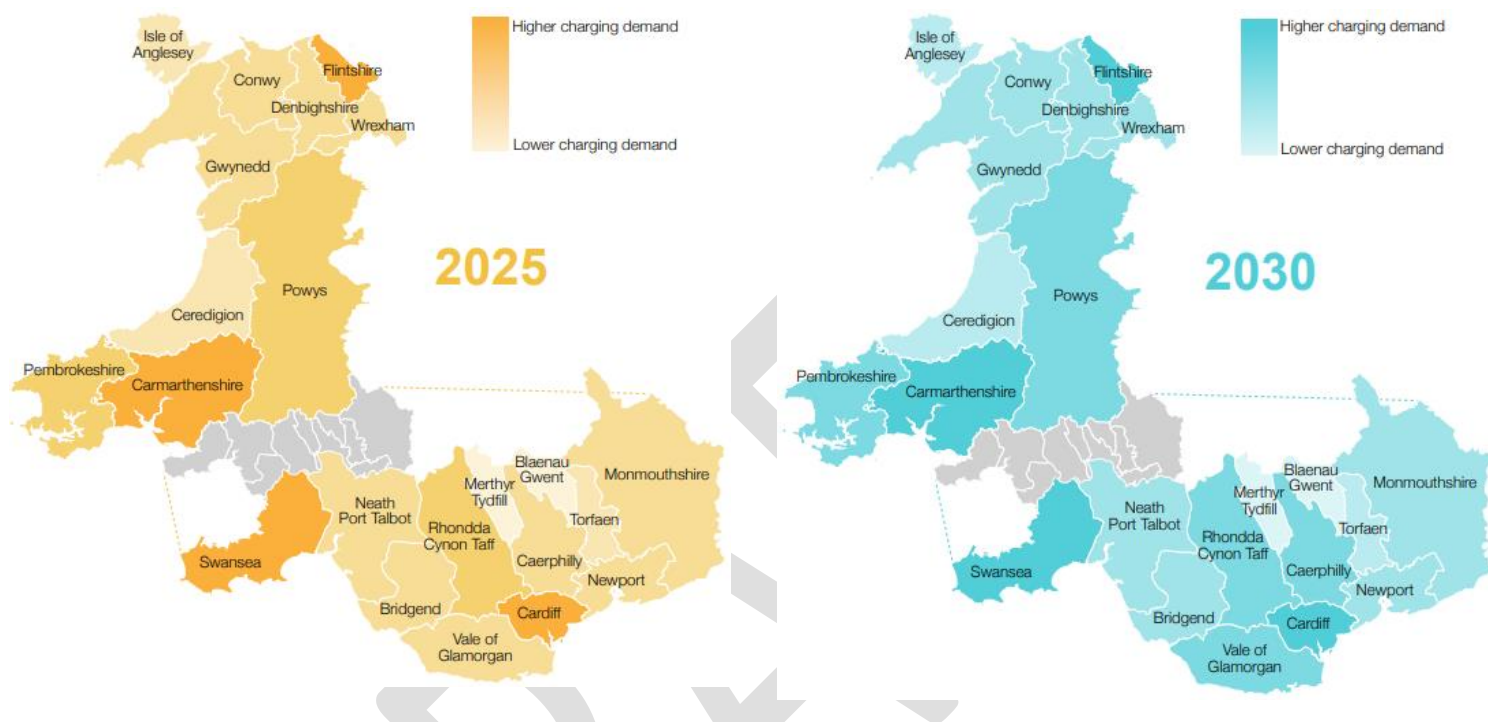


Figure 12 - Charging Demand Forecasts

The strategy itself takes 2 different approaches to modelling the increase of EVCPs. The first being 'Fast charging dominant' and the second being 'Rapid charging dominant'. As charging infrastructure requirements can be heavily dependent on user behaviours and locations of deployment, these two scenarios were developed to provide a projection considerate of one method becoming more favourable than the other, whether that be financially or logistically.

It should be noted that this modelling will be reviewing publicly available EVCP and therefore domestic EVCPs will not be included.

Fast charging dominant - Based on the widespread use of fast charging measures this scenario assumes EV charging will be utilised at locations where several hours of slower charging would be appropriate such on-street hubs, workplaces or Train stations. Fast charging is less demanding on the electrical grid network and is often more cost effective.

The EVCP modelling data has been extrapolated from the Wales EV Strategy as well as current EVCP registration databases to provide a projection from now until 2030 for the uptake of a 'Fast charging dominant' EVCP approach. This data

⁴⁷ <https://gov.wales/sites/default/files/publications/2021-03/electric-vehicle-charging-strategy-wales.pdf>.

modelling will use key milestones of 2021, 2025 and 2030 to provide a linear output for all years in between and is presented in Figure 13 below.

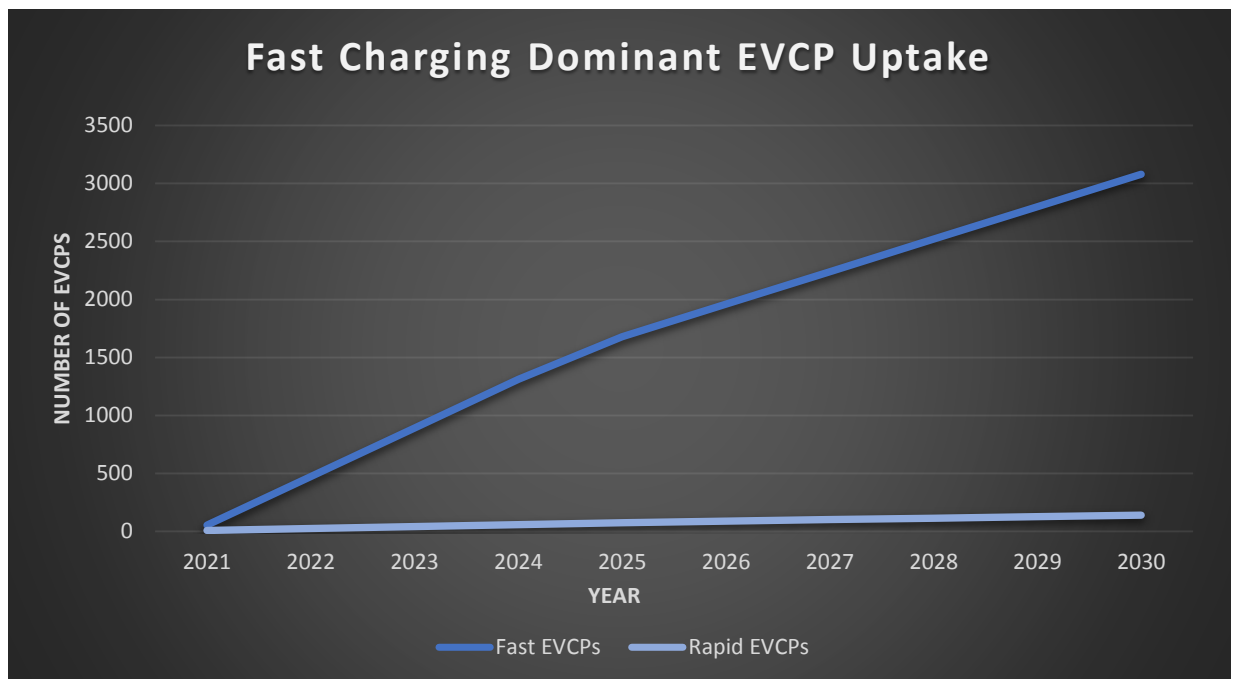


Figure 13 - Fast Charging Dominant EVCP Uptake

Rapid charging dominant – Based on the widespread use of rapid chargers. This scenario assumes that car battery capacities will continue to grow, permitting a much greater electrical range than current EVs. Along with improved battery performance and a reliable grid network this method will allow EV owners to achieve a much more convenient charge time to relieve the stresses of range anxiety and long journey breaks.

Again, the EVCP modelling data has been extrapolated from the Wales EV Strategy for the uptake of a 'Fast charging dominant' EVCP approach. This data modelling will use key milestones of 2021, 2025 and 2030 to provide a linear output for all years in between and is presented in Figure 14.

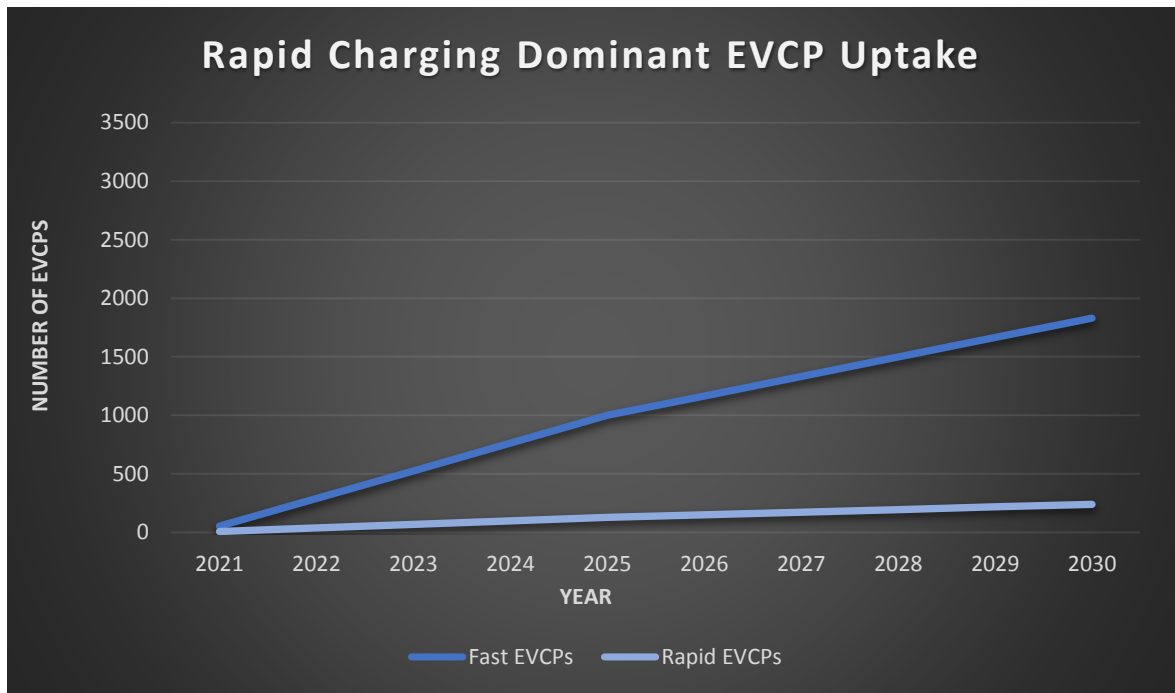


Figure 14 - Rapid Charging Dominant EVCP Uptake

To compliment the modelled EVCP uptake data for both EV charging scenarios, a side-by-side presentation of key milestone table arrays for both Fast charging dominant & Rapid charging dominant in Carmarthenshire has been presented across Table 8 & **Error! Reference source not found.** This helps clearly distinguish between both approached where 2030 targets present significant differences in projections.

It should be noted that the displayed installation targets are not a representation of CCC individual responsibility but are in fact a representation of the collective responsibility set for Carmarthenshire inclusive of private investment by Welsh Government.

Table 8 - Welsh Government Fast Dominant Scenario

Fast charging dominant EVCP uptake (Carmarthenshire Milestones)		
Year	Fast EVCPs	Rapid EVCPs
2021	54	8
2025	1680	75
2030	3080	140
Rapid charging dominant EVCP uptake (Carmarthenshire Milestones)		
Year	Fast EVCPs	Rapid EVCPs
2021	54	8
2025	1000	130
2030	1830	240

Table 9
- Welsh

Government Rapid Dominant Scenario

Future Vehicle Technology

As EV ownership continues to rise and national targets regarding the decarbonisation of transport become more accelerated, the concerns of range anxiety and recharge times become increasingly relevant. Therefore, industry professionals are constantly looking to innovate new concepts that improve the user experience with regards to EVs.

The power drawn from the grid to charge an EV will be AC. However, an EV battery itself can only store power as DC meaning somewhere along the line there must be a power conversion.

The difference between AC and DC charging is that AC charging requires power to be converted within the vehicle itself via an onboard charger, whereas DC charging has a converter built into the charger itself which can feed power directly to the EV battery. A visual example of both AC and DC charging has been provided in the infographic below.

Despite DC chargers being larger and more expensive, they can achieve much higher power levels than that of AC charging, therefore achieving a much faster charge time for users. DC charging can utilise power electronic devices such as voltage boosters to reduce the requirements from the grid whilst achieving high power levels to charge EVs quicker. Such a charging topology can be referred to as Ultra-Rapid or Hyper charging where the EVCP itself can be rated anywhere from 150kW-350kW. Developments such as Hyper charging present an exciting opportunity to mitigate any issues associated with EV charging times.

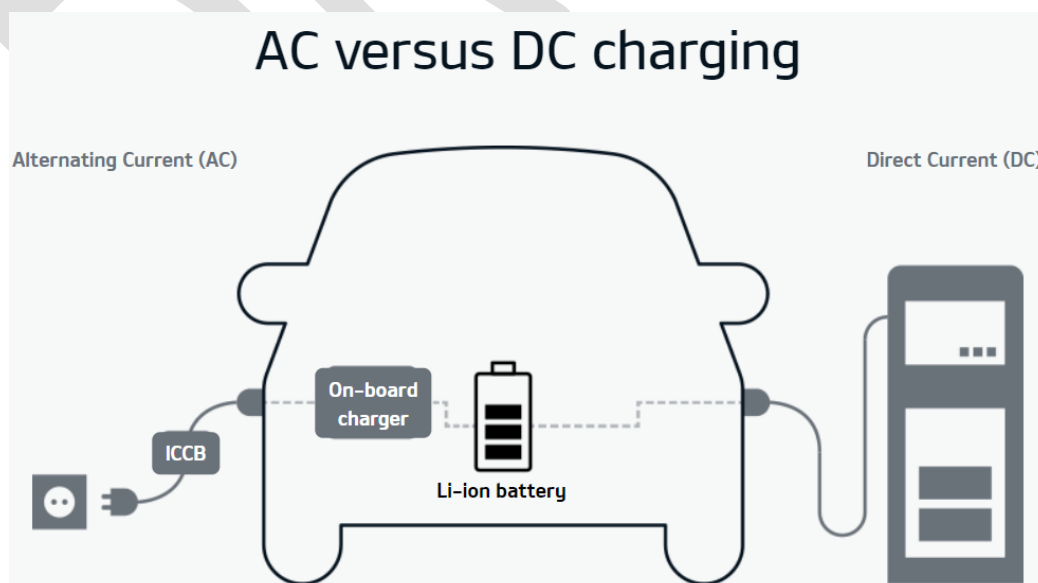


Figure 15 - AC vs DC Charging

Future Grid Demand

Carmarthenshire has 25 substations that are feasible for extra demand that will be encountered from an increase in EVCPs. This has been plotted back in the baseline chapter displaying grid capacity and a use case scenario RAG assessment.

By utilising the Welsh EV strategy forecast data for EVCP uptake for a 'Rapid charging dominant scenario' a model can be simulated to analyse the future demand headroom for each substation in line with their firm capacities. This model has been simulated for years 2021, 2025 and 2030. It should be noted that rapid charging dominant has been selected due to it being a more likely scenario to deliver charge points for Strategic Road Networks (SRN) within Carmarthenshire.

For this modelling if a substation is running over its capacity, it will gain a Red rating, if the substation is running below an available headroom of 1MVA it will gain an Amber rating and if it has over 1MVA it will gain a Green rating.

This model will incorporate domestic (5kW) charging, local fast (22kw) charging and rapid (43kW) charging to represent the most considerate and accurate forecast. It should be noted that this analysis has been evenly split across all substations and to develop a more specific and accurate analysis of each substation, more precise EV forecasting measures will be required for each community in Carmarthenshire opposed to Carmarthenshire as a whole. Furthermore only 25% of domestic EVs will be incorporated into this analysis as not all 100% will be charged at one time but some overlapping may occur due to slow charging rates.

Key Milestone results:

- **2021:** All substations can operate safely within substations firm capacity ratings. With 1 substation operating below 1MVA headroom.
- **2025:** 23 of the substations can operate safely with 2 substations forecast to be operating over substation capacity.
- **2030:** only 14 substations can operate safely with 11 substations forecast to be operating over substation capacity.

Table 10 provides a representation of the number and RAG rating of substations based on future grid demand based on the Welsh EV strategy.

Table 10 - Future Grid Capacity RAG Analysis

Future Grid Capacity RAG Analysis			
Year	Red (operating over substation capacity)	Amber (operating with below 1MVA headroom)	Green (operating with more than 1MVA headroom)
2021	0	1	24
2025	2	2	21
2030	11	5	9

Demand Mitigation Opportunities

When reviewing EVCP options CCC will consider opportunities to use innovative technologies that can sustainably aid the charging process and protect the grid. CCC

will encourage charge point suppliers to use innovative solutions to aid the EV uptake in Carmarthenshire, for example the integration of renewable energy generators such as solar PV could be used to reduce the demand that a charging location/hub would have on the grid.

Battery energy storage systems (BESS) represent another option that can be utilised at charge points where the grid may require some demand alleviation, or at points of high throughput where EV charging demand may be particularly large. This technology will allow power to be stored from onsite renewable sources or the grid network when demand is low allowing a discharge to EVs when grid demand is high, alleviating pressure on the grid network.

In addition, smart EV charging systems that control charger output in line with active infrastructure loadings will be considered, to maximise EV charging penetration levels whilst maintaining network stability.

All the above will be considered on an SRN, Destination and Residential basis when applicable.

Currently CCC is delivering a sustainable EV Charging Hub located at Cross Hands in Carmarthenshire, working with Arcadis and Swarco. This project represents not only the initiative that CCC are taking, but also the incorporation of solar panels on the roof that feed into battery back-up storage on site is one example of the measures that can be used to protect the grid network and sustainably charge EVs. This charging site is presented in



Figure 16.



Figure 16 - Cross Hands EV Charging Hub (in construction)

Vehicle to Grid (V2G)

Another innovative and exciting prospect of EVs would be their potential to aid in grid balancing.

UK distribution systems achieve frequency response by using a primary and secondary response system. This refers to low frequency events around 50Hz. During a period when the system frequency falls below 50 Hz there must be quick action taken to avoid a blackout. During a period where the frequency is over 50Hz, there must be adequate action taken to avoid the possibility of damaging supplied devices.

A principal problem with renewable power sources is their intermittency, and as we continue to move towards Net Zero, the decentralization of power systems such as solar and wind farms will continue to grow and dominate the market, thus making the issue of grid balancing vital.

Therefore, digital control within decentralised power systems is becoming more important. Integrating digital systems with technologies such as BESS provides an opportunity to harness energy and ensure that the grid remains stable during the ever-changing daily supply and demand cycle.

BESS currently requires a high capital investment for installation, due to the high manufacturing and installation costs. EVs present an alternative solution due to their ability store and release electricity during periods of low or high demand, furthermore due to the vast amount of EVs that is expected to be on the market in the future there will be enough collective battery capacity to provide this service without major influence on EV users. Therefore, grid balancing with EVs may prove to be a useful tool in the future.

Generally, the more charge and discharge cycles the EV battery goes through, the more it degrades. However, this is based on high levels of battery discharge, often more than 50%. In the case of vehicle to grid (V2G) operation, each vehicle would be subject to a discharge of a very low percentage as there would be a collective input from multiple vehicles connected to the network. This removing the concerns of battery degradation.

Alternative Fuels and Technology - Hydrogen

Hydrogen vehicles are similar in many ways to EVs and run on a motor powered by electricity. The difference between a hydrogen vehicle and a BEV is that a hydrogen vehicle uses a hydrogen fuel cell instead of a battery.

While EV charging via the electrical grid network represents some inefficiencies with the conversion from AC to DC power, the process of generating hydrogen to be used in fuel cell vehicles represents a much more complex procedure than that of connecting directly to the grid network for a BEV. The process from the generation right the way through to usage of hydrogen is relatively inefficient, and despite its ability to provide a greater range than that of BEVs these inefficiencies drive up the costs of hydrogen charging compared to electrical charging, and even when range is considered, the BEV is still considerably more favourable based on charging cost.

Despite this many manufacturers are experimenting with hydrogen vehicles as they could prove to be a great option for larger transportation vehicles such as planes, trains, and lorries. The Government has recently published a UK Hydrogen Strategy (August 2021)⁴⁸. The strategy (p53) highlights: 'hydrogen is likely to be fundamental to achieving the full decarbonisation of transport, with particular potential in areas of heavy transport 'that batteries cannot reach''. The first multi-modal hydrogen transport hub had £3 million investment committed in 2021 in Tees Valley, which it is stated could provide a blueprint for the creation of hubs in other areas across the UK⁴⁹.

However, EVs continue to see much faster growth and are currently the more widely adopted low emission vehicle of the two. As such, this strategy focuses on EVs, however the national policy position will be kept under review and the inclusion of hydrogen vehicles in more detail will be considered for future versions of Carmarthenshire County Councils EV Strategy.

⁴⁸https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1011283/UK-Hydrogen-Strategy_web.pdf

⁴⁹ P175 Decarbonising transport - A Better, Greener Britain
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf

6. Recommendations

Introduction

Recommendations have been brought forward in this section of this EV Strategy, with the objective to outline options for funding sources, the approach to procurement and operating models.

Policy objectives have been recommended based on the development and findings of this EV Strategy thus far, in the efforts to accommodate and/or accelerate EV uptake in the region and achieves Carmarthenshire's overarching vision.

Applicable Funding Sources

The recent government publications analysed in section two of this strategy⁵⁰ provide an update of funding scheme commitments, grants and incentives available regarding EVs and the associated infrastructure:

Infrastructure

On-street Charging

- The On-Street Residential Chargepoint Scheme provides local authorities access to up to 75% of funding to install EV infrastructure on-street and in public car parks.
 - From April 2021 the scheme has changed to address prohibitively high electrical connection costs by increasing the maximum funding available per chargepoint installation from £7,500 to £13,000. The funding will also help to encourage larger rollouts of charging infrastructure projects by removing the £100,000 maximum project cap.

Off-street Charging

- For properties with dedicated off-street parking, the EV Homecharge Scheme will provide funding towards the cost of a chargepoint and its installation. From April 2022, focus will shift to supporting leaseholders, renters and those living in flats.
- The Government will continue to fund EVHS until at least 2024/25.

Workplace Charging

- Workplace Charging Scheme (WCS) The Workplace Charging Scheme will provide funding towards the cost of the purchase and installation of EV chargepoints at workplaces. Since April 2021, the scheme has been opened up to small and medium enterprises (SMEs), as well as the charity sector, providing a boost as staff return to work. B&Bs will be eligible for the grant to provide visitors with certainty that they will be able to charge when they visit

⁵⁰ 'Decarbonising transport - A Better, Greener Britain' and 'HM Transitioning to zero emission cars and vans: 2035 delivery plan'

- The Government will continue to fund the WCS until at least 2024/25

Vehicle Grants/Tax incentives

- £582 million for plug-in car, van, taxi, and motorcycle grants until 2022-23, reducing Zero Emission Vehicle (ZEV) purchase prices for consumers.
 - Plug-in car grant provides up to £2,500 towards the purchase of a car priced under £35,000.
 - Plug-in van grant provides funding of 35% of the purchase price for eligible vans up to £3,000 for vans less than 2.5 tonnes, and up to £6,000 for vans between 2.5 and 3.5 tonnes.
- Favourable company car tax rates for zero emission cars up to at least March 2025, zero emission cars and electric vans pay no vehicle excise duty, and a nil rate of tax is applied to zero emission vans within the van benefit charge.

Supply Chain

- £1bn to build EV supply chain at pace and scale in the UK. (First £500m delivered through Automotive Transformation Fund over next 4 years (battery cell manufacturing and gigafactories).

Research and Development

- Faraday Battery Challenge (FBC) is a £330 million programme designed to create the innovation ecosystem needed for the UK to become a battery science superpower.
- Driving the Electric Revolution Challenge, delivered by UK Research & Innovation (UKRI), provides £80 million to scale-up and unite UK supply chains to deliver fundamental components of EVs and net zero – power electronics, electric motors, generators and drives (PEMD). Funding is committed to support this initiative until at least 2025.

Procurement and Operating Models

There are a wide range of potential operating models due to the complex roles in procurement, installation, operation and maintenance of EV chargepoints. Due to commercial agreements, contractual terms and available incentives, there is a great number of bespoke operating models in existence, but some typical and common operating models and their advantages and disadvantages are explained below.

When procuring EV charging infrastructure up to £25,000, 3 quotes must be sought from companies. Any charging units with a total life cost of over £25,000 are procured via a tendering process through Sell2Wales. This includes all rapid chargers and fast charger packages covering a number of sites.

Table 11 - Typical Models of EVCP Operation

	LA Operated	Private Agreement	Private Licensed	Private Operated
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Land costs	LA	LA	LA	Private
EVCP Infra	LA	LA	Private	Private
Installation	LA	LA	Private	Private
Maintenance	LA	Private	Private	Private
Operation/	LA	Private	Private	Private
Revenue	LA	Mixed	Mixed	Private

There are currently 2 operating models implemented by Carmarthenshire County Council:

LA Operated

Purchase, installation and operation of the charging units by the local authority. This can be via grant funding or internal CCC funds. Currently in use on the St Peters and Mart Car Park chargers.

Advantages:

- All income generated will come straight back to the council;
- Charging units remain an asset of the council;
- Free to move chargers around to other sites if necessary;
- Flexibility in charging;

Disadvantages:

- After initial period maintenance and monitoring costs must be absorbed by the Council.
- As technology develops the units may require upgrading – full cost for this to be absorbed by the council.

Private Licensed

Agreement with a company to provide and maintain units as a service to the public. Currently in use on the Nant y Ci and Llandovery Rapid Chargers.

Advantages:

- No initial cost or need to find/secure funding;
- No ongoing cost or risk to the Council;
- All maintenance, upgrade and monitoring covered by the external company.

Disadvantages:

- Any profits must be split between third party and the Council;

Other Operating Models

There are a range of alternative operating models not currently utilised by Carmarthenshire County Council which include, but are not limited to:

- Private Agreement - If new charging points were to be installed by local authorities on local authority land, private operators could be used to maintain and / or operate the EVCPs, with a fee paid to the operator, or a shared revenue risk model to offset any future costs to the local authority. Grant funding could be sourced to offset the initial cost, but it is likely there would still be DNO costs and installation costs;
- Private Operated - If the charging points were purchased, installed, and operated by a private operator, there would be no initial capital cost for a local authority in terms of procurement and installation of the infrastructure, or operating costs in terms of maintenance. Grant funding could be sourced to help encourage private operators to install further EVCPs, possibly through a match funding agreement;
- Using development control or planning permission requirements to encourage private operator funded EV chargepoint installation.

Proposed Policies

Following the review of current National, Regional and Local policies on EV's, a series of policy objectives have been developed which will assist us in achieving our overarching Vision:

“To develop and promote a network of electric charging points, that provides for and encourages future growth in EV use, and in doing so future proofs our transport network and contributes to local and global pollution reductions”

The policy options have been considered for implementation in Carmarthenshire to accommodate or accelerate EV uptake in the region. These options have been generated and considered based on achievability, benefit, and risk.

EV1 Facilitate the Provision and Delivery of Public EV Charge Points

Carmarthenshire County Council will facilitate the provision of a charging network that provides mixed speed public charging infrastructure which is available, affordable, consistent, convenient and user friendly.

Carmarthenshire Council will investigate strategic locations throughout the county for fast and rapid charge points and identify zones where charge point installation should be particularly encouraged. The Council will consider the speed of charging for each location considered, providing a range of Fast and Rapid chargers as appropriate.

The EV chargers should primarily be placed in locations that are accessible to the majority to ensure good uptake. At the same time, the council will work with rural communities to ensure that less-populated rural areas are not excluded from EV use by lack of infrastructure and will seek to identify funding sources for charge points in more remote areas where the private sector may be less likely to install. The Council

will monitor usage statistics of charge points and use this in informing future decisions and strategy.

Funding contributions will be required from a range of contributors, including private sector investment for new development, property owners for planning applications, UK Government and Welsh Government and Carmarthenshire County Council. The quantum from each is yet to be understood, and will be dependant on locations, delivery options (including chargepoint type) and demand timescales.

Different areas of the County will have different needs with regards to EV charge points, but consideration needs to be given to public charge points in the following environments:

1. Locations near the strategic road network, with at least a pair of rapid and a fast charger at least every 20 miles.
2. Destination chargers for tourist, leisure, and shopping venues.
3. Shared carparks and other locations to encourage people without off-road parking to use EVs.
4. Employment centres.
5. Air Quality Management Areas.

Carmarthenshire County Council will also investigate the possibility of lamppost chargers and other solutions such as rising chargers within the footway to encourage use of EVs amongst residents without off-street parking.

EV2 Maintain Parking Management Policies Supportive of EVs

Carmarthenshire County Council will, where appropriate, provide electric charging facilities and spaces in parking bays at council owned car parks. Installations have already been completed at several council owned car parks as of September 2021 fast charge points are installed at 28 locations across the county. In addition, there are rapid charge points at the Park & Ride car park at Nant-y-Ci and Castle Car Park in Llandovery. The Cross Hands charging hub is due to be opened imminently and will provide a further 4 rapid chargers (50kW) and 1 super rapid (150kW) on the strategic road network.

The council has had positive feedback on the installation of the current charge points, with one EV owner saying that they would not have visited Carmarthen had there not been EV charging facilities available.

EV3 Encourage EV Charge Points at Key Employment Centres, and Public Transport Interchanges.

Carmarthenshire County Council will seek to put out a tender to EV charge point providers for facilities at their main staff car parks. Some of these car parks act as council employee parking during the week and public parking at weekends, giving an additional benefit. They will also investigate available grant funding to install EV charge points at destinations used for leisure purposes.

Carmarthenshire County Council will also seek to encourage and facilitate EV parking at other employment centres, by providing information to employers about EVs, and pass any enquires about EVs onto the relevant organisations.

EV4 Encourage the Use of EVs in the Fleet

Carmarthenshire County Council will investigate opportunities to upgrade its fleet to EVs and other similar technologies such as hydrogen. The Council are developing a fleet strategy in 2022. A successful trial has already been undertaken involving the introduction of EVs in the council's fleet, with six vehicles based at Parc Myrddin Parc Dewi Sant and Spilman Street– two Mitsubishi iMIEVs and four Peugeot IONs. This initiative took place when Public Body use of EV's was in its infancy and saw Carmarthenshire become the first Local Authority in Wales to do so.

Carmarthenshire County Council are currently reviewing their fleet strategy in terms of introducing EVs into the fleet, changing the mix of technologies and will pilot the use of further EVs in the fleet, and will also seek to install EV chargepoints in their depots. The Council will also investigate training for staff so that more work on the EVs in the fleet can be done in house.

EV5 Trial New Technologies and Encourage Innovation

When looking at EV options for their fleet Carmarthenshire County Council will consider opportunities to use innovative technologies. The Council will also encourage charge point suppliers to use innovative solutions, for example integration with renewable energy generators or batteries at charge points where the grid is lacking capacity

EV6 Investigate ways to Encourage Charge Point Provision through the Planning Process

Carmarthenshire County Council will seek to support the inclusion of EV charging points within developments they permit. Planning Policy Wales 10 states that the planning system should encourage and support the provision of ULEV charging points as part of new development and suggests that planning authorities should seek a minimum of 10% of car parking spaces to have ULEV charging points. Carmarthenshire County Council will review ways in which to proactively encourage and facilitate the provision of EV charge point as part of the emerging Local Development Plan and other planning policy, and the draft Highways Design Guide for developers.

EV7 Investigate incentives for Private Developers and Landowners to Provide Charge Points on Existing Developments and explore the potential for the use of S106 contributions.

Carmarthenshire County Council will research possible incentives to encourage the installation of publicly available charge points on private land. They will investigate the precedent from other Local Authorities and discuss with relevant departments the applicability to Carmarthen. This is likely to be via the South West Wales Regional EV Network meetings and can also be used to review available grant and other

funding opportunities that can aid in identifying and providing information to landowners about funding options.

EV8 Encourage Taxis and Public Transport Providers to Upgrade to EVs

Taxi firms are well placed to benefit from the use of EVs. Taxis based at urban centres are likely to be undertaking mostly shorter journeys and would be more suitable to switch to vehicles that run solely on electricity, with hybrids being better suited to firms or vehicles undertaking longer trips to rural areas.

Carmarthenshire County Councils licensing team have already exempted EVs from the 1200cc minimum size vehicle for private hire, and the Council will investigate other mechanisms to encourage EV use amongst Carmarthenshire's taxi companies. The Council will send out appropriate information about EVs to all taxi companies on their register and seek to facilitate the installation of EV charge points at taxi ranks. This information could include estimates of cost savings on fuel and maintenance, and where possible cite examples from other taxi firms that have converted to EVs, see case study below.

Case Study: 'AJ's Taxis' EV Fleet Transition, Llanelli

The achievability and benefits for taxi firms to transition to full EVs within Carmarthenshire has been long standing. This is evidenced by an exemplar case study located within Llanelli, whereby a taxi firm had been declared the first taxi firm in Wales to go fully electric and successfully operates as being eco-friendly. This highlights the case for change to EV is achievable and can incur numerous commercial and environmental benefits.

EV9 Provide Publicly Available Information About EV Charging Options

Carmarthenshire County Council will provide easily accessible information with regards the charging infrastructure available within the county so that both locals and visitors with EVs are confident in finding a place to charge. There is a map showing charge points on the Council's website⁵¹ and this map will be developed further with further information such as charger type and pricing structure labelled.

Signage will be placed near charge points to assist vehicle owners in finding them. Public facing communication will be provided where suitable to direct residents and visitors to the Council's website where further information can be accessed for those looking to upgrade to EVs.

EV10 Inform Businesses and Residents about opportunities to upgrade to EVs and develop a comms plan to support the EV Infrastructure Strategy.

Carmarthenshire County Council will investigate other ways to encourage EV use, for example organising clear air day events and EV supplier days. The council will

⁵¹ <https://www.carmarthenshire.gov.wales/home/council-services/travel-roads-parking/electric-car-charging-points/#.W03wVE2ouUk>

seek to utilise existing community links and knowledge within the third sector, such as Carmarthenshire Energy Ltd and the Community Transport Association.

EV11 Encourage Electric Car Clubs

Carmarthenshire County Councils Corporate Strategy⁵² outlines how 60% of the County's people live in rural areas, and that many residents, particularly elderly ones, do not have access to a car or van. The strategy states "community-based services are important to enable people to continue to live within their communities; it can mean the difference between a person staying independent at home or entering residential care."

Additionally, the document 'A Strategic Regeneration Plan for Carmarthenshire 2015⁵³ highlights the limited penetration and frequency of service of public transport provision in parts of rural Carmarthenshire seeks to "invest further in the application of new technologies to ensure that our local businesses are able to compete in wider market" as well as highlighting the importance of "access to rural transport".

Electric car clubs could be used to help to meet these goals when integrated with the public transport sector, to strengthen rural communities and allow elderly and vulnerable residents to remain independent.

Carmarthenshire County Council will support communities who wish to consider setting up electric car clubs and will refer any enquiries they get onto relevant bodies. The council will also lend support to organisations promoting electric car clubs. They will also include details of existing EV car clubs and similar schemes such as the Eco Travel Network⁵⁴ in the information they provide to business and residents in the area. This type of initiative could encourage more low carbon tourism to the area, for example visitors arriving by public transport and having access to EVs whilst staying.

EV12 Work in Partnership with Other Organisations

Many of the publicly available chargepoints in the UK are not owned by the landowner of the site they are located on, but are owned by another organisation, typically a private sector company, who pay the supply and installation costs of the charge points and either take a percentage of the income or pay a lease to the landowner. This allows landowners who lack the capital or who do not want to take the financial investment of a charge point installation.

Carmarthenshire County Council will work with these organisations in identifying sites suitable for charge points on council owned land and tendering for installation. The Council will also seek to provide information on charge points and reputable installers to local business. The Council will work with community groups and other

⁵² <https://www.carmarthenshire.gov.wales/media/1214849/corporate-strategy-18-23.pdf>

⁵³ <https://www.carmarthenshire.gov.wales/media/1212060/strategic-regeneration-plan-for-carmarthenshire-2015-2030-pdf.pdf>

⁵⁴ <http://www.ecotravelnetwork.co.uk/>

not for profit organisations in supporting the development of community owned charging hubs in the county.

The cost of installing EV charge points can vary considerably depending on the capacity of the electrical distribution network in the area. When considering charge point locations Carmarthenshire County Council will liaise with Western Power Distribution (DNO) to ensure costs and grid availability are taken into consideration.

Carmarthenshire County Council will also seek to work with neighbouring local authorities on promoting EV use and the strategic deployment of charge points, to develop a coherent consistent approach across the Swansea Bay City Region and in doing so realise potential economies of scale in terms of procurement and contract arrangements.

Setting up a “Carmarthenshire EV Centre of Excellence” will be considered with the inclusion of academics, local authority representatives, private EVCP operators, vehicle manufacturers and EV strategy consultants. This would enable open discussion, knowledge share, lessons learnt and exchange of best practice between key stakeholders, with the objective to improve the rollout of EVCP infrastructure and its operational use. This proposed policy will be further explored and investigated.

EV13 Continually Review and Refresh This Strategy.

The market for low emission vehicles is changing rapidly, and many of the policies outlined here may need revision as the technologies develop. As such, Carmarthenshire County Council will need to keep this strategy under regular review with a periodic strategy refresh undertaken depending on any major changes in policy or availability of funding.

The table below summarises the policies and actions:

Table 12 - Summary of Proposed Policies

Policy	Action
EV1	Facilitate the Provision and Delivery of Public EV Charge Points
EV2	Maintain Parking Management Policies Supportive of EVs
EV3	Encourage EV Charge Points at Key Employment Centres, and transport interchanges.
EV4	Encourage the Use of EVs in the Fleet
EV5	Trial New Technologies and Encourage Innovation
EV6	Investigate ways to Encourage Charge Point Provision through the Planning Process
EV7	EV7 - Investigate incentives for Private Developers and Landowners to Provide Charge Points on Existing Developments and explore the potential for the use of S106 contributions.
EV8	Encourage Taxis and Public Transport Providers to Upgrade to EVs
EV9	Provide Publicly Available Information About EV Charging Options

EV10	EV10 - Inform Businesses and Residents about opportunities to upgrade to EVs and develop a comms plan to support the EV Infrastructure Strategy.
EV11	Encourage Electric Car Clubs EV
EV12	Work in Partnership with Other Organisations
EV13	Continually Review and Refresh This Strategy

DRAFT

7. Measuring Success

Carmarthenshire County Council are committed to their vision of developing and promoting a network of electric charging points that provides for and encourages future growth in EV use, and in doing so future proofs the transport network and contributes to local and global pollution reductions. Recognising the importance of self-accountability and delivering to timescales stated, the following milestone objective programme has been created based on 5 and 10-year time-periods. Typically, a 15-year time-period would also be included, but there is now unlikely to be targets or ambitions after a 10-year period due to Welsh and UK Government bringing targets dates forward to 2030.

DRAFT

5-year Milestone Objectives

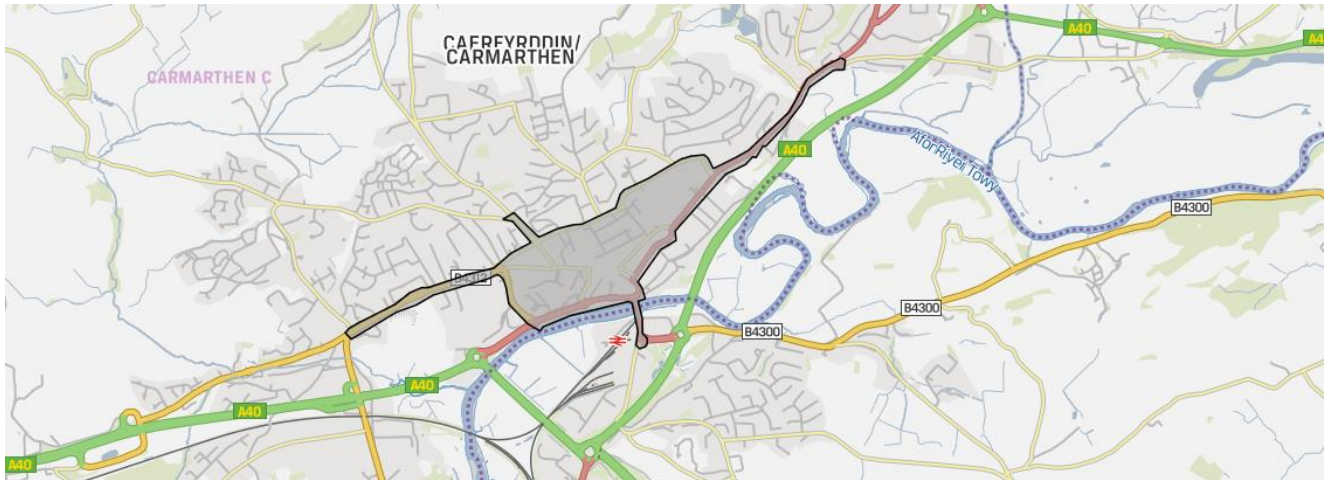
Milestone (KPI)	Measure	Timescale	Driver	Source/Reference
Facilitate EVCP provision in line with WG forecasts (not just CCC installations)	Fast EVCPs – between 1000 and 1680 available Rapid EVCPs – between 75 and 130 available	By 2025	EV Charging Strategy for Wales – Requirement for Carmarthenshire	EV Charging Strategy for Wales
Review and refresh this strategy every 3 years	Document and associated documents updated within 3 years	Before the end of 2024	Requirement to keep strategy and policy relevant and appropriate.	Carmarthenshire County Council EV Charging Infrastructure Strategy
Investigate and encourage development of car club within Carmarthenshire with a significant EV fleet	Car club with EV vehicles in operation		Facilitate EV uptake through public procurement	Carmarthenshire County Council EV Charging Infrastructure Strategy

10-year Milestone Objectives

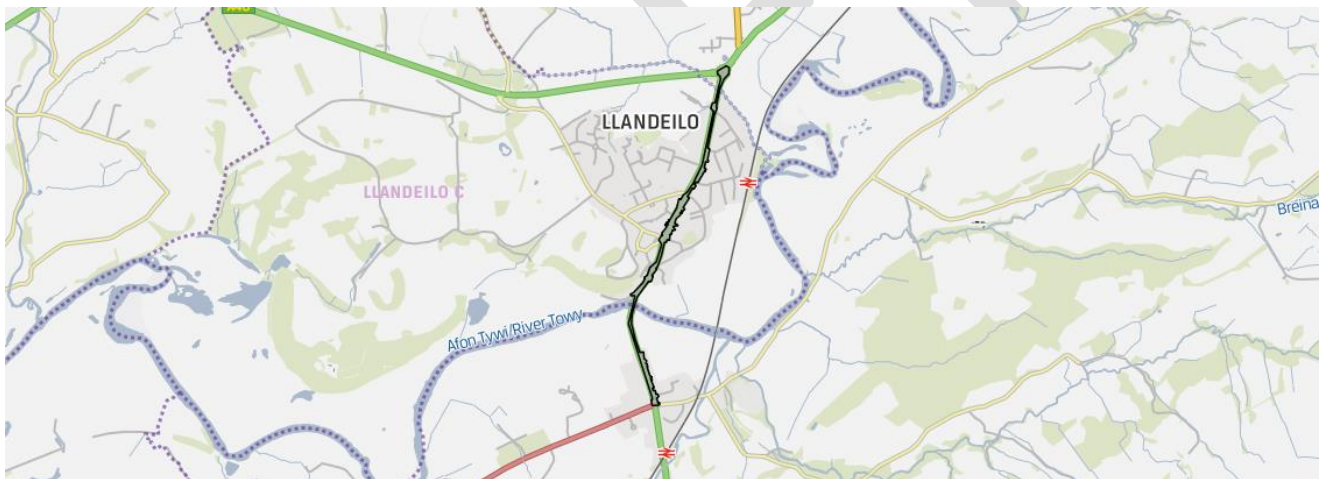
Milestone (KPI)	Measure	Timescale	Driver	Source/Reference
Facilitate EVCP provision in line with WG forecasts (not just CCC installations)	Fast EVCPs – between 1830 and 3080 available Rapid EVCPs – between 140 and 240 available	By 2030	Welsh Government EVCP requirements for Carmarthenshire	EV Charging Strategy for Wales
Carmarthenshire County Council to be net zero carbon local authority.	Greenhouse gas emissions net zero across fleet.	2030	Welsh Public Sector net zero greenhouse gas emissions by 2030	Net zero carbon status by 2030: A route map for decarbonisation across the Welsh public sector
Established car club within Carmarthenshire with whole EV fleet	Car club with all EV vehicles in operation		Facilitate EV uptake through public procurement	Carmarthenshire County Council EV Charging Infrastructure Strategy

Annex A – Air Quality Management Areas

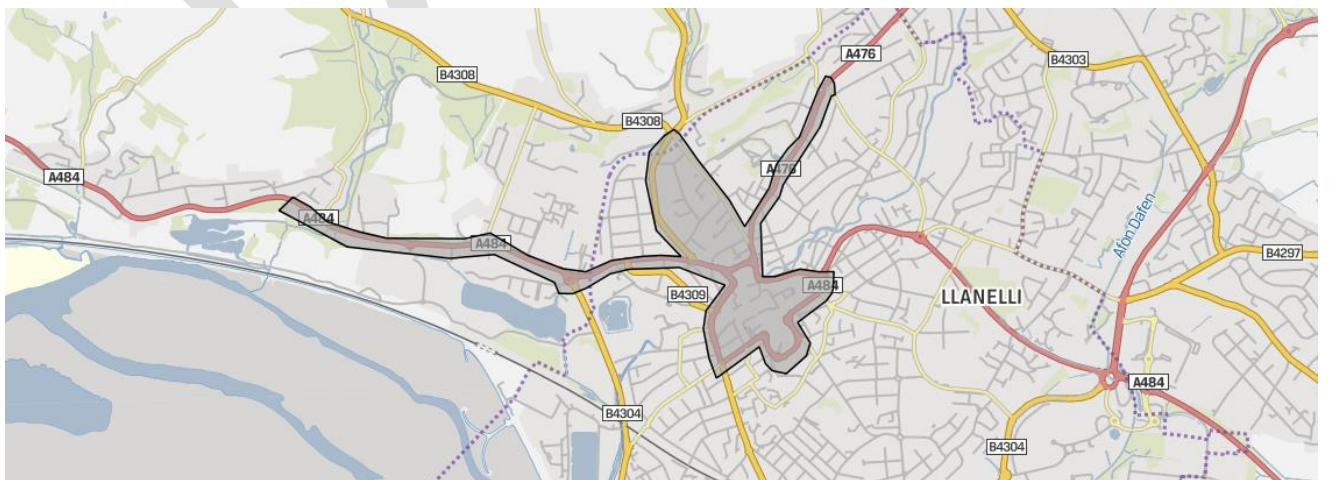
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Llanelli



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CABINET 06/12/2021

MODERNISING EDUCATION PROGRAMME

PROPOSAL TO CHANGE THE AGE RANGE OF YSGOL SWISS VALLEY FROM 4-11 TO 3-11

Recommendations / key decisions required:

It is recommended that the Cabinet approves:

- The observations received and the Local Authority's responses following the Consultation Period (Consultation Report attached);
- The modification to the implementation date of the proposal as noted in the report;
- The publication of a Statutory Notice to implement the proposal.

Reasons:

- To comply with statutory procedures and guidance in relation to school re-organisation.

Relevant scrutiny committee to be consulted: No

Cabinet Decision Required: Yes - 06/12/2021

Council Decision Required: No

Cabinet Member Portfolio Holder: Cllr. Glynog Davies (Education & Children)

<p>Directorate: Education & Children</p> <p>Name of Head of Service: Simon Davies</p> <p>Report Author: Sara Griffiths</p>	<p>Designations:</p> <p>Head of Access to Education</p> <p>Modernisation Team Manager</p>	<p>Tel: Email addresses:</p> <p>01267 246471 SiDavies@carmarthenshire.gov.uk</p> <p>01267 246618 SMGriffiths@carmarthenshire.gov.uk</p>
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**EXECUTIVE SUMMARY
CABINET
06/12/2021**

MODERNISING EDUCATION PROGRAMME

**PROPOSAL TO CHANGE THE AGE RANGE OF
YSGOL SWISS VALLEY FROM 4-11 TO 3-11**

Background

Ysgol Swiss Valley has been undertaking a pilot scheme to become a 3-11 school since 2013 which was initiated as part of a Welsh Government scheme to give parents flexibility and choice regarding nursery provision. However, as the school is currently advertised officially as a 4-11 school, parents are unaware or confused in regard to what nursery provision the school offers.

The proposal aims to provide equal provision within the Llanelli area, aligning Ysgol Swiss Valley with neighbouring schools that are already 3-11 schools. The governing body and head teacher are positive with the outcome of the pilot scheme and now wish to proceed with officially making the school a 3-11 school through statutory process.

The Proposal

The proposal is to change the age range of Swiss Valley Primary School from 4-11 to 3-11 from 1 September 2021.

Statutory Process

In accordance with the Executive Board's (now known as the Cabinet) instructions on the 21 December 2020, a formal consultation exercise was undertaken from 11 January 2021 and was due to end on the 21 February 2021. However, a decision was made by the Executive Board to extend the Consultation Period until 16 July 2021. The results of the consultation exercise are contained in the attached Consultation Report.

Should the Cabinet grant permission to proceed to Statutory Notice, the intention is to publish in due course.

If approved, following the end of the Statutory Notice period, an objection report which summarises any objections received by stakeholders will be presented to the Cabinet and ultimately to the County Council for determination.

Modifications

As a result of the extension to the Consultation Period, the implementation date for the proposal noted above require modification to ensure appropriate time to implement the proposal.

Should the Cabinet decide to proceed with this proposal it is recommended that the Cabinet accepts the modified dates as noted below:

The proposal is to change the age range of Swiss Valley Primary School from 4-11 to 3-11 from 1 September 2022.

Recommendation

It is recommended that the Cabinet approves:

- The observations received and the Local Authority’s responses following the Consultation Period (Consultation Report attached);
- The modification to the implementation date of the proposal as noted in the report;
- The publication of a Statutory Notice to implement the proposal.

DETAILED REPORT ATTACHED?	YES: Consultation Report
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IMPLICATIONS

I confirm that other than those implications which have been agreed with the appropriate Directors / Heads of Service and are referred to in detail below, there are no other implications associated with this report:

Signed: *S. Lewis* Head of Access to Education

Policy, Crime & Disorder and Equalities	Legal	Finance	ICT	Risk Management Issues	Staffing Implications	Physical Assets
YES	YES	YES	NONE	YES	YES	NONE

1. Policy, Crime & Disorder and Equalities
 Developments are consistent with the Authority’s Corporate Strategy and the Modernising Education Strategic Outline Programme.


2. Legal
 Appropriate consultation was initiated in accordance with the relevant statutory procedures.

3. Finance
 Revenue implications will be catered for within the Local Management of Schools Fair Funding Scheme.

4. ICT
 None.

5. Risk Management Issues
The proposal may impact on the demand for school places at the school and surrounding catchment area schools. The situation will be monitored as part of the school admission process and ongoing data forecasting and analysis through the Authority's Modernising Education Programme.
6. Staffing Implications
Staffing implications will be addressed in accordance with the County Council's Policy and Procedures.
7. Physical Assets
None.

CONSULTATIONS

I confirm that the appropriate consultations have taken in place and the outcomes are as detailed below	
Signed: 	Head of Access to Education
1. Scrutiny Committee – Consulted during the formal Consultation Period. 2. Local Member(s) – The local members are aware of the proposal and were consulted during the formal Consultation Period. 3. Community / Town Council – Consulted during the formal Consultation Period. 4. Relevant Partners – Consulted during the formal Consultation Period. 5. Staff Side Representatives and other Organisations – Consulted during the formal Consultation Period.	
CABINET PORTFOLIO HOLDER(S) AWARE/CONSULTED YES	N/A
Section 100D Local Government Act, 1972 – Access to Information	
List of Background Papers used in the preparation of this report:	
Title of Document	File Ref No./Locations that the papers are available for public inspection
MEP Biennial Review	www.carmarthenshire.gov.uk Executive Board 20 th June 2016
21 st Century Schools Website	www.21stcenturyschools.org
Consultation Document	Swiss Valley (gov.wales)
Stage 1 (Permission to Consult) – ECS Scrutiny Committee Report	Agenda for Education & Children Scrutiny Committee on Monday, 23rd November, 2020, 10.00 am (gov.wales)
Stage 1 (Permission to Consult) Exec Board	Agenda for Cabinet on Monday, 21st December, 2020, 10.00 am - Carmarthenshire County Council (moderngov.co.uk)

Proposal to Change the Age Range of Ysgol Swiss Valley from 4-11 to 3-11

Consultation Report



carmarthenshire.gov.uk

School Modernisation Section

Sara Griffiths, Modernisation Team Manager

If you require this information in large print, Braille or on audiotape please contact the Department for Education & Children

Email: DECMEP@carmarthenshire.gov.uk

Telephone: 01267 246618

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Executive Summary

The Consultation Period

On the 11th January 2021 Carmarthenshire County Council published a proposal to:

- Change the age range of Ysgol Swiss Valley from 4-11 to 3-11.

The consultation period commenced on 11th January 2021 in line with the publication of the proposal and closed on 16th July 2021 with a total of 36 responses received (excluding the responses received from Estyn and the pupils' consultation events) in response to the formal consultation.

Responses Received		
Online Survey	E-mail	Total
34	2	36

It must be noted that of the 36 observations received, all were received prior to the end of the consultation period.

Consultation Events

Due to the ongoing implications of the Coronavirus pandemic, we were advised to postpone all events where there was interaction between staff, parents and the wider community and as a result, virtual drop-in sessions were held via Microsoft Teams.

A virtual formal drop-in session was held on **4 February 2021 at 10:30am**. The formal consultation drop-in session was attended by 1 stakeholder.

Responses Received

The responses received have been categorised into the following themes:

Supportive

- Theme 1 - No reason
- Theme 2 - Improved provision for Early Years
- Theme 3 - Support for the Proposal
- Theme 4 - Fairness of Early Years provision
- Theme 5 - Funding
- Theme 6 - Facilities required

Concerns

- Theme 1 - Equality
- Theme 2 - Ensure appropriate funding

Overall Summary

Supportive	92%	Not supportive	8%
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Workshops

Following the closure of the consultation period on the 16 July 2021, a workshop was held to analyse the observations received.

Next Steps

The Consultation Report will be presented to the Cabinet (previously known as the Executive Board) who may decide to publish the proposal as consulted upon with appropriate modifications, to abandon the proposals and retain the status quo or to significantly recast the proposal and reconsult.

Should the Cabinet decide to proceed to publish a Statutory Notice, this will be published in due course.

Summary of Observations received and Local Authority Responses

Point Number	Point Raised	Local Authority Response	Number of responses raising this point	% of responses raising this point
Supportive Comments Raised				
1.	No reason Some respondents did not provide a reason for their support.		22	61%
2.	Improved provision for Early Years Respondents recognised the benefit of access to Early Years provision from the age of 3 at the school.	The proposal aims to provide equal provision within the Llanelli area, aligning Ysgol Swiss Valley with neighbouring schools that are already 3-11 schools. The school has been running a pilot scheme for a number of years. The outcomes of the pilot scheme have been positive and the Local Authority now wish to proceed with a proposal to change the age range of the school to 3-11 through formal consultation.	6	17%
3.	Support for the Proposal Respondents noted that they fully supported the proposal to change the age range of Ysgol Swiss Valley from 4-11 to 3-11 aligning the school with neighbouring schools.	The support was noted.	2	6%

4.	<p>Fairness of Early Years Provision Respondents noted the need to have consistency in access to early years provision across the County.</p>	<p>The proposal aims to provide equal provision within the Llanelli area, aligning Ysgol Swiss Valley with neighbouring schools that are already 3-11 schools.</p> <p>There is a combination of 3 -11 and 4 – 11 primary schools in the county and a review is currently being undertaken on nursery provision, with a report expected to be submitted to elected members in the next 6 months for consideration.</p> <p>If all schools in the county were 3 -11 then there would be a risk of non-maintained providers becoming unsustainable. It is important that the authority considers how their policies would impact private providers.</p>	1	3%
5.	<p>Funding Respondents noted that appropriate funding resources will need to be provided.</p>	<p>The school will be funded in accordance with the Fair Funding Policy based on pupil numbers.</p>	1	3%
6.	<p>Facilities required Respondents noted that although they fully supported the proposal that changes would need to be made at the school for the proposed change in age range to work effectively e.g. larger staff car park and replacing current demountable with purpose-</p>	<p>The school has been running a successful pilot scheme for a number of years using the facilities already available at the school. There are currently no plans for investment at the school, however the Department are currently undertaking a review of their Modernising Education Programme which includes all of the county's schools.</p>	1	3%

	built classroom for Nursery/Reception.			
Concerns Raised				
1.	<p>Equality</p> <p>Respondents thought that equal provision should be provided across the county and should have been implemented at the school sooner.</p>	<p>There is a combination of 3 -11 and 4 – 11 primary schools in the county and a review is currently being undertaken on nursery provision, with a report expected to be submitted to elected members in the next 6 months for consideration.</p> <p>If all schools in the county were 3 -11 then there would be a risk of non-maintained providers becoming unsustainable. It is important that the authority considers how their policies would impact private providers.</p> <p>The school has been running a pilot scheme for a number of years. The outcomes of the pilot scheme have been positive and the Local Authority now wish to proceed with a proposal to change the age range of the school to 3-11 through formal consultation.</p>	2	6%
2.	<p>Funding</p> <p>Respondents noted that appropriate funding resources will need to be provided.</p>	<p>The school will be funded in accordance with the Fair Funding Policy based on pupil numbers.</p>	1	3%

Estyn's Observations regarding the Proposal

Estyn's response to the proposal by Carmarthenshire County Council to formally change the age range from 4 to 11 to 3 to 11 at Ysgol Swiss Valley to incorporate nursery provision into the school from the 1st September 2021.

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

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

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

Introduction

The proposal is by Carmarthenshire County Council.

The proposal is that the age range at Ysgol Swiss Valley is change from 4 to 11 to 3 to 11 to incorporate nursery provision into the school aligning the school with most other schools in the area from the 1st September 2021. Carmarthenshire County Council say they are committed to providing the best possible start in life and meeting the aspirations of Welsh Government.

Summary/ Conclusion

The proposal has been developed in line with the council's vision to provide the best possible start in life for young people and to improve and clarify its educational provision.

It is Estyn's opinion that the proposal is likely to at least maintain the current standard of education provision in the area.

Description and benefits

The proposer has given a clear rationale for the proposal. The proposer clearly states that it believes that the change in age range will improve the capacity for children in the local community and become less confusing for parents. It will also align the school with most other schools in the area. The school has undertaken a pilot scheme since 2013 as a 3 to 11 year age range, the outcomes of which have been positive. However,

the school is still advertised as a 4 to 11 year age range which is confusing for parents making it unclear what nursery provision is available.

The proposer clearly defines the expected advantages of the proposal to increase the age range. These appear to be reasonable and well thought out. They include:

- seamless transition from nursery to primary school
- clarification to parents as to what the school offers
- opportunity for more employment within the school
- reducing the attainment gap for pupils from disadvantaged backgrounds

The proposer has considered the disadvantages of the proposal. They include:

- reduction in demand for places at private nurseries
- unemployment due to the lack of demand for private nurseries

The proposer has detailed the risks involved, such as failure to obtain support for the proposal, listed counter measures and considered alternate options. The proposer has provided information about the nursery school pupil numbers in the area since 2016 and pupil capacity information. The proposal does not contain any information about how pupils with special educational needs may be affected. The proposer has considered suitably how the proposal will improve the provision of Welsh medium education for 3 year olds.

The proposer has considered the financial implications of the proposal and states that there will not be any change to the funding. The proposal includes suitable arrangements for consultation and how objections can be registered. The proposer has undertaken a detailed equalities impact assessment.

Educational aspects of the proposal

The proposer has considered suitably the impact of the proposal on the quality of the outcomes, provision and leadership and management. It makes reference to the most recent Estyn inspection for the school.

Local Authority Response to Estyn's Observations

As can be seen from Estyn's observations they are of the opinion that the proposal is at least likely to maintain the current standard of education. Their observations include supporting statements as noted below.

Statements of support for this proposal by Estyn

The proposer clearly defines the expected advantages of the proposal to increase the age range. These appear to be reasonable and well thought out.

The proposer has considered suitably how the proposal will improve the provision of Welsh medium education for 3 year olds.

The proposer has undertaken a detailed equalities impact assessment.

Issues raised by Estyn and LA responses

- 1. The proposal does not contain any information about how pupils with special educational needs may be affected.*

LA Response

It is not intended that the proposal will adversely affect any pupils with special educational needs.

Carmarthenshire County Council's policy is that all its schools should be inclusive, with children with additional learning needs being educated in a mainstream setting alongside their peers wherever possible. Schools deliver a person-centered approach to children's learning supported by personalised learning packages with individually targeted interventions, strategies and opportunities and the support required for delivery.

Establishing a Nursery class in Swiss Valley is seen as a great benefit to children of the area with additional needs. Baseline assessments identify those pupils who may need additional support and earlier intervention clearly result in better outcomes later in a child's life. Once the children commence in the pilot nursery, they are provided all the support they require as they are in the remainder of the school. They are therefore able to access multi-agency support at an earlier stage in their development, for example, early Speech and Language support, Educational Psychologist advice, Team around the Family support, visually impaired advice, behaviour support intervention, etc.

Consultation with the Pupils

Children and Young People Consultation Document

A Children and Young People's version of the Consultation Document was provided to the school to distribute to all pupils.

Pupil Consultation Event

School: Ysgol Swiss Valley

Date: 05/02/21

Consultation undertaken by: Educational Support Adviser (ESA)

Interviewed: School Representatives (conducted on-line)

Observations noted during the Pupil Consultation Event:

1. What do you think of the school to keeping its classes for 3 year olds?

Really good idea – start at a younger age. Make the school bigger and they can meet more people. My class has a small amount of girls and if we'd had a nursery we'd have more girls. Get them learning at a younger age. If parents need to go to work they can send them there and they can learn. Children get educated in a different way than if they went to creche – routines, literacy & numeracy. Socialise and make friends at a younger age. More likely to send them to SV – other schools don't have 3-11. Better they are learning at a young age. Good idea – settle in at a younger age.

2. What are the advantages (good things) of being a 3-11 school?

As above. Most pupils thought it was a good idea for the LA to advertise the fact there is a nursery. Young children get use to the format of school and the routine.

3. Do you remember being in the nursery or do you know someone in the nursery – what was good about it? What could be better?

Sister went to nursery and it really helped her x2. Brother went to the nursery really liked it x2 and gained independence and gained friends. Brother enjoyed it and wasn't upset moving into reception. Friend went there and she gained lots of skills. Helped my brother with his speech.

4. **Are there any disadvantages (bad things) of being a 3-11 school? Is there anything that you would be worried about?**

Make sure there is enough space in the canteen. More staff if numbers go up.

Alternative Options

During the formal consultation period, stakeholders were provided with the opportunity to submit alternative options for consideration. The alternative options (not already considered in the consultation document) received are noted below and will be presented to the Cabinet for consideration.

To change the age range of all schools to 3-11 and allowing full time nursery provision	
Advantages	Disadvantages
Continuity of provision across the county	Risk of non-maintained providers being unsustainable
Effective transition from nursery provision to primary provision	Lack of adequate space in all schools to incorporate nursery provision
Full time childcare/education provision from an early age	Costly model of provision if there is no uptake

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MODERNISING EDUCATION PROGRAMME

**PROPOSAL TO CHANGE THE NATURE OF PROVISION AT
YSGOL Y FELIN**

Recommendations / key decisions required:

It is recommended that the Cabinet approves:

- The observations received and the Local Authority's responses following the Consultation Period (Consultation Report attached);
- The modification to the implementation date of the proposal as noted in the report;
- The publication of a Statutory Notice to implement the proposal.

Reasons:

- To comply with statutory procedures and guidance in relation to school re-organisation
- To support Carmarthenshire's Welsh in Education Strategic Plan launched on 25 June 2018 in accordance with WG Strategic Plans

Relevant scrutiny committee to be consulted: No

Cabinet Decision Required: Yes- 06/12/2021

Council Decision Required: No

Cabinet Member Portfolio Holder: Cllr. Glynog Davies (Education & Children)

Directorate:
Education & Children

Name of Head of Service:
Simon Davies

Report Author:
Sara Griffiths

Designations:

Head of Access to Education

Modernisation Team
Manager

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EXECUTIVE SUMMARY
CABINET
06/12/2021

MODERNISING EDUCATION PROGRAMME

**PROPOSAL TO CHANGE THE NATURE OF PROVISION AT YSGOL
Y FELIN**

Background

On 25th June 2018 in accordance with WG Strategic Plans the Local Authority launched **Carmarthenshire's Welsh in Education Strategic Plan** and its vision for a bilingual Carmarthenshire. To achieve this, the authority will deliver significant growth in Welsh medium education and training to increase the number of children and young people who become fluent in both Welsh and English and have the ability to use their languages confidently with their families, in their communities and in the workplace.

With this in mind, the Local Authority has a responsibility to provide its communities with the best education and opportunities possible and believes that this can be achieved through set objectives. Carmarthenshire County Council are fully supportive of the aim that all pupils are able to speak, read and write in both Welsh and English fluently by the end of Key Stage 2 and will provide services that will ensure high quality learning opportunities for all Carmarthenshire's children, young people and adults, thereby enabling them to achieve their full potential as lifetime learners in the context of the unique bilingual nature of the County.

In order to support Carmarthenshire's Welsh in Education Strategic Plan and national policies in moving the county's schools along the Welsh language continuum, the attached draft consultation document sets out proposals with regards to the change in nature of provision at **Ysgol Y Felin**.

The Proposal

- From 1 September 2022 the nature of Foundation Phase provision at Ysgol Y Felin will change to Welsh medium education with Dual Stream provision remaining from Key Stage 2 (KS2).

Statutory Process

In accordance with Executive Board's (now known as the Cabinet) instructions on the 8 February 2021 a formal consultation exercise was undertaken from 22 February 2021 and was due to end on the 4 April 2021. However, a decision was made by the Executive Board to extend the Consultation Period until the 16 July 2021. The results of the consultation exercise are contained in the attached Consultation Report.

Should the Cabinet grant permission to proceed to Statutory Notice, the intention is to publish in due course.

If approved, following the end of the Statutory Notice period, an objection report which summarises any objections received by stakeholders, will be presented to the Cabinet and ultimately to the County Council for determination.

Modifications

As a result of the extension to the consultation period, the implementation dates for the proposal noted above require modification to ensure appropriate time to implement the proposals.

Should the Cabinet decide to proceed with this proposal it is recommended that the Cabinet accepts the modified dates as noted below:

- From **1 September 2022** the nature of Foundation Phase provision at Ysgol Y Felin will change to Welsh medium education with Dual Stream provision remaining from Key Stage 2 (KS2).

Recommendation

It is recommended that the Cabinet approves:

- The observations received and the Local Authority's responses following the Consultation Period (Consultation Report attached);
- The modification to the implementation date of the proposal as noted in the report;
- The publication of a Statutory Notice to implement the proposal.

DETAILED REPORT ATTACHED?

YES:
Consultation Report

IMPLICATIONS

I confirm that other than those implications which have been agreed with the appropriate Directors / Heads of Service and are referred to in detail below, there are no other implications associated with this report:

Signed: *S. Davies*

Head of Access to Education

Policy, Crime & Disorder and Equalities	Legal	Finance	ICT	Risk Management Issues	Staffing Implications	Physical Assets
YES	YES	YES	NONE	YES	YES	NONE

1. Policy, Crime & Disorder and Equalities

Developments are consistent with the Authority's Corporate Strategy and the Modernising Education Strategic Outline Programme and WESP 2018.

2. Legal

Appropriate consultation was initiated in accordance with the relevant statutory procedures.

3.Finance

Revenue implications will be catered for within the Local Management of Schools Fair Funding Scheme.

5.Risk Management Issues

The proposal may impact on the demand for school places at the school and surrounding catchment area schools. The situation will be monitored as part of the school admission process and ongoing data forecasting and analysis through the Authority's Modernising Education Programme.

6. Staffing Implications

Staffing implications will be addressed in accordance with the County Council's Policy and Procedures.

CONSULTATIONS

I confirm that the appropriate consultations have taken in place and the outcomes are as detailed below

Signed:



Head of Access to Education

1. **Scrutiny Committee** – Consulted during the formal Consultation Period.
2. **Local Member(s)** – The local members are aware of the proposal and were consulted during the formal Consultation Period.
3. **Community / Town Council** – Consulted during the formal Consultation Period.
4. **Relevant Partners** – Consulted during the formal Consultation Period.
5. **Staff Side Representatives and other Organisations** – Consulted during the formal Consultation Period.

CABINET PORTFOLIO HOLDER(S)	N/A
AWARE/CONSULTED	
YES	

Section 100D Local Government Act, 1972 – Access to Information List of Background Papers used in the preparation of this report:

Title of Document	File Ref No.	Locations that the papers are available for public inspection
Carmarthenshire's Welsh in Education Strategic Plan		https://www.carmarthenshire.gov.wales/home/council-democracy/strategies-and-plans/welsh-in-education-strategic-plan/
MEP Biennial Review		www.carmarthenshire.gov.uk Executive Board 20 th June 2016
21 st Century Schools Website		www.21stcenturyschools.org
Consultation Document		https://www.carmarthenshire.gov.wales/media/1226179/consultation-document-ysgol-y-felin.pdf
Stage 1 (Permission to Consult) – ECS Scrutiny Committee Report		https://democracy.carmarthenshire.gov.wales/ieListDocuments.aspx?CId=153&MId=4184&Ver=4
Stage 1 (Permission to Consult) Exec Board		https://democracy.carmarthenshire.gov.wales/ieListDocuments.aspx?CId=131&MId=4190&Ver=4

Proposal to change the nature of provision at Ysgol Y Felin

Consultation Report



carmarthenshire.gov.uk

Cyngor **Sir Gâr**
Carmarthenshire
County Council



School Modernisation Section

Sara Griffiths, Modernisation Team Manager

If you require this information in large print, Braille or on audiotape please contact the Department for Education & Children

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Executive Summary

The Consultation Period

On the 22nd February 2021 Carmarthenshire County Council published proposals to:

- Change the nature of provision in the Foundation Phase from dual stream to Welsh medium.

The consultation period commenced on the 22nd February 2021 in line with the publication of the proposal and closed on 16th July 2021 with a total of 40 responses received (excluding the responses received from Estyn and the pupils' consultation) in response to the formal consultation.

Responses Received	
Online Survey	Total
40	40

It must be noted that of the 40 responses received, all were received prior to the end of the consultation period.

Consultation Events

Due to the ongoing implications of the Coronavirus pandemic, we were advised to postpone all events where there was interaction between staff, parents, and the wider community and as a result virtual drop-in sessions were held via Microsoft Teams.

Informal

Virtual informal drop-in sessions were held prior to the beginning of the formal consultation period with relevant stakeholders.

Formal

Virtual formal drop-in sessions were held on **Monday 8th March and Wednesday 10th March 2021 at 4:30pm for a period of two hours.** The formal consultation drop-in sessions were attended by 43 stakeholders.

Responses Received

The responses received have been categorised into the following themes:

Supportive

- Theme 1 - Support for the proposal
- Theme 2 - Support for Staff
- Theme 3 - The Pupils’ Education and Later Life Opportunities
- Theme 4 - Increases the number of Welsh speakers and helps preserve the Welsh Language
- Theme 5 - The proposal adheres to Council and Welsh Government policies
- Theme 6 - No reason

Concerns

- Theme 1- Removal of Choice
- Theme 2- The Pupils’ Education and Later Life Opportunities
- Theme 3 - Status Quo is Successful
- Theme 4 – Forcing the Welsh Language
- Theme 5 - Additional Learning Needs (ALN)
- Theme 6 – Coping with the Welsh Language
- Theme 7 - Parents won’t be able to help support their child
- Theme 8 - Transport and Travel to Other Schools
- Theme 9 - Transfer to English Medium Schools
- Theme 10 - Support for staff
- Theme 11 - No Reason /Misrepresentation of Data

Unsure

- Theme 1- Removal of Choice
- Theme 2- Additional Learning Needs (ALN)
- Theme 3 - Parents won’t be able to help support their child

Overall Summary

Supportive	42.5%	Not Supportive	50%	Unsure	7.5%
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Workshops

Following the closure consultation period on the 16th July 2021, a workshop was held to analyse the responses received.

Next Steps

The Consultation Report will be presented to the Cabinet (previously known as the Executive Board) who may decide to publish the proposal as consulted upon with appropriate modifications, to abandon the proposal and retain the status quo or to significantly recast the proposal and reconsult.

Should the Cabinet decide to proceed to publish a Statutory Notice, this will be published in due course.

Summary of Observations received and Local Authority Responses

Point Number	Point Raised	Local Authority Response	Number of responses raising this point	% of responses raising this point
Supportive Comments Raised				
1.	<p><u>Support for the proposal</u> Respondents noted that the proposal for Ysgol Y Felin was an excellent idea</p> <p>The proposal for Ysgol Y Felin will provide all pupils with the opportunity to become bilingual with the skills to be able to read, write and speak fluently in both Welsh and English languages. This will also help develop bilingualism within the community.</p> <p>Bilingualism offers many advantages to all pupils and learning through the Welsh language should not be seen as a disadvantage. All pupils should be provided with the opportunity to benefit from the many advantages of being bilingual.</p>	<p>It is the belief of the Local Authority, based upon international evidence and local experience, that children benefit from a truly bilingual education, which provides wider skills development, such as: cognitive ability, task understanding and flexibility, enhanced powers of concentration, etc. and that all children should receive these opportunities. Being bilingual or multilingual also broadens individuals' cultural experiences and can enhance career prospects. Evidence demonstrates that true bilingualism can only be achieved in the local context through children receiving a bilingual education.</p> <p>The Local Authority acknowledges that bilingualism will increasingly over time become an employment skill. For example, all public organisations in Wales are subject to new</p>	7	18%

		<p>statutory Welsh language standards and progressively over time will need to recruit increasing numbers of Welsh speakers to deliver services. Possessing Welsh language skills will increasingly over time give individuals a competitive advantage when seeking employment.</p> <p>The support was noted.</p>		
2.	<p><u>Support for staff</u> Respondents support the proposal but requests that the authority provide free Welsh lessons for non-Welsh speaking staff at the school</p>	<p>The schools have been identified as having the potential to move quickly along the language continuum. Rather than restrict opportunities for staff who do not speak the Welsh language, this proposal will help staff to improve their Welsh language skills. "Athrawon Bro" will provide training to staff members who are less confident in using their Welsh language skills and the Local Authority will also provide training support for any staff members wishing to develop their Welsh language skills. Support will also be given through the National Sabbatical courses as well as Welsh for Adults. Courses have been designed specifically to meet the needs of staff at all linguistic levels. Subject specific, classroom and incidental language courses are now available.</p> <p>The support was noted.</p>	1	3%

3.	<p><u>The pupil's education and later life opportunities</u></p> <p>Respondents believe that learning through the medium of Welsh will have a detrimental effect on the pupils' education and English language skills, and will disadvantage children from entering further or higher education and later in life when applying for job vacancies etc. It is believed that not all pupils will be able to reach their full potential by learning through the medium of Welsh. It must also be noted that the most common language used in day-to-day life, working life and the business world is English – therefore pupils' understanding of the English language must be secure to ensure maximum success within the real world.</p>	<p>It is the belief of the Local Authority, based upon international evidence and research and local experience, that children benefit from a truly bilingual education, which provides wider skills developments, such as cognitive ability, task understanding and flexibility, enhanced powers of concentration, etc. and that all children should receive these opportunities. Being bilingual or multilingual also broadens individuals' cultural experiences and can enhance career prospects. Evidence demonstrates that true bilingualism can only be achieved in the local context through children receiving a Welsh medium education.</p> <p>The Local Authority notes that on average, bilingual children achieve higher grades in the English language. It should also be noted that on average, about 80% of Carmarthenshire pupils who receive Welsh medium education receive an A*-C grades in both Welsh and English languages.</p> <p>Bilingualism will increasingly over time become an employment skill. For example, all public organisations in Wales are subject to new statutory Welsh language standards and progressively over time will need to recruit increasing numbers of Welsh speakers to deliver services. Possessing Welsh language skills will increasingly over time give individuals</p>	2	5%
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		<p>a competitive advantage when seeking employment.</p> <p>Schools prepare young people with the skills to attend universities around the world and the Welsh language should not be seen as a disadvantage. Rather than being an impediment, possessing skills in the Welsh language is seen by many universities, inside and outside Wales, as an additional skill, which can offer benefits when a young person is competing for a place to study.</p> <p>The support was noted.</p>		
4	<p><u>Increases the number of Welsh speakers and helps preserve the Welsh Language</u> Respondents support the proposal as it will increase the number of Welsh Speakers within the community and Carmarthenshire, in line with the Welsh Government's aim of reaching 1 million Welsh speakers by 2050. This is the right way forward for the school and will help to secure the return of Cymraeg to our communities.</p>	<p>There is a national priority in Wales, shared by Carmarthenshire County Council, to increase the number of people in our communities who are able to speak Welsh and use it in their everyday lives. Schools are regarded to be a critically important component in developing children so that they are fully bilingual by the time they leave primary school. This proposal seeks to provide all community members with the opportunity to develop their Welsh language skills.</p> <p>The support was noted.</p>	1	3%

5.	<p><u>The proposal adheres to Council and Welsh Government policies</u></p> <p>Respondents support the proposal as it is in line with the Local Authority's Welsh in Education Strategic Plan and Welsh Government's "Cymraeg 2050: A million Welsh Speakers" the proposal ensures that the Local Authority is adhering to Council and Welsh Government policies with the explicit aim of improving planning of the provision of education through the medium of Welsh, for improving the standards of that education and of the teaching of Welsh. The proposal ensures that the Local Authority meet their aim of increasing the provision of Welsh medium education in Carmarthenshire and ensure linguistic continuity from the nursery sector along the key stages to the secondary sector so that every pupil becomes fluent and confident in both Welsh and English languages.</p>	<p>The Local Authority is promoting the current proposal for primary education in the area as it firmly believes that this is in the best interests of the children's education. However, the Local Authority also has a responsibility to follow its own policies along with Welsh Government policies.</p> <p>Carmarthenshire County Council has a statutory responsibility under Part 4 of the School Standards and Organisation (Wales) Act 2013 to prepare a Welsh in Education Strategic Plan (WESP) for its area with the explicit aim of improving planning of the provision of education through the medium of Welsh, from improving the standards of that education and of the teaching of Welsh.</p> <p>In April 2014 the County Council formally adopted a comprehensive strategy for the development of the Welsh language in Carmarthenshire, endorsing the recommendations of a politically balanced group of elected members that had examined in depth the status of the Welsh language in the county in the wake of the 2011 census of the population. The strategy required action on 73 points, 21 of which applied to the education service. All relevant recommendations and actions from the strategy have been incorporated within Carmarthenshire's WESP.</p>	2	5%
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		<p>On 25th June 2018, the Local Authority launched Carmarthenshire’s most recent Welsh in Education Strategic Plan which seeks to achieve the following outcomes relevant to the proposal:</p> <ul style="list-style-type: none"> • Outcome 1 - More seven-year-old children being taught through the medium of Welsh. • Outcome 2 - More learners continuing to improve their language skills on transfer from primary to secondary school. • Outcome 5 – More students who have higher language skills in Welsh. • Outcome 6 – Welsh medium provision for learner with additional learning needs (ALN); and • Outcome 7 – Workforce planning and continuing professional development. <p>The proposal is adhering to the recommendations as set out in Carmarthenshire’s WESP.</p> <p>The support was noted.</p>		
6.	<p><u>No Reason</u> Respondents did not provide a reason for their support.</p>	<p>The support was noted.</p>	7	18%



Concerns Raised

1.	<p><u>Removal of Choice</u> Respondents have concerns regarding the removal of choice of English medium education at the school and those parents should have the choice of which language their children should be educated through.</p>	<p>Carmarthenshire County Council has a statutory responsibility under Part 4 of the School Standards and Organisation (Wales) Act 2013 to prepare a Welsh in Education Strategic Plan (WESP) for its area with the explicit aim of improving planning of the provision of education through the medium of Welsh, for improving the standards of that education and of the teaching of Welsh.</p> <p>In April 2014 the County Council formally adopted a comprehensive strategy for the development of the Welsh language in Carmarthenshire, endorsing the recommendations of a politically balanced group of elected members that had examined in depth the status of the Welsh language in the county in the wake of the 2011 census of the population. The strategy required action on</p>	3	8%
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73 points, 21 of which applied to the education service.

The language strategy received cross-party support from elected members when it was adopted at a meeting of the full County Council. On 25th June 2018, the Local Authority launched Carmarthenshire's most recent Welsh in Education Strategic Plan. The WESP has been subject to public consultation during its preparation and subsequent review. Its contents have, therefore, been subject to a test of public opinion in line with statutory requirements. It has also been approved by the Welsh Government in accordance with the requirements of the Act.

The plan seeks to achieve the following outcomes relevant to the proposal:

- Outcome 1 - More seven year old children being taught through the medium of Welsh.
- Outcome 2 - More learners continuing to improve their language skills on transfer from primary to secondary school.
- Outcome 5 – More students who have higher language skills in Welsh.
- Outcome 6 – Welsh medium provision for learner with additional learning needs (ALN); and

- Outcome 7 – Workforce planning and continuing professional development.

The proposal is adhering to the recommendations as set out in Carmarthenshire's WESP.

Choice is an important issue in the consideration of this proposal, with the most important aspect of choice being that which is available to children as they progress through their education and early lives. This proposal provides all pupils with the opportunity to become fully bilingual with the skills to read, write and speak in both Welsh and English languages by the time they leave primary school. The Local Authority's proposal to develop bilingual children by the time they leave primary school gives children a choice as they move along the education sector. The most effective way of developing bilingual children in the primary sector is to immerse them in Welsh medium education. It is generally accepted in the education profession that studying Welsh as a second language does not develop truly bilingual young people and the schools has been identified as having the potential to move quickly along the language continuum.

2.	<p><u>The Pupils' Education and Later Life Opportunities</u></p> <p>Respondents are concerned that learning through the medium of Welsh will have a detrimental effect on the pupils' education and English language skills, and will disadvantage children from entering further or higher education and later in life when applying for job vacancies etc. It is believed that not all pupils will be able to reach their full potential by learning through the medium of Welsh. It must also be noted that the most common language used in day-to-day life, working life and the business world is English – therefore pupils' understanding of the English language must be secure to ensure maximum success within the real world.</p>	<p>It is the belief of the Local Authority, based upon international evidence and research and local experience, that children benefit from a truly bilingual education, which provides wider skills developments, such as cognitive ability, task understanding and flexibility, enhanced powers of concentration, etc. and that all children should receive these opportunities. Being bilingual or multilingual also broadens individuals' cultural experiences and can enhance career prospects. Evidence demonstrates that true bilingualism can only be achieved in the local context through children receiving a Welsh medium education.</p> <p>The Local Authority notes that on average, bilingual children achieve higher grades in the English language. It should also be noted that on average, about 80% of Carmarthenshire pupils who receive Welsh medium education receive an A*-C grades in both Welsh and English languages.</p> <p>Bilingualism will increasingly over time become an employment skill. For example, all public organisations in Wales are subject to new statutory Welsh language standards and progressively over time will need to recruit increasing numbers of Welsh speakers to deliver services. Possessing Welsh language skills will increasingly over time give individuals</p>	1	3%
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		<p>a competitive advantage when seeking employment.</p> <p>Schools prepare young people with the skills to attend universities around the world and the Welsh language should not be seen as a disadvantage. Rather than being an impediment, possessing skills in the Welsh language is seen by many universities, inside and outside Wales, as an additional skill, which can offer benefits when a young person is competing for a place to study.</p>		
3.	<p><u>Status Quo is Successful</u></p> <p>Respondents noted that the current linguistic arrangements at the school are working well and there is no need for change.</p> <p>Respondents noted that the school should remain as dual stream as it gives the local community a choice in which language, they wish their children to be taught in and benefits the county as those who study through the medium of English are able to speak to more children who speak Welsh.</p>	<p>The Local Authority acknowledge that the school is performing well and is successful. This proposal seeks to improve even further the opportunity for children attending the school to secure continually improving outcomes. Carmarthenshire County Council has a statutory responsibility under Part 4 of the School Standards and Organisation (Wales) Act 2013 to prepare a Welsh in Education Strategic Plan (WESP) for its area with the explicit aim of improving planning of the provision of education through the medium of Welsh, from improving the standards of that education and of the teaching of Welsh.</p> <p>In April 2014 the County Council formally adopted a comprehensive strategy for the development of the Welsh language in</p>	6	15%

Carmarthenshire, endorsing the recommendations of a politically balanced group of elected members that had examined in depth the status of the Welsh language in the county in the wake of the 2011 census of the population. The strategy required action on 73 points, 21 of which applied to the education service.

The language strategy received cross-party support from elected members when it was adopted at a meeting of the full County Council. On 25th June 2018, the Local Authority launched Carmarthenshire's most recent Welsh in Education Strategic Plan. The WESP has been subject to public consultation during its preparation and subsequent review. Its contents have, therefore, been subject to a test of public opinion in line with statutory requirements. It has also been approved by the Welsh Government in accordance with the requirements of the Act.

The plan seeks to achieve the following outcomes relevant to the proposal:

- Outcome 1 - More seven year old children being taught through the medium of Welsh.
- Outcome 2 - More learners continuing to improve their language skills on transfer from primary to secondary school.

		<ul style="list-style-type: none"> • Outcome 5 – More students who have higher language skills in Welsh. • Outcome 6 – Welsh medium provision for learner with additional learning needs (ALN); and • Outcome 7 – Workforce planning and continuing professional development. <p>The proposal is adhering to the recommendations as set out in Carmarthenshire’s WESP.</p> <p>It is important to note that the WESP requires all primary schools in Carmarthenshire, including English medium schools, to move along the language continuum, progressively expanding the proportion of education that is delivered through the medium of Welsh, with a view to ensuring that in time all children leaving primary school are fully bilingual.</p> <p>The pace at which schools will be able to expand bilingualism and Welsh medium education will depend upon local circumstances but the expectation for progress applies to all schools. The school has been identified as having the potential to move quickly along the language continuum.</p>		
	<p><u>Forcing the Welsh Language</u> Respondents are concerned that the community should have a choice of whether</p>	<p>The proposal is consistent with national policy to expand Welsh medium education in order to</p>	2	5%

	<p>to learn through the medium of Welsh or English and the Welsh language should not be forced on anyone. It is important to learn the Welsh language and some pupils may want to use the language in their day-to-day life; however, not all pupils will want to receive their education through the medium of Welsh. Forcing the Welsh language will not create more Welsh speakers, in fact it will have the opposite effect.</p> <p>Implementing the proposal will force pupils to seek English medium education at other English medium schools which will deny pupils exposure to the Welsh language.</p>	<p>develop increasing numbers of fully bilingual young people and to enable more children to benefit from the advantages of bilingualism, gathered through international research.</p> <p>It is the Local Authority's intention that all current pupils remain at the school and continue to receive their education through the current language arrangements. The proposals will not therefore, affect current pupils. The school will continue to provide sufficient support for all current pupils through the medium in which they currently receive their education so there is, consequently, no need for any child to be moved from the school. Similarly, it is the Local Authority's desire that in the future local children attend their local school.</p> <p>It is important to remember that the teaching and the development of the English language still occurs in Welsh medium schools to the highest of standards, as a statutory part of the curriculum.</p> <p>International evidence, cited by the Welsh Government, confirms that the most effective way of developing bilingual children is to immerse them in the less common language whilst also developing their skills in the more common language. The Welsh Government also promotes those children who are from</p>		
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		non-Welsh speaking families that immersion in Welsh in school is particularly important in embedding the language.		
5.	<p><u>Additional Learning Needs (ALN)</u></p> <p>Respondents are concerned that children with special education needs, or additional learning needs may not be able to cope with learning through the medium of Welsh and may require English medium education. It is unfair to assume that all children with SEN/ALN will be able to learn through the medium of Welsh.</p>	<p>Carmarthenshire County Council's policy is that all its schools should be inclusive, with children with additional learning needs being educated in a mainstream setting alongside their peers wherever possible.</p> <p>For this proposal, the support provided to children currently in the schools with additional needs will continue through the medium in which they currently receive their education. Should the proposal be implemented, all future pupils will receive support which is individually tailored to their needs.</p> <p>All pupils with additional learning needs have specific individual plans based on their circumstances and a tailored support programme is provided according to need.</p> <p>Generally, an additional learning need is not a barrier to learning two languages. It is important to assess and monitor progress in each or all the languages that a child is using or learning, including sign and visually supported communication systems required for some pupils, particularly as the stronger developed language can be used to support and build learning through a lesser developed language medium. Staff are required to</p>	2	5%

differentiate the curriculum and make reasonable adjustments to the language of instruction and response to accommodate additional needs and ensure access to the curriculum and learning progress. At times it may be appropriate to target additional support in one language for a period to consolidate and accelerate learning, e.g., in literacy. There will be rare instances, however, where a child may be diagnosed with a condition that is not conducive to a fully bilingual education. In these circumstances a package of support is identified by professional practitioners and discussed with parents.

Whilst the system is designed to meet the needs of learners through a universal and inclusive approach, for a small number of children with significant and complex additional needs this is not always possible and specialised provision offers a more appropriate learning setting.

To make sure that the needs of all learners are met the school's system in Carmarthenshire includes a range of provision for children with additional needs. A specialised school or unit offer education to children with the most profound or complex needs where a mainstream setting is either not suitable for the children's needs or where parents prefer an alternative setting. Selected secondary and

		<p>primary schools across the county include specialised units for children with particular needs, such as autism, sensory impairment or speech and language delay. The Department for Education and Children provides specific additional support in schools wherever practicable so that as many children as possible remain in their local school. Whilst the Council's preference is to meet the needs of all children in a mainstream setting wherever possible, this is not always practicable. It is this Council's experience that the vast majority of pupils with a wide range of additional learning needs and abilities are successful in our schools irrespective of the language of instruction, but the Council does acknowledge that there will be a very few children whose needs cannot be met other than through provision at a specialist unit.</p> <p>It should be noted that this proposal does not affect the current arrangements at the special Unit at Ysgol Y Felin.</p>		
6.	<p><u>Coping with the Welsh Language</u> Respondents are concerned that not all children will be able to cope with learning through the medium of Welsh, especially pupils from non-Welsh backgrounds. In addition, there are concerns that non-Welsh speaking parents may find it hard to support</p>	<p>The school will continue to provide support for current pupils through the medium of which they currently receive their education. Should the proposal be implemented, sufficient support will be provided to all new pupils in accordance with the needs of each individual. It is also important to note that staff are</p>	3	8%

	and help their children with their schoolwork and homework should the school the proposal be implemented.	<p>required to differentiate the curriculum and make reasonable adjustments when required to meet the needs of every pupil. “Athrawon Bro” who provide support to the schools around the county will also be supporting the school. Welsh Language Immersion Centres will also be available for those pupils who may need extra input linguistically.</p> <p>The schools currently offer a range of support to pupils and parents from non-Welsh speaking families and are committed to increasing provision as necessary to meet the future needs of individual families.</p> <p>Several organisations who attended the formal drop-in session during the consultation period have also offered their help and support to the community with the development of the Welsh language.</p>		
7.	<p><u>Parents won’t be able to help support their child</u></p> <p>Respondents are concerned that parents will no longer be able to play an active role in their child’s education.</p>	<p>Welsh schools set homework instruction in Welsh and in English so there will be no problem in understanding what children are being asked to do at home. Work set will be appropriate to the pupil’s age and ability level and therefore should be within reach. Developing increasingly as independent learners, parents may find that children are happy to progress without extra parental guidance as they get older.</p>	3	8%

		The school currently offers a range of support to pupils and parents from non-Welsh speaking families and are committed to increasing provision as necessary to meet the future needs of families.		
8.	<p><u>Transport and Travel to Other Schools</u></p> <p>Respondents believe that it is unfair to expect parents to transport pupils to other schools to receive English medium education. This will have time and financial impact on families.</p>	<p>As there will be no change for current pupils attending the schools, there is consequently, no need for any child to be moved from the school. Similarly, it is the Local Authority's desire that all future pupils will attend their local school.</p> <p>The Local Authority are not proposing alternative English medium schools as part of the proposal. Should parents elect to place their children in alternative schools they will do so in full consideration of all the factors that apply, including transport implications. If any parents elect to place their children in alternative schools that are neither the designated nor nearest school, these parents will assume full responsibility for transporting their children to school.</p>	1	3%
9.	<p><u>Transfer to English Medium schools</u></p> <p>Respondents believe that it is unfair for pupils who desire/require an English medium education to have to transfer to another school outside of their catchment. In</p>	<p>It is the Local Authority's intention that all current pupils remain at the school and continue to receive their education through the current language arrangements. The proposals will not therefore, affect current pupils. The</p>	2	5%

	<p>addition, it is felt that pupils who struggle with the Welsh language will also have to transfer to another school.</p>	<p>school will continue to provide sufficient support for all current pupils through the medium in which they currently receive their education so there is, consequently, no need for any child to be moved from the school. Similarly, it is the Local Authority's desire that in the future local children attend their local school. Sufficient support will be provided for all future pupils in accordance with each individual's needs.</p> <p>Please see point 6 which refers to the help and support which is currently and will continue to be provided to all pupils and parents with regards to the Welsh language.</p> <p>Please see point 5 which refers to pupils with additional learning needs, special educational needs and the help and support which is and will continue to be provided to these pupils.</p>		
10.	<p><u>Support for staff</u> Respondents support the proposal but requests that the authority provide free Welsh lessons for non-Welsh speaking staff at the school</p>	<p>The schools have been identified as having the potential to move quickly along the language continuum. Rather than restrict opportunities for staff who do not speak the Welsh language, this proposal will help staff to improve their Welsh language skills. "Athrawon Bro" will provide training to staff members who are less confident in using their Welsh language skills and the Local Authority will also provide</p>	1	3%

		<p>training support for any staff members wishing to develop their Welsh language skills. Support will also be given through the National Sabbatical courses as well as Welsh for Adults. Courses have been designed specifically to meet the needs of staff at all linguistic levels. Subject specific, classroom and incidental language courses are now available.</p> <p>The support was noted.</p>		
11.	<p><u>No Reason</u> Some respondents did not provide a reason for their objection.</p>		6	15%
Unsure				
1.	<p><u>Removal of Choice</u> Respondents have concerns regarding the removal of choice of English medium education at the school and those parents should have the choice of which language their children should be educated through.</p>	<p>Carmarthenshire County Council has a statutory responsibility under Part 4 of the School Standards and Organisation (Wales) Act 2013 to prepare a Welsh in Education Strategic Plan (WESP) for its area with the explicit aim of improving planning of the provision of education through the medium of Welsh, for improving the standards of that education and of the teaching of Welsh.</p>	1	2.5%

In April 2014 the County Council formally adopted a comprehensive strategy for the development of the Welsh language in Carmarthenshire, endorsing the recommendations of a politically balanced group of elected members that had examined in depth the status of the Welsh language in the county in the wake of the 2011 census of the population. The strategy required action on 73 points, 21 of which applied to the education service.

The language strategy received cross-party support from elected members when it was adopted at a meeting of the full County Council. On 25th June 2018, the Local Authority launched Carmarthenshire's most recent Welsh in Education Strategic Plan. The WESP has been subject to public consultation during its preparation and subsequent review. Its contents have, therefore, been subject to a test of public opinion in line with statutory requirements. It has also been approved by the Welsh Government in accordance with the requirements of the Act.

The plan seeks to achieve the following outcomes relevant to the proposal:

- Outcome 1 - More seven year old children being taught through the medium of Welsh.
- Outcome 2 - More learners continuing to improve their language skills on transfer from primary to secondary school.
- Outcome 5 – More students who have higher language skills in Welsh.
- Outcome 6 – Welsh medium provision for learner with additional learning needs (ALN); and
- Outcome 7 – Workforce planning and continuing professional development.

The proposal is adhering to the recommendations as set out in Carmarthenshire's WESP.

Choice is an important issue in the consideration of this proposal, with the most important aspect of choice being that which is available to children as they progress through their education and early lives. This proposal provides all pupils with the opportunity to become fully bilingual with the skills to read, write and speak in both Welsh and English languages by the time they leave primary school. The Local Authority's proposal to develop bilingual children by the time they leave primary school gives children a choice as they move along the education sector. The most effective way of developing bilingual

		children in the primary sector is to immerse them in Welsh medium education. It is generally accepted in the education profession that studying Welsh as a second language does not develop truly bilingual young people and the schools has been identified as having the potential to move quickly along the language continuum.		
2.	<p><u>Additional Learning Needs (ALN)</u></p> <p>Respondents are unsure about the proposal and are concerned what effect this will have on children with learning difficulties and speech delays or autism that attend Ysgol Y Felin. The school is known and well run for children with learning difficulties</p>	<p>Carmarthenshire County Council's policy is that all its schools should be inclusive, with children with additional learning needs being educated in a mainstream setting alongside their peers wherever possible.</p> <p>For this proposal, the support provided to children currently in the schools with additional needs will continue through the medium in which they currently receive their education. Should the proposal be implemented, all future pupils will receive support which is individually tailored to their needs.</p> <p>All pupils with additional learning needs have specific individual plans based on their circumstances and a tailored support programme is provided according to need. Generally, an additional learning need is not a barrier to learning two languages. It is important to assess and monitor progress in each or all the languages that a child is using or learning, including sign and visually</p>	1	2.5%

supported communication systems required for some pupils, particularly as the stronger developed language can be used to support and build learning through a lesser developed language medium. Staff are required to differentiate the curriculum and make reasonable adjustments to the language of instruction and response to accommodate additional needs and ensure access to the curriculum and learning progress. At times it may be appropriate to target additional support in one language for a period to consolidate and accelerate learning, e.g., in literacy. There will be rare instances, however, where a child may be diagnosed with a condition that is not conducive to a fully bilingual education. In these circumstances a package of support is identified by professional practitioners and discussed with parents.

Whilst the system is designed to meet the needs of learners through a universal and inclusive approach, for a small number of children with significant and complex additional needs this is not always possible and specialised provision offers a more appropriate learning setting.

To make sure that the needs of all learners are met the school's system in Carmarthenshire includes a range of provision for children with additional needs. A specialised school or unit

		<p>offer education to children with the most profound or complex needs where a mainstream setting is either not suitable for the children's needs or where parents prefer an alternative setting. Selected secondary and primary schools across the county include specialised units for children with particular needs, such as autism, sensory impairment or speech and language delay. The Department for Education and Children provides specific additional support in schools wherever practicable so that as many children as possible remain in their local school. Whilst the Council's preference is to meet the needs of all children in a mainstream setting wherever possible, this is not always practicable. It is this Council's experience that the vast majority of pupils with a wide range of additional learning needs and abilities are successful in our schools irrespective of the language of instruction, but the Council does acknowledge that there will be a very few children whose needs cannot be met other than through provision at a specialist unit.</p> <p>It should be noted that this proposal does not affect the current arrangements at the special Unit at Ysgol Y Felin.</p>		
<p>Page 174</p>	<p><u>Parents won't be able to help support their child</u></p>	<p>Welsh schools set homework instruction in Welsh and in English so there will be no</p>	<p>1</p>	<p>2.5%</p>

	<p>Respondents are concerned that parents will no longer be able to play an active role in their child's education.</p>	<p>problem in understanding what children are being asked to do at home. Work set will be appropriate to the pupil's age and ability level and therefore should be within reach. Developing increasingly as independent learners, parents may find that children are happy to progress without extra parental guidance as they get older.</p> <p>The school currently offers a range of support to pupils and parents from non-Welsh speaking families and are committed to increasing provision as necessary to meet the future needs of families.</p>		
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Estyn's Observations regarding the Proposal

Estyn response to the proposal by Carmarthenshire County Council's consultation on changing the nature of provision in the Foundation Phase from dual stream to Welsh medium at Ysgol Y Felin.

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

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

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

Summary/ Conclusion

Overall, the proposal is likely to maintain or improve the standard of education provision in the area.

Description and benefits

Carmarthenshire local authority propose to change the nature of the foundation phase provision at Ysgol Y Felin, in Felinfoel, Llanelli. The school is a dual stream primary school providing education to pupils between the ages of 4 and 11 years old. It provides education through the medium of Welsh and English across two language streams. Parents currently choose a language stream for their children from Reception onwards. At the time of the proposal, there are four Welsh medium classes and five English medium classes at the school. The pupils in the English classes are taught Welsh as a second language whilst the Welsh classes are taught through the medium of Welsh.

Carmarthenshire local authority propose that from 1 September 2022 the nature of the foundation phase provision at Ysgol Y Felin will change to Welsh medium education, rather than a dual stream option. The authority propose that this will only affect pupils starting in the foundation phase at the school from September 2022 onwards and that current pupils attending the school will be unaffected. Overall, the authority has set out an appropriate rationale for the proposal and have generally considered the expected benefits and disadvantages in comparison to the status quo. The authority has specifically considered the extent to which the proposal would support the targets in their approved Welsh in Education Strategic Plan (WESP) and how the proposal would expand Welsh language provision. It has also appropriately included a community impact assessment and a Welsh impact assessment as part

of the consultation document. However, the proposer does not identify how it will address risks it identifies, such as the potential loss of pupils to other schools.

The proposal does not identify or address well enough the issue of parents within the school's catchment who may choose to send their child to another school if the proposal goes ahead. For example, it does not identify the distance to other local schools, how pupils' travel time to school may be affected or how the Council's policy regarding home to school transport provision will apply.

The proposal seems to address the growing call for Welsh medium provision at the foundation phase within the school. The proposer has outlined how in recent years the number of pupils attending the English stream within the foundation phase at Ysgol Y Felin has been decreasing and those attending the Welsh stream foundation phase has increased. However, the local authority offers no information on pupil numbers at the school beyond 2020 to show whether these trends are likely to continue.

The local authority has sensibly stated that it will review the language provision within key stage 2 in the future in order to address the potential increased demand for places. It is important the authority continue to monitor the demand for Welsh and English medium places within the school so that the provision continues to meet the demand.

The consultation document provides useful guidance to parents and others about the benefits of Welsh medium education and outlines appropriately how the change reflects the local authority's ambitions within its Welsh in Education Strategic Plan.

Educational aspects of the proposal

The consultation document provides a commentary about the quality of the outcomes, provision and leadership and management at the school, mostly based on Estyn's inspection report from September 2016. Although there are a few more recent comments in the text, it is overly reliant on that provided in the inspection report five years ago. In addition, the consultation document lacks detail on how the proposal would strengthen or change the effectiveness of provision or standards within the school. For example, although the consultation document refers to the benefits of the 'Early Welsh Medium Immersive Provision' it does not provide enough detail about the effect this might have at this particular school. In addition, the document lacks enough information on how providing learning predominately through the medium of Welsh at the foundation phase would improve the provision and learning for pupils at this school.

The consultation document refers to a special educational needs (SEN) centre comprising of two foundation phase assessment and observation classes, a language unit and a key stage 2 class for pupils with severe learning difficulties (SLD Centre). The Centre is a purpose-built unit attached to the school building that houses the Language Unit class and the Observation and Assessment classes. However, the consultation document does not explicitly outline if the language provision for these pupils will change, and if so, what impact this may have on pupils. The authority has considered carefully how to minimise the disruption to learners and will implement the change for pupils starting at the foundation phase from September 2022. Pupils currently in the foundation phase will be unaffected.

Local Authority Response to Estyn's Observations

As can be seen from Estyn's observations they are of the opinion that the proposal is likely to at least maintain the current standard of education and provision in the area. Their observations include supporting statements as noted below.

Statements of support for this proposal by Estyn

Overall, the authority has set out an appropriate rationale for the proposal and have generally considered the expected benefits and disadvantages in comparison to the status quo. The authority has specifically considered the extent to which the proposal would support the targets in their approved Welsh in Education Strategic Plan (WESP) and how the proposal would expand Welsh language provision. It has also appropriately included a community impact assessment and a Welsh impact assessment as part of the consultation document.

The local authority has sensibly stated that it will review the language provision within key stage 2 in the future in order to address the potential increased demand for places.

The consultation document provides useful guidance to parents and others about the benefits of Welsh medium education and outlines appropriately how the change reflects the local authority's ambitions within its Welsh in Education Strategic Plan.

Issues raised by Estyn and LA Response

1. *The proposer does not identify how it will address risks it identifies, such as the potential loss of pupils to other schools.*

LA Response

It is the Local Authority's intention that all current pupils remain at the school and continue to receive their education through the current language arrangements. The proposals will not therefore, affect current pupils. The school will continue to provide sufficient support for all current pupils through the medium in which they currently receive their education so there is, consequently, no need for any child to be moved from the school. Similarly, it is the Local Authority's desire that in the future local children attend their local school. Sufficient support will be provided for all future pupils in accordance with each individual's needs.

Please see **point 6, page 20 above** which refers to the help and support which is currently and will continue to be provided to all pupils and parents with regards to the Welsh language.

Please see **point 5, page 17 above** which refers to pupils with additional learning needs, special educational needs and the help and support which is and will continue to be provided to these pupils.

2. The proposal does not identify or address well enough the issue of parents within the school's catchment who may choose to send their child to another school if the proposal goes ahead. For example, it does not identify the distance to other local schools, how pupils' travel time to school may be affected or how the Council's policy regarding home to school transport provision will apply.

LA Response

The movement of pupils between school catchment areas is a common circumstance across the country in both urban and rural areas. Children living within catchment areas receive preference to attend their catchment schools before children living outside the catchment area. However, parents can state a preference for a school, which is not the designated catchment area school, and they do this for several reasons, e.g., access to extended family for working parents, ease of transporting children, proximity of the home to schools, reputation, provision, faith character, etc. When parents elect to place their children in a particular school, they will do so in full consideration of all the factors that apply, including the nature of provision.

It is the Local Authority's intention that all current pupils remain at the school and continue to receive their education through the current language arrangements. The proposals will not therefore, affect current pupils at the school. Ysgol Y Felin will continue to provide sufficient support for all current pupils through the medium in which they currently receive their education so there is, consequently, no need for any child to be moved from the school. Similarly, it is the Local Authority's desire that in the future local children attend their local school.

The Local Authority are not proposing alternative English medium schools as part of the proposal. Should parents elect to place their children in alternative schools they will do so in full consideration of all the factors that apply, including transport implications. If any parents elect to place their children in alternative schools that are neither the designated nor nearest school, these parents will assume full responsibility for transporting their children to school.

3. The local authority offers no information on pupil numbers at the school beyond 2020 to show whether these trends are likely to continue.

LA Response

Projections are based on the PLASC numbers which we receive from all our schools in January of each year. Unfortunately, this past year due to Covid, PLASC day was delayed until April. This information is used for calculating the averages for each school to obtain the projected figures for the next 5 years. The projected figures do not provide us with a linguistic split.

PUPIL PROJECTIONS based on January 2020 data (Excluding all Nursery Pupils)

School	ACTUAL Pupil Total (Head Count) Jan 20	Projected Pupil Total (Head Count) Jan 21	Projected Pupil Total (Head Count) Jan 22	Projected Pupil Total (Head Count) Jan 23	Projected Pupil Total (Head Count) Jan 24	Projected Pupil Total (Head Count) Jan 25
Ysgol Y Felin	222	218	220	217	217	215

4. *The consultation document lacks detail on how the proposal would strengthen or change the effectiveness of provision or standards within the school. For example, although the consultation document refers to the benefits of the ‘Early Welsh Medium Immersive Provision’ it does not provide enough detail about the effect this might have at this particular school. In addition, the document lacks enough information on how providing learning predominately through the medium of Welsh at the foundation phase would improve the provision and learning for pupils at this school.*

LA Response

This proposal seeks to improve further the opportunity for children attending the school to secure continually improving outcomes. Carmarthenshire County Council has a statutory responsibility under Part 4 of the School Standards and Organisation (Wales) Act 2013 to prepare a Welsh in Education Strategic Plan (WESP) for its area with the explicit aim of improving planning of the provision of education through the medium of Welsh. This also falls in line with Welsh Government outcomes as well as the WG target for Carmarthenshire.

The school has been identified as having the potential to move quickly along the language continuum from 4 years of age building upon the education in the Cylch. Thus, ensuring that all Foundation Phase children in the future, become bilingual by the age of 7.

The Curriculum Bill also lays the foundation for the new curriculum in that Welsh is a mandated element of a school curriculum or setting for children or pupils from 3 years and English will be mandated from 7 years

The question of the advantages both educationally and cognitively of immersion teaching are not in question. In the words of Prof. Colin Baker

“Language among young children is caught rather than taught. The process is not learning but acquisition”

The Cymraeg 2050 strategy also states clearly that full Welsh immersion education is the most reliable way to create individuals with the skills and confidence to use the language in their daily lives.

Our vision is to enable all learners to develop their Welsh language skills and to use the language confidently in everyday life. Immersion teaching in the early years makes this possible. Pupils within Ysgol y Felin will then have the opportunity to continue their education through the medium of Welsh or English to the end of KS2.

5. *The consultation document does not explicitly outline if the language provision for these pupils will change, and if so, what impact this may have on SEN pupils.*

LA Response

As noted on **point 5, page 20** above this proposal does not affect the current arrangements at the Special Unit at Ysgol Y Felin.

Carmarthenshire County Council's policy is that all its schools should be inclusive, with children with additional learning needs being educated in a mainstream setting alongside their peers wherever possible.

For this proposal, the support provided to children currently in the schools with additional needs will continue through the medium in which they currently receive their education. Should the proposal be implemented, all future pupils will receive support which is individually tailored to their needs.

All pupils with additional learning needs have specific individual plans based on their circumstances and a tailored support programme is provided according to need. Generally, an additional learning need is not a barrier to learning two languages. It is important to assess and monitor progress in each or all the languages that a child is using or learning, including sign and visually supported communication systems required for some pupils, particularly as the stronger developed language can be used to support and build learning through a lesser developed language medium. Staff are required to differentiate the curriculum and make reasonable adjustments to the language of instruction and response to accommodate additional needs and ensure access to the curriculum and learning progress. At times it may be appropriate to target additional support in one language for a period to consolidate and accelerate learning, e.g., in literacy. There will be rare instances, however, where a child may be diagnosed with a condition that is not conducive to a fully bilingual education. In these circumstances a package of support is identified by professional practitioners and discussed with parents.

Whilst the system is designed to meet the needs of learners through a universal and inclusive approach, for a small number of children with significant and complex additional needs this is not always possible and specialised provision offers a more appropriate learning setting.

To make sure that the needs of all learners are met the school's system in Carmarthenshire includes a range of provision for children with additional needs. A specialised school or unit offer education to children with the most profound or complex needs where a mainstream setting is either not suitable for the children's needs or where parents prefer an alternative setting. Selected secondary and primary schools across the county include specialised units for children with needs, such as autism, sensory impairment or speech and language delay. The Department

for Education and Children provides specific additional support in schools wherever practicable so that as many children as possible remain in their local school. Whilst the Council's preference is to meet the needs of all children in a mainstream setting wherever possible, this is not always practicable.

It is this Council's experience that most pupils with a wide range of additional learning needs and abilities are successful in our schools irrespective of the language of instruction, but the Council does acknowledge that there will be a very few children whose needs cannot be met other than through provision at a specialist unit.

Consultation with the Pupils

Children and Young People Consultation Document

A Children and Young People' version of the Consultation Document was provided to the school to distribute to all pupils

Pupil Consultation

School: Ysgol Y Felin

Date: 18/05/21

Consultation undertaken by: Educational Support Advisor (ESA)

Interviewed: 14 pupils (Conducted online due to Coronavirus)

Observations noted during the Pupil Consultation Event:

1. Do you know there could be changes to your school?

Yes: 14	No: 0
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2. Is there anything you are looking forward/ worried about?

Looking forward	Worried
All pupils agreed that this change is for the better and welcomed the change	Concern regarding the support for children at home with their Welsh – for non-Welsh speaking families
Being able to speak two languages at a young age makes it easier to learn other languages e.g., when you attend secondary school. (<i>'My sister now speaks French and Spanish too'</i>) – becoming multilingual is easier if you're bilingual	What happened in history might happen again – i.e., the Welsh Not. However, another pupil replied, noting

Everyone gets the chance to learn Welsh

A reference to the new Curriculum was noted and how this consultation supports the 'Cynefin' and belonging concept. (*This is good timing*)

Being able to speak Welsh gets you a better job

Being able to speak Welsh gets you a job easier in Wales. It is important in the world of work

A long time ago children were not allowed to speak Welsh that's why not many speak Welsh now. We don't want that to happen again

Pupils currently in the 'Ffrwd Gymraeg' noted that they were very happy

It is a good opportunity to get all 3-year-olds to speak Welsh. Then they will always be able to speak Welsh.

Welsh stream pupils noted how lucky they have been to have attended the Welsh stream as they are now bilingual and very happy.

Very happy that all pupils will have the opportunity to speak Welsh

that it won't happen again because too many can speak Welsh now

3. What would you like to keep the same?

Keep the same classes i.e., keep children together in their current classes

Teachers to stay the same

Continue to reward the children that try their best to speak Welsh

All school posters to be bilingual

1. What would you like to be different?

- No responses to note

Further comments:

- Polish students can help teach Polish to pupils
- Concerned for the children that can't speak Welsh

Alternative Options

During the formal consultation period stakeholders were provided with the opportunity to submit alternative options for consideration. The only alternative options received were in relation to the Status Quo as documented within the consultation document.

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CABINET

06/12/2021

MODERNISING EDUCATION PROGRAMME

PROPOSAL TO RECONFIGURE AND REMODEL BEHAVIOUR SUPPORT SERVICES AT YSGOL RHYDYGORS TO IMPROVE PROVISION FOR CHILDREN AND YOUNG PEOPLE

Recommendations / key decisions required:

It is recommended that the Cabinet approves:

- The observations received and the Local Authority's responses following the Consultation Period (Consultation Report attached);
- The modifications to the implementation dates of the proposal as noted in the report;
- The publication of a Statutory Notice to implement the proposal.

Reasons:

- To comply with statutory procedures and guidance in relation to school re-organisation.

Relevant scrutiny committee to be consulted: No

Cabinet Decision Required: Yes- 06/12/2021

Council Decision Required: No

Cabinet Member Portfolio Holder: Cllr. Glynog Davies (Education & Children)

Directorate:
Education & Children

Name of Head of Service:
Simon Davies

Report Author:
Sara Griffiths

Designations:
Head of Access to Education

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**EXECUTIVE SUMMARY
CABINET
06/12/2021**

MODERNISING EDUCATION PROGRAMME

PROPOSAL TO RECONFIGURE AND REMODEL BEHAVIOUR SUPPORT SERVICES AT YSGOL RHYDYGORS TO IMPROVE PROVISION FOR CHILDREN AND YOUNG PEOPLE

Background

Following a strategic review of the Local Authority's Behaviour Services, the LA aims to move from a silo focus on behaviour to a more universal approach to include pupil wellbeing and engagement. To achieve this the LA has developed a Four Phase Model of its behaviour services which includes providing behaviour and engagement support on four levels. Support ranges from intervention and support in mainstream schools to specialised respite or residential placements.

This proposal supports the realisation of the Four Phase Model. Currently, the Local Authority have a range of settings in which pupils with SEBD are supported. This includes Ysgol Rhydygors, Carmarthenshire Secondary Teaching and Learning Centre (Pupil Referral Unit for secondary pupils), Canolfan Bro Tywi (Pupil Referral Unit for primary pupils) and Canolfan y Gors (Pupil Referral Unit for secondary pupils with significant anxiety and/or emotional wellbeing and mental health issues requiring the support of CAMHS-Child and Adolescent Mental Health Services).

The vision of the four-phase model includes encouraging each of these settings to work together as one Specialist Behaviour and Wellbeing Support Service Team. One of the principal ways of achieving this is to create consistency in the type of provision offered at each of the settings and to create a system ensuring that links with mainstream schools.

At the current time, once a child is placed in Rhydygors, the historical evidence suggests that the young person remains there until they are 16 with no further mainstream experience.

The new Four Phase Model is developing behaviour support services to allow easier access to early intervention so that schools have direct access to a link Behaviour Support Service team member who will be trained in restorative approaches, trauma informed practices and have continuous professional development to support the needs of their cluster of schools. Members of the Behaviour Support Community team are supported by their line Manager, the Lead Officer for Behaviour Support Services and PRUs and an ECP with senior responsibility for behaviour to address any young people that they feel they need advice, support and guidance with so that any training will be approved to meet the needs of the young learners and the schools they attend.

As the Behaviour Support Community Team and PRUs will come under Phase 3 management there will be consistency in training programmes, ethos development, curriculum offer and the development of trauma informed practitioners in a trauma informed setting and psychological informed environments (PIE).

By having regular and link access to Behaviour Support Community Team staff we will have greater opportunity to work with our learners at an earlier stage for intervention and allow us through multi-agency meetings and possibly TAPPAS (Teams Around Pupils Parents and

Settings), currently a pilot project in the local authority, we will be able to develop creative and innovative support packages at the earliest possible time to keep our learners in mainstream if this is the most appropriate setting.

There are always learners who have complex needs and require robust support packages outside of mainstream provision but our ethos supports inclusivity and developing needs led support and services. Within the Four Phase model when a child is recommended for a place in Phases 3 or 4 there should always be the opportunity for transition back to mainstream, or even access mainstream for subjects that they engage with positively and the learning of others is not negatively impacted, when the young person can regulate emotions and engage in their education in a positive and safe manner. This can be undertaken by continuous monitoring and assessment and with close, transparent and trusting relationships with our mainstream schools.

For the reasons of consistency, access to highly specialist support, access to a broad and balanced curriculum with a range of accreditation options and the offer of individual and bespoke education plans offered in the current PRUs through the 3-Tiered approach, there is a requirement to discontinue Ysgol Rhydygors as a special school and establish it as a Pupil Referral Unit. This proposal will initiate this change.

Whilst it is acknowledged that Ysgol Rhydygors has been providing education for pupils with social, emotional, and behavioural difficulties (SEBD) in the form of a special school for a number of years, it is recognised that an enhancement of the PRU model will more appropriately cater for the needs of society and its young people providing consistent opportunities across the county.

The Proposal

1. In line with the School Organisation Code (2018) the Local Authority proposes to:
Discontinue Ysgol Rhydygors Special School as of the 1st January 2022

All former Ysgol Rhydygors pupils will continue to receive their education on the site of the former Ysgol Rhydygors school. If approved, instead of receiving provision in a special school, pupils will be educated in a Pupil Referral Unit (PRU).

Whilst the proposal should be considered as a whole. This consultation document relates to Point 1 only. Points 2 and 3 noted below will be undertaken via separate procedures.

2. Should the above (Point 1) be approved, the Local Authority will establish a Pupil Referral Unit (PRU) on the site of the former Ysgol Rhydygors school as of the 1st January 2022.
3. Additionally, should Point 1 be approved, the Local Authority will establish a Children's Home/Respite Centre on the site of the former Ysgol Rhydygors school/Residential Unit as of the 1st January 2022.

All former Ysgol Rhydygors pupils who have an element of residential education as part of their SEN Statement will continue to receive this on the site of the former Ysgol Rhydygors school.

Statutory Process

In accordance with Executive Board's (now known as the Cabinet) instructions on the 21 December 2020 a formal consultation exercise was undertaken from 11 January 2021 and was due to end on the 21 February 2021. However, a decision was made by the Executive Board to extend the Consultation Period until the 16 July 2021. The results of the consultation exercise are contained in the attached Consultation Report.

Should the Cabinet grant permission to proceed to Statutory Notice, the intention is to publish in due course.

If approved, following the end of the Statutory Notice period, an objection report which summarises any objections received by stakeholders, will be presented to the Cabinet and ultimately to the County Council for determination.

Modifications

As a result of the extension to the Consultation Period, the implementation dates for the proposal noted above require modification to ensure appropriate time to implement the proposals.

Should the Cabinet decide to proceed with this proposal it is recommended that the Cabinet accepts the modified dates as noted below:

1. In line with the School Organisation Code (2018) the Local Authority proposes to:
Discontinue Ysgol Rhydygors Special School as of the 31st August 2022

All former Ysgol Rhydygors pupils will continue to receive their education on the site of the former Ysgol Rhydygors school. If approved, instead of receiving provision in a special school, pupils will be educated in a Pupil Referral Unit (PRU).

Whilst the proposal should be considered as a whole. This consultation document relates to Point 1 only. Points 2 and 3 noted below will be undertaken via separate procedures.

2. Should the above (Point 1) be approved, the Local Authority will establish a Pupil Referral Unit (PRU) on the site of the former Ysgol Rhydygors school as of the 1st September 2022.
3. Additionally, should Point 1 be approved, the Local Authority will establish a Children's Home/Respite Centre on the site of the former Ysgol Rhydygors school/Residential Unit as of the 1st September 2022.

All former Ysgol Rhydygors pupils who have an element of residential education as part of their SEN Statement will continue to receive this on the site of the former Ysgol Rhydygors school.

Recommendation

It is recommended that the Cabinet approves:

- The observations received and the Local Authority's responses following the Consultation Period (Consultation Report attached);
- The modifications to the implementation dates of the proposal as noted in the report;
- The publication of a Statutory Notice to implement the proposal

DETAILED REPORT ATTACHED?

YES: Consultation Report

IMPLICATIONS

I confirm that other than those implications which have been agreed with the appropriate Directors / Heads of Service and are referred to in detail below, there are no other implications associated with this report:

Signed: *S. Lewis*

Head of Access to Education

Policy, Crime & Disorder and Equalities	Legal	Finance	ICT	Risk Management Issues	Staffing Implications	Physical Assets
YES	YES	YES	NONE	YES	YES	YES

1. Policy, Crime & Disorder and Equalities

Developments are consistent with the Authority's Corporate Strategy and the Modernising Education Strategic Outline Programme.

2. Legal

Appropriate consultation was initiated in accordance with the relevant statutory procedures.

3. Finance

Revenue implications will be catered for within the Local Management of Schools Fair Funding Scheme.

5. Risk Management Issues

If the proposal is not implemented the local authority will continue to provide inconsistent SEBD provision to pupils across the County.

6. Staffing Implications

Staffing implications will be addressed in accordance with the County Council's Policy and Procedures.

7. Physical Assets

The Ysgol Rhydygors site will continue to be used for Education purposes. If approved, it will be the location of the Pupil Referral Unit and Children's Home/Respite Centre.

CONSULTATIONS

I confirm that the appropriate consultations have taken in place and the outcomes are as detailed below

Signed:



Head of Access to Education

1. **Scrutiny Committee** – Consulted during the formal Consultation Period.
2. **Local Member(s)** – The local members are aware of the proposal and were consulted during the formal Consultation Period.
3. **Community / Town Council** – Consulted during the formal Consultation Period.
4. **Relevant Partners** – Consulted during the formal Consultation Period.
5. **Staff Side Representatives and other Organisations** – Consulted during the formal Consultation Period.

CABINET AWARE/CONSULTED	PORTFOLIO HOLDER(S)	N/A
YES		

Section 100D Local Government Act, 1972 – Access to Information List of Background Papers used in the preparation of this report:

Title of Document	File Ref No.	Locations that the papers are available for public inspection
Carmarthenshire's Welsh in Education Strategic Plan		https://www.carmarthenshire.gov.wales/home/council-democracy/strategies-and-plans/welsh-in-education-strategic-plan/
MEP Biennial Review		www.carmarthenshire.gov.uk Executive Board 20 th June 2016
21 st Century Schools Website		www.21stcenturyschools.org
Consultation Document		Ysgol Rhydygors (gov.wales)
Stage 1 (Permission to Consult) – ECS Scrutiny Committee Report		Agenda for Education & Children Scrutiny Committee on Monday, 23rd November, 2020, 10.00 am (gov.wales)
Stage 1 (Permission to Consult) Exec Board		Agenda for Cabinet on Monday, 21st December, 2020, 10.00 am - Carmarthenshire County Council (modern.gov.co.uk)

**Proposal to reconfigure and remodel
Behaviour Support Services at Ysgol
Rhydygors to improve provision for
children and young people**

Consultation Report



carmarthenshire.gov.uk



School Modernisation Section

Sara Griffiths, Modernisation Team Manager

If you require this information in large print, Braille or on audiotape please contact the Department for Education & Children

Email: DECMEP@carmarthenshire.gov.uk

Telephone: 01267 246618

Acronyms

ALN Additional Learning Needs

ALNco Additional Learning Needs Co-ordinator

BESD Behavioural, Emotional and Social Difficulties

DCF Digital Competence Framework

ECPs Education and Child Psychologists

ELSA Emotional Literacy Support Assistant

EOTAS Education other than at School

ESA Education Support Advisor

ICF Integrated Care Fund

IDP Individual Development Plan

LA Local Authority

LALI Local Authority Link Inspector

MEP Modernising Education Programme

OPP One Page Profiles

PCP Person-Centre Practice

PIAP Post Inspection Action Plan

PRU Pupil Referral Unit

SEN Special Educational Needs

SLT Senior Leadership Team

TAs Teaching Assistants

TAPPAS Team around Pupils Parents and Settings

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Appendices
Appendix A – Four Phase Model Outline
Appendix B – Four Phase Model of Behaviour Support Services

Executive Summary

The Consultation Period

On the 11th January 2021 Carmarthenshire County Council published a proposal to:

- Reconfigure and remodel Behaviour Support Services at Ysgol Rhydygors to improve provision for children and young people

The consultation period commenced on 11th January 2021 in line with the publication of the proposal and closed on 16th July 2021 with a total of 53 responses received (excluding the responses received from Estyn and the pupils' consultation event) in response to the formal consultation.

Responses Received			
Online Survey	E-mail	SNAP Cymru	Total
50	1	2	53

It must be noted that of the 53 observations received, all were received prior to the end of the consultation period.

Consultation Events

Due to the ongoing implications of the Coronavirus pandemic we were advised to postpone all events where there was interaction between staff, parents and the wider community and as a result virtual drop-in sessions were held via Microsoft Teams.

Informal

Virtual informal drop-in sessions were held prior to the beginning of the formal consultation period with relevant stakeholders.

Formal

A virtual formal drop-in session was held on **27 January 2021 at 4:30pm for a period of two hours**. The formal consultation drop-in session was attended by 21 stakeholders.

In addition, Ysgol Rhydygors held a Question-and-Answer opportunity for both pupils and parents in relation to the proposal.

Responses Received

The responses received have been categorised into the following themes:

Supportive

- Theme 1 – No reason
- Theme 2 – Support for the proposal
- Theme 3 – Ensuring provision meets the needs of pupils
- Theme 4 – Safeguarding staff employment
- Theme 5 – Staff and pupil wellbeing
- Theme 6 – Capacity of provision
- Theme 7 – Financial position
- Theme 8 – Benefits of the change for pupils
- Theme 9 – Learning environment
- Theme 10 – Support for senior management
- Theme 11 – Curriculum provision
- Theme 12 – Staffing levels
- Theme 13 – Transition
- Theme 14 – Re-integration to Mainstream Education

Unsure (respondents did not answer yes or no)

- Theme 1 – Model of provision

Concerns

- Theme 1 – Staff employment
- Theme 2 – Impact of change on pupils
- Theme 3 – No reason
- Theme 4 – Leadership
- Theme 5 – Suitability of PRU provision
- Theme 6 – Future residential provision
- Theme 7 – Timing of implementation
- Theme 8 – Re-integration to Mainstream Education
- Theme 9 – Upskilling of staff
- Theme 10 – Impact on mainstream schools

Overall Summary

Supportive	55%	Not supportive	43%	Unsure	2%
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Workshops

Following the closure of the consultation period on the 16 July 2021 a workshop was held to analyse the observations received.

Next Steps

The Consultation Report will be presented to the Cabinet (previously known as the Executive Board) who may decide to publish the proposal as consulted upon with appropriate modifications, to abandon the proposals and retain the status quo or to significantly recast the proposal and reconsult.

Should the Cabinet decide to proceed to publish a Statutory Notice this will be published in due course.

Summary of Observations received and Local Authority Responses

Point Number	Point Raised	Local Authority Response	Number of responses raising this point	% of responses raising this point
Supportive Comments Raised				
1.	No reason Some respondents did not provide a reason for their support.		16	30%
2.	Support for proposal Respondents supported the proposal to discontinue Ysgol Rhydygors and establish a Pupil Referral Unit (PRU). The benefits of a PRU were recognised as an improvement in provision.	The proposal is part of the wider Behaviour Services review and the Carmarthenshire Four Phase model. This change will ensure a better strategic fit for this unit within the wider strategy and better serve the learners who'll attend the facility.	3	6%
3.	Ensuring provision meets the needs of pupils Respondents acknowledged that the facility would need to be staffed by suitably qualified and experienced teachers with provision tailored to the needs of individual pupils. It was acknowledged that the PRU model would allow pupils to access	The Local Authority (LA) agrees that suitably qualified and experienced staff will be sought. Potential employees that have relevant specialisms, the capacity to further develop professionally and have the appetite and inclination to work in this area of service delivery will be sought after. The Four Phase model strives to ensure that as many young people as possible have access to mainstream education. Following a successful period of specialised	2	4%

	mainstream provision where appropriate.	support at the PRU, pupils can be considered to be reincluded in mainstream. Pupils attending the provision will have had their needs clearly identified and robust planning and interventions will be provided to support each learner. All learners will be frequently monitored and their progress reviewed to identify the most appropriate provision to meet their needs.		
4.	Safeguarding staff employment Respondents noted the need to safeguard the positions of current staff members, for the benefit of pupils.	See answer to point 3 above.	2	4%
5.	Staff and pupil wellbeing Respondents noted the requirement to support staff and pupil wellbeing during the change process to ensure limited disruption.	The LA agrees with this perspective and will make the necessary arrangements for this to be facilitated.	2	4%
6.	Capacity of provision Respondents questioned whether the proposal would impact on the number of pupils accessing the PRU provision.	There is no current intention to change the capacity of the provision so the number of pupils who can access provision will remain the same.	1	2%
7.	Financial position Respondents sought information on the proposed budget and in particular: whether costs of providing more creative learning had been included in the proposed budget; how ongoing costs of the PRU provision would be met and	The creative learning delivered in PRUs has been developed by staff currently employed there and volunteering to attend training to develop a creative curriculum listening to pupil voice and attempt to have a more engaging curriculum to meet the needs of learners. The curriculum developed in these settings has been developed using the budget already available.	1	2%

	whether spending per learner would remain the same or be increased.	<p>The rationale for staff budget is that the pupils will retain a high pupil to staff ratio with 1 teacher and 2 support staff for each class of six pupils. In addition, there will be a Centre Manager and an Additional Learning Needs Co-ordinator (ALNCo) and will fall within the overall Four Phase Model of Support with an overarching senior leadership team comprising of Phase 2, 3 and 4 Managers.</p> <p>The consultation is not about saving money but providing a more equitable approach to working with learners with Behavioural, Emotional and Social Difficulties (BESD), ensuring all have equal opportunities and that we have far more focus on early intervention.</p>		
8.	<p>Benefits of change for pupils</p> <p>Respondents asked what the benefits of the proposed changes are for the current pupils of Ysgol Rhydygors.</p>	<p>The benefits of the Four Phase Model for pupils with BESD, more complex needs and for those requiring long term educational placements include:</p> <ul style="list-style-type: none"> • The strategy for meeting the needs of learners with BESD, more complex and long- term needs, will be led by the Education & Children’s Services (ECS) Department, robustly governed, implemented and evaluated by a skilled, shared Management Committee that understands the varying needs of these learners and how to meet these needs. • Pupils will access effective provision that is needs led and equitable in terms of holistic support, wellbeing and learning experiences with effective practice being shared across the PRU settings and the relevant areas of the Four Phase model. • Increasingly pupils’ needs will be met within their mainstream schools due to the effective support and professional development opportunities provided via 	1	2%

the Four Phase model. As a result, pupils' learning and wellbeing needs will be met via a hybrid model, including access to relevant mainstream school or partnership learning experiences or provision within the PRU structure; ratios will vary depending on pupils' needs.

- Improved continuity in the Carmarthen area for pupils moving from primary to secondary aged PRU provision; familiar systems, processes and staffing alongside high expectations.
- Providing for these learners via one PRU system provides:
 - Clarity of vision and expectation.
 - Collaboration and learning amongst staff and leaders, sharing effective practices and evaluating constructively in a self-improving manner.
 - Collegiate governance via a management committee, building expertise in relation to the provision required to meet the needs of pupils with BESD, complex or long-term needs.
 - An innovative, needs led curriculum, sharing staffing expertise and resources across the PRUs and maximising the shared opportunities that this will enable.
 - Flexibility in relation to the deployment of staffing to meet pupils' needs and to lead strategic areas in a distributed manner.
 - Economies of scale, providing shared learning experiences for pupils.

- A larger learning community for pupils to develop their social and learning skills in a safe, inspirational yet empathetic environment.
- Provision for learners within Trauma Informed environments where the curriculum is designed to ensure that pupils' wellbeing, social, vocational and academic needs form the basis of all learning experiences.
- Residential provision is included within the Four Phase Model; the ethos, care and wellbeing will align directly to the learning provision accessed during the day providing a settled, familiar environment for all.

In summary, the rationale for the school to become a PRU is to provide pupils with an inclusive and aspirational learning pathway that does not restrict them to remaining in a small (currently 38 pupils on register) setting from KS2-KS4 with a narrow curriculum and a lack of aspiration to return (even in part) to mainstream provisions.

Rhydygors have talented pupils in sport, digital technology, music and the expressive arts who deserve access to progression pathways in these subjects. They deserve to be taught by specialist subject teachers in literacy, numeracy, science and DCF (Digital Competence Framework) that are difficult areas to recruit to when staff are expected to deliver the holistic curriculum across age groups and learning needs.

		<p>The setting is isolated and too small to offer the breadth required by the pupils. Working in a collaborative manner across the Specialist settings will allow for greater flexibility of staffing to work across the varying sites, providing greater equity of curriculum offer.</p> <p>The proposed changes allow for greater professional development for our staff across settings as the robust leadership structure will allow for greater opportunity to also access leadership experiences.</p>		
9.	<p>Learning environment Respondents noted that the current site and buildings are not fit for purpose and require development. Respondents asked whether there would be any improvements/adaptations made to the learning environment to facilitate their new use and what funding was available to support this.</p>	<p>How will the school / PRU site be improved?</p> <ul style="list-style-type: none"> • Provision will be shared with the current PRU currently on site for the primary aged pupils, enhancing the learning environment for all. • The department are currently undertaking a review of its Modernising Education Programme (MEP) which includes all the county's schools including Ysgol Rhydygors. • The outdoor learning environment has been re-designed to align to the learning offer. This includes: <ul style="list-style-type: none"> ➤ Covered areas for play and learning. ➤ The development of gardening zones and provision for keeping small animals. • Internal and external areas have been de-cluttered and have been re-purposed to include nurture areas and purposeful learning areas, for example, 	1	2%

hairdressing and music technology facilities are now in place.

Specifically in relation to Recommendation 5 from the ESTYN report

R5 Improve the learning environment

As a result of relevant training and ongoing advice the learning environment across the school is improving. Across key stage 2 there is a focus on implementing a nurture influenced provision, for example clear routines for the school day, a range of multi-sensory opportunities, and the potential for improved outdoor spaces to be used as valuable learning spaces.

Leaders are developing worthwhile links with other providers to enhance the environment, for example, staff from the Botanical Gardens of Wales.

Next steps:

- Plan purposefully for outdoor learning opportunities.
- Continue to reflect on the progress of the nurture-based environment and its impact on pupils.

10.	Support for senior management Respondents asked how the Local Authority would support the Head Teacher and Senior Leadership	Since September 2014 Ysgol Rhydygors has had a very challenging period retaining consistent senior leadership and governance. There have been five headteachers appointed, one permanent and four interims. The acting	1	2%
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	<p>team during the time of uncertainty and change.</p>	<p>headteacher at the time of the last inspection was appointed in September 2018 but resigned from the school in Spring Term 2021. The remainder of the leadership team, as it stood at that time, have since resigned to go to new posts.</p> <p>To support the school the Local Authority have seconded leaders to create an interim leadership team for the school.</p> <p>Benefits of the Current LA leadership arrangements in place at Rhydygors, which align to the future Four Phase Model proposal, and the positive impact to date:</p> <ul style="list-style-type: none"> • Improved leadership from Interim LA Headteacher with access to staffing and processes across the PRUs. Leadership sits on the ministerial advisory group, accessing and informing current developments for vulnerable children. • Direct leadership support from the Local Authority's Education other than at school (EOTAS) Manager, leading to improved culture and expectations regarding positive behaviours and engagement in learning. • Sharing of expertise across the PRU settings and improving learning provision, for example, collaboration across the Senior Leadership Team (SLT) has led to a shared vocational offer for pupils at key stage 4. • More effective multi-agency support is now commissioned by the leadership team; this is having a positive impact on provision and progress. 		
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		<ul style="list-style-type: none"> • More robust evaluation of current provision and subsequent improvement planning. • Leadership continuity across the primary provision being provided by the primary PRU lead. 		
11.	<p>Curriculum provision Respondents asked for clarity on how the curriculum provision would be better than at present.</p>	<p>The curriculum offer was not engaging pupils effectively. When asked for pupil voice regarding their curriculum pupils felt the curriculum offer was not interesting.</p> <p>In line with the New Curriculum for Wales we will require our teachers to be specialist and flexible so that we can offer pupils Enabling Adults, Enabling Environments and Enabling Experiences (Welsh Government Enabling Pathways document currently in consultation).</p> <p>As stated previously Rhydygors have talented pupils in sport, digital technology, music and the expressive arts who deserve access to progression pathways in these subjects. They deserve to be taught by specialist subject teachers in literacy, numeracy, science and DCF that are difficult areas to recruit to when staff are expected to deliver the holistic curriculum across age groups and learning needs.</p> <p>The setting is isolated and too small to offer the breadth required by the pupils. Working in a collaborative manner across the Specialist settings will allow for greater flexibility of staffing to work across the varying sites, providing greater equity of curriculum offer.</p>	1	2%

12.	<p>Staffing levels Respondents asked whether the staffing levels would remain the same or be increased.</p>	<p>As stated in the finance section our intention is to keep a high staff to pupil ratio with one teacher and two support assistants for each class of six pupils. Each pupil has an Individual Development Plan (IDP) and this will reflect their specific need and identify the need for a higher staff ratio with a rationale and what the higher ratio will achieve.</p>	1	2%
13.	<p>Transition Respondents asked what steps the Local Authority would take to ensure a smooth transition for pupils from school to PRU provision.</p>	<p>As the Acting Head and other members of the leadership team resigned and recruitment and secondment options failed to provide professionals needed the Local Authority placed an interim leadership team in the school.</p> <p>If the outcome of the consultation is to discontinue the school and establish a PRU there will be a minimum of one term allowing for a new staffing structure to be introduced. It is hoped that staff within the structure who are familiar with the pupils will be part of this structure. As location will remain the same and we are hopeful that a number of staff will be the same, pupils will not have a huge amount of change to deal with. Pupils have already been introduced to new leadership and this has provided positive outcomes. Any new member of staff will be welcomed and slowly begin to meet pupils and build relationships. In addition, we are implementing processes, in line with Additional Learning Needs (ALN) reform, to change statements to IDPs. In these review meetings we will be using person centred approaches to listen to pupil voice and parent/carers as well as professionals and will be co-</p>	1	2%

		creating plans to ensure that any progress is recognized and celebrated and any current needs and how they can be supported are clear and transparent so that the learner, family and professionals work together and feel part of the creation of the plan and feel they have some control in how, what and where they undertake their learning and support.		
14.	<p>Re-integration to Mainstream Education</p> <p>Respondents questioned whether the proposal would be used to re-educate and remodel behaviour with the view of encouraging pupils back in to mainstream education with support.</p>	<p>Historically PRU provisions are set up to be short term and are offered on a two term placement with the expectation that pupils should return to their mainstream school. The current process is to monitor, assess and evaluate if enough progress has been made within two terms for the pupil to return to mainstream. If the pupil has not made enough progress and/or an assessment may then be formally carried out to identify if the pupil requires a long-term placement which is Rhydygors.</p> <p>This may appear that a PRU has not been successful, when in reality it could be that the learner just needed a longer period of time to work on interventions, strategies and support.</p> <p>It is not the intention that pupils currently attending Rhydygors will be expected to return to a mainstream school. Rather they will be considered as requiring a long-term placement in specialist settings.</p> <p>The Four Phase Model has been developed to create more opportunity to support pupils in their mainstream setting</p>	1	2%

		<p>and seeks to identify needs at an earlier stage so that support can be offered as soon as possible.</p> <p>The Four Phase Model is being developed to be needs led and will include multi-agency support where we are working towards early identification, upskilling mainstream schools, family support and offering truly bespoke packages of support clearly working with the young person at the centre feeling part of the process and involved in the decisions being made about their support and education.</p>		
Unsure (respondents did not answer yes or no)				
1.	<p>Model of provision Respondents asked for clarity on what the new model of provision would look like compared to current provision.</p>	<p>We are seeking to ensure that pupils attending specialist provision (school or PRU) have equity regarding interventions and curriculum offer regardless of the site of their provision.</p> <p>The future model of the provision would include a provision working with a restorative ethos and trained staff who are trauma informed. We would like to offer a trauma recovery model in the setting. We are also working to increase accreditation available and increase qualifications available offering more vocational and bespoke education programmes. We also intend to create more outdoor learning opportunities and targeted wellbeing interventions that are tracked, monitored and evaluated.</p> <p>We can increase accreditation and curriculum offer by having staff working together across the PRU provisions (Phase 3 of the 4 Phase Model) to offer a greater number of subject specialisms and greater offer of vocational courses and accredited courses. Working together rather</p>	1	2%

		than in individual settings allows for greater expertise to be shared.		
Concerns Raised				
1.	Staff employment Respondents raised concerns regarding the future employment opportunities for staff in the PRU should the proposal be implemented and queried whether staff would have to apply for positions in the PRU.	See answer to point 3 above.	5	9%
2.	Impact of change on pupils Respondents highlighted concerns regarding the impact of the change of provision and staffing on pupils.	The Local Authority do not want to lose experience and expertise and the structure going forward would continue to require a high staff to pupil ratio. It is hoped that a significant number of staff currently working at the school with the skills, experience, expertise and desire to work with our learners would wish to work in the setting as a PRU. In addition, the site is not changing. With regards to change of provision pupils will continue to be registered as long-term pupils and their provision would only change following a robust delivery, tracking, assessing and review of their needs. All review and progress will be person centred so pupil voice, in addition to parents and professionals will be involved in any decision.	4	8%

3.	<p>No reason Some respondents did not provide a reason for their concerns.</p>		3	6%
4.	<p>Leadership Respondents questioned whether the proposal was a reaction to the leadership of the school.</p>	<p>The restructure is part of the wider Behaviour Services review and is a strategic restructure.</p>	2	4%
5.	<p>Suitability of PRU provision Respondents questioned the suitability of PRU provision especially for those pupils who have previously attended a PRU.</p>	<p>Historically PRU provisions are set up to be short term and are offered on a two term placement with the expectation that pupils should return to their mainstream school. The current process is to monitor, assess and evaluate if enough progress has been made within two terms for the pupil to return to mainstream. If the pupil has not made enough progress and/or an assessment may then be formally carried out to identify if the pupil requires a long-term placement which is Rhydygors.</p> <p>This may appear that a PRU has not been successful, when in reality it could be that the learner just needed a longer period of time to work on interventions, strategies and support.</p> <p>It is not the intention that pupils currently attending Rhydygors will be expected to return to a mainstream school. Rather they will be considered as requiring a long-term placement in specialist settings.</p> <p>The Four Phase Model has been developed to create more opportunity to support pupils in their mainstream setting and seeks to identify needs at an earlier stage so that support can be offered as soon as possible.</p>	2	4%

		The Four Phase Model is being developed to be needs led and will include multi-agency support where we are working towards early identification, upskilling mainstream schools, family support and offering truly bespoke packages of support clearly working with the young person at the centre feeling part of the process and involved in the decisions being made about their support and education.		
6.	Future residential provision Respondents noted concerns for the future of the residential provision.	<p>Residential provision is being considered as part of phase 4 of the LA model.</p> <p>Should the proposal to discontinue Ysgol Rhydygors be approved, the Local Authority will establish a Children's Home/Respite centre on the site of the former Ysgol Rhydygors school/Residential Unit.</p> <p>All former Ysgol Rhydygors pupils who have an element of residential education as part of their Special Educational Needs (SEN) Statement will continue to receive this on the site of the former Ysgol Rhydygors school. To coincide and further develop the proposals, the Local Authority are currently in the process of progressing an Integrated Care Fund (ICF) funding application to develop a new, 21st century children's home. This will hopefully enhance the children's home model and provision available and will meet the needs of children both locally and regionally. The scheme is currently in the development stages of design.</p>	2	4%
7.	Timing of implementation Respondents questioned the appropriateness of the timing of the proposal. Respondents were	The timeline for the proposal was prepared in line with the requirements of Welsh Government's School Organisation Code (2018) . In addition, the Four Phase Model has been	2	4%

	<p>concerned with the impact of implementing the proposal prior to other phases of the behaviour model being embedded. In addition, respondents felt that the proposal had been rushed which they believe implies that the proposal has not been fully considered.</p>	<p>written in response to a whole review of Behaviour Support Services in the Local Authority.</p> <p>The Model has been in development initially investing in upskilling staff with training which is the first Phase of the model. The second Phase is creating greater opportunity for specialist support and interventions in mainstream schools and we are developing the TAPPAS model (Teams Around Pupils Parents and Settings) to create a system of identifying training needs to support our young people in their mainstream setting or provide robust packages of support as early as possible in their mainstream setting. Phase 3 is developing a large specialist team for those young people where mainstream is not currently the right environment for them. This is where the PRUs and special schools align so that we can all work together as a large specialist team providing the greatest expertise to the learners at the appropriate time. Phase 4 is the wrap around packages and family work which is also currently under consultation (residential element). In time Phase 4 will also include Post 16 opportunities in line with ALN reform.</p>		
8.	<p>Re-integration to Mainstream Education</p> <p>Respondents were concerned that the proposal would involve a focus on re-integrating pupils into a mainstream setting and the detrimental impact this could have on pupils.</p>	<p>Historically PRU provisions are set up to be short term and are offered on a two term placement with the expectation that pupils should return to their mainstream school. The current process is to monitor, assess and evaluate if enough progress has been made within two terms for the pupil to return to mainstream. If the pupil has not made</p>	2	4%

		<p>enough progress and/or an assessment may then be formally carried out to identify if the pupil requires a long-term placement which is Rhydygors.</p> <p>This may appear that a PRU has not been successful, when in reality it could be that the learner just needed a longer period of time to work on interventions, strategies and support.</p> <p>It is not the intention that pupils currently attending Rhydygors will be expected to return to a mainstream school. Rather they will be considered as requiring a long-term placement in specialist settings.</p> <p>The Four Phase Model has been developed to create more opportunity to support pupils in their mainstream setting and seeks to identify needs at an earlier stage so that support can be offered as soon as possible.</p> <p>The Four Phase Model is being developed to be needs led and will include multi-agency support where we are working towards early identification, upskilling mainstream schools, family support and offering truly bespoke packages of support clearly working with the young person at the centre feeling part of the process and involved in the decisions being made about their support and education.</p>		
9.	<p>Upskilling of staff Respondents noted whether appropriate training could be provided to upskill staff to meet the needs of the proposed provision.</p>	<p>The four-phase model is predicated on a strong model of staff Continuing Professional Development and upskilling will be supported.</p>	1	2%

10.	<p>Impact on mainstream schools Respondents queried whether the implementation of the proposal would pose challenges for Mainstream schools.</p>	<p>As part of the Four Phase model there is greater support provided to mainstream schools from the behaviour support community team and greater emphasis on early intervention and working restoratively to support schools, pupils and families (refer to TAPPAS Pilot). Most recently, as evidence of our commitment to support schools the team will be increasing from 6 to 14 members.</p>	1	2%
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Estyn's Observations regarding the Proposal

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

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

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

1. All former Ysgol Rhydygors pupils will continue to receive their education on the site of the former Ysgol Rhydygors School. If approved, instead of receiving provision in a special school, pupils will be educated in a Pupil Referral Unit (PRU).

Whilst the proposal should be considered as a whole, this consultation document relates to point 1 only. **Points 2 and 3 noted below will be undertaken via separate procedures.**

2. Should the above (point 1) be approved, the local authority will establish a pupil referral unit (PRU) on the site of the former Ysgol Rhydygors school as of 1st January 2022.
3. Additionally, should point 1 be approved, the local authority will establish a Children's Home/Respite centre on the site of the former Ysgol Rhydygors school/Residential Unit as of 1st January 2022.

All former Ysgol Rhydygors pupils who have an element of residential education as part of their SEN statement will continue to receive this on the site of the former Ysgol Rhydygors School.

Summary/ Conclusion

Ysgol Rhydygors is a purpose built maintained residential special school. At the time of the last core inspection in November 2019, there were 37 pupils on roll aged from 7 to 16 years. All pupils have a statement of special educational needs (SEN) or an individual development plan (IDP) primarily for social emotional and behavioural difficulties (SEBD). The school is in Estyn Review having received judgements of adequate and needs improvement across all five inspection areas. The school has five recommendations for improvement.

The school was previously inspected in September 2014. Since this time, there have been five headteachers appointed, one permanent and four interim. The current interim headteacher was appointed in September 2018.

Pupil numbers across the school have fluctuated over the last five years. There has been a decline in residential pupil numbers during the same time.

Overall, the consultation document lacks sufficient detail on the proposal to close Ysgol Rhydygors special school. The rationale provided from the local authority to close the special school and establish it as a pupil referral unit is unclear. There is insufficient information provided on the benefits of this proposal for pupils with SEBD and especially those with needs that are more complex and require long-term educational placements.

Description and benefits

Currently the local authority has a range of settings in which pupils with SEBD are supported, a total of four providers, which includes Ysgol Rhydygors and three pupil referral units (PRUs). The local authority's vision is to bring provisions together under one Specialist Behaviour and Wellbeing Support Service Team under a four phase model. Increased access to the Behaviour Support Service Team as part of the early intervention model to support clusters of schools is suggested. The four phases of the model outlined in the consultation does not contain sufficient detail, especially on phases 3 and 4.

Page 9 paragraph 4, the proposal identifies historical evidence that suggests pupils remain long term at Ysgol Rhydygors with no further mainstream experience. It is unclear why at the annual review of pupils' statements, discussions on the current educational setting including the option to access mainstream provision, where appropriate, is not taking place. The local authority has a statutory duty to review and monitor pupils with statements which includes their educational placement. Additional detail would be helpful to understand the local authority rationale for this comment. The local authority does not have to decommission the school to promote opportunities for pupils to access mainstream settings where appropriate.

The proposal on page 10, paragraph 3 state 'for reasons of consistency, access to highly specialist support, access to a broad and balanced curriculum with a range of accreditation options and the offer of individual and bespoke education plans offered in the current PRUs through the 3 tiered approach, there is a requirement to discontinue Ysgol Rhydygors as a special school and establish it as a PRU'. It is unclear why the specialist support cannot be offered to Ysgol Rhydygors but would be available if it were a PRU. The proposal seem to imply that currently, Ysgol Rhydygors

is not able to provide a broad and balanced curriculum with a range of accreditation or individualised bespoke education plans. There is no evidence to suggest this is the case based from our last inspection. Additionally, the proposal mentions a four phase model in the consultation and a 3 tiered approach. It would be helpful to have greater clarity on these and how they complement each other.

On page 10, paragraph 3 the proposal discusses ‘enhancement of the PRU model will more appropriately cater for the needs of society...’ there is no further detail on what the ‘enhancement’ is or how this would differ from the current offer at Ysgol Rhydygors.

It seems that the proposal is suggesting that pupils with the most complex and challenging SEBD needs would receive their education in a PRU. It is not clear if pupils would continue to require a statement to access such provision and at which tier or phase this would be appropriate.

Page 11, paragraph 1, the proposal is putting forward a plan for an ICF funding application to develop a new, 21st century children’s home. The core inspection identified the need to improve the learning environment in the school. The proposal does not comment on how the school site will be improved. If the site requires improvement as a school, it seems logical the same would apply should there be the establishment of a PRU.

The proposal makes suitable reference on their commitment to a bilingual service. Concern for the progress of pupils at Ysgol Rhydygors who are Welsh first language was raised during the last inspection.

Educational aspects of the proposal

Currently the proposal has limited information on the intended outcomes or benefits for pupils in moving from a special school to accessing PRU provision. The rationale to decommission the school is unclear. PRUs are primarily a short-term provision where there is an expectation that all pupils should re-integrate into mainstream. This approach might not suit all pupils with SEBD as their needs are so complex that they cannot function in the mainstream environment. In the list of options considered, the LA has not proposed that Ysgol Rhydygors be the centre for excellence for SEBD in the LA.

On page 13 bullet point 1 under disadvantages the proposal identifies that ‘initially schools will be nervous that a long-term school provision will not be available in more complex cases’. Currently the consultation paper does not provide sufficient information on what will be available for these pupils.

Page 13- Impact on SEN

The proposal implies that the addition of a PRU to the current Rhydygors site would cater for the diverse range of pupils of all ages with SEBD. This is currently the case with Ysgol Rhydygors sharing its site with one of the three already established PRUs. It is therefore unclear how the closure of the special school and opening of an additional PRU would provide a different and improved overall provision for pupils with SEBD across the local authority.

Page 14- Admission arrangements

The proposal states ‘there are some pupils who present with significant, persistent challenges relating to their social, emotional, and behavioural difficulties and require specialist long-term day or residential SEBD provision in Ysgol Rhydygors’. It is unclear where and how the needs of these pupils will be met under the current proposal to close the school.

The proposal states that ‘The discontinuation of Ysgol Rhydygors and the creation of a PRU to cater for the needs of a diverse range of pupils of all ages and stages of development on one co-located site will ensure a consistent approach to the relevant teaching strategies across all key stages, including the foundation phase’. There is limited evidence in the current consultation to support this statement. The proposal does not provide sufficient evidence to clarify why the special school is not seen as part of the behavioural continuum of provision for SEBD pupils.

Page 16- Alternative Options Considered

In developing a preferred option, the proposal includes a range of alternative options. Additional comments from Estyn in **bold**.

Option 1	Status Quo	Does not address the variation in provision for pupils with SEBD in Carmarthen. - it is unclear from the information provided in the consultation what the ‘variation’ in provision is currently.
Option 2	Discontinue Ysgol Rhydygors and provide for pupils in the current Carmarthenshire Secondary Teaching and Learning Centre	Insufficient capacity in Carmarthenshire’s Secondary Teaching and Learning Centre to accommodate Ysgol Rhydygors pupils. - what about the primary pupils in the school? What are the projected pupil numbers in the authority who require this provision and would they necessitate a fourth PRU being established?
Option 3	Discontinue Ysgol Rhydygors and cater for pupils in mainstream schools	Schools will require specialist support that cannot be delivered in mainstream. - based on pupil statements this doesn’t seem to be a viable option.

Option 4 (Preferred)	Discontinue Ysgol Rhydygors and provide for pupils in a new Pupil Referral Unit (PRU) on the Ysgol Rhydygors school site.	Creates consistency in the quality and standard of provision on offer for pupils with SEBD in Carmarthenshire and limits disruption for pupils. - it may be the case that consistency in the quality and standard of provision offered could be developed at Ysgol Rhydygors
Option 5	Discontinue Ysgol Rhydygors and provide no alternative provision	Does not cater for the needs of pupils with SEBD in Carmarthen.

Local Authority Response to Estyn's Observations

Issues raised by Estyn and LA responses

1. *Overall, the consultation document lacks sufficient detail on the proposal to close Ysgol Rhydygors special school. The rationale provided from the local authority to close the special school and establish it as a pupil referral unit is unclear. There is insufficient information provided on the benefits of this proposal for pupils with SEBD and especially those with needs that are more complex and require long-term educational placements.*

LA Response

The Local Authority undertook a behaviour review in 2018 which resulted in a number of recommendations being made to transform the provision that was available and to ensure that the needs of all pupils are effectively met.

In response to this review a behaviour and wellbeing transformation manager was employed to undertake the task of transforming the services.

A Four Phase Model has been developed in consultation with primary and secondary Headteachers, Service Managers and Heads of Service and phases 1,2,3 are currently being successfully implemented across the authority.

The aim of the Four Phase Model, which includes the proposed discontinuation of Ysgol Rhydygors, is to ensure high quality, equitable provision for all learners across all schools and settings in Carmarthenshire. The model will ensure greater inclusion in mainstream settings by providing appropriate training and support for staff; early identification and intervention aims to ensure that learners successfully remain in mainstream wherever possible and appropriate or that a blend of mainstream and

PRU provision meets their learning needs more effectively. Those pupils with more complex needs may access their provision solely through the PRU settings, if this is what is required.

Please see summary of the Four Phase Model outline attached at appendix A.

The benefits of the Four Phase Model for pupils with BESD, more complex needs and for those requiring long term educational placements include:

- The strategy for meeting the needs of learners with BESD, more complex and long- term needs, will be led by the Education & Children's Services Department, robustly governed, implemented and evaluated by a skilled, shared Management Committee that understands the varying needs of these learners and how to meet these needs.
- Pupils will access effective provision that is needs led and equitable in terms of holistic support, wellbeing and learning experiences with effective practice being shared across the PRU settings and the relevant areas of the Four Phase model.
- Increasingly pupils' needs will be met within their mainstream schools due to the effective support and professional development opportunities provided via the Four Phase model. As a result, pupils' learning and wellbeing needs will be met via a hybrid model, including access to relevant mainstream school or partnership learning experiences or provision within the PRU structure; ratios will vary depending on pupils' needs.
- Improved continuity in the Carmarthen area for pupils moving from primary to secondary aged PRU provision; familiar systems, processes and staffing alongside high expectations.
- Providing for these learners via one PRU system provides:
 - Clarity of vision and expectation.
 - Collaboration and learning amongst staff and leaders, sharing effective practices and evaluating constructively in a self-improving manner.
 - Collegiate governance via a management committee, building expertise in relation to the provision required to meet the needs of pupils with BESD, complex or long-term needs.
 - An innovative, needs led curriculum, sharing staffing expertise and resources across the PRUs and maximising the shared opportunities that this will enable.
 - Flexibility in relation to the deployment of staffing to meet pupils' needs and to lead strategic areas in a distributed manner.
 - Economies of scale, providing shared learning experiences for pupils.
 - A larger learning community for pupils to develop their social and learning skills in a safe, inspirational yet empathetic environment.
 - Provision for learners within Trauma Informed environments where the curriculum is designed to ensure that pupils' wellbeing, social, vocational and academic needs form the basis of all learning experiences.

- Residential provision is included within the Four Phase Model; the ethos, care and wellbeing will align directly to the learning provision accessed during the day providing a settled, familiar environment for all.

Challenges of retaining the current Rhydygors School include:

- Since September 2014 Ysgol Rhydygors has had a very challenging period retaining consistent senior leadership and governance. There have been five headteachers appointed, one permanent and four interims. The acting headteacher at the time of the last inspection was appointed in September 2018 but resigned from the school in Spring Term 2021. The remainder of the leadership team, as it stood at that time, have since resigned to go to new posts.
- Recruitment of suitably qualified and experienced permanent teachers to stabilize the structure has also been challenging. The impact of having a frequent change of staff, high staff absence, high levels of temporary or supply staff directly impacts on the progress and outcomes of learners.
- Lack of flexibility to deploy staffing from the PRU teams into the school to meet pupils needs.
- Recruiting governors with the appropriate skills to govern a special school is exceptionally challenging.
- Children who are placed at Ysgol Rhydygors do not return to mainstream; neither staff, nor children and young people consider this to be an option.
- The lack of consistency and expertise amongst staffing leads to variable progress for pupils.
- Overtime, leadership expectations are not sufficiently aspirational for the learners, despite challenge being provided robustly from the Local Authority.
- Despite the Local Authority providing the school with high levels of support from the Education Support Advisors (ESAs), Additional Learning Needs Department and training packages for both teaching and learning to improve academic success and training for supporting emotional wellbeing, the impact overtime remains variable due to the high turnover of staff.
- Staff report wellbeing concerns: they do not routinely collaborate with mainstream schools nor with the PRU settings.
- Parental and pupil perception of the school can be poor.

Benefits of the Current Local Authority leadership arrangements in place at Rhydygors, which align to the future Four Phase Model proposal, and the positive impact to date:

- Improved leadership from Interim Local Authority Headteacher with access to staffing and processes across the PRUs. Leadership sits on the ministerial advisory group, accessing and informing current developments for vulnerable children.

- Direct leadership support from Local Authority's EOTAS Manager, leading to improved culture and expectations regarding positive behaviours and engagement in learning.
- Sharing of expertise across the PRU settings and improving learning provision, for example, collaboration across the Senior Leadership Team has led to a shared vocational offer for pupils at key stage 4.
- More effective multi-agency support is now commissioned by the leadership team; this is having a positive impact on provision and progress.
- More robust evaluation of current provision and subsequent improvement planning.
- Leadership continuity across the primary provision being provided by the primary PRU lead.

In summary, the rationale for the school to become a PRU is to provide pupils with an inclusive and aspirational learning pathway that does not restrict them to remaining in a small (38 pupil) setting from KS2-KS4 with a narrow curriculum and a lack of aspiration to return (even in part) to mainstream provisions.

Rhydygors have talented pupils in sport, digital technology, music and the expressive arts who deserve access to progression pathways in these subjects. They deserve to be taught by specialist subject teachers in literacy, numeracy, science and DCF that are difficult areas to recruit to when staff are expected to deliver the holistic curriculum across age groups and learning needs.

The setting is isolated and too small to offer the breadth required by the pupils. Working in a collaborative manner across the Specialist settings will allow for greater flexibility of staffing to work across the varying sites, providing greater equity of curriculum offer.

The proposed changes allow for greater professional development for our staff across settings as the robust leadership structure will allow for greater opportunity to also access leadership experiences.

- 2. The four phases of the model outlined in the consultation does not contain sufficient detail, especially on phases 3 and 4.*

LA Response

Please see the Four Phase Model of Behaviour Support Services attached at appendix B and detail included above.

- 3. **Page 9 paragraph 4**, the proposal identifies historical evidence that suggests pupils remain long term at Ysgol Rhydygors with no further mainstream experience. It is unclear why at the annual review of pupils' statements, discussions on the current educational setting including the option to access mainstream provision, where appropriate, is not taking place. The local*

authority has a statutory duty to review and monitor pupils with statements which includes their educational placement. Additional detail would be helpful to understand the local authority rationale for this comment. The local authority does not have to decommission the school to promote opportunities for pupils to access mainstream settings where appropriate.

LA Response

There is a system to ensure annual reviews are undertaken. The Additional Learning Needs Department in the Local Authority holds a central record and there is a robust system in place to ensure annual reviews take place. Due to issues of consistency in leadership, lack of evidence for robust monitoring and evaluation of progress, lack of evidence for programmes of support for the hardest to reach pupils, there appears to be little evidence of progress made that would suggest that during an annual review there would be enough evidence of change for professionals to recommend that a child could engage positively in a mainstream education.

Referencing the information shared above, the proposed changes will mitigate the concern noted here.

4. *The proposal on page 10, paragraph 3 state ‘for reasons of consistency, access to highly specialist support, access to a broad and balanced curriculum with a range of accreditation options and the offer of individual and bespoke education plans offered in the current PRUs through the 3-tiered approach, there is a requirement to discontinue Ysgol Rhydygors as a special school and establish it as a PRU’. It is unclear why the specialist support cannot be offered to Ysgol Rhydygors but would be available if it were a PRU. The proposal seems to imply that currently, Ysgol Rhydygors is not able to provide a broad and balanced curriculum with a range of accreditation or individualised bespoke education plans. There is no evidence to suggest this is the case based on our last inspection. Additionally, the proposal mentions a four-phase model in the consultation and a 3-tiered approach. It would be helpful to have greater clarity on these and how they complement each other.*

LA Response

How does the 3 Tier approach feature within the Four Phase model?

Phase 3 of the 4 Phase Model describes specialist settings which are the Local Authority’s Teaching and Learning Centres (PRUs). The current system in the secondary BESD PRUs has three tiers of support which simply summarised is as follows:

Once in the PRU:

Tier 1 – pupils attend the BESD Teaching and Learning Centre but also access some form of mainstream provision. They may attend their mainstream school; they may be transitioning back into their mainstream school, or they may attend a college placement.

Tier 2- pupils attend the teaching and learning centre on site on a full-time timetable.

Tier 3 – pupils are those pupils who have high end complex needs around their mental health and regulating their emotions which require them to have a bespoke package of support to meet their identified specific needs. These pupils often require trauma

informed practice and access to bespoke packages of support using alternative accreditation packages, outdoor learning, bespoke vocational and wellbeing support to build positive relationships with staff, develop a sense of safety with staff and gradually build their package of support to gain higher levels of engagement with support services and their education plan.

Ysgol Rhydygors Curriculum, access to accreditation and impact of the bespoke education Plans:

- Please note below the June 2021 update to the Local Authority Link Inspector (LALI), including the next steps required.
- References to planning with other settings – this is a reference to working with other PRUs in line with the Four Phase Model.
- Ysgol Rhydygors is receiving significant Local Authority officer support to ensure that the professional development of staffing leads to improved provision for pupils.

R1 Raise standards and improve pupils' literacy and numeracy skill.

The school is collaborating successfully to develop an aspirational vocational offer across key stages 3 and 4. As a result there is a more comprehensive offer that is impacting positively on engagement. An audit of staff skills is supporting more effective deployment of staff to secure delivery of this vocational model.

Across key stage 2 there is a clear focus on the developing nurture influenced environment as a resource to develop both engagement and skills.

Staff are being supported by officers from a range of departments to assess and plan accurately for improvement in literacy and numeracy. However, there has been limited evaluation of its impact on pupils' progress to date.

Next steps:

Continue to increase purposeful opportunities for pupils and young people to apply their skills across the broadening curriculum offer.

R2 Improve pupils' behaviour and attitudes to learning

There is greater consistency of process across the school. A trauma informed model aims to support consistent practice, providing the bespoke training programmes for all staff. A range of Local Authority officers are supporting the development of consistent approaches. As a result, the learning coaches are impacting positively on the KS3 and KS4 vocational offer, which is resulting in the increased engagement of young people.

Across key stage 2, One Page Profiles (OPP) evidence pupil and peer voice which is supporting a nurture influenced environment. Sensory profiles have been completed for key stage 3 pupils, with plans to profile primary phase pupils. Sensory Processing

training is planned for all staff based on the outcomes of these profiles which will further support an enabling provision that impacts on wellbeing and behaviour.

However, due to inconsistent staffing arrangements there is still significant variation across the setting that limits the impact for success.

Next Steps:

- Further develop the impact of training so that it impacts on the environment and pupils and young people.
- Develop the use of Person-Centred Practice (PCP) tools with parents so that the information gathered informs planning.
- Embed the Relationships policy with all stakeholders

R3 Improve the quality of teaching and the effectiveness of assessment

Leaders are providing further opportunities for all teachers to develop their expertise. A more strategic approach is ensuring that all staff are responsible for implementing the change in their classrooms.

Teachers continue to engage with a range of Local Authority officers and are also linking with mainstream schools and other specialist settings. The focus for development is maximising the potential of enabling environments, communication as an intervention and accurate approaches to observation, assessment, and planning. This further develops the peer support that has supported the shared approaches to thematic planning and the contribution of pupil voice.

However, the strategy to support teaching, learning and assessment is still in the early stages of implementation.

Next steps:

- Through improved approaches to observation, assessment and planning, develop curriculum experiences through a person-centred approach.
- Personalise strategies that ensure pupils make engage and make effective progress from their starting point.
- Plan for a highly appropriate indoor and outdoor provision that addresses pupils' and young people's individual needs.

R4 Strengthen improvement planning

As a result of improving self-evaluation processes, health and safety processes are consistent. There is improvement in the vocational provision across key stages 3 and 4 that is impacting on levels of engagement. The learning environment is more inspiring providing greater opportunity for independence and involvement.

An audit of staff skills has resulted in more appropriate deployment of the staff and where staff development is required, robust training, intervention and support has been put in place.

The school will now be supported to prioritise efficient and effective self-evaluation priorities so that it continues to look at the broader need for improvement, including demonstrable impact on pupils and young people.

Next steps:

- SLT to work with ESA colleagues to evaluate school's reviewed Post Inspection Action Plan (PIAP) against LA action plan to ensure support continues to be relevant.
- SLT to plan a cycle of monitoring that involves a range of stakeholders.

R5 Improve the learning environment

As a result of relevant training and ongoing advice the learning environment across the school is improving. Across key stage 2 there is a focus on implementing a nurture influenced provision, for example clear routines for the school day, a range of multi-sensory opportunities, and the potential for improved outdoor spaces to be used as valuable learning spaces.

Leaders are developing worthwhile links with other providers to enhance the environment, for example, staff from the Botanical Gardens of Wales.

Next steps:

- Plan purposefully for outdoor learning opportunities. approach and secures connections for the pupils.
- Continue to reflect on the progress of the nurture-based environment and its impact on pupils.

5. ***On page 10, paragraph 3 the proposal discusses 'enhancement of the PRU model will more appropriately cater for the needs of society...' there is no further detail on what the 'enhancement' is or how this would differ from the current offer at Ysgol Rhydygors. It seems that the proposal is suggesting that pupils with the most complex and challenging SEBD needs would receive their education in a PRU. It is not clear if pupils would continue to require a statement to access such provision and at which tier or phase this would be appropriate***

LA Response

How will the Four Phase Model be enhanced / differ to the current offer being provided at Rhydygors?

The learning experiences at Rhydygors have been very limited; expectations have not been consistently high enough and ongoing challenges in relation to staff recruitment and retention hinder progress, despite professional development from the LA.

Prior to LA headteacher leadership, the learning offer did not meet the needs of all learners effectively.

The Four Phase will offer greater collaboration amongst staff and pupils, robust leadership from an LA led management committee and so forth as noted above.

Will all pupils continue to require a statement?

All pupils currently attending PRUs in the Local Authority have an IDP. This has been a requirement from the Inclusion Panel where placements are considered and agreed in preparation for ALN Reform. Pupils requiring placement in a specialist SEBD setting will have a co-constructed IDP to ensure that their needs have been identified and supported.

6. *Page 11, paragraph 1, the proposal is putting forward a plan for an ICF funding application to develop a new, 21st century children's home. The core inspection identified the need to improve the learning environment in the school. The proposal does not comment on how the school site will be improved. If the site requires improvement as a school, it seems logical the same would apply should there be the establishment of a PRU.*

LA Response

How will the school / PRU site be improved?

- Provision will be shared with the current PRU currently on site for the primary aged pupils, enhancing the learning environment for all.
- The department are currently undertaking a review of its Modernising Education Programme (MEP) which includes all the county's schools including Ysgol Rhydygors.
- The outdoor learning environment has been re-designed to align to the learning offer. This includes:
 - Covered areas for play and learning.
 - The development of gardening zones and provision for keeping small animals.
- Internal and external areas have been de-cluttered and have been re-purposed to include nurture areas and purposeful learning areas, for example, hairdressing and music technology facilities are now in place.

7. Educational aspects of the proposal

Currently the proposal has limited information on the intended outcomes or benefits for pupils in moving from a special school to accessing PRU provision. The rationale to decommission the school is unclear. PRUs are primarily a short-term provision where there is an expectation that all pupils should re-integrate into mainstream. This approach might not suit all pupils with BESD as their needs are so complex that they cannot function in the mainstream environment. In the list of options considered, the LA has not proposed that Ysgol Rhydygors be the centre for excellence for BESD in the LA.

LA Response

Please note above the benefits of the proposed Four Phase Model which will ensure that all learners access high quality learning provision through a hybrid mainstream / PRU approach as is necessary at the varying stages of their educational journey.

The model ensures flexibility and high aspiration for all learners.

Our current PRU structure continues to promote the aspiration to re-integrate to mainstream and there is evidence of successful re-integration and flexibility of approach.

From the difficulties outlined creating the current Ysgol Rhydygors into a centre of excellence is not in line with our proposed Four Phase Model. Our development plan has the aspiration to create all of our Phase 3 provisions to be centres of excellence.

8. *On page 13 bullet point 1 under disadvantages the proposal identifies that 'initially schools will be nervous that a long-term school provision will not be available in more complex cases'. Currently the consultation paper does not provide sufficient information on what will be available for these pupils.*

LA Response

The Vision of the Four Phase model is to provide needs led ESB services where inclusion, restorative approaches and early intervention are the key to successfully supporting learners, schools and settings to deliver the support required in a timely manner. By providing the support required at the earliest possible time, with appropriately trained and experienced staff, we will provide the best opportunity for our learners to feel safe and valued so that they do not become disengaged and disaffected.

The learning offer will provide the following for all pupils:

- A restorative, trauma informed culture in which all wellbeing, social and learning needs will be met.

- A purposeful blend of learning within the classroom, outdoors and within the community, developing skills, interests and talents that will support all children and young people in leading a happy, fulfilling life.

- A broad range of learning experiences, leading to valuable accreditation in KS3 and KS4 to include the following:
 - Construction
 - Outdoor Adventure
 - Countryside Management
 - Small Animal Care
 - Sport
 - Digital Media
 - Cooking
 - Gardening
 - Hair and Beauty

- Public Services
- Duke of Edinburgh
- Princes Trust

- Opportunities to work alongside a broad range of –professionals:
 - Dr MZ
 - Botanic Gardens
 - Tir Coed
 - Llandysul Paddlers
 - Area 43
 - Work experience and community opportunities

Key stage 2 experiences will include the offer of a broad and balanced curriculum with access to outdoor learning opportunities together with wellbeing support including trauma informed practice and restorative approaches and close relationships with our multi-agency partnerships to allow us to access services required at the earliest possible time and provide robust holistic plans for our learners.

In addition, those pupils with more complex needs will access:

- A Trauma Recovery Model, leading to a bespoke, needs led package specific to their individual identified needs. This aligns to the current Tier 3 model in existing PRUs.

The Learning environment will include:

- Indoor and outdoor areas to play and learn.
- Residential facilities that are safe, secure, warm and inviting

The Four Phase Model will support our vision by ensuring:

- Collaboration between all staff across the Four Phase model, sharing effective practice, delivering learning experiences in line with their areas of expertise.
- Flexibility in the deployment of staffing across the PRU sites, ensuring that the needs of pupils are met.
- Flexible access to provision across mainstream and PRU settings
- Robust governance from a central management committee.
- Efficient use of resources due to economies of scale.

9. Page 13- Impact on SEN

The proposal implies that the addition of a PRU to the current Rhydygors site would cater for the diverse range of pupils of all ages with SEBD. This is

currently the case with Ysgol Rhydygors sharing its site with one of the three already established PRUs. It is therefore unclear how the closure of the special school and opening of an additional PRU would provide a different and improved overall provision for pupils with SEBD across the local authority.

LA Response

Please note benefits of the Four Phase model outlined in point 1 (page 27) of this document.

In addition, please note:

- The provision at the PRU in Carmarthen is for Foundation Phase and KS2 only; extending this provision to KS3 and KS4 also by utilising the Rhydygors site and resources will ensure greater flexibility in the nature of educational provision available for pupils.
- The current provision at Ysgol Rhydygors can only be accessed with a statement.
- As a PRU the learners accessing this provision will require an IDP ensuring greater flexibility to work between mainstream and the PRU. This is particularly significant for those learners in the Northwest of the county who do not access this provision due to travel times. Outreach workers from the PRU will be able to take this provision to the pupils.

10. Page 14- Admission arrangements

The proposal states 'there are some pupils who present with significant, persistent challenges relating to their social, emotional, and behavioural difficulties and require specialist long-term day or residential SEBD provision in Ysgol Rhydygors'. It is unclear where and how the needs of these pupils will be met under the current proposal to close the school.

The proposal states that 'The discontinuation of Ysgol Rhydygors and the creation of a PRU to cater for the needs of a diverse range of pupils of all ages and stages of development on one co-located site will ensure a consistent approach to the relevant teaching strategies across all key stages, including the foundation phase'. There is limited evidence in the current consultation to support this statement. The proposal does not provide sufficient evidence to clarify why the special school is not seen as part of the behavioural continuum of provision for SEBD pupils.

LA Response

Please note previous responses.

How will the needs of these pupils be met under the proposed Four Phase model, including the PRU that will replace Ysgol Rhydygors?

- The Four Phase Model includes training and development to create a consistent inclusive ethos across mainstream schools using restorative approaches and creating a process to have immediate access to the Behaviour Support Community team creating a far earlier intervention model.

- Earlier intervention and a model which creates capacity in school should reduce BESD escalating and reduce complex long term place requests
- When a pupil is placed at a PRU their needs will be continuously monitored and reviewed allowing for greater opportunity to reintegrate to mainstream fully or access part time with an appropriate support package.

How will the Four Phase model and the creation of a PRU ensure a consistent approach to relevant teaching strategies across all key stages including the Foundation Phase?

- The new model aligns all the PRUs under one Management Committee
- The new model has a new leadership structure which has a centre manager of each site with an overarching senior leadership team to develop equity and consistency across the settings.

11. Page 16- Alternative Options Considered

*In developing a preferred option, the proposal includes a range of alternative options. Additional comments from Estyn in **bold**.*

LA Response

OPTION	DESCRIPTION	DETAIL	ESTYN RESPONSE
1	STATUS QUO	Does not address the variation in provision for pupils with SEBD in Carmarthen.	- it is unclear from the information provided in the consultation what the 'variation' in provision is currently.

Response to Option 1 query: The quality of provision, consistent expertise of staff, one governance structure with a planned training programme is in development as part of the Four Phase Model. The variation of staffing levels and budget between PRUs and the school is considerable but the outcomes from the school do not reflect this.

OPTION	DESCRIPTION	DETAIL	ESTYN RESPONSE
2	Discontinue Ysgol Rhydygors and provide for pupils in the current Carmarthenshire Secondary Teaching and Learning Centre	Insufficient capacity in Carmarthenshire's Secondary Teaching and Learning Centre to accommodate Ysgol Rhydygors pupils	- what about the primary pupils in the school? What are the projected pupil numbers in the authority who require this provision and would they necessitate a fourth PRU being established?

Response to option 2 query. Historically there has always been two classes (12-14 primary aged pupils). There is currently no intention to increase the capacity of

primary pupils accessing specialist provision. We are increasing the capacity of the Behaviour Support Community Team to be able to provide support to more learners in mainstream. If there is a greater demand in the future this will be addressed but it is not part of the current plan.

OPTION	DESCRIPTION	DETAIL	ESTYN RESPONSE
3	Discontinue Ysgol Rhydygors and cater for pupils in mainstream schools.	Schools will require specialist support that cannot be delivered in mainstream.	based on pupil statements this doesn't seem to be a viable option.

OPTION	DESCRIPTION	DETAIL	ESTYN RESPONSE
4 (preferred)	Discontinue Ysgol Rhydygors and provide for pupils in a new Pupil Referral Unit (PRU) on the Ysgol Rhydygors school site.	Creates consistency in the quality and standard of provision on offer for pupils with SEBD in Carmarthenshire and limits disruption for pupils.	– it may be the case that consistency in the quality and standard of provision offered could be developed at Ysgol Rhydygors

Response to Option4 query: Please refer to information in the document regarding issues around securing leadership and continuity at the school and the need for the Local Authority to place an interim seconded leadership into the school.

OPTION	DESCRIPTION	DETAIL	ESTYN RESPONSE
5	Discontinue Ysgol Rhydygors and provide no alternative provision.	Does not cater for the needs of pupils with SEBD in Carmarthen.	No comment made from ESTYN.

Consultation with the Pupils

Children and Young People Consultation Document

A Children and Young People's version of the Consultation Document was provided to the school to distribute to all pupils.

Pupil Consultation Event

Pupils were provided with the opportunity to meet with the Educational Support Adviser to share their views on the proposal on 11th February 2021. However, there was limited interest in engaging in discussion. Despite this, pupils' views were collated by the school and the feedback is summarised below.

During the week of the 8th-12th February 2021 school staff facilitated a meeting with a range of pupils accessing the school site to consult on the process of change. On the 17th the ESA was planned to talk to a select group of pupils on the findings of the whole group. However, 3 out of 4 pupils were absent on that day and 1 pupil who was initially prepared to feed back to the ESA, declined at the last minute.

The ESA engaged with the acting head teacher to discuss the outcomes of the discussion, which are detailed below.

*All pupils were asked the following questions and 19 pupils engaged with the discussion.

1. Do you know there could be changes to your school?

5- Yes	14- No
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2. Is there anything you are looking forward/ worried about?

Looking forward	Worried
As part of looking forward pupils were asked to share their positive thoughts. There were a range of responses, including: <ul style="list-style-type: none">• Nothing• Don't know• More time off site• The school closing• Leaving school	Pupils who access this setting experience a range of social, emotional, and behavioural difficulties. The responses were: <ul style="list-style-type: none">• Don't like new people/pupils• Don't like being off site• I like my staff – will they be the same-don't like new staff• Will it be the same?• What is going to be different?

3. What would you like to keep the same?

The setting has a high staff to pupil ratio at present with all pupils having access to key workers whom they trust. Responses again varied. <ul style="list-style-type: none">• Staff – (some staff were named)• Small classes• School trips• Nothing

4. What would you like to be different?

Pupils have limited positive experiences and have often missed out on play-based learning from the very start of life. Levels of concentration for formal learning are often underpinned by significant wellbeing needs. The pupils struggle to engage in formal situations as with the consultation process. Staff revisited this question with pupils:

- More play and opportunities to work in a structured way outdoors.
- More practical things to do on and off site, more art, and craft
- More practical activity off site to access more work-type experiences
- A broader range of practical opportunities: Photography, woodwork, animal care on and off site
- Nicer staff
- Moving around and going to different classes like a 'real' school

A few years 10 and 11 pupils added:

- Sixth form
- Staying in school instead of going to college

SNAP Cymru also submitted feedback in relation to consultation with the pupils which provided the same results.

Alternative Options

During the formal consultation period stakeholders were provided with the opportunity to submit alternative options for consideration. The alternative options (not already considered in the consultation document) received are noted below and will be presented to the Cabinet for consideration.

To move the new PRU provision to a new site	
Advantages	Disadvantages
More appropriate location	Disruption for pupils and staff
Opportunity for re-brand of the setting	Significant capital required
	Appropriate site required
	Land acquisition

To merge all PRUs with investment from 21st Century Schools Programme	
Advantages	Disadvantages
Would provide pupils with 21 st century facilities	Would require large scale re-organisation
Greater consistency of access to subject specialists	Dependent on business case approval to secure funding
Economies of scale	Disruption for staff and pupils in attendance at PRUs

To retain Ysgol Rhydygors and establish a separate PRU.	
Advantages	Disadvantages
Ysgol Rhydygors remains	Would require additional capital and revenue funding
Lessens disruption for current pupils and staff	Additional land required
Creates additional job opportunities	The current permanent placement does not reflect the inclusive aspiration of the Four Phase Model
	Historically, young people leaving Ysgol Rhydygors have not successfully completed post 16 qualifications

Maintain Ysgol Rhydygors and provide suitable permanent leadership.	
Advantages	Disadvantages
Ysgol Rhydygors remains	Employing and maintaining successful suitable leadership for Ysgol Rhydygors remains a challenge
Lessens disruption for current pupils and staff	Difficulty in identifying and maintaining an experienced Governing Body

	The current permanent placement does not reflect the inclusive aspiration of the Four Phase Model
	Historically, young people leaving Ysgol Rhydygors have not successfully completed post 16 qualifications

Pause the proposal until the Four Phase model of behaviour services has been embedded and there is evidence to support a decline in the requirement for Ysgol Rhydygors' specialist provision	
Advantages	Disadvantages
	PRUs are currently at capacity whereas Ysgol Rhydygors numbers are declining.
	Potential to de-moralise staff by lengthening the uncertainty of the future of the school
	Cannot sustain temporary emergency leadership

Appendix A

Four Phase Model Outline



carmarthenshire.gov.uk



PHASE 1: MAINSTREAM SCHOOLS

We promote that all schools develop a restorative ethos and have provided training opportunities for all schools. We have also invested in a pilot project training clusters of schools to all train together to implement and embed restorative approaches in their schools. In addition, we have purchased emotional literacy toolkits for every school in the local authority to enable schools to have a consistent approach to the early identification of specific areas of emotional literacy for learners and have further supported this with training and support from the Behaviour Support Community Team. We have also funded training for every school to have an Emotional Literacy Support Assistant (ELSA) and this provides a supervision model provided by the Education and Child Psychologists (ECPs) for the ELSAs. We have also funded training for anxiety, mental health first aid, resilience and mindfulness. We have also purchased a Wellbeing Toolkit for Teenagers for every secondary school in the Local Authority and provided training and introduction to this toolkit from Tina Rae.

We have several pilots and further training opportunities for the 2021-22 academic year.

Essentially Phase 1 is upskilling and supporting schools to develop and maintain a confident and competent workforce to deliver emotional wellbeing support for learners.

PHASE 2 – BEHAVIOUR SUPPORT COMMUNITY TEAM

The mid to long term plan is to deliver training across schools so that there is a growing skill set to develop systems to work with pupils with far earlier intervention, have a larger Behaviour Support Community Team to deliver support, training and guidance to their link cluster schools, supporting schools and learners following exclusions, supporting interventions and robust support packages including supporting transition into new settings. The teachers in the team have recently completed the Trauma Informed Practice diploma. We intend to employ L3 teaching assistants to support the team who will all be ELSA trained and will support teaching assistants and other staff to develop strategies and plans to support pupils in school and/or through transition periods.

The team will be able to provide support for bespoke packages of education and wellbeing plans for pupils demonstrating some deregulated and challenging behaviours. In addition, they will be working in an integrated model with Teams Around the Family who will be able to support families who may need support. Using teams that will provide a consistent restorative approach in and outside of school will enable the child to have a consistent message of support.

At Phase 2 a more robust package of support will be delivered, in school, and monitored and evaluated using TAPPAS (Teams Around Pupils, Parents and Settings). The team member will be able to provide evidence and overview of support to add to any conversation and co-construction of plans going forward for longer term support. The team member would also support the learner through transition into a PRU (Phase 3) if this was agreed and would have support to transition back into school when progress was made.

PHASE 3 – SPECIALIST SETTINGS

Learners attending these settings will have access to a broad and balanced curriculum delivered by trauma informed staff. They will have access to bespoke packages of support co-constructed with them and other professionals which will be closely monitored and reviewed, and all progress celebrated. The Specialist Settings will use a trauma recovery model for our deregulated learners and our priority is to ensure the learners feel safe and valued so that they can begin to engage positively and effectively in their learning pathways.

There will always be an aspiration to return learners to a mainstream setting with any plan always focussed on the progress and needs of the individual and working towards their best possible outcomes.

PHASE 4 – LONG TERM PLACEMENTS AND POST 16 PATHWAYS

Phase 4 of the model works with learners and their families who have complex issues and dynamics to work with and will require longer-term input from multi-agency support services. We will be working with learners who require trauma informed work with their families and will require support to engage in post 16 pathways which we will be developing in line with their ability to engage and their vocational aspirations.

Appendix B

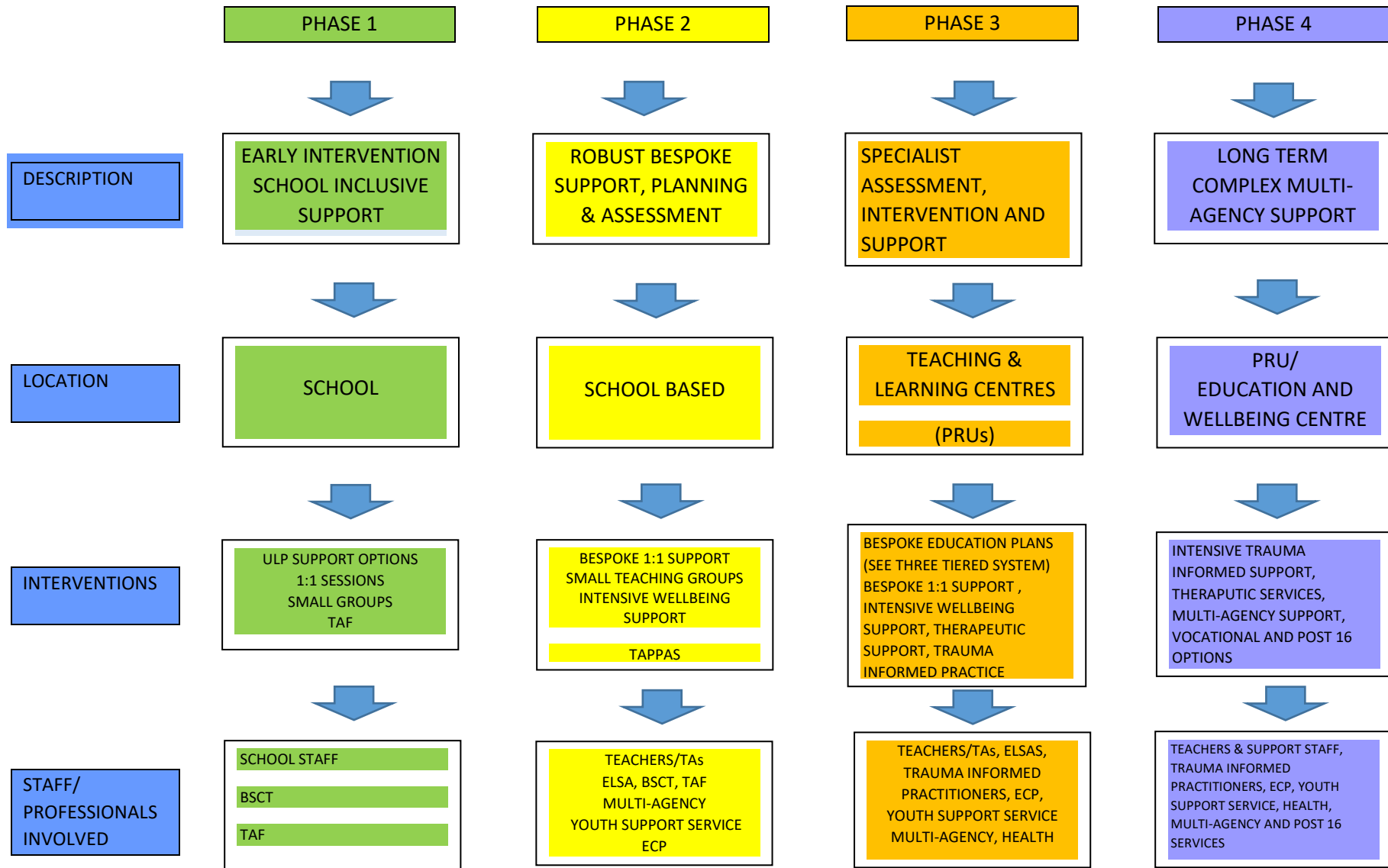
Four Phase Model of Behaviour Support Services



carmarthenshire.gov.uk



FOUR PHASE MODEL OF BEHAVIOUR SUPPORT SERVICES



**CABINET
06/12/2021**

MODERNISING EDUCATION PROGRAMME

**PROPOSAL TO REVIEW PRIMARY EDUCATION PROVISION IN THE
BLAENAU AND LLANDYBIE AREAS**

Recommendations / key decisions required:

It is recommended that the Cabinet approves:

- The observations received and the Local Authority's responses following the Consultation Period (Consultation Report attached);
- The modifications to the implementation dates of the proposal as noted in the report;
- The publication of a Statutory Notice to implement the proposal.

Reasons:

- To comply with statutory procedures and guidance in relation to school re-organisation.

Relevant scrutiny committee to be consulted: No

Cabinet Decision Required: Yes- 06/12/2021

Council Decision Required: No

Cabinet Member Portfolio Holder: Cllr. Glynog Davies (Education & Children)

Directorate:
Education & Children

Name of Head of Service:
Simon Davies

Report Author:
Sara Griffiths

Designations:

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**EXECUTIVE SUMMARY
CABINET
06/12/2021**

MODERNISING EDUCATION PROGRAMME

**PROPOSAL TO REVIEW PRIMARY EDUCATION PROVISION IN THE
BLAENAU AND LLANDYBIE AREAS**

Background

The Authority has a legal responsibility to review the number and type of schools it has in an area and whether it is making the best use of resources and facilities to deliver the opportunities that children deserve.

Ysgol Gynradd Blaenau

Ysgol Gynradd Blaenau is a Welsh medium, community primary school located in the village of Blaenau with capacity for 99 pupils aged between 4-11 years. In recent years, pupil numbers at the school have declined. January 2020 PLASC showed that there were 34 pupils at the school meaning that there were 65 surplus places, or 66%. Welsh Government through the School Organisation Code advises local authorities to review their provision where there are more than 10% surplus places in an area.

Whilst there are 44 pupils living within Ysgol Gynradd Blaenau's catchment area **only 8 of those pupils attend the school**, meaning that 36 pupils living within the school's catchment area attend other schools.

Based on pupil projections (2020) it is estimated that the pupil figures will remain low in the foreseeable future. Additionally, Ysgol Gynradd Blaenau's building condition is 'poor' and the school has been in deficit since 2011/12 and remains with a deficit of £83,895 for 2019/20. Their original funding allocation for 2020/21 was £149k and their forecast position for the year is an increase to the deficit balance.

From an educational perspective having such a small number of pupils and mixed age classes makes it extremely difficult for the school to deliver the breadth and depth of curricular and social experiences which pupils of this age require to fully develop.

The culmination of these unavoidable facts presents a school model which does not represent a sound, stable educational model or best use of resources. With no prospect of there being a significant increase in pupil numbers for the foreseeable future consideration is required on the sustainability of the school.

Ysgol Gynradd Llandybie

Ysgol Gynradd Llandybie is a transitional (working towards Welsh medium) 3-11 primary school located in the rural village of Llandybie approximately two miles north of the town of Ammanford in Carmarthenshire.

Ysgol Gynradd Llandybie is a successful school which by January 2019 had reached its capacity and although there was a slight decrease in pupils in January 2020 this trend is likely to continue

for the foreseeable future based on pupil projections (2020). As a result the Local Authority are developing a scheme to increase the capacity of Ysgol Gynradd Llandybie to 315 places with 45 nursery places by providing a new school with facilities fit for the 21st Century on a new site.

The project will re-locate Ysgol Gynradd Llandybie from its current site to a new site which is within the current catchment area of Ysgol Gynradd Llandybie. The new school will provide a Welsh Government standard primary school building with capacity to accommodate 315 pupils and 45 nursery pupils between the ages of 3-11 years old and ensure that the school is able to deliver the full curriculum in modern, safe and inspiring learning environments with enhanced outside areas.

This proposed investment will address poor building condition and lack of adequate space and provision in the existing school by providing a category **A** school with sufficient places for current and projected demand.

Over the last 5 years there has been a sustained increase in the number of pupils choosing to enter the Welsh medium stream and a fall in the number of pupils choosing to enter the English stream.

The Local Authority has a responsibility to provide all pupils with the best education possible and believes that providing bilingual opportunities has a role to play in this. This aligns with Carmarthenshire's Welsh in Education Strategic Plan 2017-2020's objective of ***ensuring "that all pupils are able to speak, read and write the Welsh language fluently by the end of Key Stage 2 in accordance with their expected stage of development."*** The best way to create confident, bilingual individuals is through immersing pupils in the Welsh language and as a result the Local Authority is looking to change the nature of provision.

As a result of the ongoing challenges that both schools face, it is not possible to sustain current arrangements and a review of the education provision within the areas of Blaenau and Llandybie is required.

The Proposal

- Discontinue Ysgol Gynradd Blaenau as of 31 August 2021.
- From 1 September 2021 all pupils will be registered at Ysgol Llandybie operating on both sites (Ysgol Gynradd Llandybie and the former Ysgol Gynradd Blaenau) increasing its capacity to 287 + 50 nursery places.
- Re-designate Ysgol Gynradd Llandybie's catchment area to include that of the former Ysgol Gynradd Blaenau catchment area as of 1 September 2021.
- Change the nature of provision at Ysgol Gynradd Llandybie to Welsh Medium as of 1 September 2021.
- Relocate Ysgol Gynradd Llandybie to a new school site and increase its capacity to 315 + 45 nursery places as of September 2024, when occupation of the new school is proposed.

The transitional capacity noted above (287 + 50 nursery places) combines both schools' current capacity including nursery places. As a result, the nursery places in the transitional capacity is

greater than the final school's capacity. The final capacity figure (315 + 45 nursery places) meets the need and demand of the area for the longer term.

It is the Local Authority's intention that all current pupils remain at the school and continue to receive their education through the current language. It is important to note that there will be no change for current pupils attending Ysgol Llandybie.

Statutory Process

In accordance with Executive Board's (now known as the Cabinet) instructions on the 21 December 2020 a formal consultation exercise was undertaken from 11 January 2021 and was due to end on the 21 February 2021. However, a decision was made by the Executive Board to extend the Consultation Period until the 16 July 2021. The results of the consultation exercise are contained in the attached Consultation Report.

Should the Cabinet grant permission to proceed to Statutory Notice, the intention is to publish in due course.

If approved, following the end of the Statutory Notice period, an objection report which summarises any objections received by stakeholders, will be presented to the Cabinet and ultimately to the County Council for determination.

Modifications

As a result of the extension to the Consultation Period, the implementation dates for the proposal noted above require modification to ensure appropriate time to implement the proposals.

Should the Cabinet decide to proceed with this proposal it is recommended that the Cabinet accepts the modified dates as noted below:

- Discontinue Ysgol Gynradd Blaenau as of 31 August 2022.
- From 1 September 2022 all pupils will be registered at Ysgol Llandybie operating on both sites (Ysgol Gynradd Llandybie and the former Ysgol Gynradd Blaenau) increasing its capacity to 287 + 50 nursery places.
- Re-designate Ysgol Gynradd Llandybie's catchment area to include that of the former Ysgol Gynradd Blaenau catchment area as of 1 September 2022.
- Change the nature of provision at Ysgol Gynradd Llandybie to Welsh Medium as of 1 September 2022.
- Relocate Ysgol Gynradd Llandybie to a new school site and increase its capacity to 315 + 45 nursery places as of September 2025, when occupation of the new school is proposed.

Recommendation

It is recommended that the Cabinet approves:

- The observations received and the Local Authority's responses following the Consultation Period (Consultation Report attached);
- The modifications to the implementation dates of the proposal as noted in the report;
- The publication of a Statutory Notice to implement the proposal.

DETAILED REPORT ATTACHED?

YES: Consultation Report

IMPLICATIONS

I confirm that other than those implications which have been agreed with the appropriate Directors / Heads of Service and are referred to in detail below, there are no other implications associated with this report:

Signed: *S. Davis*

Head of Access to Education

Policy, Crime & Disorder and Equalities	Legal	Finance	ICT	Risk Management Issues	Staffing Implications	Physical Assets
YES	YES	YES	YES	YES	YES	YES

1. Policy, Crime & Disorder and Equalities

Developments are consistent with the Authority's Corporate Strategy and the Modernising Education Strategic Outline Programme.

2. Legal

Appropriate consultation was initiated in accordance with the relevant statutory procedures.

3. Finance

Revenue implications will be catered for within the Local Management of Schools Fair Funding Scheme.

4. ICT

ICT colleagues will be consulted with in relation to the potential relocation of IT equipment.

5. Risk Management Issues

Continuing with current provision would see current problems being perpetuated with the education of children in the area being placed at unacceptable risk and the County Council failing to meet WG target that all buildings should be of an appropriate standard.

6. Staffing Implications

Staffing implications will be addressed in accordance with the County Council's Policy and Procedures.

7. Physical Assets


- i. One redundant school site – Ysgol Gynradd Blaenau. Should the proposal be adopted the property will be transferred to Corporate Property Division of the Regeneration and Policy Department for the procedures outlined in the 'Future Use/Disposal of Redundant Land and Buildings arising from the Modernising Education Programme policy to be actioned.

This policy has been developed to allow the community to be offered the asset in the first instance before placing the site on the open market.

- ii. If the proposal is implemented to discontinue Ysgol Gynradd Blaenau, Ysgol Gynradd Llandybie will proceed to operate on split sites occupying both current Ysgol Gynradd Llandybie and Ysgol Gynradd Blaenau locations until the proposed new Ysgol Gynradd Llandybie school building is ready for occupation.
- iii. Following the project completion of developing a new school building for Ysgol Gynradd Llandybie the current Ysgol Gynradd Llandybie will become redundant as point i above.

CONSULTATIONS

I confirm that the appropriate consultations have taken in place and the outcomes are as detailed below

Signed: 

Head of Access to Education

1. **Scrutiny Committee** – Consulted during the formal Consultation Period.
2. **Local Member(s)** – The local members are aware of the proposal and were consulted during the formal Consultation Period.
3. **Community / Town Council** – Consulted during the formal Consultation Period.
4. **Relevant Partners** – Consulted during the formal Consultation Period.
5. **Staff Side Representatives and other Organisations** – Consulted during the formal Consultation Period.

CABINET	PORTFOLIO	HOLDER(S)	N/A
AWARE/CONSULTED			
YES			

Section 100D Local Government Act, 1972 – Access to Information List of Background Papers used in the preparation of this report:

Title of Document	File Ref No.	Locations that the papers are available for public inspection
Carmarthenshire’s Welsh in Education Strategic Plan		https://www.carmarthenshire.gov.wales/home/council-democracy/strategies-and-plans/welsh-in-education-strategic-plan/
MEP Biennial Review		www.carmarthenshire.gov.uk Executive Board 20 th June 2016
21 st Century Schools Website		www.21stcenturyschools.org
Consultation Document		Blaenau and Llandybie (gov.wales)
Stage 1 (Permission to Consult) – ECS Scrutiny Committee Report		Agenda for Education & Children Scrutiny Committee on Monday, 23rd November, 2020, 10.00 am (gov.wales)
Stage 1 (Permission to Consult) Exec Board		Agenda for Cabinet on Monday, 21st December, 2020, 10.00 am - Carmarthenshire County Council (moderngov.co.uk)

Proposal to review Primary Education Provision in the Blaenau and Llandybie areas

Consultation Report



carmarthenshire.gov.uk

Cyngor **Sir Gâr**
Carmarthenshire
County Council



School Modernisation Section

Sara Griffiths, Modernisation Team Manager

If you require this information in large print, Braille or on audiotape please contact the Department for Education & Children

Email: DECMEP@carmarthenshire.gov.uk

Telephone: 01267 246618

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Appendices
Appendix A – Business Plan
Appendix B – Pupil Submissions

Executive Summary

The Consultation Period

On the 11th January 2021 Carmarthenshire County Council published a proposal to:

- Review Primary Education Provision in the Blaenau and Llandybie areas.

The consultation period commenced on 11th January 2021 in line with the publication of the proposal and closed on 16th July 2021 with a total of 420 responses received (excluding the responses received from Estyn and the pupils' consultation events) in response to the formal consultation.

Responses Received			
Online Survey	E-mail	Letter	Total
324	41	55	420

It must be noted that of the 420 observations received, all were received prior to the end of the consultation period.

Consultation Events

Due to the ongoing implications of the Coronavirus pandemic we were advised to postpone all events where there was interaction between staff, parents and the wider community and as a result virtual drop-in sessions were held via Microsoft Teams.

Informal

Virtual informal drop-in sessions were held prior to the beginning of the formal consultation period with relevant stakeholders.

Formal

A virtual formal drop-in session was held on **26 January 2021 at 4:30pm for a period of two hours**. The formal consultation drop-in session was attended by 21 stakeholders.

Responses Received

The responses received have been categorised into the following themes:

Supportive

- Theme 1 - No reason
- Theme 2 - Support for the proposal
- Theme 3 - Future education of pupils
- Theme 4 - Safe routes and parking
- Theme 5 - Not supportive of change in nature of provision
- Theme 6 - Childcare provision
- Theme 7 - Fairness of early years provision
- Theme 8 - Proposed new school site
- Theme 9 - Community facilities
- Theme 10 - Transitional arrangements
- Theme 11 - Inclusion
- Theme 12 - Redundant school sites
- Theme 13 - New school capacity
- Theme 14 - Consulting during a pandemic
- Theme 15 - Support for small schools
- Theme 16 - Supportive of change in nature of provision
- Theme 17 - Re-location of Ysgol Llandybie

Unsure (respondents did not answer yes or no)

- Theme 1 - No reason
- Theme 2 - Status quo

Concerns

- Theme 1 - Community impact
- Theme 2 - Small school preference
- Theme 3 - Status quo
- Theme 4 - Consulting during a pandemic
- Theme 5 - Impact on pupils' travel time and distance
- Theme 6 - Future choice for a small school
- Theme 7 - Success of Ysgol Blaenau's Cylch Meithrin and the impact of closure
- Theme 8 - No reason
- Theme 9 - Concerns with large schools/classes
- Theme 10 – Quality of Consultation Document and misinformation
- Theme 11 – Additional Learning Needs (ALN)
- Theme 12 – Change in nature of provision
- Theme 13 - Condition and suitability of Ysgol Blaenau
- Theme 14 – Impact on the Welsh language
- Theme 15 - New school name
- Theme 16 – Financial pressure
- Theme 17 – Redundant school sites
- Theme 18 – Sustainable leadership
- Theme 19 - Impact of the proposal on current pupils

- Theme 20 - Impact of the proposal/rumours
- Theme 21 - Proposed new school site
- Theme 22 - Impact of the proposal on the village and residents of Llandybie
- Theme 23 - Timing of implementation
- Theme 24 - New school design

Overall Summary

Supportive	36%	Not supportive	63.5%	Unsure	0.5%
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Workshops

Following the closure of the consultation period on the 16 July 2021, a workshop was held to analyse the observations received.

Other Submissions Received

Business Plan

In addition to observations received a Business Plan for Ysgol Gynradd Blaenau was submitted during the formal Consultation Period. The full business plan can be seen at appendix A.

Video

A video was received in lieu of consultees/stakeholders' ability to gather and protest due to the timing of the consultation during a global pandemic and has been passed on to the Cabinet (previously known as the Executive Board).

Petition and Facebook Page Statistics

An online petition "Stop the Closure of Ysgol Blaenau" had received 552 signatures by 10:30pm on 21/02/21.

A Facebook Page "Ysgol Blaenau - SOS - Save our School" also had 428 likes, a post reach of 11,600 and 5,443 post engagements within the week commencing 15/02/21.

Next Steps

The Consultation Report will be presented to the Cabinet who may decide to publish the proposal as consulted upon with appropriate modifications, to abandon the proposals and retain the status quo or to significantly recast the proposal and reconsult.

Should the Cabinet decide to proceed to publish a Statutory Notice, this will be published in due course.

Summary of Observations received and Local Authority Responses

Point Number	Point Raised	Local Authority Response	Number of responses raising this point	% of responses raising this point
Supportive Comments Raised				
1.	No reason Some respondents did not provide a reason for their support.		93	22%
2.	Support for the proposal Respondents recognised the need for investment and the benefits of a new and modern school fit for learning in the 21 st Century.	<p>One of the strategic aims of the Modernising Education Programme is to develop infrastructure at all schools that is equipped for learning in the 21st century, facilitating the realisation of core objectives for raising educational standards and sustaining them at high levels of performance.</p> <p>Schools designed to meet current demands are expected to provide a broad and balanced curriculum through high quality and inspirational teaching all of which will be possible through the realisation of this proposal, should it be accepted.</p>	31	7%
3.	Future education of pupils Respondents acknowledged that the proposal would support the development of an education model fit for the future. Respondents	If the proposal is accepted, its implementation will support the development of a schools' network that is educationally effective, resource efficient and sustainable for the long term. Most importantly, it will ensure a sustainable model of learning provision	7	2%

	recognised how investment would improve education facilities for pupils.	which meets the needs and aspirations of all children now and in the future.		
4.	<p>Safe routes & parking</p> <p>Respondents noted the need to ensure safe routes to school and sufficient parking.</p>	<p>As part of the planning process a full Transport Assessment will be carried out which considers both the current situation and proposed development, this includes assessment of all travel types (motorised vehicles, pedestrian and cycling etc.) including parking provision.</p> <p>The number of parking spaces is regulated by guidance issued by the local planning authority and highways requirements; therefore the number of spaces will be a result of these requirements. The number of spaces will be suitable for all staff, visitors and parents etc. for times when pupils are collected and dropped off. The number of spaces will also allow for events such as parents evenings or Christmas concerts etc.</p>	4	1%
5.	<p>Not supportive of change in nature of provision</p> <p>Respondents did not feel that changing Ysgol Llandybie to Welsh Medium was beneficial to pupils or the right decision. Respondents noted that the school should remain transitional.</p>	<p>This proposal seeks to improve further the opportunity for children attending the school to secure continually improving outcomes. Carmarthenshire County Council has a statutory responsibility under Part 4 of the School Standards and Organisation (Wales) Act 2013 to prepare a Welsh in Education Strategic Plan (WESP) for its area with the explicit aim of improving planning of the provision of education through the medium of</p>	4	1%

		<p>Welsh, from improving the standards of that education and of the teaching of Welsh.</p> <p>In April 2014 the County Council formally adopted a comprehensive strategy for the development of the Welsh language in Carmarthenshire, endorsing the recommendations of a politically balanced group of elected members that had examined in depth the status of the Welsh language in the county in the wake of the 2011 census of the population. The strategy required action on 73 points, 21 of which applied to the education service.</p> <p>The language strategy received cross-party support from elected members when it was adopted at a meeting of the full County Council. On 25th June 2018, the Local Authority launched Carmarthenshire's most recent Welsh in Education Strategic Plan. The WESP has been subject to public consultation during its preparation and subsequent review. Its contents have, therefore, been subject to a test of public opinion in line with statutory requirements. It has also been approved by the Welsh Government in accordance with the requirements of the Act.</p> <p>The proposal is adhering to the recommendations as set out in Carmarthenshire's WESP.</p> <p>It is important to note that the WESP requires all primary schools in Carmarthenshire, including English medium schools, to move along the</p>		
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		<p>language continuum, progressively expanding the proportion of education that is delivered through the medium of Welsh, with a view to ensuring that in time all children leaving primary school are fully bilingual. The change in language designation of Llandybie would ensure the said aim being more deliverable whilst also ensuring that Blaenau school pupils could transfer on the basis of no detriment to their existing learning arrangements.</p> <p>The pace at which schools will be able to expand bilingualism and Welsh medium education will depend upon local circumstances but the expectation for progress applies to all schools. The school has been identified as having the potential to move quickly along the language continuum and has been in the 'Transitional' designation for a number of years now. (Transitional – a school identified to progress to Welsh medium).</p>		
6.	<p>Childcare provision Respondents noted the need to ensure suitable childcare and wrap around care provision is available at the new school. Respondents also highlighted the need to consider the presence of a Cylch Meithrin in the proposal.</p>	<p>The future location of the Cylch Meithrin at Ysgol Blaenau would be considered as part of the proposal. The new school development would include space for childcare provision.</p> <p>If the proposal is implemented Ysgol Gynradd Llandybie's catchment area would be redesignated to include that of the former Ysgol Gynradd Blaenau catchment area, therefore the community of Blaenau would have access to the childcare provision within the new school development.</p>	2	0.5%

7.	<p>Fairness of Early Years provision Respondents noted the need to have consistency in access to early years provision across the County.</p>	<p>There is a combination of 3-11 and 4-11 primary schools in the county and a review is currently being undertaken on nursery provision, with a report expected to be submitted to elected members in the next 6 months for consideration. If all schools in the county were 3-11 then there would be a risk of non-maintained providers becoming unsustainable. It is important that the authority considers how their policies would impact on private providers.</p>	2	0.5%
8.	<p>Proposed new school site Respondents questioned the suitability of the proposed new school site.</p>	<p>A detailed site selection exercise was undertaken by colleagues in Environment which identified a potential of 7 sites for the new school development. The Recreation Ground scored highly as a potential site following the site selection exercise.</p> <p>Flooding - using the bund and with careful consideration of the existing levels (without removing the flood protection embankment/bund) the new access road has been designed to be wholly within the council owned land, no additional land will be required. A vehicular access to the farmland, and existing pedestrian route will remain. There will be some works on the boundary but this would be subject to party wall notices but at this time would not require the purchase of any additional land.</p>	2	0.5%

9.	Community facilities Respondents noted the need to ensure the new school included facilities which could be shared with the community.	The new school development will be designed to facilitate community use. The proposed investment would benefit both communities from the use of shared facilities outside of school hours.	1	0.2%
10.	Transitional arrangements Respondents questioned whether there would be enough space and resources for both schools during the interim and until the new school is ready for occupation.	The transitional arrangements for the proposal have been carefully planned to minimise disruption and any detrimental impact on learners. During the transitional period pupils will remain on their existing school sites under the management of Ysgol Llandybie until the new build is ready for occupation to accommodate all pupils from Ysgol Blaenau and Ysgol Llandybie.	1	0.2%
11.	Inclusion Respondents noted the need to include Blaenau in the planning and not to leave it to Llandybie Governors alone.	The Local Authority will encourage both schools to work together for the benefit of all pupils. Similarly, both the community of Blaenau and Llandybie will be encouraged to participate in the new school development planning/design consultation process.	1	0.2%
12.	Redundant school sites Respondents questioned what would happen to the former school sites.	Should the proposal be adopted, any redundant property will be transferred to the Regeneration Division for the procedures outlined in the Future Use/Disposal of Redundant Land and Buildings arising from the Modernising Education Programme policy to be actioned. This policy has been developed to allow the community to be offered the	1	0.2%

		<p>asset in the first instance before placing the site on the open market.</p> <p>Any capital receipts received as a result of the proposal would be re-invested into the Modernising Education Programme.</p>		
13.	<p>New school capacity Respondents noted the need to ensure that the increased capacity did not disadvantage pupils.</p>	<p>The new school capacity will be accommodated through sufficient space for the number of pupils; providing a suitable and stimulating learning environment with an ample supply of good learning resources well matched to pupil's needs.</p>	1	0.2%
14.	<p>Consulting during a pandemic Respondents did not believe that consulting during a pandemic was appropriate. Respondents believed that without face to face meetings the consultation process is flawed.</p>	<p>The consultation was prepared and conducted in line with the requirements of Welsh Government's School Organisation Code (2018).</p> <p>The School Organisation Code (2018) does not require proposers 'to hold consultation meetings although there will be circumstances where proposers will consider that meeting with certain groups of consultees will assist greatly in the dissemination of information and provide a suitable platform for the consultees to make their views known.'</p> <p>Due to the ongoing implications of the coronavirus pandemic during the consultation period the Local Authority provided consultees with the opportunity to attend virtual drop-in sessions in place of face to face meetings. This provided consultees with an</p>	1	0.2%

		<p>opportunity to ask questions, express their views and to discuss the proposal with Local Authority officers. Whilst it is accepted that not all stakeholders would have the means to access a virtual drop-in session all consultees were provided with the opportunity to submit their views or ask questions via letter, telephone or email.</p> <p>Whilst the benefits of face to face meetings are understandable, in response to the pandemic the local authority adapted its engagement methods in order to ensure that the consultation was as accessible as possible to all. Many of these tools have proved even more successful than traditional face to face meetings and previous methods used in historic consultations. The Local Authority will continue to adapt its communication methods to meet stakeholder needs.</p>		
15.	<p>Support for small schools Respondents noted that small schools should remain open.</p>	Comments noted.	1	0.2%
16.	<p>Supportive of change in nature of provision Respondents noted that they were happy with the proposal to change the nature of provision at Ysgol Llandybie to Welsh medium.</p>	<p>The support is noted. It is the belief of the Local Authority, based upon international evidence and local experience, that children benefit from a truly bilingual education, which provides wider skills development, such as: cognitive ability, task understanding and flexibility, enhanced powers of concentration, etc. and that all children should receive these opportunities. Being bilingual or multilingual also broadens individuals' cultural experiences and can enhance career prospects.</p>	1	0.2%

		<p>Evidence demonstrates that true bilingualism can only be achieved in the local context through children receiving a bilingual education.</p> <p>The Local Authority acknowledges that bilingualism will increasingly over time become an employment skill. For example, all public organisations in Wales are subject to new statutory Welsh language standards and progressively over time will need to recruit increasing numbers of Welsh speakers to deliver services. Possessing Welsh language skills will increasingly over time give individuals a competitive advantage when seeking employment.</p>		
17.	<p>Re-location of Ysgol Llandybie Respondents were pleased with the plans to re-locate Ysgol Llandybie from its current site to a new site as it would minimise school drop off/pick up disruption for current residents.</p>	<p>The support is noted.</p>	1	0.2%
Unsure (respondents did not answer yes or no)				
1.	<p>Status quo Respondents noted that a new school for Ysgol Llandybie should be progressed, but Ysgol Blaenau should not close.</p>	<p>As part of its statutory obligation to keep the number and type of school places under review, the County Council has adopted a wide-ranging programme designed to improve school buildings and enhance opportunities for learning. The strategy reflects the vision and policies established by the County</p>	1	0.2%

		Council which embrace the requirement to deliver services, to clear standards – covering both cost and quality – by the most economic and effective means. If implemented, this proposal will realise this ambition and provide the communities of Blaenau and Llandybie with 21 st Century teaching and learning provision.		
2.	No reason Respondents did not provide a reason for their response.		1	0.2%
Concerns Raised				
1.	Community impact Respondents showed concern for the negative impact of the school closure on the community. Respondents noted that the school had a rich history and is valued by the community and families.	<p>The Local Authority recognises that a key disadvantage of accepting the proposal includes losing the presence of a school in the community of Blaenau. However, the Local Authority is of the opinion that the proposal will improve the community of Blaenau's access to 21st century teaching, learning and community facilities through shared use.</p> <p>The principal purpose of a school is to educate the pupils to the best standards possible and it is not reasonable to expect schools to carry wider burden of the impact on the community. Ultimately, economic and social factors are non-educational issues and they cannot be allowed to compromise the education of children.</p>	120	29%

2.	<p>Small school preference Respondents noted a preference for small schools and the benefits of this type of provision e.g.</p> <ul style="list-style-type: none"> • Mixed age classes • Small class sizes • Pupil Teacher Ratio • Familiarity between staff and pupils 	<p>The Local Authority recognises that parents may have a preference for the type of education that they wish for their child to receive.</p> <p>‘Parents can state a preference for a school, which is not the designated catchment area school. Subject to the limit on the number of pupils who can be admitted into the school not being exceeded and the correct procedures being followed, then admission will be granted.’ Admission to School: Information for Parents 2021 - 2022 booklet.</p> <p>Due regard must be given to the potential social and educational benefits available to children through learning and working in partnership with a wider range of peers and staff.</p> <p>Pupils can learn from opportunities of collaboration and building relationships in all class types, be it mixed or single aged groups.</p> <p>A lot of research has been carried out into the impact of class sizes, much of which is contradictory. Andreas Schleicher, Director of Education and Skills at the OECD says: “Everywhere, teachers, parents and policy-makers favour small classes as the key to better and more personalised education and yet, Pisa results show no relationship between class size and learning outcomes, neither within nor across countries.”</p>	110	26%
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3.	<p>Status quo Respondents noted that both schools should remain independent and Ysgol Blaenau should not close. Respondents praised the school and the excellent education provision provided at Ysgol Blaenau and that it should not close.</p>	<p>As part of its statutory obligation to keep the number and type of school places under review, the County Council has adopted a wide-ranging programme designed to improve school buildings and enhance opportunities for learning. The strategy reflects the vision and policies established by the County Council which embrace the requirement to deliver services, to clear standards – covering both cost and quality – by the most economic and effective means. If implemented, this proposal will realise this ambition and provide the communities of Blaenau and Llandybie with 21st Century teaching and learning provision.</p>	102	24%
4.	<p>Consulting during a pandemic Respondents did not believe that consulting during a pandemic was appropriate. They did not feel that requirements imposed by social distancing allowed for a full and transparent consultation. Respondents noted the detrimental impact of consulting during a pandemic on stakeholders' mental health and wellbeing.</p>	<p>The Local Authority appreciates that the last 21 months have been extremely difficult for families.</p> <p>The Local Authority would like to assure stakeholders that the consultation was prepared and conducted in line with the requirements of Welsh Government's School Organisation Code (2018) and guidance on 'Changes to the School Organisation Code in response to the coronavirus outbreak' published on the 8th January 2021, which allowed for school consultations to continue during this time. This guidance included temporary changes to certain requirements of the School Organisation Code and provided Local Authorities with advice for</p>	99	24%

		<p>consulting on school organisation proposals during the coronavirus (COVID-19) outbreak.</p> <p>Subsequently, on the 16th February 2021 Welsh government published further guidance on consulting on school organisation proposals during the Coronavirus pandemic. In response to this guidance, following a meeting of the Executive Board on the 22nd February 2021 a decision was made to extend the consultation period for the proposal until 1st March 2021.</p> <p>The consultation period was extended further on the 1st March to the 16th July 2021, in response to the Executive Board's consideration of a notice of motion submitted to County Council on 10th February 2021.</p> <p>Due to the ongoing implications of the coronavirus pandemic during the consultation period the Local Authority provided consultees with the opportunity to attend virtual drop-in sessions in place of face to face meetings. This provided consultees with an opportunity to ask questions, express their views and to discuss the proposal with Local Authority officers. Whilst it is accepted that not all stakeholders would have the means to access a virtual drop-in session all stakeholders were provided with the opportunity to submit their views or ask questions via letter, telephone or email.</p>		
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		<p>Whilst the benefits of face to face meetings are recognised, in response to the pandemic the local authority adapted its engagement methods in order to ensure that the consultation was as accessible as possible to all. Many of these tools have proved even more successful than traditional face to face meetings and previous methods used in historic consultations. The Local Authority will continue to adapt its communication methods to meet stakeholder needs.</p>		
5.	<p>Impact on pupils travel time and distance Respondents noted that the proposal would have a detrimental impact on pupils' ability to walk to school and current family transport arrangements. Concerns were raised for the safety of pupils walking from the current Ysgol Blaenau catchment area to the proposed new school site and the implication of increased travel on the Carbon Footprint. Respondents noted that this goes against CCC Policy.</p>	<p>The Local Authority acknowledges that the implementation of the proposal may impact on pupils and families' current transport and travel arrangements. If the proposal is implemented. The distance from Ysgol Blaenau to the proposed preferred new school site is approximately 1.3 miles. Transport would be provided in accordance with the Council's School Transport Policy.</p>	94	22%

6.	<p>Future choice for a small school</p> <p>Respondents believed that by closing Ysgol Blaenau the future choice of parents for a small school is taken away.</p>	<p>The Local Authority recognises that parents may have a preference for the type of education that they wish for their child to receive.</p> <p>‘Parents can state a preference for a school, which is not the designated catchment area school. Subject to the limit on the number of pupils who can be admitted into the school not being exceeded and the correct procedures being followed, then admission will be granted.’ Admission to School: Information for Parents 2021 - 2022 booklet.</p> <p>More information on the Local Authority’s admissions policy can be found in Carmarthenshire County Council’s Admission to School: Information for Parents 2021-2022 booklet.</p>	88	21%
7.	<p>Success of the Cylch Meithrin at Ysgol Blaenau and impact of closure</p> <p>Respondents noted that the Cylch Meithrin is very successful and could support the increase in pupil numbers at the school. Respondents also raised concerns that the Cylch Meithrin would lose it’s home and the community would lose a valuable service if the proposal to discontinue Ysgol Blaenau was implemented.</p>	<p>The Local Authority recognises the importance of the Cylch Meithrin for children’s education and development.</p> <p>Whilst the Local Authority acknowledges that the Cylch Meithrin could support pupil numbers. The future sustainability of Ysgol Blaenau has been considered for several reasons inclusive of pupil numbers and projections, school budget, building/resources condition and suitability and the proposal to provide a new school for Ysgol Llandybie which allows the pupils of Blaenau the</p>	81	19%

		<p>opportunity to benefit from this. Therefore, the discontinuation of Ysgol Blaenau does not rely solely on pupil numbers.</p> <p>The future location of the Cylch Meithrin at Ysgol Blaenau would be considered as part of the proposal. The new school development would include space for childcare provision.</p> <p>If the proposal is implemented Ysgol Gynradd Llandybie's catchment area would be redesignated to include that of the former Ysgol Gynradd Blaenau catchment area, therefore the community of Blaenau would have access to the childcare provision within the new school development.</p>		
8.	<p>No reason Some respondents did not provide a reason for their objection.</p>		63	15%
9.	<p>Concerns with large schools/classes Respondents noted concerns that pupils would not cope/flourish in a large school and believed that large classes were not good for pupils' education.</p>	<p>Pupils can develop and flourish in all class types. High quality education is currently being provided in very large schools.</p> <p>An Estyn inspection for a new 315 place + 45 nursery place replacement school building in Carmarthenshire quotes that the school provides a 'homely and inclusive environment' which 'contributes to pupils' sense of pride in their work and belonging to their school. They are happy to</p>	28	7%

		<p>attend, behave very well and develop positive attitudes to learning.'</p> <p>The School Admissions (Infant Class Sizes) (Wales) Regulations 2013, impose a limit on class sizes for infant classes i.e. year groups Reception, Year 1 and Year 2.</p> <p>The limit imposed is the maximum of 30 pupils in an infant class at any time while an ordinary teaching session is conducted by a single school teacher (or, where the session is conducted by more than one school teacher, a maximum of 30 pupils for every teacher).</p> <p>All Carmarthenshire County Council Schools are therefore bound legally to keep Infant class sizes to a limit of 30 pupils.</p> <p>Whilst there is no legislation limiting Key Stage 2 classes to 30 or fewer, Welsh Government has a target of ensuring children aged 7 to 11 are taught in classes of no more than 30 children per school teacher.</p> <p>The capacity of schools is determined by applying the Welsh Government's Measuring the Capacity of Schools in Wales methodology. This method provides a robust and consistent method of assessing the capacity of schools and subsequently capacity of class sizes. This methodology uses a formula to provide a realistic and consistent assessment of the capacity of all primary schools.</p>		
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		<p>The Local Authority aims to have suitably sized classes with no more than two-year groups per class and which do not span the key stages of the curriculum.</p> <p>There are also many advantages to schools with greater numbers of pupils including:</p> <ul style="list-style-type: none"> • Economies of scale – e.g. more efficient and effective use of financial resources • Greater opportunity to socialise with a wider range of pupils and better chance to be able to choose their friends and/or have a wider circle of friends • Better chance of being able to participate in a wider variety of sports and cultural teams, with the added incentive of ‘friendly’ competition • More chance of being able to work with pupils of similar ability 		
10.	<p>Quality of Consultation Document and misinformation</p> <p>Respondents felt that the Consultation Document was biased and included false/misleading information.</p> <p>Respondents did not believe that the Consultation document had considered the</p>	<p>The consultation document produced complies with the guidance as set out in the School Organisation Code (2018).</p> <p>All data and information contained within the Consultation Document is accurate and is based upon the Pupil Level Annual School Census Data (PLASC). All data contained within the Consultation</p>	9	2%

	<p>principles of the Wellbeing of Future Generations Act policy.</p> <p>Respondents criticised the quality and depth of information received from officers in response to queries raised.</p>	<p>Document is stipulated as a requirement within the School Organisation Code (2018).</p> <p>Whilst the local authority notes the comments made. It must be reiterated that all answers provided in response to queries raised via drop-in sessions or alternative methods were based on factual and accurate information.</p>		
11.	<p>Additional Learning Needs (ALN)</p> <p>Respondents believed that pupils with ALN would struggle with the change and queried how pupils would be supported. Respondents believe that small schools are better for pupils requiring one to one teaching.</p>	<p>Carmarthenshire County Council's policy is that all its schools should be inclusive, with children with additional learning needs being educated in a mainstream setting alongside their peers wherever possible. School and classroom size should not be a factor when schools deliver a person-centred approach to children's learning supported by personalized learning packages with individually targeted interventions, strategies and opportunities and the support required for delivery.</p>	8	2%
12.	<p>Change in nature of provision</p> <p>Respondents questioned the need to change Ysgol Llandybie's nature of provision, from transitional to Welsh medium.</p>	<p>This proposal seeks to improve further the opportunity for children attending the school to secure continually improving outcomes. Carmarthenshire County Council has a statutory responsibility under Part 4 of the School Standards and Organisation (Wales) Act 2013 to prepare a Welsh in Education Strategic Plan (WESP) for its area with the explicit aim of improving planning of the provision of education through the medium of</p>	6	1%

		<p>Welsh, from improving the standards of that education and of the teaching of Welsh. This will ensure that more pupils will have the opportunity to become fully bilingual by the age of 11.</p> <p>In April 2014 the County Council formally adopted a comprehensive strategy for the development of the Welsh language in Carmarthenshire, endorsing the recommendations of a politically balanced group of elected members that had examined in depth the status of the Welsh language in the county in the wake of the 2011 census of the population. The strategy required action on 73 points, 21 of which applied to the education service.</p> <p>The language strategy received cross-party support from elected members when it was adopted at a meeting of the full County Council. On 25th June 2018, the Local Authority launched Carmarthenshire's most recent Welsh in Education Strategic Plan. The WESP has been subject to public consultation during its preparation and subsequent review. Its contents have, therefore, been subject to a test of public opinion in line with statutory requirements. It has also been approved by the Welsh Government in accordance with the requirements of the Act.</p> <p>The proposal is adhering to the recommendations as set out in Carmarthenshire's WESP.</p>		
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		<p>It is important to note that the WESP requires all primary schools in Carmarthenshire, including English medium schools, to move along the language continuum, progressively expanding the proportion of education that is delivered through the medium of Welsh, with a view to ensuring that in time all children leaving primary school are fully bilingual.</p> <p>The pace at which schools will be able to expand bilingualism and Welsh medium education will depend upon local circumstances but the expectation for progress applies to all schools. The school has been identified as having the potential to move quickly along the language continuum.</p> <p>The Curriculum Bill also lays the foundation for the new curriculum in that Welsh is a mandated element of a school curriculum or setting for children or pupils from 3 years and English will be mandated from 7years</p> <p>The question of the advantages both educationally and cognitively of immersion teaching are not in question. In the words of Prof. Colin Baker</p> <p><i>“Language among young children is caught rather than taught. The process is not learning but acquisition”</i></p> <p>The Cymraeg 2050 strategy also states clearly that full Welsh immersion education is the most reliable</p>		
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		way to create individuals with the skills and confidence to use the language in their daily lives.		
13.	<p>Condition & suitability of current Ysgol Blaenau</p> <p>Respondents questioned how the Local Authority's lack of investment had allowed Ysgol Blaenau's building condition and suitability to deteriorate to a position where closure is viewed as the preferred option.</p>	<p>School Governing Bodies have a responsibility in respect of school's maintenance in addition to the Local Authority's responsibility.</p> <p>Works that are CAPITAL in nature are the responsibility of the Local Authority and any other works required would be REVENUE in nature and therefore the responsibility of the school.</p> <p>The budget for CAPITAL major maintenance work in schools is under severe pressure and urgent works are prioritised on an annual basis across the schools estate.</p> <p>The Executive Board approved a revised Modernising Education Programme and 21st Century Schools Band B on the 18th December 2017 where approval was given to pursue grant funding (from Welsh Government) for a total of 19 individual projects at a total value of £129.5m which included a scheme for Ysgol Llandybie. Due to the challenges faced at Ysgol Blaenau it would be unlikely to attract WG funding as it would not be considered strategic enough, considering that a new school for Ysgol Llandybie was proposed for the area.</p>	5	1%

14.	<p>Impact on the Welsh language</p> <p>Respondents noted that the closure of Ysgol Blaenau would have a detrimental impact on the Welsh language. Ysgol Blaenau is the only small Welsh medium school within the area. Respondents noted that the closure of Ysgol Blaenau may result in pupils choosing an alternative English medium small school.</p>	<p>As part of the proposal, it is the Local Authority's intention that all current pupils remain at the school and continue to receive their education through the current Welsh medium language arrangements.</p> <p>If the proposal is implemented, it is the Local Authority's intention that Ysgol Blaenau pupils transfer to the new school development, where pupils would be able to continue their Welsh medium education journey.</p> <p>The language status of all schools will be reviewed as part of the WESP – and as more schools journey along the language continuum. This review will apply to small English medium schools as well as all other schools.</p>	4	1%
15.	<p>New school name</p> <p>Respondents noted the importance of ensuring that the new school had a new name to include Ysgol Blaenau.</p>	<p>Whilst the Local Authority supports the idea of the new school having a name which reflects both schools/communities. It does not have the power to enforce this. The name of the new school will be a decision for the school's Governing Body.</p>	3	0.7%
16.	<p>Financial pressure</p> <p>Respondents believed that the proposal was being implemented for financial reasons and to avoid investing in Ysgol Blaenau.</p>	<p>The decision to proceed with a proposal to discontinue Ysgol Blaenau was made based on a number of individual factors inclusive of pupil numbers and projections, school budget, building/resources condition and suitability and the proposal to provide a new school for Ysgol</p>	3	0.7%

		<p>Llandybie which allows the pupils of Blaenau the opportunity to benefit from this.</p> <p>Furthermore, the Executive Board approved a revised Modernising Education Programme and 21st Century Schools Band A and Future Programme on the 18th December 2017 where approval was given to pursue grant funding (from Welsh Government) for a total of 19 individual projects at a total value of £129.5m which included a scheme for Ysgol Llandybie.</p>		
17.	<p>Redundant school sites Respondents questioned what would happen to the old school buildings and believed that they would be left to deteriorate following closure.</p>	<p>Should the proposal be adopted, any redundant property will be transferred to the Regeneration Division for the procedures outlined in the Future Use/Disposal of Redundant Land and Buildings arising from the Modernising Education Programme policy to be actioned. This policy has been developed to allow the community to be offered the asset in the first instance before placing the site on the open market.</p> <p>Any capital receipts received as a result of the proposal would be re-invested into the Modernising Education Programme.</p>	3	0.7%
18.	<p>Sustainable leadership Respondents questioned the lack of permanent leadership with no teaching commitment</p>	<p>Funding of schools is based on pupil numbers in line with Carmarthenshire's fair funding policy. Larger schools will naturally have greater budgets with opportunities for headteachers to focus on</p>	2	0.5%

	at Ysgol Blaenau to manage the school.	leaderships and strategic development including monitoring and improving learning.		
19.	<p>Impact of the proposal on current pupils</p> <p>Respondents noted the need to consider the impact of the proposal on the current pupils of Ysgol Blaenau.</p>	<p>The Local Authority recognises that school re-organisation proposals can create a period of uncertainty for pupils.</p> <p>However, the Local Authority is confident that teachers and school support staff would provide appropriate support to pupils during this time to minimise any detrimental impact on their wellbeing.</p> <p>Moreover, should the proposal be implemented, pupils would be supported in their transition to ensure a positive experience.</p>	2	0.5%
20.	<p>Impact of the proposal/rumours</p> <p>Respondents noted the negative effects of the consultation and previous rumours on the sustainability of Ysgol Blaenau.</p>	<p>Whilst the Local Authority recognises the detrimental impact of such rumours - openness and transparency are a key dimension of effective consultation in order for parents to consider what is best for their child in the long term.</p>	1	0.2%
21.	<p>Proposed new school site</p> <p>Concerns were raised in relation to the loss of the recreation ground that the new school is proposed to be built on.</p>	<p>On 15th December 2014 Carmarthenshire County Council's Executive Board unanimously agreed a package to offer Town and Community Councils and various Organisations the opportunity to take over the running of various facilities/assets within their areas. Councillors believed that the transfer of these assets could give local people greater control of their area and their community. The Board also set a</p>	1	0.2%

		<p>final transfer deadline of 31st March 2018 for the transfers and confirmed that the future of any assets not transferred would need to be considered further, including the option of ceasing to maintain them.</p> <p>A period of consultation was carried out whereby expressions of interest were sought from Individuals, Community and Voluntary Sector Groups and Town and Community Councils.</p> <p>On 26th February 2018, in considering the asset transfer options of the remaining parks, playgrounds and amenity areas, the Executive Board decided that those assets that have not received an expression of interest before 1st April 2018 would be classed as surplus to requirements and Carmarthenshire County Council would cease to maintain.</p> <p>Following the consultation period no expression of interest was received for the recreation ground in Llandybie which is why the land is now being considered for the new school development.</p>		
22.	<p>Impact of the proposal on the village and residents of Llandybie</p> <p>Respondents noted concerns on increased traffic in the village of Llandybie as a result of the proposal and the</p>	<p>As part of the planning process a Traffic Impact Assessment (TIA) will be undertaken to ascertain the effect of the new school development on the surrounding infrastructure. The TIA is a technical</p>	1	0.2%

	potential noise and disruption during the construction period.	<p>analysis of traffic problems and safety issues relating to a new development. The outcome of the assessment will determine what measures will be put in place to ensure that highway improvements if required are put in place.</p> <p>Unfortunately, construction sites do create noise however in order to ensure that there is minimum disruption to tenants in accordance with the Health and Safety regulations the Council set limits for noise levels. In addition the Council will set times for the start and finish of works so that generally no works are carried out before 8.00am or after 6.00pm with no works on Sundays, Bank Holidays* or after 12.00noon on Saturday*. (*Without prior permission of the Council). In addition, if we know there are specific requirements i.e night workers although we cannot stop work we do ask the contactor to liaise with resident and agree options for carrying out noisy activities</p>		
23	<p>Timing of implementation</p> <p>Respondents questioned the transitional arrangements regarding the discontinuation of Ysgol Blaenau.</p>	<p>The timing of implementation of the proposal has been planned to ensure limited disruption and a smooth transition for pupils of both Ysgol Blaenau and Ysgol Llandybie.</p> <p>If the proposal is implemented, on discontinuation of Ysgol Blaenau, the school will be managed by Ysgol Llandybie headteacher and governing body. This will allow the staff and pupils of both schools to adjust to</p>	1	0.2%

		new ways of working prior to their transition to the new school building.		
24.	<p>New school design Respondents questioned the new school management, design and facilities, in particular;</p> <ul style="list-style-type: none"> • Facilities available • Traffic Management • Capacity • Community Use • Childcare • Staffing • Funding • Environmental Impact 	<p>If the proposal is implemented, more detail on the design and facilities of the new school development would be made available to stakeholders as the scheme progresses through its development stages.</p> <p>Stakeholders would be provided with the opportunity to view and make comment on the plans of the new school development during the Pre-Application Consultation. This would include any highway/traffic management proposals which form part of the scheme.</p> <p>The new school will be designed to accommodate the required number of pupils and would be suitably funded, resourced and staffed.</p> <p>Funding would be provided in accordance with the County Council's funding formula.</p>	1	0.2%

Estyn's Observations regarding the Proposal

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

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

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

Introduction

This proposal is presented by Carmarthenshire County Council as part of the process of announcing its vision for the future of all the County's primary and secondary schools. This includes consulting on reviewing primary education provision in the Blaenau and Llandybie areas.

Summary/ Conclusion

The proposer has provided useful information which explains the rationale behind this proposal. It aligns with the School Organisation Policy. It also responds to the 21st Century Schools Modernisation Programme. This proposal is to review primary education provision in the Blaenau and Llandybie areas. This plan will relocate Ysgol Gynradd Llandybie to a new site with investment to provide more capacity in a new-build school with facilities for the 21st century and excellent outdoor spaces. As part of this plan, the proposal is to increase the number of places in the school to 315, and provision for 45 nursery places.

The favoured proposal is to close Ysgol Gynradd Blaenau and include its catchment area within the existing catchment area of Ysgol Gynradd Llandybie. This proposal aims to increase Welsh language provision in the Llandybie area by formalising the schools' progress along the Welsh language continuum. If this proposal is implemented, the school will change from being a transitional school to a Welsh medium school. This supports the targets outlined in Carmarthenshire's Welsh in Education Strategic Plan 2017-2020 which was approved by the Local Authority, and supports the Welsh Government's aim of 'Cymraeg 2050: A million Welsh speakers'. It also supports the County's new Welsh Language Targets set by the Welsh Government for Welsh in Education Strategic Plans over 10 years, as well as aligning with the new School Designations in future.

Since launching the consultation, a Project Officer has contacted the Headteacher, staff and parents of Ysgol Gynradd Blaenau and Ysgol Gynradd Llandybïe about the proposal.

Estyn is of opinion that the proposal is likely to maintain or improve the current standards in terms of education, provision and leadership and management.

Description and benefits

The rationale for this proposal is methodical with clearly stated considerations. The evidence is based on valid facts and considerations.

The proposer has identified the expected advantages and disadvantages compared with the current situation. They have considered:

1. No change – both schools will continue to operate as independent schools
2. A formal federation between Ysgol Gynradd Llandybïe and Ysgol Gynradd Blaenau
3. To continue with the current situation for Ysgol Gynradd Blaenau / New build school for Ysgol Gynradd Llandybïe
4. To close Ysgol Gynradd Blaenau and include its catchment area within the existing catchment of Ysgol Gynradd Llandybïe

Carmarthenshire officers have conducted an evaluation of the current situation based on standards, wellbeing, teaching and learning experiences, care, support and guidance and leadership and management. As a result of this activity, the fourth proposal is the preferred option.

The advantages of this proposal, namely the fourth of the above proposals, outlines important issues which include maintaining and raising educational standards, improving pupils' learning experiences, as well as improving staff and pupils' wellbeing. It is also noted that a new building and facilities would ensure effective co-operation between staff and external partnerships.

Overall, considerations are firmly in favour of this proposal. Another core factor in this proposal is the fact that it complements the Council's vision and objectives for Welsh-medium education, in line with that identified in Carmarthenshire's Welsh in Education Strategic Plan (WESP), 2017–2020. By changing the nature of provision at Ysgol Gynradd Llandybïe to Welsh-medium provision from 1 September 2021, this proposal will provide more opportunities to gain access to Welsh-medium education in the Llandybïe area. This proposal is supported by the fact that there has been a continuous increase during the past 5 years in the number of pupils choosing to attend the Welsh-medium stream, and a reduction in the number of pupils choosing to attend the school's English stream. This will ensure linguistic continuity from the nursery sector along the key stages through to the secondary phase, so that all pupils develop fluency and confidence in both Welsh and English.

The disadvantages of accepting this proposal include important issues such as losing a school's presence in the community of Blaenau when pupils move to a new school building, as well as increased travel time for some pupils. However, the current building's poor condition, a significant reduction in the number of pupils over a period of time, challenging financial pressures, the challenges of providing a comprehensive

curriculum as the pupils are in mixed-age classes, are also considerations in favour of accepting the proposal. In addition, there is no permanent headteacher in Ysgol Blaenau at present.

The proposer has outlined challenges in continuing with the current situation of both schools. The strengths of this proposal outweigh the weaknesses consistently in nearly all of the considerations.

Educational aspects of the proposal

The proposer has given due consideration to the proposal in terms of the quality of the outcomes, provision and leadership and management.

The proposer suggests there would not be much change for pupils during the transitional period, as they will remain on their existing school sites under the management of Ysgol Llandybie until the new building is ready for occupation to accommodate all pupils from Ysgol Blaenau and Ysgol Llandybie. As a result of the School Modernisation Programme, this proposal aims to provide modern facilities to all pupils, in order to support the new curriculum and digital learning. It is also intended that establishing the school in a new build will provide better community facilities which can be used by the communities of Blaenau and Llandybie.

The positive impact on the standard of teaching and learning provided to pupils through merging both schools is another good feature identified by this proposal. As Ysgol Llandybie has recently appointed a new headteacher, the focus has been on ensuring that there is a robust and collaborative vision throughout the school, focussing on raising standards and meeting the particular needs of pupils well. In addition, the process of sharing ideas and good practices has had a positive impact on ensuring a consistent approach to teaching throughout the school, by reducing variation suitably in the school.

This proposal will clearly have a dual impact on the local community. Firstly, if it is approved, the proposal will allow more opportunities for pupils to gain access to places in Welsh-medium education in the Llandybie area, in line with national and local policies. Secondly, if the proposal is approved, it will improve the Blaenau community's access to teaching, learning and community facilities which are suitable for the 21st Century.

It is suggested that the proposal complies fully with the Council's Welsh in Education Strategic Plan for 2017-2020. This proposal supports the Council's vision and objectives for Welsh-medium education, in line with that noted in Carmarthenshire's Welsh in Education Strategic Plan (WESP), 2017–2020. It supports Carmarthenshire's vision to provide a service which will ensure access to learning opportunities of a high quality to all pupils, young people and adults, and therefore enables them to fulfil their full potential within the context of the county's unique bilingual nature. It is noted that the proposal will give more opportunities to gain access to Welsh-medium education in the Llandybie area, ensuring linguistic continuity from the nursery sector along the key stages through to the secondary phase, so that all pupils develop fluency and confidence in both Welsh and English.

It is suggested that there would be no negative impact on pupils from other primary schools in the surrounding catchment area. It is also noted that there will be no change to the existing arrangements in terms of pupils transitioning to secondary education.

As part of this process, attention is given to the implications in terms of staffing in line with the County Council's Procedures and Staff Relocation Policy relating to school re-organisation, and it refers to the fact that these will be implemented if necessary. The Authority will support the school's staff to gain other suitable employment, if possible, through relocation processes, if necessary. In addition, it is highlighted that the Authority will provide linguistic support to teaching staff and support staff on a suitable level and according to individual needs to ensure that all members of staff have the necessary skills to deliver the curriculum in Welsh.

It appears that this proposal of merging would produce annual revenue savings for the Council. Establishing one primary school would secure one budget which would be run by one headteacher and governing body. This would enable the school to operate more effectively compared with the existing arrangements. Due to the increase in the numbers of surplus school places, this has placed the school in a difficult financial situation.

It is suggested that the Council should consider a proposed site for the new school as part of the 21st Century Schools Modernisation Programme. The preferred location for the proposed site has been identified. It is emphasised that the proposals noted in this document are subject to the County Council's approval and future capital investment is subject to the Welsh Government's approval. A consultation is needed on relocating Ysgol Gynradd Llandybïe in order to meet the School Organisation Code (2018). By relocating Ysgol Gynradd Llandybïe to a new school site, the ambition of increasing the number of places to 315 + 45 nursery places from September 2024 is emphasised, when it is proposed that the school will move to its new building. The plans are referred to in the transitional period from 1 September 2021 of using both sites (Ysgol Gynradd Llandybïe and the former Ysgol Gynradd Blaenau), and increasing the number of places to 287 + 50 nursery places. This suggests that the transitional period will take place step by step, and smoothly.

In terms of transport, it is claimed this will be provided in line with the Council's School Transport Policy. It is noted that the intention is to design a new school for Llandybïe to include safe spaces to drop-off and pick-up pupils. If this proposal is approved, safe pathways to the school will be considered as part of the Transport Impact Assessment for the school's new building.

Ysgol Gynradd Blaenau was inspected by Estyn in January 2016, and its performance was judged to be 'Adequate' and its capacity for improvement was also 'Adequate.' As a result of the school's progress based on the recommendations, the school was removed from the 'Estyn monitoring' category in May 2017. Ysgol Llandybïe was inspected by Estyn in September 2013. Its capacity for improvement was judged to be 'Good'.

Local Authority Response to Estyn's Observations

As can be seen from Estyn's observations they are of the opinion that the proposal is likely to maintain or improve the current standards in terms of education, provision and leadership and management. Their observations include supporting statements as noted below.

Statements of support for this proposal by Estyn

The proposer has provided useful information which explains the rationale behind this proposal. It aligns with the School Organisation Policy. It also responds to the 21st Century Schools Modernisation Programme.

The proposal supports the targets outlined in Carmarthenshire's Welsh in Education Strategic Plan 2017-2020 which was approved by the Local Authority, and supports the Welsh Government's aim of 'Cymraeg 2050: A million Welsh speakers'. It also supports the County's new Welsh Language Targets set by the Welsh Government for Welsh in Education Strategic Plans over 10 years, as well as aligning with the new School Designations in future.

The proposer has outlined challenges in continuing with the current situation of both schools. The strengths of this proposal outweigh the weaknesses consistently in nearly all of the considerations.

Consultation with the Pupils

Children and Young People Consultation Document

A Children and Young People's version of the Consultation Document was provided to the school to distribute to all pupils.

In addition to the pupil consultation events noted below, pupils' observations including pictures and drawings were received through the generic consultation and have been included in the summary of responses received and Local Authority related responses which can be found on pages 5 – 32 of this document. Copies of the photos and drawings submitted by pupils can be found at appendix B.

Pupil Consultation Events

School: Ysgol Gynradd Blaenau

Date: 11/02/2021

Consultation undertaken by: Educational Support Adviser (ESA)

Interviewed: 8 pupils (conducted on-line due to coronavirus)

Observations noted during the Pupil Consultation Event:

Do you know that there could be some changes to your school?

- We are going to mix with Llandybie school.
- Pupils have not seen images of new build.

What changes have you heard about?

ESA to go through the proposal in detail with pupils.

How do you feel about the 'proposal'/changes?

- 1 not looking forward _ 'I like this school I've been in it since 5 and I don't want to change.'
- 1 other pupil feels the same.
- It could be awkward meeting back up with someone who has moved to Llandybie from Blaenau – they might have changed over the years.
- Blaenau is small _ I like this.

Is there anything you are looking forward to/worried about?

- More friends there x2.
- Seeing old friends again.

How can we help with your worries? (If appropriate)

What do you like about your school?

- Like all friends and teachers really nice to me.
- Know where everything is – in a new schools wouldn't know where everything is.
- Small and you know everyone.

Is there anything you dislike?

- Since Pandemic – can't touch anyone and it's all different.

Is there anything you'd like it to have?

- Exercise room
- More toys
- More room to run around outside
- New football pitch - full size
- PE room – all necessary equipment for exercise and sport
- Workout room
- Bikes outside
- Healthier food in dinner hall
- I wish for a pony
- Trampoline and dogs. Bulldogs
- Jugs?
- Hospital / first aid room
- Tech and science room
- Grass area

School: Ysgol Gynradd Llandybie

Date: 11/02/2021

Consultation undertaken by: Educational Support Adviser (ESA)

Interviewed: 7 pupils (conducted on-line due to coronavirus)

Observations noted during the Pupil Consultation Event:

Do you know that there could be some changes to your school?

- Yes
- Pupils had seen images of a recent new build within the LA.

What changes have you heard about?

Pupils were aware of the fact that Blaenau pupils could be joining them at a new build.

Seen plan

Their understanding of how many new pupils would join Llandybie cohort was a little uncertain – ‘I don’t want lots more pupils joining us’

How do you feel about the ‘proposal’/changes?

Initial comments included:

It’s big,

Nice colour,

Like a mansion

It has 2 storeys

It’s like Bro Dinefwr

Excited about seeing it

Is there anything you are looking forward to/worried about?

- Looking forward at having a bigger yard as we can have more people there to play with.
- One questioned whether there would be bad behaved pupils there (poeni a fyddai plant drwg yno).

How can we help with your worries? (If appropriate)

- Pupils wanted to know what was going to happen to their current school.
- Will their current clubs be available for them in the new school e.g. mindcraft?

What do you like about your school?

- Clubs

Is there anything you dislike?

- One child doesn't like the existing fence between the younger and older pupils.
- Lack of green space.
- Too much work!
- Don't want hard homework!

Is there anything you'd like it to have?

Pupils shared that they would like the following in the new school:

- Swimming pool
- Swings (they have a park on the existing site but it hasn't got swings!)
- Grassed area – they wouldn't get badly hurt if they fell on grass when playing
- A bigger yard
- A 'chill out' area – with sofas
- Apple macs
- Computer suite/room
- One table each
- More clubs
- More resources and facilities e.g. for rugby
- School to start later in the day
- Fish
- Science room
- Library
- A bigger dining hall and a clean one!

Alternative Options

During the formal consultation period stakeholders were provided with the opportunity to submit alternative options for consideration. The alternative options (not already considered in the consultation document) received are noted below and will be presented to the Cabinet for consideration.

Cost works required to upgrade Ysgol Blaenau/Invest in the current Ysgol Blaenau school building	
Advantages	Disadvantages
School remains in the community of Blaenau	Does not address declining pupil numbers and high surplus places
Small School remains an option for parents	Not financially viable for the long term
No statutory process required	Pupils continue to be taught in multi-age classes
Would address the poor building condition	Lack of sustainable leadership
Would provide pupils with a 21 st Century building and facilities.	There is currently no scheme allocated for Ysgol Blaenau within the Band B Modernising Education Programme
	Dependent on business case approval to secure funding. Potential for Welsh Government rejection of Business Case due to scope of the project not meeting strategic needs

Close both schools, open a new school on two sites utilising the sites of the former Ysgol Blaenau and Ysgol Llandybie	
Advantages	Disadvantages
School remains in the community of Blaenau	Does not address current challenges at Ysgol Blaenau or Ysgol Llandybie
Small School remains an option for parents	Challenge in closing a popular sustainable school
No additional land required	Increased maintenance costs for new school on split sites
Would address Ysgol Blaenau's deficit budget	Continued deterioration of building fabric of current school sites

Change the age range of all schools to 3-11	
Advantages	Disadvantages
Continuity of provision across the county	Risk of non-maintained providers being unsustainable
Effective transition from nursery provision to primary provision	Lack of adequate space in all schools to incorporate nursery provision
Full time childcare/education provision from an early age	Costly model of provision if there is no uptake

Change the age range of Ysgol Blaenau to 3-11	
Advantages	Disadvantages
Seamless transition from nursery into primary school	Reduction in the demand for places at the Cylch Meithrin/childminders/privately-run nurseries who currently offer this provision
Opportunity for employment at Ysgol Blaenau	Unemployment due to the lack of demand at the establishments who currently offer this provision
Would attract pupils at an earlier age avoiding them having to attend an alternative school	Costly model of provision if there is no uptake
	More pupils at the school would result in the Cylch Meithrin having to vacate the premises

Establish Additional Learning Needs provision at the Ysgol Blaenau site alongside the proposed new school development.	
Advantages	Disadvantages
Additional Learning Needs provision provided in close proximity to mainstream setting	Statutory process required to discontinue Ysgol Blaenau
	Statutory process required to establish Additional Learning Needs provision
	Additional funding required to staff and resource the new provision
	Ysgol Blaenau building condition and suitability not suitable
	Impact on the County's wider Additional Learning Needs Provision

Change Ysgol Blaenau to a nursery	
Advantages	Disadvantages
Effective use of redundant school building	Blaenau lose the presence of a primary school in the community

	Reduction in the demand for places at the Cylch Meithrin/childminders/ privately-run nurseries who currently offer this provision
	Unemployment due to the lack of demand at the establishments who currently offer this provision
	Costly model of provision if there is no uptake

Increase wrap around provision to include a daily after school club to be consistent with other neighbouring schools	
Advantages	Disadvantages
Provides parents with greater childcare options/flexibility	Requires additional staffing
School remains in the community of Blaenau	Sufficient space required
Small School remains an option for parents	Does not address Ysgol Blaenau's current challenges
No statutory process required	Pupils continue to be taught in a condition C building
May attract pupils	Pupils continue to be taught in multi-age classes
	Lack of sustainable leadership remains an issue
	Not financially viable for the long term

Utilise surplus capacity for community purposes at Ysgol Blaenau	
Advantages	Disadvantages
School remains in the community of Blaenau	Sufficient space required
Small School remains an option for parents	Demand for provision is not evident
No statutory process required	Does not address Ysgol Blaenau's current challenges
Reduces surplus space	Pupils continue to be taught in a condition C building
	Pupils continue to be taught in multi age classes
	Lack of sustainable leadership remains an issue
	Not financially viable for the long term

Federate Ysgol Blaenau with a neighbouring primary school	
Advantages	Disadvantages
School remains in the community of Blaenau	Requires a school to be available and willing to enter into a Federation

Opportunity to share management, governing body responsibility and curriculum expertise	Requires a legal process
Deliver greater value for money	Will not address deficit budget at Ysgol Gynradd Blaenau
Allows schools to pool resources and staff	Does not address declining pupil numbers and high surplus places at Ysgol Gynradd Blaenau
Extend the breadth and quality of education provision	Pupils continue to be taught in condition C buildings
Respond to pupils' wider needs	Does not provide pupils with modern 21 st century facilities
Widen opportunities for staff professional development	Managing headteacher time across two schools
Small School remains an option for parents	Requires the rationalisation of both governing bodies
	More work for governors in the first year of Federation

Obtain 21st Century Schools funding for Ysgol Blaenau and Ysgol Llandybie.	
Advantages	Disadvantages
School remains in the community of Blaenau	Does not address Ysgol Blaenau's declining pupil numbers and high surplus places, deficit budget or lack of sustainable leadership
Small School remains an option for parents	There is currently no scheme allocated for Ysgol Blaenau within the Band B Modernising Education Programme
No statutory process required	Dependent on business case approval to secure funding. Potential for Welsh Government rejection of Business Case due to scope of the project not meeting strategic needs
Would address the poor building condition of both schools	
Would provide pupils with 21 st Century buildings and facilities	

Obtain funding to enhance the community aspect of Ysgol Blaenau	
Advantages	Disadvantages
Improved community facilities at Ysgol Blaenau	No capital or revenue available to support this type of provision
	Demand for provision not evident
	Does not address Ysgol Blaenau's current challenges

	Pupils continue to be taught in a condition C building
	Pupils continue to be taught in mixed age classes
	Lack of sustainable leadership remains an issue
	Not financially viable for the long term

Keep Ysgol Llandybie transitional providing the option of English medium education.	
Advantages	Disadvantages
No language provision change for stakeholders	Does not support Welsh Government aim of 1 million Welsh speakers by 2050
No statutory process required	Does not meet the aims of the County's WESP
	Does not increase Welsh Medium education provision

Provide Ysgol Blaenau with additional funding and resources.	
Advantages	Disadvantages
Opportunity for full time headteacher to manage the school	Not financially viable for the long term
School remains in the community of Blaenau	Schools are funded based on pupil numbers in accordance with the fair funding model
Small School remains an option for parents	
No statutory process required	

Invest in the current Ysgol Llandybie school and site.	
Advantages	Disadvantages
No additional land required	Restrictive site for required capacity
	Period of disruption for staff and pupils during refurbishment/construction period
	Does not include provision for Ysgol Blaenau

Appendix A

Business Plan



carmarthenshire.gov.uk





Ysgol Gynradd
Blaenau

Dyfodol gydag Ysgol Gynradd Blaenau

A Future with Ysgol Gynradd Blaenau

“Yr Ysgol o Ddewis.”



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Foreword

Ysgol Gynradd Blaenau is a small Welsh medium primary school that provides good standards of education and offers parents of the surrounding area an alternative provision for education. The School offers pupils an alternative learning environment of small mixed age classes where children benefit from a more personal relationship with staff and pupils. This learning environment has statistically proven advantages, which parents of Ysgol Blaenau value and have specifically chosen for their children. A school closure will take this choice away from parents.

Ysgol Blaenau stands proudly in the village and we cannot underestimate the devastating impact that a potential closure would have on the community, residents and most importantly pupils. The villages of Blaenau and Caerbryn would simply become a 'through' road between Penygroes and Llandybie. There will be nothing left and the small Welsh community would become forgotten.

The threat of school closure has hung over the village for long enough. We are asking Carmarthenshire County Council to give certainty to the community and to the families of Ysgol Blaenau that, during a time, when the emphasis on 'pulling together' has never been stronger or more important than it is now, that they will seriously consider the plan that we are submitting and the proposals that are within it.

In recent years and under the 2016 to 2021 administration of the Welsh Government, it was reported that the Welsh Government would introduce changes to the School Organisation Code that guides local authorities' decisions about schools. Within this document, then education minister Kirsty Williams stated that

“Small and rural schools play an important role in our national mission in raising standards and extending opportunities for all of our young people”

She went on to say that all schools should get a fair hearing when their future is being considered, and that Local authorities carry out rigorous consultation and conscientiously consider **ALL** viable alternatives to closure, including linking up with other schools, known as federation.

We acknowledge that the school faces challenges and as governors, parents, residents and friends of Ysgol Gynradd Blaenau we are keen to move forward - with the support of the Local Education Authority- to implement a positive action plan to address the challenges and to ensure a successful future for Ysgol Gynradd Blaenau.

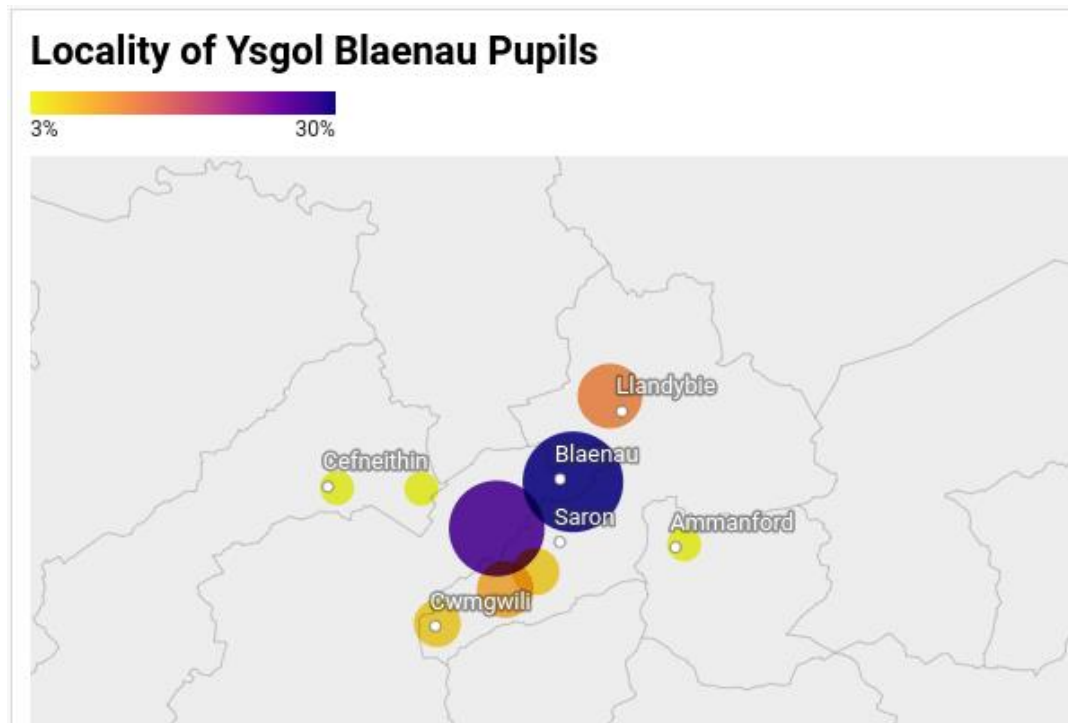
Ofsted reported in 2008 that:

‘Small schools have a positive ethos that fosters a family atmosphere, good standards of behaviour and close links with parents and the community.’

This is a sentiment that is still held today and which makes smaller schools an attractive option.

Our business plan presents realistic and achievable objectives which will enable us to remain open and to continue to serve generations of families in years to come. It will continue to provide parents in the surrounding area with an alternative educational environment, one which has been chosen by 70% of parents whose children attend Ysgol Blaenau from outside of the catchment area.

The map below demonstrates where pupils live and travel from to attend Ysgol Gynradd Blaenau - the school of choice for many parents.



We believe that Ysgol Gynradd Blaenau has a purpose and justifies its place in this area of the county. It has a reason to exist.

further Estyn audits since.

Welsh Language

The school is a strong Welsh Medium school. The Welsh language is naturally used in the school by its pupils during their day to day learning and socialising. It is also the language used at the heart of the Community in Caerbryn and Blaenau. In fact, when surveyed the Welsh-medium aspect was one of the most common reasons for parents choosing the school along with it being small.

The new school proposal states that Ysgol Llandybie will be transitioning to a Welsh Medium category school. We do have some concern over the quality of Welsh that will be taught and that the proposal will dilute the Welsh language in the area. Currently not all teachers in Ysgol Llandybie are fluent Welsh speakers and all teachers have been guaranteed to keep their jobs following the build of the new school. There is a concern that the Welsh language education of the children will not be in-line with the current standards of Welsh teaching that pupils receive in Ysgol Blaenau. This is not sufficient or in line with the Welsh Government's One million Welsh speakers policy.

According to research from the University of Cambridge Language Assessment, it takes 200 guided hours for a motivated learner to advance from one level to the next. The Council of Europe's Common European Framework of References (CEFR) for Languages groups language learners into six concrete proficiency levels from "Basic" "Proficient." So even if a teacher is currently considered to speak Welsh at an independent level they will need at least 600 guided hours to become a proficient Welsh user and able to teach efficiently through the Welsh language. For a teacher who has a very basic understanding of Welsh then 1200 guided hours will be necessary.

When we contacted Ffred Ffrancis, Cymdeithas yr Iaith regarding the concerns over the impact on the quality of Welsh teaching, we had the following in response.

"Effaith ar y Gymraeg:

Mae'n wir fod y Côt Trefniadaeth Ysgolion, wrth fynnu bod Asesiad Effaith ar y Gymraeg, ac ar Gymunedau, yn datgan na ddylai hyn fod yn faich drom ar Awdurdodau (yng nghyd-destun peidio â mynny comisiynu adroddiad allannol), ond disgwylir rhyw ymdrech at asesiad gwrthrychol o'r holl ffeithiau perthnasol ! Mae llawer o ystyriaethau perthnasol nas cyfeirir o gwbl atynt yn y pwt o adroddiad.

(a) Mae Ysgol Blaenau yn ysgol gyfrwng-Cymraeg lle mae Ysgol Llandybie ar hyn o bryd yn ysgol ddwy ffrwd. Dymunwn bob llwyddiant i Ysgol Llandybie ar ei symudiad

ar hyd y continwmm ieithyddol, **ond risg (o safbwynt y Gymraeg)** yw penderfyniad ymlaen llaw i gofrestru disgyblion ysgol Gymraeg fel Blaenau mewn ysgol arall na fydd ar y pryd wedi cychwyn ei thymor cyntaf fel ysgol Gymraeg

(b) **Nid oes unrhyw gydnabyddiaeth yn yr adroddiad fod perygl colli disgyblion i addysg Gymraeg o ganlyniad i gau Ysgol Blaenau.** Ar hyn o bryd y mae'r 34 o blant mewn addysg gyfrwng Cymraeg oherwydd eu bod naill ai'n byw yn Blaenau, gyda chysylltiad â'r ardal neu oherwydd fod eu rhieni wedi dewis ysgol ddigon bach ar eu cyfer. O golli'r adnodd hwn, nid oes raid i rieni anfon eu plant i Ysgol Llandybie. Gallent ddewis anfon plant at un o'r ddwy ysgol ddwy ffrwd yn Rhydaman, yn enwedig os bydd anghenion arbennig, neu at ysgol drawsnewidiol Betws neu at yr ysgol fach agosaf yn Llanedi sy'n bennaf saesneg ei chyfrwng. **Mewn gair, does dim modd ennill yr un disgybl i addysg Gymraeg o gau Ysgol Blaenau, ond mae perygl colli nifer arwyddocaol o ddisgyblion presennol a'r dyfodol.**

(c) **Yr ysgol yw canolfan Gymraeg cymuned bentrefol Blaenau** ac yn yr adeilad hwn y mae Mudiad Meithrin a'r Urdd yn cynnal gweithgareddau. Heb fod ysgol yn yr adeilad, ni allent fforddio cynnal yr adeilad at weithgareddau o'r fath."

The Proposal

We have considered the modernising education team’s consultation document and while we appreciate there is a rationale for the need for change for Ysgol Blaenau’s future we offer this Business Plan as a solution. This is the best option for the pupils and the wider community of the school.

Council’s Rationale for Change

‘Primary Education Footprint Principles from Carmarthenshire County Council’

To facilitate the future transformation of the schools’ network, a set of principles have been developed and act as a benchmark for what every primary school in Carmarthenshire should have as a minimum.

<u>Carmarthenshire County Council Principles</u>	<u>Current Position of Ysgol Blaenau</u>
<p>Have sustainable leadership, with leaders who are free to lead and manage, with no Headteacher having a permanent teaching commitment</p>	<p>In forming a federation, we will share a Headteacher with another school meaning our current Acting head will be able to focus on providing a high level of teaching to her class.</p>
<p>Have no more than 2-year groups per teaching class- Not have teaching classes that span the key stages of the curriculum, e.g. the Foundation Phase and Key Stage 2</p>	<p>We appreciate that there are a few disadvantages for mixed classes, but the advantages far outweigh the negatives and in fact reflect the four purposes of the new Curriculum for Wales.</p> <p>Children spend longer periods with the same teacher, allowing the teacher to develop a deeper understanding of a child’s strengths and needs, making them better equipped to support the child’s learning. The teacher focuses on teaching each child according to his or her own strengths. Children are not labelled according to their ability, and children learn at their own rate. Children develop a sense of family with their</p>

	<p>classmates. They become a "family of learners" who support and care for each other. Something that is at the heart of Ysgol Blaenau.</p> <p>Older children have the opportunity to serve as mentors and to take leadership roles. Acting as role models to their younger peers building their self-esteem. Children are more likely to cooperate than compete. The spirit of cooperation and caring makes it possible for children to help each other as individuals, not see each other as competitors.</p> <p>Older children model more sophisticated approaches to problem solving, and younger children are able to accomplish tasks they could not do without the assistance of older children. This dynamic increases the older child's level of independence and competence. Children are invited to take charge of their learning, by making choices at centres and with project work. This sense of "ownership" and self-direction is the foundation for lifelong learning.</p>
<p>Have sufficient pupil numbers to sustain the above structural arrangements</p>	<p>In speaking to parents of children in the Cylch at Blaenau the main reason given for not sending their children to Ysgol Blaenau was the intake age. If this was lowered, we would have a higher percentage of pupils attending the school.</p>
<p>Be financially viable under the Local Management of Schools (LMS) funding framework and able to operate for the long-term without a budget deficit</p>	<p>Please see our figures on how we plan to operate the school without an annual budget deficit.</p>

<p>Have outdoor teaching facilities as required for the Foundation Phase and to support other areas of learning and physical well-being</p>	<p>Ysgol Blaenau benefits from a large outdoor play area, a climbing wall, plenty of space to explore and to take part in team sports. We also have access to a large field opposite the school which is used for Sports Days and to exercise. The school is also currently working with parents and the community to enhance the outdoor facilities further.</p>
<p>Be fully inclusive and accessible for all</p>	<p>Ysgol Blaenau has undergone work which provides a fully inclusive and accessible educational setting and community hub for pupils, staff and members of the local community.</p>
<p>Be equipped with modern facilities to support digital learning</p>	<p>The recent pandemic has proven that we can adapt and thrive in 'restrictive' and remote circumstances, digital learning became the new normal. Pupils were able to access laptops from Ysgol Blaenau. Online and engaging remote classes were provided throughout. Technology is ever changing and Ysgol Blaenau is focused on ensuring that pupils are able to access the technology needed. To do this we will continually look at available grants and resources.</p>

<p>Have a high-quality learning environment to support the wellbeing of all learners and to enhance learner progress and their achievements across a wide range of skills and curriculum areas</p>	<p>Extract from Ysgol Blaenau's Estyn report to show we meet this principle. <i>'The school is an inclusive and homely community. As a result, nearly all pupils are happy at school. A strong feature at the school is the familial ethos that encourages pupils to take care of, and responsibility for, their fellow pupils, and in doing so it engenders an attitude of respect and self-confidence. There are effective procedures in place to ensure that no pupils suffer because of disadvantage and all pupils have an equal right to all areas of learning and provision.'</i></p>
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The following are the four purposes from "A Curriculum for Wales"

- Ambitious, capable learners who are ready to learn throughout their lives.
- Healthy, confident individuals who are ready to lead fulfilling lives as valued members of society
- Enterprising, creative contributors who are ready to play a full part in life and work.
- Ethical, informed citizens who are ready to be citizens of Wales and the world.

Ysgol Blaenau's Ethos already reflect these four purposes and is fully set for the future curriculum.

Action Plan

- Formal Federation
- Lower age of intake
- Provide after school provision on all evenings
- Reassurance from CCC
- Agreed achievable targets
- Keep Blaenau open in the future as a Federated School

Formal Federation

We are asking the council to consider Ysgol Blaenau for a federation with Ysgol Llandybie or an alternative suitable school. Within the consultation a federation is mentioned as a way of ensuring sustainable headship for Ysgol Blaenau.

A federation is the ideal opportunity for Ysgol Blaenau's pupils to benefit from all the advantages a small school can offer and where many pupils thrive, but which also enables access to a wider pool of human and material resources to aid in their education and personal growth.

A formal federation would give the school staff more opportunities to collaborate and work with a larger group of other teaching professionals where they would feel more supported and have more opportunity to develop professionally, gain new ideas and share best practice.

Ysgol Blaenau also retains its own identity as it has done for over a century.

Addressing Pupil Numbers

Lower Age of Intake

One identified reason that people do not choose Ysgol Blaenau for their children's education is that they are able to access education two terms earlier in other settings. Schools which have a nursery admission age of the term after they turn three are more attractive to working parents as once the child is enrolled in a school they are also able to take advantage of breakfast clubs and after school clubs meaning child care is accounted for while they work.

There are 22 children currently enrolled in the Cylch Meithrin, 7 of these are 3 years old and the other 15 are 2 years old. We argue that the lower pupil numbers of 3 year olds at Cylch is due to the free provision which parents have available to them at other local schools which provide nursery provision.

We propose lowering our school starting age to offer nursery provision. If nursery provision was only offered in the mornings or afternoons (or as many schools do to limit pupil numbers in class at one time - first term afternoons, second term mornings) the existing Cylch Meithrin on the school site could provide the wrap-around care required for those children. This will attract more of the Cylch Meithrin parents to enrol their children in Ysgol Blaenau as they will be offered the same opportunity for earlier education as elsewhere but in an environment where the child is already comfortable and also with the reassurance that the child is still being nurtured by the staff of the

Cylch Meithrin.

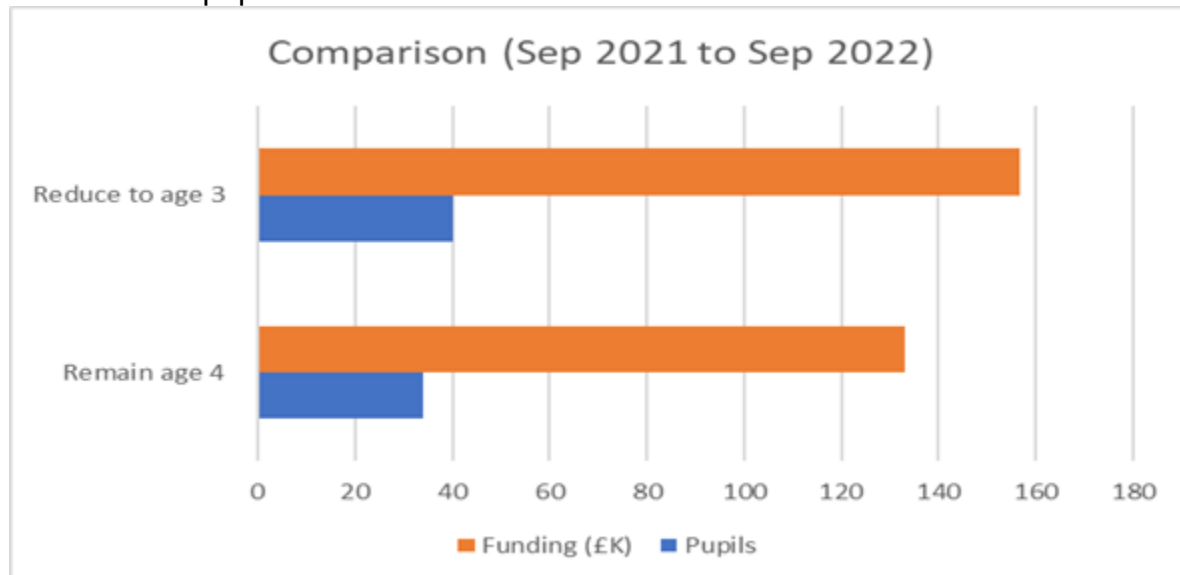
The Local Education Authority has been undertaking a piloting scheme in Swiss Valley Primary school in Llanelli for the last five years. This scheme has piloted lowering the admission age to accept three year olds the term after their third birthday. The school has reported on the successes of the scheme and are awaiting the formalisation of this process. The scheme was agreed on the principle to

‘bring it in to line with other schools in the area’

Ysgol Blaenau should be afforded the same and the reasoning that there is enough provision in the local area is not accepted. The same principles should apply to all schools across the county. As per our own consultation document:

*“The Public Sector Equality Duty ensures that public authorities and those carrying out a public function consider how they can **positively contribute to a fairer society** through advancing equality and good relations in their day-to-day activities. The duty ensures that **equality considerations are built into the design of policies** and the delivery of services and that they are kept under review. This will achieve better outcomes for all.”*

We have looked at the impact that lowering the starting age at Ysgol Blaenau could have on both pupil numbers and deficit. See below:



It is evident that lowering the starting age at Ysgol Blaenau will have both a positive impact on pupil numbers and deficit.

The forecast from now (July 2021) to September 2022 if start age is reduced to 3 years old:

Pupils moved to secondary school	6
Pupils from Cylch to Blaenau school	12
Total Pupils in school	40

In summary, by reducing the starting age for Ysgol Blaenau pupils to 3 by September 21, the school would experience a 17% increase in pupil population / £23,400 additional funding in the first 12 months alone.

After School Provision

Working parents require wrap-around childcare provision during their working hours. Ysgol Blaenau already offers a popular breakfast club from 8.15 in the morning. Currently after school provision is provided on Thursdays and Fridays by “Clwb Hwyl” which runs until 17:30.

In order to bring the provision at Ysgol Blaenau in line with other schools in the area we propose offering after-school provision every evening. A number of parents with a background in childcare and education have offered to volunteer their time to help out with running after school clubs on nights that it is not currently offered. We understand that appropriate DBS checks and inductions would need to be carried out before these parents are permitted to volunteer within the school.

From September 2022 all after school clubs must have a staff member with a Playwork Level 3 CACHE qualification. Upon discussion with Coleg Sir Gar they have confirmed that they will be offering their next Playwork course in October 2021, which will be free for volunteers who wish to assist at an after school club. This will be hugely beneficial to

working parents by supporting them with childcare during their working hours.

Reassurances from the LEA

We require that Carmarthenshire County Council offer reassurance to parents of children within the school, and to potential parents of children who may be attending the school in the future, that the threat of closure is removed.

There has been a long-standing presumption of the impending closure surrounding Ysgol Blaenau. There have been various campaigns that have taken place dating back to the 1980's, where parents and governors of the school have fought to keep the school open. This has, naturally, prevented the school from pupil growth, parents will be reluctant to enrol their children into a school that may close, this would be disruptive and unfair on any small child. This will have removed the choice of parents who feel that a smaller school would be beneficial for their child.

The presumption of closure will also be demoralising for the excellent teachers that are employed and for the dedicated board of Governors who oversee the running of the school. It also falsely undermines the viability and credibility of the school. This can, of course, be rectified, and Carmarthenshire County Council has the opportunity here to show that smaller schools, with the right planning and drive, can be a part of future plans.

We are asking for positive promotion to be applied by the authority, which will also be in line with the ethos and core values of the governors, staff, parents and pupils. If the threat of closure is removed, then the school immediately becomes more attractive to new families. In order for the school to become viable financially and raise pupil numbers we need the council to view and advocate more positively about Ysgol Blaenau as a school and as an integral part of the local community.

Agreed Achievable Targets

Following LEA approval of this business plan we would like to meet with a representative to agree on Targets that are Specific, Measurable, Attainable, Relevant and Time-based in order to measure the success of our proposal following the key changes we require. They will be based upon the following:

- Raise Social Profile
- Increase Pupil Numbers
 - Lower Starting Age
 - After School Club Provision
- An Active Fundraising Group for School - PTA
- Enhance Community Aspects of School
- Lower Deficit Budget

Timescales

Strategy		
A summary of our strategic plan to strengthen the position and secure the future of Ysgol Blaenau		
Immediate Actions Needed	Proposed Start Date	Action By
Pilot Scheme to Reduce Starting age to 3	Pending Authorisation	LEA
Permanant Formal Federation (4 year trial with view of becoming permanant after)	Pending Authorisation	LEA
Improvements/Upgrades to the building	Pending Authorisation	LEA
Explore Funding opportunities	Immediate	Governers/Parents
Campaign - Public Exposure and re-assurance of security of Ysgol Blaenau	Immediate	LEA
Parent of Ysgol Blaenau to join Cylch committee	Jul-21	Parents
Reform PTFA (Frindiau Ysgol Blaenau)	Sep-21	Parents
12 Month Programme of events that are part of the community (inclusive of Cylch)	Sep-21	Parents
Increase afterschool club provisions to 5 days (Voluntary personnel immediate solution)	Sep-21	Governers/Parents

Lowering the starting age, providing after school club provision and positively promoting the school. This will give Ysgol Blaenau a fair opportunity to prove its sustainability and viability.

Four Year Forecast based on Implementation of Plan:

September 2021 -2022	
Total pupils by end of year	45
Nursery & Reception	15
Primary	30
Pupil Funding (same per head rate as previous year)	175890
Federation Funding	6000
Expenditure (2.5% increase on previous year)	192805
Balance	-10915
September 2022-2023	
Total pupils end of year	48
Nursery & Reception	20
Primary	28
Pupil Funding (same per head rate as previous year)	187384
Federation Funding	6000
Expenditure (2.5% increase on previous year)	197625
Balance	-4241
September 2023-2024	
Total pupils by end of year	53
Nursery & Reception	18
Primary	35
Pupil Funding (same per head rate as previous year)	207140
Federation Funding	6000
Expenditure (5% increase on previous year)	207506
Balance	5634
September 2024-2025	
Total pupils by end of year	63
Nursery & Reception	22
Primary	41
Pupil Funding (same per head rate as previous year)	246188
Federation Funding	6000
Expenditure (10% increase on previous year)	228256
Balance	23932

NB - This is a conservative forecast and results could be more favourable.

Budget Deficit

Under the consultation plan Ysgol Blaenau would have its deficit erased. Our developed plan will help us to sustainably reduce our deficit.

A large part of the current deficit mirrors that of other smaller schools in Carmarthenshire, years of austerity and chronic underfunding has hit smaller schools the hardest, Ysgol Blaenau is no exception.

Another issue identified are the children who register with the school after the month of January. In our case, pupil numbers are submitted in January, PLASC funding is only given to those pupils on the register at that time. This school year for instance, three additional pupils have moved to Ysgol Blaenau from other schools since January 2021 and we also had two new starters at Easter. Funding is not received for them until the following January, meaning we have not currently had funding for five of the children in the school. This contributes to the deficit growing.

Pupil deprivation grants; there are currently eight pupils eligible for free school meals we have not accounted for this additional funding within our budget forecast.

Raising pupil numbers is the only way to increase the grant given to the school. An obvious solution to this, is to lower pupil admission age to 3 years old and to remove the threat of closure so that pupils are not removed from the school.

In order to future proof the school building, we have estimated costs of work which needs to be done for further details, please see page 27 'The Building' in the Supporting Material.

Supporting Material

The following section contains an overview of the research and information we have collated in building this business plan and other research that supports the proposal to keep Ysgol Blaenau at the heart of the community in Blaenau.

Ysgol Blaenau - Heart of a Community

Ysgol Blaenau has stood in its prominent location in the village of Blaenau for over 110 years. It has seen multiple generations of the same families come through its doors to be educated. It has hosted numerous concerts, summer fayres, Christmas fayres, pupil discos, parents' evenings and seasonal events such as harvest festivals and St David's day celebrations. These events play a vital role in the lives of the children who attend Blaenau school along with their parents and grandparents alike. Further, it has become commonplace for members of the wider community who may not have the same generic 'link' to the school to attend and support the events. Their link to the school is a link to their wonderful community, of which the school is it's one and only remaining hub. The school captures the vision and ethos of the community as a whole and plays an active part in enabling the community to remain strong, close-knit and interdependent.

The school building itself stands tall and central on the village 'square'; its location prominent for those attending, visiting or even passing by. Whilst its dominant appearance is obvious to all, what may be less apparent is the overriding part it plays in the community. It is, put simply, the heart of this community.

Across the road from the school, there is a small children's park that is equipped with a selection of swings, slides and climbing frames, in recent years there has been financial investment made to the park so that local children can enjoy and socialise. Most days after school, you will find the school children and their parents meeting in the park for play time, this is despite the children having been together all day in school and being of mixed ages. You will hear the children of Ysgol Blaenau refer to this park as '*The school park*' or '*Parc yr Ysgol*'.

Beyond the park are the community fields and rugby pitch, again an area which was given to the community for leisure activities and enjoyment. Ysgol Blaenau has benefited from the green space that this piece of land offers and is often used for sports activities and other recreational activities such as fundraising events. Fundraising events such as summer BBQ's (mabolgampau) have historically been very successful, both as a fundraiser as well as for bringing the local community together. This has also been used as an opportunity to celebrate and say farewell to the Year 6 children who will not be returning following the Summer break.

Next door to the park is the local rugby club, more recently also used as a restaurant. This building is currently undergoing refurbishment and upon reopening may provide

the community with an influx of new visitors, thus showcasing what our lovely village has to offer as well as what our wonderful Ysgol Blaenau has to offer. The local rugby team of Blaenau are currently trialling a reform and many of its current players and supporters are former pupils of Ysgol Blaenau.

We have spoken with team manager Steffan Thomas regarding working more closely together and he is keen to do this. The village has not had a junior side for around 22 years, and this is something he is keen to promote by working closely with the school through fundraisers as well as getting the older school children involved. As a former pupil, we asked Steffan how he would describe his experience at Ysgol Blaenau and his response was this:

“Amazing. Being able to be on first name terms with all pupils of all ages, parents and community members associated with the school. Having smaller classes meant more interaction with teachers and having a slight stammer when younger enabled me to have the confidence to speak up in class and the teachers and fellow pupils not allowing it to hold me back.”

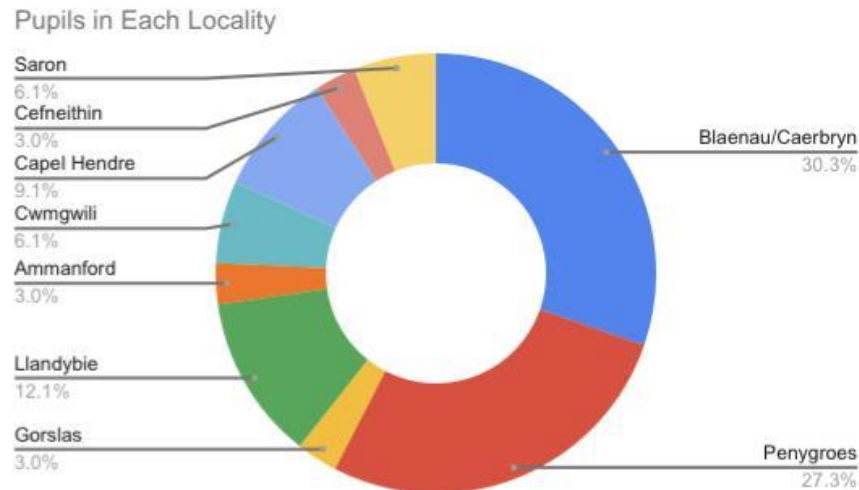
The School of Choice

Many parents have chosen Ysgol Blaenau as they want both a small intimate school and a good quality Welsh-Medium education for their pupils. 70% of pupils in Ysgol Blaenau travel from outside of the catchment area. Interestingly these parents are happy to travel for the benefits that they feel Ysgol Blaenau provides their children. On surveying the parents there is a strong feeling that their choices for their children’s education are being removed by the current preferred option of the County Council.

These parents are happy to travel for the benefits of a small school. There is an assumption that all parents will want to send their children to the new build school in Llandybie however this does not appear to be the case. If forced to put their children into a larger school the majority of parents have claimed that they would opt for the larger school which is more local to them, consider home-schooling or private education.

This will be devastating to all the pupils involved who have formed strong friendships with their peers through being in a close-knit school to then be spread across many local schools.

See below a graph which shows the areas that the pupils are travelling from presently:



Advantages of Small Schools

Mervyn Benford from the National Association of Small Schools has commented:

“We were invited to meet Estyn, as a result of which we learned that in a then (2008) report to the Assembly Estyn had no complaints about the academic performance generally of small schools. Of course, individual schools, of any size, can and do cause concern but your 2016 report shows a very rich model of local partnership which Estyn reported warmly of.”

Following our visit, we selected a random set of small schools with the recent Estyn report and I attach that summary. You will see nothing damning to justify a school your size being rationalised for the sake of neater bureaucracy. You need to emphasis to your political representative, ward councillor, AM and MP, that strand in our literature that argues convincingly from American experience that for marginal higher resources at the outcome small schools, long-term, deliver profit to taxpayers and governments.”

At present pupils are taught in two mixed age classes (infants and junior) with a teacher assigned to each and an additional part-time employed Teacher who covers PPE time to ensure consistency for the pupils. Staff of the school also consist of a highly experienced Teaching Assistant, caterer, cleaner and after school club staff. Teaching the same pupils over a number of years contributes to developing a deep understanding and knowledge of pupils' strengths and abilities, this underpinning knowledge enables teachers to support each individual child's learning. The routine that is then put in place, means that precious time does not have to be spent getting to know each new child at the beginning of term time, instead a relationship has already been established between the teacher and pupil and amongst pupils themselves, which would contribute to new starters feeling more at ease.

A smaller school offers a strengthened relationship between pupils, staff and peers. A culture is developed where children of all ages learn and socialise together, this should not be viewed as a negative. Older children will gain a sense of responsibility and confidence when being with younger children, and the younger children will equally gain confidence in their approach as they will be used to mixing with older ages.

Each pupil becomes known to every staff member, as does their family dynamic, this opens the lines of communication between staff and parents and enables positive relationships to develop.

Each and every child contributes to school plays and festivals. The relationship that develops between older and younger children extends to the local community, they mix socially not only in school, but outside of school too.

Additional Learning Needs

15% of pupils in the school have specific additional learning needs which their parents feel are well supported within the school.

Case Study - Child A

Child A has autism and really struggles with communication and making friends. He benefits hugely from being in a mixed-aged class with his younger brother. His parents say the size of the school was a big factor in why they chose Ysgol Blaenau for their children. In large group settings Child A has been known to become socially withdrawn and isolates himself from the other children. His parents say, "Blaenau is a great size for Child A, everyone knows him and supports him greatly." They continue to say "Blaenau has an extremely intimate environment. The head teacher has a real feel for how the classrooms operate and reacts quickly and organically to any necessary changes." Without Ysgol Blaenau there would not be a small school in the locality to suit Child A and his needs.

Case Study - Child B

Child B is a former pupil from Ysgol Blaenau and feels being educated in a small school was a huge advantage for her. She explained to us how she had severe hearing problems along with speech difficulties, the teaching staff at Ysgol Blaenau helped support her in getting a diagnosis and supported her through her primary education in every possible way. She says being in a small school "helped me in getting the issues resolved as much as possible before going on to secondary" Child B is currently completing a degree in Animal Science and proudly quotes "I can honestly say without Ysgol Blaenau and the teachers I wouldn't be where I am today".

Cylch Meithrin Plant Bach y Blaenau

Ysgol Blaenau is home to a very successful and thriving Cylch Meithrin, the meithrin also has its own safe outdoor space within the grounds of Ysgol Blaenau. The Cylch Meithrin has space for 25 pupils, it currently has 22 on its register and takes up to 16 children in each session. The Cylch operates from 9.10am - 2.50pm and currently offers full days or morning only sessions. The Cylch charges parents £10 for a morning and £20 for a full day. Working parents of three-year olds can also be eligible for up to 20 free hours under the Childcare Scheme.

Ysgol Blaenau is keen to strengthen its links with the Cylch Meithrin and to enhance its position as a 'feeder' preschool into the main primary school. The cylch which were previously based in Llandybie up until two years ago do not currently have any representatives of Blaenau on the committee. This is something which is very likely going to be changed within the next few weeks with the recruitment of an Ysgol Blaenau parent/ resident likely to take over as chair of the cylch and another two Ysgol Blaenau parents supporting as committee members. This will further strengthen the relationship between the school and the cylch to ensure a focus is put on trying to encourage the natural progression from cylch and into the school itself.

This will further be supported by lowering the starting age at Ysgol Blaenau, thus also allowing Blaenau the same equal opportunity as other provisions in the area who accept three-year olds. At present, the pupils of both the school and cylch enjoy the benefits of one site and prior to current restrictions were often seen collaborating which benefited all age ranges.



Sustainability

Consider green energy - research grants for green energy. Solar panels on the roof could be added while essential maintenance is ongoing.

Reconsider current heating system. Look at a more energy efficient boiler, consider biomass fuel or an alternative more environmentally friendly option, again we would look into grants for this.

Ecovision Systems state:

*“The Government offers subsidies in the form of the Renewable Heat Incentive (RHI) for **all heat produced and used on site**. This turns your heat requirements from a financial drain into a cash generator, through **regular payments that are based upon the amount of fuel you use**. Biomass installations qualify for the Non-Domestic RHI. These are paid quarterly for a period of 20 years. These subsidies will see your initial cost paid off in an average of 5-7 years and will provide further payments that run for until the end of the 20 year period, generating a **significant return on your investment**.”*

Ysgol Blaenau currently has a boiler room and oil-fired boiler which is in the basement of the school building. Ecovision Systems continue to say:

*“Renewable Energy solutions provide **substantial benefits for our climate**. Through the burning of fossil fuels, we are actively overloading our atmosphere with emissions such as carbon dioxide that contribute to global warming. These greenhouse gases result in **trapped heat, increasing the temperature of our planet**. This is harmful for our health, well-being and environment today, but also risks irreversible change in our planet's climate in the future. Renewable heating systems use **energy sources that are constantly replenished** which have the potential to **provide heat and hot water to your school indefinitely**.”*

Look at current lighting arrangements and consider how we can improve energy efficiency by changing light fittings to LED.

Refurbishment has a lower carbon footprint than rebuilding or demolishing. .

There comes a time in the life of every building where extensive refurbishment is required. For many a building this seems to bring with it thoughts of starting again – essentially to demolish and ‘rebuild’. The normal practice in modern times seems to be the preference to demolish and replace. Whereas conservationists naturally prefer to

retain existing structures so as to repair them and bring them back to their former glory. This latter approach retains the existing character and heritage of a building, and also has less of a carbon footprint impact than building something new and allowing an old building to decay or be demolished.

The Royal Institute of British Architects (RIBA) placed importance on the need to invest in school buildings and not see it as a cost saving exercise.

*“Making upfront cost a primary consideration for schools may potentially cause a number of **long-term social and economic consequences** whose implications are yet to be fully understood.”*

They also note concern of the quality of new school buildings being built across the UK

*“New school designs are now 15% smaller per pupil than those previously built and have smaller corridors, assembly halls, canteens and no standalone atria. This could have a **direct impact on maintenance costs and student well-being.**”*

RIBA President Alun Jones says:

*“**Well-designed schools have the power to shape society – improving the attainment, behaviour, health and well-being of every child. It is crucial to focus on the delivery of good quality design, sustainability and safety.**”*

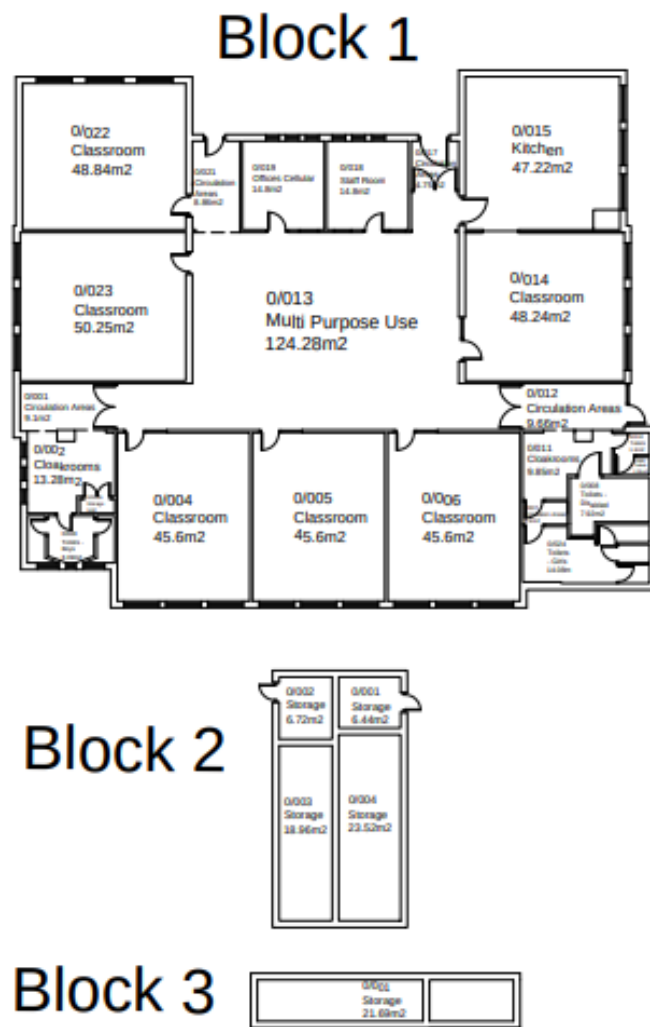
Investing in Ysgol Blaenau as it stands will have a huge positive long-term impact on the community and the well-being of both current and future pupils.

The Building

This is a list of works needed to the school and estimated costs.

Work needed	Estimated costs
Internal:	
Damp proofing and plastering throughout	£25,000
Ceilings replacing- Staff room and foundation phase foyer- 23m ²	£1330
Boys toilets need upgrading- two cubicles 8.39m ²	£15,000
Windows replacing in the dining room x 3	£3000
Block flooring replaced: Total: 214.92m ²	£11,000
Sand and Polish:	£2150 (£10 per square metre)
Lighting- new LED lighting and wiring	£2015
Radiator covers needed in all classes, hall and dining room- 9 radiators	£2775
Skirting board replacements in staff room and office- 30m ²	£450

External work needed:	
Boundary walls	£32,000 (Capital Spending Approved)
External wall - repointing	£50,000 (Awaiting Capital Approval)
Tower Scaffolding for the following: Roof – replace some slates Replace guttering Soffits and piping need sanding and painting	Tower Scaffolding- £125 p/week Guttering- £4500-5000 £5000
Replace flat roof- office/ staff room and boys' toilets- 38m2	£3000 - £3500
Main entrance gate sand and re paint	Parent Volunteers
Railing at front- sand and re paint	Parent Volunteers
Areas of tarmac need resurfacing	£5000



Above is a floor plan of the school. The building of Ysgol Blaenau currently has four classrooms within the school, a main hall, school kitchen and dining room (0/014 on plan).

In addition to this, Ysgol Blaenau hosts our Cylch Meithrin in a separate classroom (0/006 on plan).

The building of Ysgol Blaenau has served the community for 110 years and is itself a piece of living history. Although the school building is over 110 years old it is structurally sound with some need for some general building improvements. Past pupils talk about the school building and the memories it holds for them. Future generations feel more connected to their family histories knowing that they are learning in the same classrooms and playing on the same facilities as their ancestors.

There has been basic investment into Ysgol Blaenau over the last 15 Years. As with any older building the school does require further investment to ensure it is suitable for 21st century learning. The lack of improvement and money invested on the building has

not gone unnoticed by staff and parents who feel the council do not see the school's worth. The school building has been neglected under the assumption of closure over the last decade. From the research which we have completed, it would appear that there have not been any official building surveys conducted on the school in at least 20 years to determine the state of the building as well as the repairs which may be required.

Ysgol Llangadog recently benefited from a £4.5 million investment as part of the councils Modernising Education Programme and 21st century school's initiative, this saw the existing school building being totally remodelled. Ysgol Llangadog has since been praised by Education board members for the relationship which has developed between education and community, and specific mention of 'the pupils and staff benefiting from community facilities, such as the rugby field next door.' It is worth noting that this is something that Ysgol Blaenau have always had in place and have worked well with the community to ensure this.

Future Generations Act 2015

The Well-being of Future Generations Act 2015 requires public bodies in Wales to think about the long term impact of their actions, to work better with people, communities and each other, and to prevent persistent problems such as poverty, health inequalities and climate change.

The Act put in place seven well-being goals, each of which public bodies must work towards:

- 1) *A prosperous Wales*
- 2) *A resilient Wales*
- 3) *A more equal Wales*
- 4) *A healthier Wales*
- 5) *A Wales of cohesive communities*
- 6) *A Wales of vibrant culture and thriving Welsh language*
- 7) *A globally responsible Wales*

Our business plan will have a positive impact on both the prosperity and the resilience of the local community by providing both a community resource and also by helping to make Blaenau and the surrounding area an attractive location to live in for people with young families. Local businesses and suppliers could also potentially benefit by providing services to the school.

Equal access to education is a key aspect of equality and a local school accessible to all in the community makes a valuable contribution to providing this.

Small schools are the backbone of rural Welsh communities and have made an invaluable contribution to keeping Welsh culture and the Welsh language alive. Schools are an important point of contact for members of the community and help to create a sense of cohesion.

A strong sense of local community and local identity helps to foster the skills and attitudes needed to recognise the links and mutual interests of other communities in other parts of the world, as well as the recognition that more unites us than divides us.

Equality Act (2010)

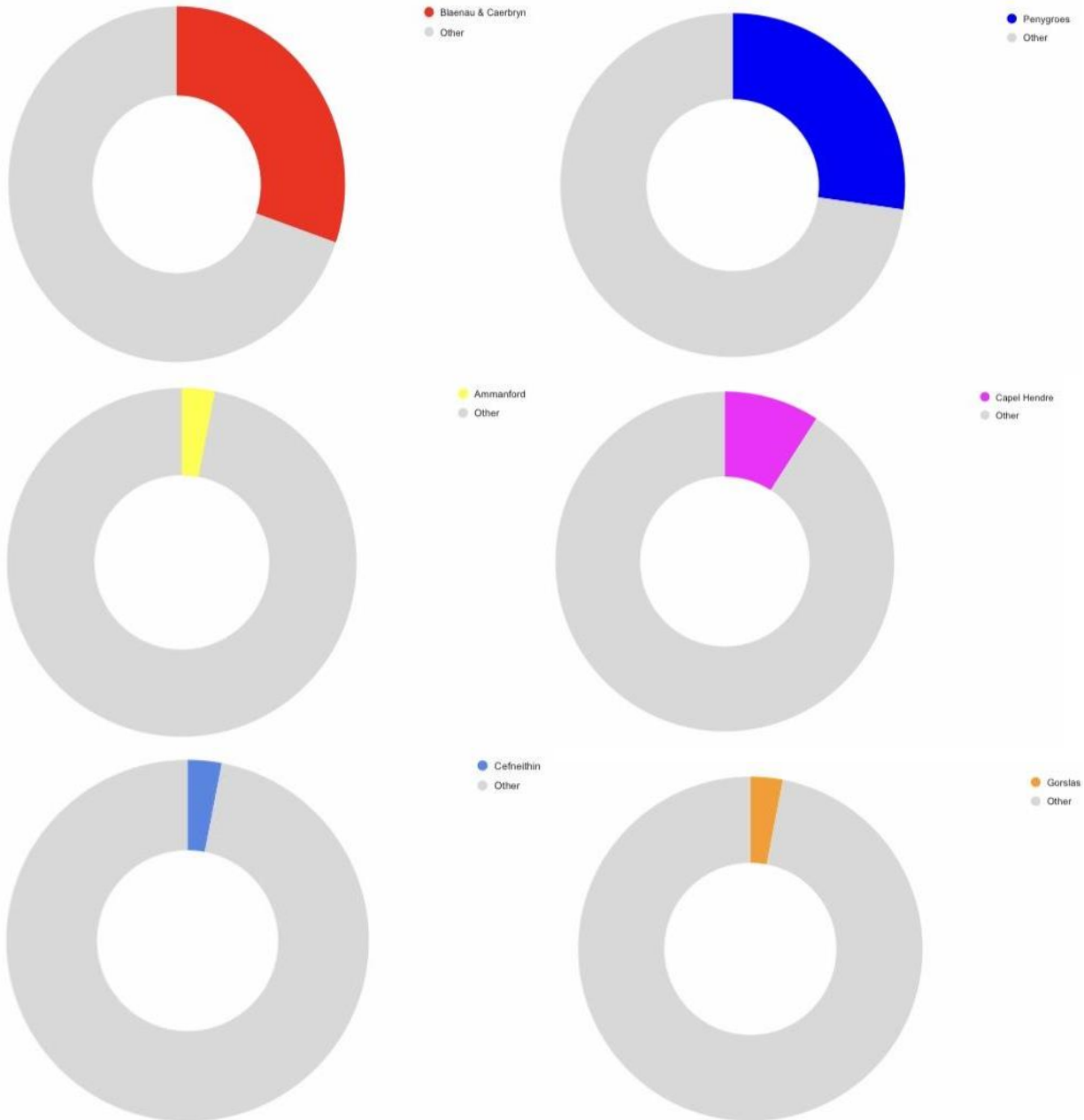
The Equality Act (2010) places a general duty on public authorities to consider how they can positively contribute to a fairer society through advancing equality and good relations in their day-to-day activities. To ensure the council are doing this they must carry out an Equality Impact Assessment. Within the consultation document the attached Equality Impact Assessment, which is a legal process that must be carried out to ensure the Council are acting in accordance with the Equality Act 2010, does not take into account or mention the fact that Ysgol Blaenau is closing. The assessment has not taken into account the pupils within Blaenau who will be directly impacted by the closure of the school. The Equality Impact Assessment within the consultation document was signed off as approved in October 2020 and claims that:

“The Project Officer has liaised with the Headteacher, Staff and Parents of Ysgol Gynradd Blaenau and Ysgol Gynradd Llandybie with regards to the proposal.”

This is not true and does present questions regarding the fairness and transparency of the consultation exercise. Parent Governors were informed on the 10th November 2020 and parents were informed via email on the 16th November 2020. Both these dates fall after October 2020 when it is stated within the consultation document that the parents had already been liaised with. If parents had been liaised with prior to this there would be greater understanding of the needs of the pupils who attend Ysgol Blaenau and the value the parents place on the small Welsh medium school.

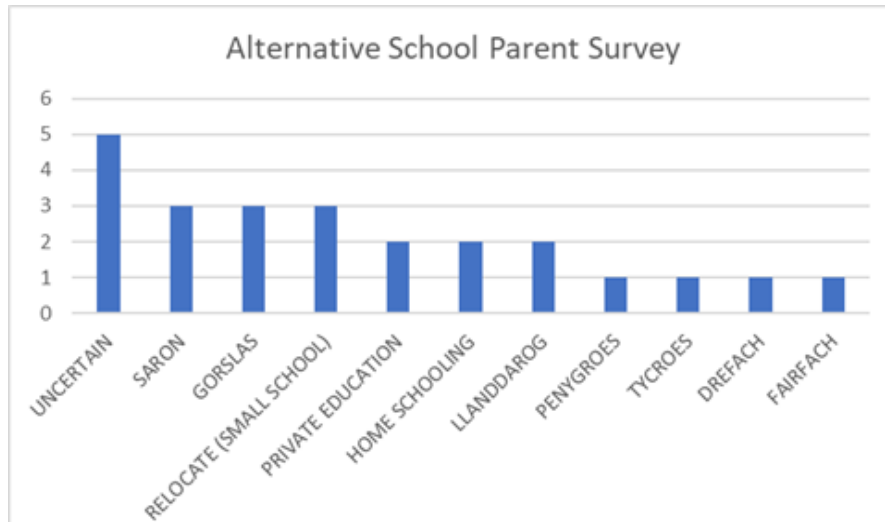
2) Where do you live and how long does it take you to travel to school?

The following charts demonstrate the percentage of pupils in each of the locality's pupils travel from. Commute times vary from a two-minute walk to a ten minute drive.





- 3) If Ysgol Blaenau was to close which school or schools would you consider for your child/children?



Ex-Pupils Survey

- 1) How would you describe your experience at Ysgol Blaenau?

Here are some snapshots of ex-pupils responses:

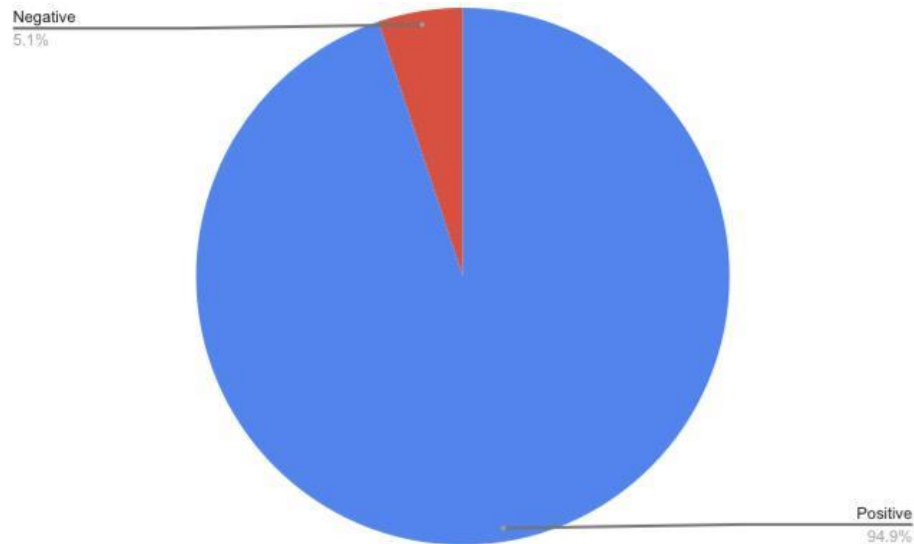
“I had a wonderful childhood at Blaenau school, I made many friends whom I still have today .. I walked to school everyday Rain or shine with my brother's. Having more individual time from the teacher was important as we all have our own learning styles so a smaller size classroom benefited me hugely. We always played sports and PE, had netball and rugby teams, with huge support from our village. We were encouraged to go on school trips and holidays at an outdoor pursuit centre near the coast, that gave me a chance to try something new and challenge myself, whilst being encouraged and motivated by our teachers from Blaenau. Blaenau school has playing fields across the road which where and still are used regularly, also a park which is a meeting place for children and parents after school to socialise and support each other, which is important for a small community. We would take walks into the village to local gardens to see the seasonal flowers and vegetables that were growing. The local residents supported and encouraged this, the interaction between the older and younger generation was invaluable, teaching respect and appreciation for each other”

“Amazing. Being able to be on first name terms with all pupils of all ages, parents, and community associated with the school. Having smaller classes meant more interaction with teachers, and having a slight stammer when younger enabled me to have the

confidence to speak up in class and the teachers and fellow pupils now allowed it to hold me back.”

“I loved my time at Blaenau school and remained friends with all of my classmates.”

We split the responses into positive and negative. The chart shows the percentage of these.



2) How would you say your education in a small school (Ysgol Blaenau) has helped you in later life?

Here are snapshots of some Ex-pupil's responses:

“It has given me the confidence to know my worth. I was treated with respect and listened to, this has filled me with courage to take on many challenges through my life and know that I deserve to be treated well and fairly. I am currently doing a degree in teaching as I want to provide children with the kind of education and experience I had in Ysgol Gynradd Blaenau.”

“I think it gave me an excellent base for gaining the confidence needed to get through life, it also helped me meet lovely friends & a good support network within the community.”

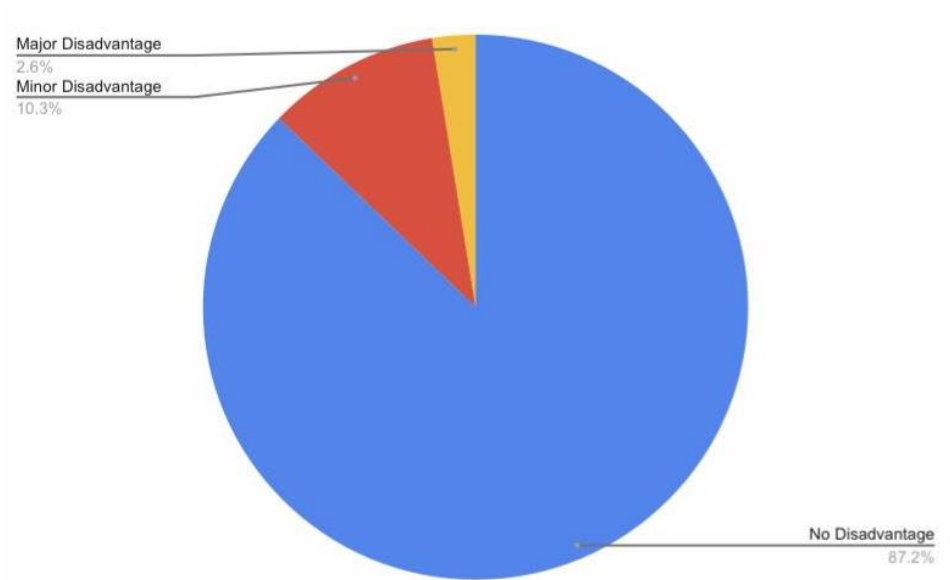
“Ensured I embrace community no matter where I have lived and allowed me to have the mindset of never forget your roots.”

3) Do you feel being in a small school was a disadvantage at all? If so, how?

Most Ex-Pupils said they did not feel at all disadvantaged by being in a smaller school.

A few pupils identified minor disadvantages such as less sporting teams to join and less variety of trips.

One Ex-pupil said they felt very disadvantaged by being in a smaller school but did not elaborate on reasons for this.



4) Name and when you attended school?

Ex-pupils who responded to our survey attended the school in the times ranging between 1948-2018.

Online Community Support

We have received support online through our Facebook page which currently has 480 follows. Our online petition regarding the closure of Ysgol Blaenau has now reached 600 signatures.



Appendix B

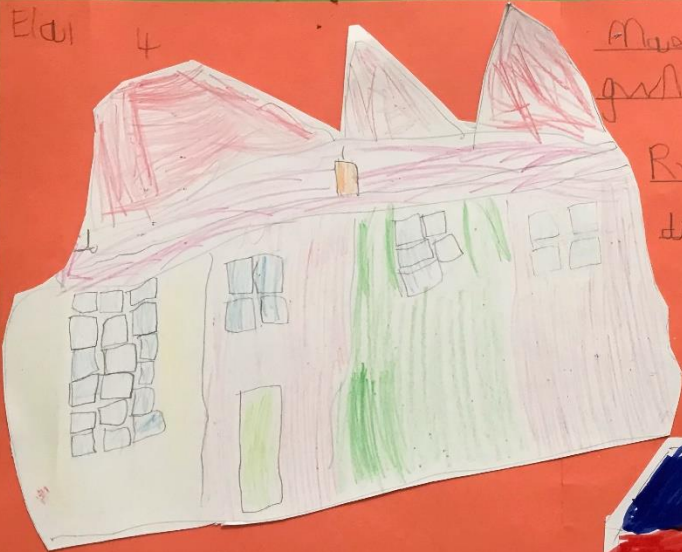
Pupil Submissions



carmarthenshire.gov.uk



Elad 4



Mae ysgol Blaerhau yn
gwneud i mi hapus

Rwy'n hoffi fod yn
debarthi gyda ffurindiau
fod ceffwr

Mae Mrs Thomas a Mrs
Allison yn dysgu fi ac yn
e drych wrt i fi



Ysgol Blaerhau

Happy

I love to

Play

learn

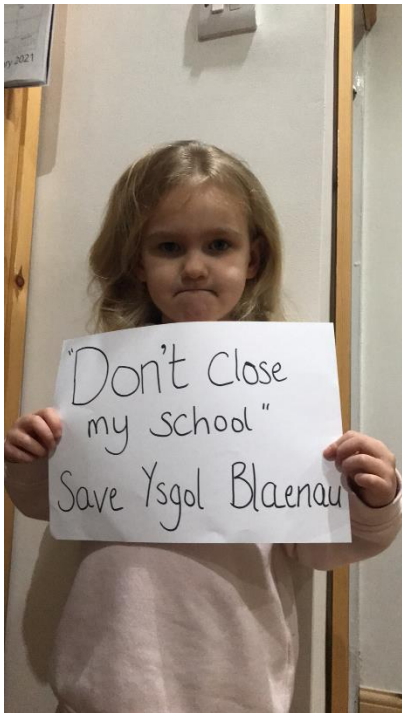
Safe

Big family

Fantastic

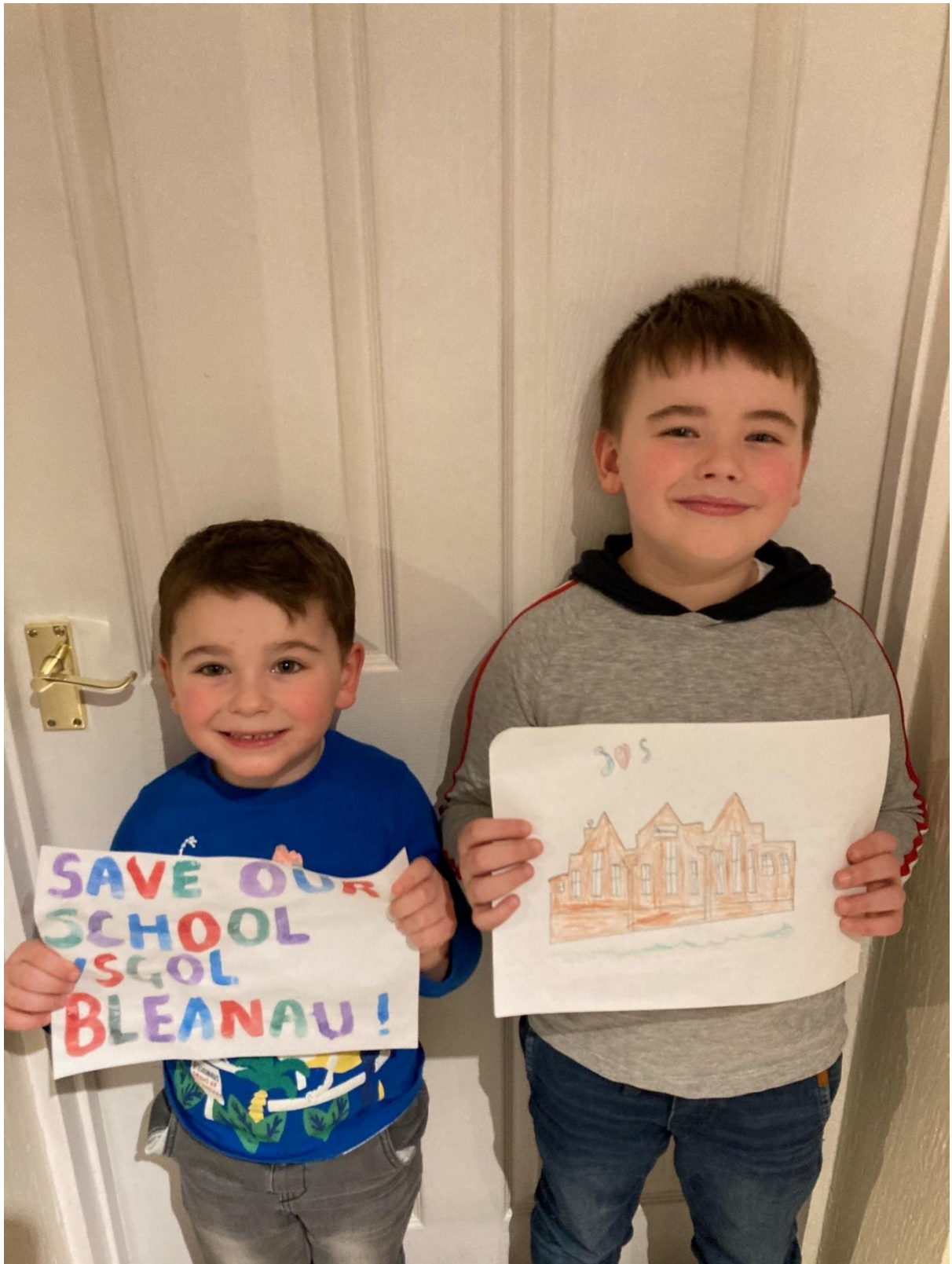


Best
Friends.









CABINET

06/12/2021

MODERNISING EDUCATION PROGRAMME

PROPOSAL TO REVIEW PRIMARY EDUCATION PROVISION IN THE MYNYDDYGARREG AND GWENLLIAN AREAS

Recommendations / key decisions required:

It is recommended that the Cabinet approves:

- The observations received and the Local Authority's responses following the Consultation Period (Consultation Report attached);
- The modifications to the implementation dates of the proposal as noted in the report;
- The publication of a Statutory Notice to implement the proposal.

Reasons:

- To comply with statutory procedures and guidance in relation to school re-organisation.

Relevant scrutiny committee to be consulted: No

Cabinet Decision Required: Yes – 06/12/2021

Council Decision Required: No

Cabinet Member Portfolio Holder: Cllr. Glynog Davies (Education & Children)

Directorate:
Education & Children

Name of Head of Service:
Simon Davies

Report Author:
Sara Griffiths

Designations:

Head of Access to Education

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**EXECUTIVE SUMMARY
CABINET
06/12/2021**

MODERNISING EDUCATION PROGRAMME

**PROPOSAL TO REVIEW PRIMARY EDUCATION PROVISION
IN THE MYNYDDYGARREG AND GWENLLIAN AREAS**

Background

The Authority has a legal responsibility to review the number and type of schools it has in an area and whether it is making the best use of resources and facilities to deliver the opportunities that children deserve.

Ysgol Gynradd Mynyddygarreg

Ysgol Gynradd Mynyddygarreg is a Welsh medium community primary school located in the village of Mynyddygarreg with capacity for 55 pupils between 4-11 years. In recent years pupil numbers have remained consistent but are still well below capacity. January 2020 PLASC showed that there were 36 pupils at the school with 19 surplus places, or 35%. Welsh Government through the School Organisation Code advises local authorities to review their provision where there are more than 10% surplus places in an area.

Whilst there are 113 pupils living within Ysgol Gynradd Mynyddygarreg's catchment area **only 22 of those pupils attend the school**, meaning that 91 pupils living within the school's catchment area attend 16 other schools within the County, many being neighbouring catchment schools.

Based on projections (2020) it is estimated that pupil figures will remain well below capacity for the foreseeable future. Additionally, Ysgol Gynradd Mynyddygarreg's building condition is 'poor' and the school has been in deficit since 2016/17 and remains with a deficit of £48,265 going into the 2020/21 financial year. Their original funding allocation for 2020/21 was £172k.

From an educational perspective having such a small number of pupils and mixed age classes makes it extremely difficult for the school to deliver the breadth and depth of curricular and social experiences which pupils of this age require to fully develop.

The culmination of these unavoidable facts presents a school model which does not represent a sound, stable educational model for best use of resources. With no prospect of there being a significant increase in pupil numbers for the foreseeable future, consideration is required on the sustainability of the school.

Ysgol Gymraeg Gwenllian

Ysgol Gymraeg Gwenllian is a Welsh medium 3-11 community primary school situated in the historical town of Kidwelly.

In recent years, pupil numbers have remained consistent and slightly below the school's capacity of 140. However, based on pupil projections (2020), pupil numbers are expected to increase the school is expected to be close to capacity by 2025 and this trend is likely to continue for the foreseeable future. As a result, the Local Authority are developing a scheme to provide a new school with facilities fit for the 21st Century on a new site.

The project will re-locate Ysgol Gymraeg Gwenllian from its current site to a new site which is within the current catchment area of Ysgol Gymraeg Gwenllian. The new school will provide a Welsh Government standard primary school building with capacity to accommodate 240 pupils (210 + 30 nursery places) between the ages of 3-11 years old and ensure that the school is able to deliver the full curriculum in a modern, safe and inspiring learning environment with enhanced outside areas.

This proposed investment will address poor building condition and lack of adequate space and provision in the existing school by providing a category **A** school with sufficient places for current and projected demand.

As a result of the ongoing challenges that both schools face, it is not possible to sustain current arrangements.

Statutory Process

In accordance with Executive Board's (now known as the Cabinet) instructions on the 21 December 2020 a formal consultation exercise was undertaken from 11 January 2021 and was due to end on the 21 February 2021. However, a decision was made by the Executive Board to extend the Consultation Period until the 16 July 2021. The results of the consultation exercise are contained in the attached Consultation Report.

Should the Cabinet grant permission to proceed to Statutory Notice, the intention is to publish in due course.

If approved, following the end of the Statutory Notice period, an objection report which summarises any objections received by stakeholders, will be presented to the Cabinet and ultimately to the County Council for determination.

Modifications

As a result of the extension to the Consultation Period, the implementation dates for the proposal noted above require modification to ensure appropriate time to implement the proposal.

Should the Cabinet decide to proceed with this proposal it is recommended that the Cabinet accepts the modified dates as noted below:

- Discontinue Ysgol Gynradd Mynyddygarreg as from 31st August, 2022.
- From 1st September, 2022 all pupils will be registered at Ysgol Gymraeg Gwenllian operating on both sites (Ysgol Gymraeg Gwenllian and the former Ysgol Gynradd Mynyddygarreg) increasing its capacity to 178 + 17 nursery places.
- Re-designate Ysgol Gymraeg Gwenllian’s catchment area to include that of the former Ysgol Gynradd Mynyddygarreg’s catchment area as of 1st September, 2022.
- Relocate Ysgol Gymraeg Gwenllian to a new site and increase its capacity to 210 + 30 nursery places as of September 2024, when occupation of the new school is proposed.

Recommendation

It is recommended that the Cabinet approves:

- The observations received and the Local Authority’s responses following the Consultation Period (Consultation Report attached);
- The modifications to the implementation dates of the proposal as noted in the report;
- The publication of a Statutory Notice to implement the proposal.

DETAILED REPORT ATTACHED?	YES: Consultation Report
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IMPLICATIONS

I confirm that other than those implications which have been agreed with the appropriate Directors / Heads of Service and are referred to in detail below, there are no other implications associated with this report:

Signed: *[Signature]* Head of Access to Education

Policy, Crime & Disorder and Equalities	Legal	Finance	ICT	Risk Management Issues	Staffing Implications	Physical Assets
YES	YES	YES	YES	YES	YES	YES

1. Policy, Crime & Disorder and Equalities
 Developments are consistent with the Authority’s Corporate Strategy and the Modernising Education Strategic Outline Programme.

2. Legal
 Appropriate consultation was initiated in accordance with the relevant statutory procedures.

<p>3.Finance</p> <p>Revenue implications will be catered for within the Local Management of Schools Fair Funding Scheme.</p>
<p>4. ICT</p> <p>ICT colleagues will be consulted with in relation to the potential relocation of IT equipment.</p>
<p>5. Risk Management Issues</p> <p>The proposal may impact on the demand for school places at the school and surrounding catchment area schools. The situation will be monitored as part of the school admission process and ongoing data forecasting and analysis through the Authority's Modernising Education Programme.</p>
<p>6. Staffing Implications</p> <p>Staffing implications will be addressed in accordance with the County Council's Policy and Procedures.</p>
<p>7. Physical Assets</p> <p>i. One redundant school site – Ysgol Gynradd Mynyddygarreg. Should the proposal be adopted the property will be transferred to Corporate Property Division of the Regeneration and Policy Department for the procedures outlined in the 'Future Use/Disposal of Redundant Land and Buildings' arising from the Modernising Education Programme policy to be actioned.</p> <p>This policy has been developed to allow the community to be offered the asset in the first instance before placing the site on the open market.</p> <p>ii. If the proposal is implemented to discontinue Ysgol Gynradd Mynyddygarreg, Ysgol Gymraeg Gwenllian will proceed to operate on split sites occupying both current Ysgol Gynradd Mynyddygarreg and Ysgol Gymraeg Gwenllian locations until the proposed new Ysgol Gymraeg Gwenllian school building is ready for occupation.</p> <p>iii. Following the project completion of developing a new school building for Ysgol Gymraeg Gwenllian the current Ysgol Gymraeg Gwenllian will become redundant as point i. above.</p>

CONSULTATIONS

I confirm that the appropriate consultations have taken in place and the outcomes are as detailed below

Signed:



Head of Access to Education

1. **Scrutiny Committee** – Consulted during the formal Consultation Period.
2. **Local Member(s)** – The local members is aware of the proposal and was consulted during the formal Consultation Period.
3. **Community / Town Council** – Consulted during the formal Consultation Period.

4. Relevant Partners – Consulted during the formal Consultation Period.	
5. Staff Side Representatives and other Organisations – Consulted during the formal Consultation Period.	
CABINET PORTFOLIO HOLDER(S) AWARE/CONSULTED YES	N/A

Section 100D Local Government Act, 1972 – Access to Information List of Background Papers used in the preparation of this report:	
Title of Document	File Ref No./Locations that the papers are available for public inspection
Carmarthenshire's Welsh in Education Strategic Plan	https://www.carmarthenshire.gov.wales/home/council-democracy/strategies-and-plans/welsh-in-education-strategic-plan/
MEP Biennial Review	www.carmarthenshire.gov.uk Executive Board 20 th June 2016
21 st Century Schools Website	www.21stcenturyschools.org
Consultation Document	Mynyddygarreg and Gwenllian (gov.wales)
Stage 1 (Permission to Consult) – ECS Scrutiny Committee Report	Agenda for Education & Children Scrutiny Committee on Monday, 23rd November, 2020, 10.00 am (gov.wales)
Stage 1 (Permission to Consult) Exec Board	Agenda for Cabinet on Monday, 21st December, 2020, 10.00 am - Carmarthenshire County Council (modern.gov.co.uk)

Proposal to review Primary Education Provision in the Mynyddygarreg and Gwenllian areas

Consultation Report



carmarthenshire.gov.uk

Cyngor **Sir Gâr**
Carmarthenshire
County Council



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School Modernisation Section

Sara Griffiths, Modernisation Team Manager

If you require this information in large print, Braille or on audiotape please contact the Department for Education & Children

Email: DECMEP@carmarthenshire.gov.uk

Telephone: 01267 246618

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Local Authority Response to Estyn’s Observations	27
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Appendices
Appendix A – Business Plan
Appendix B – Pupil Submissions

Executive Summary

The Consultation Period

On the 11th January 2021 Carmarthenshire County Council published a proposal to:

- Discontinue Ysgol Gynradd Mynyddygarreg from 31st August, 2021.
- From 1st September, 2021 all pupils will be registered at Ysgol Gymraeg Gwenllian operating on both sites (Ysgol Gymraeg Gwenllian and the former Ysgol Gynradd Mynyddygarreg) increasing its capacity to 178 + 17 nursery places.
- Re-designate Ysgol Gymraeg Gwenllian's catchment area to include that of the former Ysgol Gynradd Mynyddygarreg's catchment area as of 1st September, 2021.
- Relocate Ysgol Gymraeg Gwenllian to a new site and increase its capacity to 210 + 30 nursery places as of September 2023, when occupation of the new school is proposed.

The consultation period commenced on 11th January 2021 in line with the publication of the proposal and closed on 16th July 2021 with a total of 476 responses received (excluding the responses received from Estyn and the pupils' consultation events) in response to the formal consultation.

Responses Received			
Online Survey	E-mail	Letters	Total
336	62	78	476

It must be noted that 396 of the 476 observations received, were received during the consultation period. One response was received following the end of the consultation period but has been included as part of the consultation process.

Correspondence was received prior to the commencement of the consultation period. However, it was agreed that these could be included as part of the consultation process. A total of 78 letters and 1 e-mail were received at this time and have been included in the above table. Two drawings were also received prior to the commencement of the consultation period and have been included in the summary of responses received and Local Authority related responses. Copies of the drawings submitted by pupils can be found in Appendix B.

Consultation Events

Due to the ongoing implications of the Coronavirus pandemic we were advised to postpone all events where there was interaction between staff, parents and the wider community and as a result virtual drop-in sessions were held via Microsoft Teams.

Informal

Virtual informal drop-in sessions were held prior to the beginning of the formal consultation period with relevant stakeholders.

Formal

A virtual formal drop-in session was held on **25 January 2021 at 4.30pm for a period of two hours**. The formal consultation drop-in session was attended by 22 stakeholders.

Responses Received

The responses received have been categorised into the following themes:

Supportive

- Theme 1 - No reason
- Theme 2 - Support for the Proposal
- Theme 3 - Childcare Provision
- Theme 4 - Impact on the Welsh Language
- Theme 5 - Effect on Expected Timeline
- Theme 6 - Small School Preference
- Theme 7 - Financial Pressure
- Theme 8 - Name of New School
- Theme 9 - Future Education of Pupils
- Theme 10 - Community Facilities
- Theme 11 - Status Quo
- Theme 12 - Condition & Suitability of Existing School Building

Concerns

- Theme 1 - Community Impact
- Theme 2 - Status Quo
- Theme 3 - Impact on Pupils' Travel Times and Distance
- Theme 4 - Small School Preference
- Theme 5 - No Reason
- Theme 6 - Impact on the Welsh Language
- Theme 7 - Concerns with large school/classes
- Theme 8 - Education Standards
- Theme 9 - Success of Cylch Meithrin Mynyddygarreg
- Theme 10 - Condition and Suitability of current Ysgol Mynyddygarreg School Building
- Theme 11 - Consulting during a pandemic

- Theme 12 - Quality of Consultation Document and Misinformation
- Theme 13 - Financial Pressure
- Theme 14 - Future Choice for a Small School
- Theme 15 - Change in Age Range
- Theme 16 - Impact of the Proposal on the Town and Residents of Kidwelly
- Theme 17 - Transfer to Alternative Schools
- Theme 18 - New School Design
- Theme 19 - New School Name
- Theme 20 - Impact of the Proposal/Rumours
- Theme 21 - Timing of Consultation
- Theme 22 - Contradicts Policy
- Theme 23 - Redundant School Sites
- Theme 24 - ALN Pupils

Overall Summary

Supportive	18%	Not supportive	82%
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Workshops

Following the closure of the consultation period on the 16th July 2021, a workshop was held to analyse the observations received.

Other Submissions Received

Business Plan

In addition to observations received, a Business Plan for Ysgol Gynradd Mynyddygarreg was submitted during the formal Consultation Period. The full Business Plan can be seen at Appendix A.

Petition and Facebook Page Statistics

An online petition “Save Our School – Stop the Closure of Ysgol Mynyddygarreg” which was created on 16/01/2021 had received 854 signatures by 10:48 on 21/02/21 and 1027 signatures by 4.00pm on 21/7/21.

A Facebook Page “Mynyddygarreg SOS – Save Our School” also had 314 likes as at 4.00pm on 21/07/21.

Next Steps

The Consultation Report will be presented to the Cabinet (previously known as the Executive Board) who may decide to publish the proposal as consulted upon with

appropriate modifications, to abandon the proposals and retain the status quo or to significantly recast the proposal and reconsult.

Should the Cabinet decide to proceed to publish a Statutory Notice, this will be published in due course.

Summary of Observations received and Local Authority Responses

Point Number	Point Raised	Local Authority Response	Number of responses raising this point	% of responses raising this point
Supportive Comments Raised				
1.	No reason Some respondents did not provide a reason for their support.		46	10%
2.	Support for proposal Respondents recognised the need for investment and the benefits of a new and modern school fit for learning in the 21 st century.	<p>One of the strategic aims of the Modernising Education Programme is to develop infrastructure at all schools that is equipped for learning in the 21st century, facilitating the realisation of core objectives for raising educational standards and sustaining them at high levels of performance.</p> <p>Schools designed to meet current demands are expected to provide a broad and balanced curriculum through high quality and inspirational teaching all of which will be possible through the realisation of this proposal, should it be accepted.</p>	29	6%
3.	Childcare Provision Respondents expressed concern that no plans were in	The Local Authority recognises the importance of the Cylch Meithrin for children's education and	6	1%

	place to move Cylch Meithrin Mynyddygarreg to the proposed new site and that this should be considered at an early stage in the process if possible.	development and is considering the options available for the relocation of the Cylch Meithrin should the proposal be implemented.		
4.	<p>Impact on the Welsh language</p> <p>Respondents noted the need to continue promoting the Welsh language within the community to support its future sustainability within the areas</p>	Supporting the promotion of the Welsh Language within the community to support its future sustainability within the areas is paramount. Ysgol Gwllian will be in a position to ensure that children from the Mynyddygarreg area have a high-quality Welsh medium education which will ensure that pupils become fully bilingual, not only educationally, but also socially. The school will source opportunities and encourage the use of the language when at home and within the community. The surrounding areas will be given opportunities to become active conduits in all parts of school life, and the school in the life of the communities.	4	1%
5.	<p>Effect on Expected Timeline</p> <p>Respondents questioned the impact of the ongoing consultation on the timeline and the implications of this on the new school development.</p>	The timeline for the proposed new school development is currently being reviewed in consideration of a number of factors inclusive of but not limited to the extension to the consultation period.	3	1%

6.	Small School Preference Respondents appreciated the need for a new school building but hoped that the benefits of a small school and its ethos could be retained.	The Local Authority is of the opinion that the small school ethos could be retained within the new school development and would encourage both schools to work together to strengthen and build on established relationships.	2	0.4%
7.	Financial Pressure Respondents noted that they were fully supportive of the proposal and also commented that small schools are unsustainable due to the high running costs and financial burden placed on them	The support is noted.	2	0.4%
8.	Name of New School Respondents noted the need to incorporate and celebrate both schools and their communities in the new school name.	Whilst the Local Authority supports the idea of the new school having a name which reflects both schools/communities, it does not have the power to enforce this. The name of the new school will be a decision for the school's Governing Body.	1	0.2%
9.	Future Education of Pupils Respondents acknowledged the proposal would support the development of an education model fit for the future. Respondents recognised how investment would improve education facilities for pupils.	If the proposal is accepted, its implementation will support the development of a schools' network that is educationally effective, resource efficient and sustainable for the long term. Most importantly, it will ensure a sustainable model of learning provision which meets the needs and aspirations of all children now and in the future.	1	0.2%

10.	<p>Community Facilities Respondents noted the need to ensure the new school included facilities which could be shared with the community.</p>	<p>The new school development will be designed to facilitate community use. The proposed investment would benefit both communities from the use of shared facilities outside of school hours.</p>	1	0.2%
11.	<p>Status Quo Respondents noted that whilst they were fully supporting the proposal to invest in a new school for Ysgol Gwenllian they were not supporting the closure of Ysgol Mynyddygarreg</p>	<p>As part of its statutory obligation to keep the number and type of school places under review, the County Council has adopted a wide-ranging programme designed to improve school buildings and enhance opportunities for learning. The strategy reflects the vision and policies established by the County Council which embrace the requirement to deliver services, to clear standards – covering both cost and quality – by the most economic and effective means. If implemented, this proposal will realise this ambition and provide the communities of Mynyddygarreg and Gwenllian with 21st Century teaching and learning provision.</p>	1	0.2%
12.	<p>Condition & Suitability of Existing School Building Respondents acknowledged the limitations of extending or adapting the current school building of Ysgol Mynyddygarreg due to the age and location of the building</p>	<p>The support is noted.</p>	1	0.2%

Concerns Raised				
1.	<p>Community Impact Respondents showed concern for the impact of the school closure on the community. Respondents noted that the school had a rich history and is valued by the community and families. A large number of new houses are also expected to be constructed in the next few years which would provide the school with additional pupils.</p>	<p>The Local Authority recognises that a key disadvantage of accepting the proposal includes losing the presence of a school in the community of Mynyddygarreg. However, the Local Authority is of the opinion that the proposal will improve the community of Mynyddygarreg's access to 21st century teaching, learning and community facilities through shared use.</p> <p>The principal purpose of a school is to educate the pupils to the best standards possible and it is not reasonable to expect schools to carry the wider burden of the impact on the community. Ultimately, economic and social factors are non-educational issues and they cannot be allowed to compromise the education of children.</p> <p>Whilst, in practice, most parents send their child to their local catchment area school, parents have a right to state a preference for different schools therefore, a large number of new houses does not necessarily attract a large number of new pupils to the catchment area school.</p>	165	35%
2.	<p>Status Quo Respondents noted that both schools should remain open and the current informal federation should be</p>	<p>As part of its statutory obligation to keep the number and type of school places under review, the County Council has adopted a wide-ranging programme designed to improve school buildings and enhance</p>	149	31%

	<p>formalised. Respondents praised the school and the excellent education provision at Ysgol Mynyddygarreg and reiterated that it should not close.</p>	<p>opportunities for learning. The strategy reflects the vision and policies established by the County Council which embrace the requirement to deliver services, to clear standards – covering both cost and quality – by the most economic and effective means. If implemented, this proposal will realise this ambition and provide the communities of Mynyddygarreg and Kidwelly with 21st Century teaching and learning provision.</p>		
3.	<p>Impact on Pupils' Travel Times and Distance Respondents noted that the proposal would have a detrimental impact on pupils' ability to walk to school and current family transport arrangements. Concerns were raised for the safety of pupils walking from the current Ysgol Mynyddygarreg catchment area to the proposed new school site (which involves crossing a busy bypass) and the implication of increased travel on the Carbon Footprint. Respondents noted that this goes against CCC Policy.</p>	<p>The Local Authority acknowledges that the implementation of the proposal may impact on pupils and families' current transport and travel arrangements. If the proposal is implemented, the distance from Ysgol Mynyddygarreg to the proposed preferred new school site is approximately 2.4 miles. Transport will be provided in accordance with the Council's School Transport Policy.</p>	121	25%

4.	<p>Small School Preference</p> <p>Respondents noted a preference for small schools and the benefits of this type of provision e.g.</p> <ul style="list-style-type: none"> • Mixed age classes • Small class sizes • Pupil Teacher Ratio • Familiarity between staff and pupils 	<p>The Local Authority recognises that parents may have a preference for the type of education that they wish for their child to receive.</p> <p>‘Parents can state a preference for a school, which is not the designated catchment area school. Subject to the limit on the number of pupils who can be admitted into the school not being exceeded and the correct procedures being followed, then admission will be granted.’ Admission to School: Information for Parents 2021 - 2022 booklet.</p> <p>Due regard must be given to the potential social and educational benefits available to children through learning and working in partnership with a wider range of peers and staff.</p> <p>Pupils can learn from opportunities of collaboration and building relationships in all class types, be it mixed or single aged groups.</p> <p>A lot of research has been carried out into the impact of class sizes, much of which is contradictory. Andreas Schleicher, Director of Education and Skills at the OECD says: “Everywhere, teachers, parents and policy-makers favour small classes as the key to better and more personalised education and yet, Pisa results show no relationship between class size and learning outcomes, neither within nor across countries.”</p>	96	20%
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5.	<p>No reason Some respondents did not provide a reason for their concerns.</p>		53	11%
6.	<p>Impact on the Welsh Language Respondents expressed concern that the community of Mynyddgarreg would lose its Welsh speaking heritage in a time when WG is promoting the language to encourage more Welsh speakers. Ysgol Mynyddgarreg is the only small Welsh medium school within the area and its closure could result in pupils choosing an alternative English medium school.</p>	<p>As part of the proposal, it is the Local Authority's intention that all current pupils remain at the school and continue to receive their education through the current Welsh medium language arrangements.</p> <p>If the proposal is implemented, it is the Local Authority's intention that Ysgol Mynyddgarreg pupils transfer to the new school development, where pupils would be able to continue their Welsh medium education journey.</p> <p>The language status of all schools will be reviewed as part of the WESP – and as more schools journey along the language continuum. This review will apply to small English medium schools as well as all other schools.</p>	50	10%
7.	<p>Concerns with large school/classes Respondents noted concerns that pupils would not cope/flourish in a large school and believed that large classes were not good for pupils' education.</p>	<p>Pupils can develop and flourish in all class types. High quality education is currently being provided in very large schools.</p> <p>An Estyn inspection for a new 315 place + 45 nursery place replacement school building in</p>	39	8%

Carmarthenshire quotes that the school provides a 'homely and inclusive environment' which 'contributes to pupils' sense of pride in their work and belonging to their school. They are happy to attend, behave very well and develop positive attitudes to learning.'

The School Admissions (Infant Class Sizes) (Wales) Regulations 2013, impose a limit on class sizes for infant classes i.e. year groups Reception, Year 1 and Year 2.

The limit imposed is the maximum of 30 pupils in an infant class at any time while an ordinary teaching session is conducted by a single school teacher (or, where the session is conducted by more than one school teacher, a maximum of 30 pupils for every teacher).

All Carmarthenshire County Council Schools are therefore bound legally to keep Infant class sizes to a limit of 30 pupils.

Whilst there is no legislation limiting Key Stage 2 classes to 30 or fewer, Welsh Government has a target of ensuring children aged 7 to 11 are taught in classes of no more than 30 children per school teacher.

The capacity of schools is determined by applying the Welsh Government's Measuring the Capacity of Schools in Wales methodology. This method provides a robust and consistent method of

		<p>assessing the capacity of schools and subsequently capacity of class sizes. This methodology uses a formula to provide a realistic and consistent assessment of the capacity of all primary schools.</p> <p>The Local Authority aims to have suitably sized classes with no more than two-year groups per class and which do not span the key stages of the curriculum.</p> <p>There are also many advantages to schools with greater numbers of pupils including:</p> <ul style="list-style-type: none"> • Economies of scale – e.g. more efficient and effective use of financial resources • Greater opportunity to socialise with a wider range of pupils and better chance to be able to choose their friends and/or have a wider circle of friends • Better chance of being able to participate in a wider variety of sports and cultural teams, with the added incentive of ‘friendly’ competition • More chance of being able to work with pupils of similar ability 		
8.	<p>Education Standards Respondents questioned the difference in education standards of both schools and highlighted that Mynyddygarreg was a green rated school.</p>	<p>The national schools’ categorisation process has been suspended since 2020 and therefore is it not appropriate to comment on historic data.</p>	38	8%

9.	<p>Success of Cylch Meithrin Mynyddygarreg Respondents noted that the Cylch Meithrin is very successful and could support the increase in pupil numbers at the school. Respondents also raised concerns that the Cylch Meithrin would lose its home and the community would lose a valuable service if the proposal to close Ysgol Mynyddygarreg was implemented.</p>	<p>The Local Authority recognises the importance of the Cylch Meithrin for children’s education and development.</p> <p>Whilst the Local Authority acknowledges that the Cylch Meithrin could support pupil numbers, the future sustainability of Ysgol Mynyddygarreg has been considered for several reasons including school budget, building/resources condition and suitability and the proposal to provide a new school for Ysgol Gwenllian which allows the pupils of Mynyddygarreg the opportunity to benefit from this. Therefore, the discontinuation of Ysgol Mynyddygarreg does not rely solely on pupil numbers.</p> <p>The proposed new school development does not include space for the Cylch Meithrin or childcare provision.</p> <p>If the proposal is implemented the Local Authority would work with the Cylch Meithrin to look at the different options available to them.</p>	35	7%
10.	<p>Condition and Suitability of Current School Buildings Respondents questioned how the Local Authority’s lack of investment had allowed Ysgol</p>	<p>School Governing Bodies have a responsibility in respect of school’s maintenance in addition to the Local Authority’s responsibility.</p>	30	6%

	<p>Mynyddygarreg's building condition and suitability to deteriorate to a position where closure is viewed as the preferred option.</p>	<p>Works that are CAPITAL in nature are the responsibility of the Local Authority and any other works required would be REVENUE in nature and therefore the responsibility of the school.</p> <p>The budget for CAPITAL major maintenance work in schools is under severe pressure and urgent works are prioritised on an annual basis across the schools estate.</p> <p>The Executive Board approved a revised Modernising Education Programme and 21st Century Schools Band B on the 18th December 2017 where approval was given to pursue grant funding (from Welsh Government) for a total of 19 individual projects at a total value of £129.5m which included a scheme for Ysgol Gwenllian. Due to the challenges faced at Ysgol Mynyddygarreg it would be unlikely to attract WG funding as it would not be considered strategic enough, considering that a new school for Ysgol Gwenllian was proposed for the area.</p>		
11.	<p>Consulting During a Pandemic Respondents did not believe that consulting during a pandemic was appropriate. They did not feel that requirements imposed by social distancing allowed for a full and transparent consultation. Some</p>	<p>The Local Authority appreciates that the last 21 months have been extremely difficult for families.</p> <p>The Local Authority would like to assure stakeholders that the consultation was prepared and conducted in line with the requirements of Welsh Government's School Organisation Code (2018) and guidance on 'Changes to the School Organisation</p>	25	5%

	<p>respondents mentioned the difficulty they had encountered to join the virtual meetings.</p> <p>Respondents noted the detrimental impact of consulting during a pandemic on stakeholders' mental health and wellbeing.</p>	<p>Code in response to the coronavirus outbreak' published on the 8th January 2021, which allowed for school consultations to continue during this time. This guidance included temporary changes to certain requirements of the School Organisation Code and provided Local Authorities with advice for consulting on school organisation proposals during the coronavirus (COVID-19) outbreak.</p> <p>Subsequently, on the 16th February 2021 Welsh government published further guidance on consulting on school organisation proposals during the Coronavirus pandemic. In response to this guidance, following a meeting of the Executive Board on the 22nd February 2021 a decision was made to extend the consultation period for the proposal until 1st March 2021.</p> <p>The consultation period was extended further on the 1st March to the 16th July 2021, in response to the Executive Board's consideration of a notice of motion submitted to County Council on 10th February 2021.</p> <p>Due to the ongoing implications of the coronavirus pandemic during the consultation period the Local Authority provided consultees with the opportunity to attend virtual drop-in sessions in place of face to face meetings. This provided consultees with an opportunity to ask questions, express their views and to discuss the proposal with Local Authority officers. Whilst it is accepted that not all</p>		
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		<p>stakeholders would have the means to access a virtual drop-in session all stakeholders were provided with the opportunity to submit their views or ask questions via letter, telephone or email.</p> <p>Whilst the benefits of face to face meetings are recognised, in response to the pandemic the local authority adapted its engagement methods in order to ensure that the consultation was as accessible as possible to all. Many of these tools have proved even more successful than traditional face to face meetings and previous methods used in historic consultations. The Local Authority will continue to adapt its communication methods to meet stakeholder needs.</p>		
12.	<p>Quality of Consultation Document and misinformation</p> <p>Respondents felt that the Consultation Document was biased and included false/misleading information.</p> <p>Respondents did not believe that the Consultation document had considered the principles of the Wellbeing of Future Generations Act policy.</p>	<p>The consultation document produced complies with the guidance as set out in the School Organisation Code (2018).</p> <p>All data and information contained within the Consultation Document is accurate and is based upon the Pupil Level Annual School Census Data (PLASC). All data contained within the Consultation Document is stipulated as a requirement within the School Organisation Code (2018).</p> <p>Whilst the local authority notes the comments made. It must be reiterated that all answers provided in</p>	20	4%

	Respondents criticised the quality and depth of information received from officers in response to queries raised.	response to queries raised via drop-in sessions or alternative methods were based on factual and accurate information.		
13.	<p>Financial Pressure</p> <p>Respondents believed that the proposal was being implemented for financial reasons and to avoid investing in Ysgol Mynyddygarreg. Concern was also expressed that the school's deficit budget was being used as a reason for closure when there were schools in the County in a much larger deficit.</p>	<p>The decision to proceed with a proposal to discontinue Ysgol Mynyddygarreg was made based on a number of individual factors inclusive of pupil numbers and projections, school budget, building/resources condition and suitability and the proposal to provide a new school for Ysgol Gwllian which allows the pupils of Mynyddygarreg the opportunity to benefit from this.</p> <p>Furthermore, the Executive Board approved a revised Modernising Education Programme and 21st Century Schools Band A and Future Programme on the 18th December 2017 where approval was given to pursue grant funding (from Welsh Government) for a total of 19 individual projects at a total value of £129.5m which included two separate schemes for Kidwelly. Due to the low pupil numbers at Ysgol Mynydd y Garreg, it is unlikely that an application for funding to renovate the school would be successful as this would not be considered to be strategic enough, considering that a further two investment projects were taking place in the area.</p>	20	4%
14.	<p>Future Choice for a Small School</p> <p>Respondents believed that school closure limited</p>	The Local Authority recognises that parents may have a preference for the type of education that they wish for their child to receive.	17	3%

	<p>parents' and pupils' human rights to choose their preferred primary education provision. Many believed that by closing Ysgol Mynyddygarreg the future choice of parents for a small school is taken away.</p>	<p>'Parents can state a preference for a school, which is not the designated catchment area school. Subject to the limit on the number of pupils who can be admitted into the school not being exceeded and the correct procedures being followed, then admission will be granted.' Admission to School: Information for Parents 2021 - 2022 booklet.</p> <p>More information on the Local Authority's admissions policy can be found in Carmarthenshire County Council's Admission to School: Information for Parents 2021-2022 booklet.</p>		
15.	<p>Change in Age Range Respondents felt that the age range of Ysgol Mynyddygarreg should be changed from 4-11 to 3-11 enabling them to offer part-time Nursery provision and increase the number of pupils at the school. This would also align the provision with that of Ysgol Gwenllian.</p>	<p>There is a combination of 3 -11 and 4 – 11 primary schools in authority and a review is currently being undertaken on nursery provision, with a report expected to be submitted to elected members in the next 6 months for consideration.</p> <p>If all schools in the authority were 3 -11 then there would be a risk of non-maintained providers becoming unsustainable. It is important that the authority considers how their policies would impact private providers.</p>	16	3%
16.	<p>Impact of the Proposal on the Town and Residents of Kidwelly Respondents noted concerns with the increased traffic in Kidwelly during drop-off and</p>	<p>As part of the planning process a Traffic Impact Assessment will be undertaken to ascertain the effect of the new school development on the</p>	16	3%

	pick-up times in an already heavily congested town.	surrounding infrastructure. The TIA is a technical analysis of traffic problems and safety issues relating to a new development. The outcome of the assessment will determine what measures will be put in place to ensure that highway improvements if required are put in place.		
17.	<p>Transfer to Alternative Schools</p> <p>Respondents expressed concern that as the proposed site of the new school would not be within walking distance for the residents of Mynyddgarreg, parents could opt to send their children to an alternative school rather than to Ysgol Gwenllian. Some respondents mentioned that they would consider home educating their children.</p>	<p>If the proposal is implemented, it is the Local Authority's intention that all current pupils remain at the school and transfer to the new school once it has been completed.</p> <p>However, the Local Authority also recognises that parents have a right to state a preference when choosing a school for their child. Should parents wish to choose an alternative school for their children, they may do so in line with the School Admissions Policy 2022-2023.</p>	13	3%
18.	<p>New School Design</p> <p>Respondents questioned the new school design and facilities in particular why had space not been allocated for the Cylch Meithrin. Concern was also expressed that plans had been amended and that the original plans did</p>	<p>If the proposal is implemented, more detail on the design and facilities of the new school development would be made available to stakeholders as the scheme progresses through its development stages.</p> <p>The new school will be designed to accommodate the required number of pupils and would be suitably funded, resourced and staffed. Since the original</p>	10	2%

	provide a space for the Cylch Meithrin.	<p>school designs were presented a number of years ago, the capacity of the school has been reviewed and updated accordingly.</p> <p>The Local Authority recognises the importance of the Cylch Meithrin for children’s education and development. If the proposal is implemented the Local Authority would discuss the possibilities available to the Cylch Meithrin in terms of future location with the appropriate representative.</p>		
19.	<p>New School Name Respondents noted the importance of ensuring that the new school had a new name to include Ysgol Mynyddygarreg.</p>	<p>Whilst the Local Authority supports the idea of the new school having a name which reflects both schools/communities. It does not have the power to enforce this. The name of the new school will be a decision for the school’s Governing Body.</p>	10	2%
20.	<p>Impact of the Proposal/Rumours Respondents expressed concern that Ysgol Mynyddygarreg had been operating under the threat of closure for many years and that this threat/rumour had affected the school’s ability to attract new pupils.</p>	<p>Whilst the Local Authority recognises the detrimental impact of such rumours - openness and transparency are a key dimension of effective consultation in order for parents to consider what is best for their child in the long term.</p>	4	0.8%
21.	<p>Timing of Consultation Respondents questioned why the proposal to close Ysgol</p>	<p>The timing of implementation of the proposal has been planned to ensure limited disruption and a</p>	4	0.8%

	<p>Mynyddygarreg was incorporated into the proposal at such a late stage in the process when the proposal for a new build for Ysgol Gwenllian could have been progressed without this closure.</p>	<p>smooth transition for pupils of both Ysgol Mynyddygarreg and Ysgol Gwenllian.</p> <p>If the proposal is implemented, on discontinuation of Ysgol Mynyddygarreg, all pupils will be registered at Ysgol Gwenllian which will operate on both sites. This will allow the staff and pupils on both sites to adjust to new ways of working prior to their transition to the new school building.</p>		
22.	<p>Contradicts Policy Respondents noted that the proposal contradicts Welsh Government's policy on the presumption against the closure of rural schools.</p>	<p>The second edition of the School Organisation Code (2018) makes special arrangements for rural schools (defined within the Code), establishing a procedural presumption against the closure of rural schools. This requires proposers to follow a more detailed set of procedures and requirements in formulating a rural school closure proposal and in consulting on and reaching a decision as to whether to implement a rural school closure proposal.</p> <p>A list of Carmarthenshire's rural schools as defined by Welsh Government can be found on page 78 of the School Organisation Code (2018).</p> <p>Ysgol Mynyddygarreg is not defined as a rural school by the code.</p>	3	0.6%
23.	<p>Redundant school sites</p>	<p>Should the proposal be adopted, any redundant property will be transferred to the Regeneration Division for the procedures outlined in the Future</p>	3	0.6%

	<p>Respondents questioned what would happen to the former school sites.</p>	<p>Use/Disposal of Redundant Land and Buildings arising from the Modernising Education Programme policy to be actioned. This policy has been developed to allow the community to be offered the asset in the first instance before placing the site on the open market.</p> <p>Any capital receipts received as a result of the proposal would be re-invested into the Modernising Education Programme.</p>		
24.	<p>ALN Pupils Respondents believed that pupils with ALN would struggle with the change and queried how pupils would be supported. It is believed that small schools were better for pupils requiring one to one teaching.</p>	<p>Carmarthenshire County Council's policy is that all its schools should be inclusive, with children with additional learning needs being educated in a mainstream setting alongside their peers wherever possible. School and classroom size should not be a factor when schools deliver a person-centred approach to children's learning supported by personalised learning packages with individually targeted interventions, strategies and opportunities and the support required for delivery.</p>	2	0.4%

Estyn's Observations regarding the Proposal

Estyn's response to the proposal to review primary education provision in the Mynyddygarreg and Gwenllian Areas

Introduction

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

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

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

Summary/ Conclusion

This proposal is by Carmarthenshire county council. It is to review primary education provision in the Mynyddygarreg and Gwenllian areas. More specifically the proposal aims to:

- Discontinue Ysgol Gynradd Mynyddygarreg from 31st August, 2021.
- From 1st September, 2021 all pupils will be registered at Ysgol Gymraeg Gwenllian operating on both sites (Ysgol Gymraeg Gwenllian and the former Ysgol Gynradd Mynyddygarreg).
- Re-designate Ysgol Gymraeg Gwenllian's catchment area to include that of the former Ysgol Gynradd Mynyddygarreg's catchment area as of 1st September, 2021.
- Relocate Ysgol Gymraeg Gwenllian to a new site and increase its capacity to 210 + 30 nursery places as of September 2023, when occupation of the new school is proposed.

It is Estyn's view that this proposal is unlikely to have an overall adverse impact on the standard of education provision in the area.

Description and benefits

The proposer has provided a seemingly clear rationale for the proposal. It is to reduce the number of surplus places and to improve the condition of the buildings at Ysgol

Gynradd Mynyddygarreg and Ysgol Gymraeg Gwenllian by combining the two schools and relocating them to a new purpose built school on a different site. It is also intended that the proposal will address budgetary issues.

The council has set out the expected advantages and disadvantages of the proposal. The advantages centre mainly on the benefits of a new build school, ensuring sufficient Welsh medium provision to meet demand and reducing surplus places. The disadvantages include securing funding and increased travelling time for some pupils.

The council has recognised three risks in relation to the proposal and has identified seemingly suitable counter measures to address these risks. However it doesn't appear to have addressed the risk of having ongoing significant numbers of surplus places at the school. The capacity of the new build on the new site in 2023 will be 240 including nursery age. The pupil projections for both schools together including nursery age for January 2023 is 171 pupils. This will mean surplus places of 69 pupils or 29%. It is not clear how the council intends to address this risk.

The council asserts that 91 pupils living within Ysgol Gynradd Mynyddygarreg's catchment area attend other schools and that 192 pupils living within Ysgol Gymraeg Gwenllian's catchment area attend other schools.

The council has listed a number of other schools affected by this proposal and provided data for these schools including current numbers, projected numbers, capacity and budget. None of these schools are at capacity or projected to be at capacity over the next few years. The council has provided no commentary regarding the impact of the proposal on these schools, however it appears that it will have little impact on addressing the issue of surplus places across the local authority.

The council has considered four alternative options and listed the advantages and disadvantages of each option. It has also listed the advantages and disadvantages of the preferred option. These appear to be reasonable and valid.

The council has stated that transport will be provided in accordance with the statutory requirements of the Learner Travel (Wales) Measure 2008. The distance from Ysgol Gynradd Mynyddygarreg to the new proposed site of Ysgol Gymraeg Gwenllian is over one mile. Ysgol Gymraeg Gwenllian's new school building will be designed to incorporate safe areas for the drop-off and collection of pupils. If the proposal is approved, safe routes to school will be looked at as part of the Transport Impact Assessment for the new school building. This appears to be reasonable.

The council has included a community impact assessment for both schools and identified some areas that need addressing, however it is not clear how the council intends to address the impact on the two communities, for example it has identified that the Mudiad Meithrin currently use the hall at Ysgol Gynradd Mynyddygarreg but no alternative facilities in the local area have been proposed.

The council has provided a Welsh language impact assessment and refers to its Welsh in Education Strategic Plan (WESP). It is intended that the proposal will allow greater opportunities for access to Welsh medium education within the Kidwelly and Mynyddygarreg area and will ensure linguistic continuity from the nursery sector along

the key stages to the secondary sector so that every pupil becomes fluent and confident in both Welsh and English. This seems to be relevant and suitable.

Educational aspects of the proposal

The council has considered an evaluation of the present informal federation arrangements and included relevant extracts from the most recent Estyn inspection reports for both schools. It has concluded with a commentary on the impact of the proposal on both schools. This includes a positive impact on teaching and staff welfare and appears to be reasonable and valid.

The council has also provided an equality impact assessment which appears to be generally suitable. However, this assessment refers to the outdated term “DDA compliant.” In addition, there appears to be very little reference in the document as to how the proposal will impact on pupils with SEN.

The council appears to have considered how disruption to learners will be minimised. During the transitional period pupils will remain on their existing school sites under the management of Ysgol Gymraeg Gwenllian until the new build is ready for occupation to accommodate all pupils from Ysgol Gynradd Mynyddygarreg and Ysgol Gymraeg Gwenllian.

Local Authority Response to Estyn’s Observations

As can be seen from Estyn’s observations they are of the opinion that the proposal is unlikely to have an overall adverse impact on the standard of education provision in the area. Their observations include supporting statements as noted below.

Statements of support for this proposal by Estyn

The proposer has provided a seemingly clear rationale for the proposal.

The council has recognised three risks in relation to the proposal and has identified seemingly suitable counter measures to address these risks.

The council has considered four alternative options and listed the advantages and disadvantages of each option. It has also listed the advantages and disadvantages of the preferred option. These appear to be reasonable and valid.

Issues raised by Estyn and LA responses

- 1. However it doesn't appear to have addressed the risk of having ongoing significant numbers of surplus places at the school. The capacity of the new build on the new site in 2023 will be 240 including nursery age. The pupil projections for both schools together including nursery age for January 2023 is 171 pupils. This will mean surplus places of 69 pupils or 29%. It is not clear how the council intends to address this risk.*

LA Response

When considering the business case process for application of funding, Carmarthenshire County Council need to demonstrate to Welsh Government the need to provide Ysgol Gwenllian with a new school building of a relevant capacity, which will be fit for purpose for a number of years. The economic appraisal for a new school build is undertaken for a period of 60 years and it is expected that a new school build would be fit for purpose and have a life span of such a time. In considering the “new school factor” that needs to be applied to pupil numbers once a new school is in construction or complete for occupation (which has been demonstrated in a number of new Carmarthenshire schools), the Local Authority has proposed a capacity of 240 to ensure that the new school building is fit for purpose at completion and in the future.

- 2. The council has listed a number of other schools affected by this proposal and provided data for these schools including current numbers, projected numbers, capacity and budget. None of these schools are at capacity or projected to be at capacity over the next few years. The council has provided no commentary regarding the impact of the proposal on these schools, however it appears that it will have little impact on addressing the issue of surplus places across the local authority.*

LA Response

The Local Authority has provided a list of schools that may be affected in compliance with the School Organisation Code 2018 and includes the surrounding catchment area schools to Ysgol Gwenllian and Ysgol Mynyddygarreg. The Local Authority is not proposing that any other school is directly affected as a result of this proposal, however accepts that there may be some indirect implications as a result of parental preference.

With regards to addressing the issue of surplus places across the county, the Local Authority is currently progressing a wholesale review of its Modernising Education Programme which contains all of the county’s schools and will consider issues such as oversubscription and surplus capacity.

- 3. The council has included a community impact assessment for both schools and identified some areas that need addressing, however it is not clear how the council intends to address the impact on the two communities, for example it has identified that the Mudiad Meithrin currently use the hall at Ysgol Gynradd Mynyddygarreg but no alternative facilities in the local area have been proposed.*

LA Response

Should the proposal be approved and implemented, the Local Authority will work with the Cylch Meithrin to look at the different options available to them.

4. *The council has also provided an equality impact assessment which appears to be generally suitable. However, this assessment refers to the outdated term “DDA compliant.” In addition, there appears to be very little reference in the document as to how the proposal will impact on pupils with SEN.*

LA Response

The updated term of Equality Act 2010 will be used in all our documentation from this point forwards.

Carmarthenshire County Council’s policy is that all its schools should be inclusive, with children with additional learning needs being educated in a mainstream setting alongside their peers wherever possible. The school will continue to support those pupils with special educational needs.

Consultation with the Pupils

Children and Young People Consultation Document

A Children and Young People's version of the Consultation Document was provided to the school to distribute to all pupils.

In addition to the pupil consultation events noted below, pupils' observations were received through the generic consultation and have been included in the summary of responses received and Local Authority related responses which can be found on pages 5-24.

Pupil Consultation Event

School: Ysgol Gynradd Mynyddygarreg

Date: 08/02/21

Consultation undertaken by:– Senior Education Consultant

Interviewed: Members of the School Council (conducted on-line)

Observations noted during the Pupil Consultation Event:

A virtual meeting was held with members of the Ysgol Mynyddygarreg School Council on 08.02.21.

In addition to the School Council the Headteacher and members of staff were present.

Almost every pupil had a parent in the same room as them.

The ESA read the pamphlet to everyone ensuring that they understood what was being discussed.

Here is a summary of the pupils' responses:

- Almost everyone had stated that they felt sad that the school was closing and that they did not want this to happen.
- Despite this, one pupil did say that it was a good thing that a new school was being built as the school was old.
- Many of the pupils mentioned the resources that were available in the village e.g. the Community Hall.
- It was said that there were more opportunities in a small school e.g. during the Christmas Show, with no one being left out.
- In the new school, as there would be many more pupils, there would be less support for the pupils in the class as staff would not be able to help everyone.

- Some of them liked the fact that they are able to walk to school to keep fit and that this also helped the environment.
- One pupil stated that it was not the building that made the school but the people within it.
- Some of the pupils had a feeling that there would be more bullying in the new school as there would be more pupils.
- Also, as there would be more pupils in the new school, the opinion of some pupils would not be considered in group work, and their ideas would not be considered in the work.
- One pupil mentioned that pupils from small schools did better educationally than pupils from larger schools. She referred to her brother's experience in secondary school.
- Again they stated that they were sad as they felt that they were one large family together and had more support. The school had been open for a long time with a very successful history.
- Some pupils were sad that they would have different people teaching them and that they were friends with the teachers.
- One pupil stated that she was sad as her mother would lose her job maybe.
- Pupils should have the change to finish their primary education in Ysgol Mynyddygarreg, there would be no chance of this if the school closed.

Considering the benefits of moving:

- More pupils to make new friends.
- One pupil stated that it was good that a new school was being build. She currently has to travel a long way but the new school would be closer.
- Pupils would have an opportunity to mix with older pupils.

Current needs:

- They would like to have a swimming pool with more space on the yard to play.

One thing the council could do to help would be to not close the school.

Message from Steffan (Mynyddygarreg School Council) who could not be present.

"I feel sad that someone would want to close our school, I don't want the school to close. I don't want to travel further to school. I enjoy walking to school and I wouldn't be able to do this at a new school in Kidwelly. I want other children, like me to be able to come to our school - if the school is closed - no children will be able to go to the school again/in the future. Lots of new houses in the village are being built - what if the children who live here -want to come to our school? but they cant as its no longer open?"

I love to play in the park, rugby field and sports court next to the school every day when the weather is nice. Me and my friends have a lot of fun! - we have lots of space to run around and play.

We also use the hall (village hall) to do plays and ymarfer corff as there's lots of room in there. We also go to the church and chapel to sing songs at Christmas and at other times... its nice because all the people who live in Mynyddygarreg come and see us. This wouldn't happen if the school was closed and that's very sad.

I like playing and working with children who are older and younger than me - we all know each other really well and play nice together.

I hope that you can do your best and try hard to keep the school open".

Steffan"

School: Ysgol Gymraeg Gwenllian

Date: 08/02/21

Consultation undertaken by:– Senior Education Consultant

Interviewed: Members of the School Council (conducted on-line)

Observations noted during the Pupil Consultation Event:

A virtual meeting was held with members of the Ysgol Gwenllian School Council on 08.02.21.

As well as the School Council the Headteacher and members of staff were present.

Almost every pupil had a parent in the same room as them.

The ESA read the pamphlet to everyone to ensure that they understood what was being discussed.

Here is a summary of pupil observations:

- Most pupils were very happy for the opportunity to be taught in a new school.
- More opportunities to make new friends, and an opportunity to be part of sports teams.
- Equal opportunity for everyone with better technology resources for everyone.
- New resources, larger rooms and new reading material.
- An opportunity to have a grassed playing field.
- As the pupils at both schools were already friends through leisure activities, joining both schools would be easy.
- A larger school would give more pupils in the Kidwelly area an opportunity to be taught through the medium of Welsh.
- There would be more room to park in the new school which would be much safer than the current situation in Ysgol Gwenllian.
- It would be good to have our own kitchen on the site to prepare fresh food.

- It will be nice to have everything new.
- We need a large stage to hold concerts in the school.
- It would be beneficial to have a 'Chill Out area' in the new school.

With regards to what they don't like about the current school:

- Not enough space to play/grass on the site.
- Need a larger hall for physical exercise/for assemblies.
- There is no room to do any gardening or grow vegetables.
- Cabins – not much space in them.
- No room for outdoor learning for everyone.
- Mixed year groups in classes.
- The toilets are currently located outside.
- Disabled people cannot easily access the school.
- It can be cold at times.

What could the council do to help:

- "Clatcho bant da'r build newydd" (Get on with the new build) – a quote from one of the older pupils.
- Ensure that the name of the school incorporates the 2 areas of Gwenllian and Mynyddygarreg.

Alternative Options

During the formal consultation period stakeholders were provided with the opportunity to submit alternative options for consideration. The alternative options (not already considered in the consultation document) received are noted below and will be presented to the Cabinet for consideration.

Change the age range of Ysgol Mynyddygarreg from 4-11 to 3-11	
Advantages	Disadvantages
Seamless transition from nursery into primary school	Reduction in the demand for places at the Cylch Meithrin/childminders/privately-run nurseries who currently offer this provision
Opportunity for employment at Ysgol Mynyddygarreg	Unemployment due to the lack of demand at the establishments who currently offer this provision
Standardisation of part-time nursery provision in the area	Costly model of provision if there is no uptake
Would attract pupils at an earlier age avoiding them having to attend an alternative school	More pupils at the school would result in the Cylch Meithrin having to vacate the premises

Invest in Ysgol Mynyddygarreg	
Advantages	Disadvantages
Mynyddygarreg would retain a school in the community	Dependent on business case approval to secure funding. Potential for Welsh Government rejection of Business Case due to scope of the project not meeting strategic needs
Would address the poor building condition	Would not address the school's deficit budget
Would provide pupils with a 21 st Century building and facilities	Would not increase the number of Welsh medium school places. Projections show that pupil numbers are not expected to increase beyond the school's current capacity
No statutory process required	There is currently no scheme allocated for Ysgol Mynyddygarreg within the Band B Modernising Education Programme

Change Ysgol Mynyddygarreg into a dual stream school	
Advantages	Disadvantages
Would provide parents with a choice of language medium for their child(ren)	Does not support the LA's approved Carmarthenshire's Welsh in Education Strategic Plan 2017-2020
Could attract pupils who would otherwise access English medium provision elsewhere	Does not support Welsh Government's 'Cymraeg 2050: A Million Welsh Speakers' aim
More employment opportunities at the school	Significant investment would be required at the school to enable both streams to be taught separately
	Costly model of provision if there is no uptake

Extend the catchment area of Ysgol Mynyddygarreg so that they are able to attract more pupils	
Advantages	Disadvantages
A larger catchment area would have more pupils living within it	Changing a catchment area would not guarantee that pupil numbers would increase at Ysgol Mynyddygarreg. Parents can choose where they send their children and, as long as there was capacity in their chosen school their children would be admitted

	Would result in the catchment area of a neighbouring school or schools being reduced having a knock-on effect on the number of pupils in their catchment area and potentially compromising the school's viability
	Consultation required with neighbouring schools

Make the current Ysgol Mynyddygarreg school building a Hub/Nursery/Ti a Fi facility growing what is already in place	
Advantages	Disadvantages
The community would retain the provision of a Cylch Meithrin	Would require significant investment to make it a suitable building for this provision
Increased employment opportunities.	Would require the community to submit a business case to the Local Authority
The building could be utilised by the whole community	Costly model of provision if there is no uptake

Appendix A

Business Plan



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Ysgol Gynradd Mynyddygarreg

Cynllun Busnes ar gyfer y Dyfodol

A Business Plan for the Future





Forward

The strength of feeling in Mynyddygarreg is not to be underestimated. After decades of growth in the village, the last amenity is under threat of closure. The community believes the school has a future and has come together to present this Business Plan and show the way forward for the school.

We are supported not only by Ysgol Mynyddygarreg Governors but by Kidwelly Town Council and Ysgol Gwenllian Governors and we hope that our County Council shares our commitment to taking the school forward into the future.

Despite the difficulties presented by Covid, the consultation has been an opportunity to consider the school's issues and find solutions to them. We know that something needs to be done but we do not believe that closing the school is the solution - far from it, that would be a disaster for Mynyddygarreg itself and for the wider issues of Welsh language and culture. The threat of school closure has hung over the village for long enough and it is finally time to give certainty back to the community - when community has never been more important.

The plan demonstrates how we can overcome the challenges of budget and building neglect to continue with the outstanding educational attainment and performance that are a feature of the school.

Summary of Key Points

- Ysgol Mynyddygarreg is categorised as an “excellent” performing school and an exemplar in demonstrating the benefits of the Federation system. Moving to a formal Federation is the next step.
- The school plays a very significant part in the Welsh culture and language of the area and is the hub of the village. If Welsh language is to be promoted then the school needs to remain in the village.
- Growth in housing capacity in Mynyddygarreg has doubled the size of the community in recent decades, particularly for affordable family housing. New development continues and the future LDP adds further capacity. This is attracting increasing numbers of non-Welsh speaking families to the community, and the presence of the school will be the main driving force to ensure that the children, and many of their parents, will be able to take part fully in Welsh social and cultural activities.
- The County Council’s long-standing presumption of closure (as interpreted in the “Modernising Education” strategy since 2005) has prevented the school from benefitting from this local pupil growth, putting a brake on the creation of new Welsh speakers, removing choice for parents, demoralising teachers and falsely undermining the school’s viability. This situation can be corrected, and the Council has the chance here to show that smaller schools – with the right planning – can be part of future plans.



- The new school proposal only increases total Welsh medium capacity by 45 places if Mynyddygarreg school closes. This is not sufficient to allow for future growth in the area's population AND fulfilling the increase in Welsh Medium places and One million Welsh speakers policy.
- The school is situated in the heart of the village surrounded by great facilities on its "campus". The building, however is in a poor state of repair and will require £417,000 to modernise. A grant application to 21st Century Schools, alongside the new school for Gwenllian would cost only £5,800 per annum capital costs to provide a newly refurbished school in the village. For context, the school has already spent £3,600 this year alone on patching the leaking roof. The school outdoor "campus" including "Nature Trail School" would be an asset to the federation.
- The school's Age 4-11 category constrains the school from increasing pupil numbers. The school's on-site Meithrin (age 2-4) currently has 35 children on roll. As Ysgol Mynyddygarreg cannot take them until age 4 the majority of these feeder children have no choice but to move to age 3-11 schools. Once settled in a different school they are unlikely to move again. To compound this problem, any younger siblings take the same limited path.
- Using population numbers, obtained from Freedom of Information, it is calculated that this year there are 11 (out of 22) new pupils age 3 in the catchment that could attend Ysgol Mynyddygarreg later this year if the school offers Age 3 intake. These additional 11 pupils would be on-roll at school full-time next year, with new intakes of 3-year-olds feeding the increased level of actual pupil numbers in subsequent years.
- Using modest scenario figures based on parent pledges and Age 3 intake, the school will be in budget surplus by 2022/23 and could be at full capacity as early 2024.



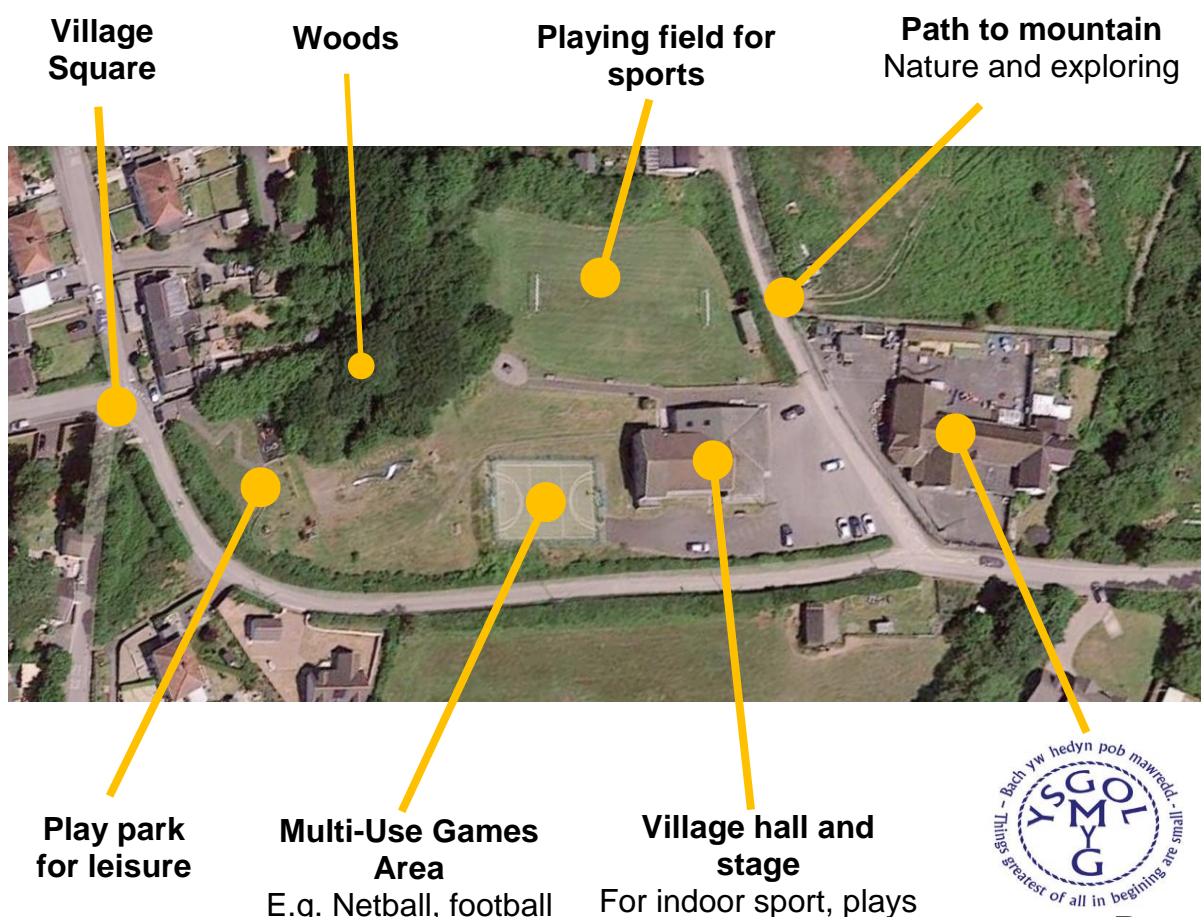
Ysgol Mynyddygarreg – an Introduction

Ysgol Mynyddygarreg has been the hub of the village since it was built in 1885 but was established even earlier with Sophia’s school - teaching children in a barn at her home in the village. Formerly teaching children from 5-14 and latterly a primary school teaching children from age 4, over 135 years it has been a constant at the heart of the community - an engine driving the Welsh language for multiple family generations.

Its importance to the community cannot be underestimated and smaller community schools form the lifeblood for keeping the language alive.

Located just a few minutes’ walk from the village square, the school has been extended and modernised over the years and now has three classrooms and a multi-use room for lunch and play, plus it is home to the Meithrin, looking after the thriving pre-school population. The school site has an outdoor area for Foundation Phase children with outbuildings for equipment storage and a further area for older children’s play. There is also an outdoor cabin classroom shared by all.

But this school’s facilities don’t end at its boundary walls. Take a school in a village on the edge of a mountain and see what that offers children in terms of curriculum and well-being. Ysgol Mynyddygarreg has its own “campus”, including: A large hall and stage for indoor sport/play and concerts; a new multi-use games area for netball and football; a playing field for school sports; a play park for exercise via leisure; woods and a path to the mountain open spaces for nature (and donkeys). This provision is rarely available elsewhere. It is unique to this setting at no additional cost to the Council’s budget. The image shows these amazing educational opportunities:





Pupils are taught in two mixed age classes (infants and junior) with a teacher and assistant assigned to each. Additional assistants are assigned when a child has additional learning needs. Whole class lessons are prepared with tasks allocated according to age and ability. Teaching themes and mixing of pupil ages, to bring on the most able and talented in reading and maths, are commonplace in schools today and mixed age classes give teachers the flexibility to do this easily. Teaching the same pupils over a number of years develops deeper understanding of pupils' strengths and needs and puts teachers in a better position to support each individual's learning. They don't have to spend the early weeks of the term getting to know each child and the pupils feel comfortable with the same teacher.

A small school offers a different dynamic – relationships and connection. A culture of caring and socialised nature, allowing the older children to develop in confidence by taking responsibility with the younger pupils and providing greater opportunities for those that would be lost in a larger school. Those children “in the middle” are all afforded more attention and greater support for pupils that need that extra time. Every pupil is known by every staff member, down to their individual characteristics and their social and emotional needs. The school play includes every child.

That caring extends to the community - older and younger children play together, not only in school but outside in the village.

School Performance

Ysgol Mynyddygarreg achieved a score of *Good* at the last Estyn inspection in 2014. The Welsh Government's school categorisation system provides a better indication of current and recent levels of achievement:

Ysgol Mynyddygarreg categories:

2014-2016 Yellow

2017/18 Green

2018/19 Green

2019/20 Green

The school has been coded as *Excellent*.

Welsh Government Policy change has since ended the categorisation process and the latest Estyn inspection is now overdue, having been expected in 2019. However, the school continues to maintain its high standards.

Governance through Federation

Ysgol Mynyddygarreg's excellent performance has benefitted from collaboration known as an 'informal federation' for many years, initially working with Ysgol Trimsaran.

Sharing a **Head Teacher** meant the school went from 0.2 of a Head and, in effect, gained a full-time Head as the administrative costs benefitted from the shared agreement. **Teachers** have enjoyed the development opportunities of any larger school by shared working practices, using peer-reviewing, mentoring, curriculum development, etc. within the

federation. A federation is an ideal opportunity to retain small schools and all their benefits. The traditional argument against small schools, creating pressures on teachers as they struggle alone, are swept away in a federation. Support and collaboration with a larger group of peers allows teachers to develop professionally, bringing more ideas and sharing good practice. **Pupils** of both schools enjoyed joint activities, sharing costs for transport and venues whilst using the facilities offered by the larger new Trimsaran school meant that pupils gained all the benefits of a small school without missing opportunities that can be achieved in a larger setting.

The Federation with Trimsaran School was hailed as an exemplar model of smaller and larger schools working together and even included a visit to the sites by Carmarthenshire Councillors. Since then a number of Federations have been set up in the area.

Since January 2020 Mynyddygarreg School has been in an informal federation with Ysgol Gwenllian. Most of this period has been during Covid-19 lockdown, but that has not prevented the relationships between staff of both schools being developed. Once schools are open normally, the benefits to pupils and teachers from federation will become evident. The school has gained admin support as it now shares admin with Ysgol Gwenllian, allowing parents to contact the school freely throughout the day and strengthening the parent school contact.

The benefits to both schools in progressing from an 'soft' informal federation to a formal Federation were being explored up until March 2020, with both schools almost ready to formalise the arrangement. A Federation is a long-term legal solution in its own right, where two independent schools share a Board of Governors with a mission to share resources to provide a wider pool of human and material resources.

The Building

There has been little or no investment in Ysgol Mynyddygarreg by the County Council over at least the last 10 years. The school building has been neglected under presumption of closure and the staff feel this neglect.

Although the school is a Victorian structure it is not unsound. Heritage buildings do not need to be condemned just because they are old – indeed most of society embraces its older buildings, along with their history and tries to preserve them. Community assets need to be maintained, of course, and allowed to evolve to gain modern equipment and facilities.

The carbon footprint and the financial cost of this rejuvenating approach is much lower than building afresh. £6.5million for a new carbon-intensive primary school compared to £417,000 for a carbon-light refurbishment to future-proof the current school and keep more Welsh language places is a crucial, and insightful, investment in both education and the amenity at the heart of its community.

No detailed conditions survey has been performed by the Council's Property Maintenance Service for over a decade. On request the service quickly supplied their assumed maintenance estimations, via a desktop exercise, which highlights the roof as the major investment requirement; currently scheduled for replacement in 2023. Until 2023 the roof



will continue to be a failure risk, creating more problems for the building and its occupants. The school has already spent £3,600 this year alone on separate roof repairs and numerous emergency patchings over the last 10 years, which have led to the gradual deterioration of the building.

In the absence of accurate and detailed conditions information an independent building survey was undertaken by the school to ascertain the likely cost of transforming the building, both internally and externally, for its long-term future. The Surveyor has indicated that most of the issues stem from the roof problems and once that is repaired (including insulation, soffits, guttering and ceiling repairs, etc) and windows replaced the building would need: Re-plastering (in areas where damp has caused damage); toilet refurbishment; staff room refurbishment; some electrical upgrading; decorating throughout; boundary wall maintenance and outside surface tarmac.

Budget Deficit

The school has a growing budget deficit and there is an assumption that cost is too high for the school to continue.

A large part of the deficit mirrors that of other small schools – years of austerity and chronic underfunding, which hits small schools hardest. Prior to 2010 the school carried a £16,000 surplus, which was gradually eroded as austerity cuts progressed. This scenario is common for many smaller schools.

However, there were two specific instances which added multiple debt to the school's budget:

- A family of 3 moved from school in December only to return again in March. Grants assessment for children on roll is based on PLASC January census and as they were not in school in January the school was not funded for the three who were actually on the register for the bulk of the year. This left a £10,000 gap in the year's planned budget.
- Long term sickness of a teacher where the supply teacher was not covered by the insurance.

Just 3 more pupils would have prevented the school's deficit from growing each year. However, changes this year in the Pupil Deprivation Grant has meant that the school deficit will rise by an additional £10,000. This means we either need another 3 children or we need three existing pupils to be eligible for free school meals (not in our control), so we can get additional pupil deprivation grant. Like all smaller schools, changes in the way funding is allocated can make a difference to whether a school has enough budget for each year. A sum as small as £10,000 can make a real difference to a smaller community school.

Raising the number of pupils at school is the only way to increase the grant so that the school can break even. Currently pupils are not able to start school in Mynyddygarreg until age 4. Many parents whose children attend the on-site Meithrin (which is thriving with 35 children at present) will send their children to other schools with an age 3 start and this badly impacts the numbers attending Mynyddygarreg.



Pupil occupancy rates for schools in the area demonstrates how Age 3 starting boosts pupil numbers on roll. See below:

	Ysgol Mynyddygarreg	Ysgol Gwenllian	Ysgol y Castell	Ysgol y Fro	Ysgol Gwynfryn	Ysgol Pontietts	Ysgol Glan y Fferi	Ysgol Carwe	Ysgol Trimsaran	Ysgol Penbr e	Ysgol Parc y Tywyn
Age	4-11	3-11	3-11	4-11	4-11	4-11	4-11	4-11	3-11	3-11	3-11
Roll	36	119	233	28	61	37	39	58	190	231	262
Capacity	65%	85%	95%	68%	63%	43%	31%	46%	79%	96%	72%

If Mynyddygarreg was able to take pupils at age 3, we forecast that the increase in funding for additional pupils, plus additional foundation phase grants, would transform the school budget back into long-term surplus.

Under the new school structure currently under consultation Ysgol Mynyddygarreg would have its historical budget deficit erased on entering a Formal Foundation. The assumption is made here that the same clean slate solution would be applied to this alternative proposal i.e. prior deficit would be removed.

Pupil Numbers in a Growing Population

Over the last 30 years the growth of Mynyddygarreg through private housing developments has been significant. In 1990 there were 210 homes in Mynyddygarreg, 4 pubs and a large hotel. In 2021 there are no pubs – they are now homes, and no hotel – it’s site currently on the market for yet another multi-house development.

Housing capacity in the village has doubled with approximately 150 new homes added, with a high proportion of affordable starter homes for young families.

Ribbon development on the main road and 3 private housing developments between 2010 and 2014 (100 homes, 28 and 14 in addition to the tens of self-build homes). A further development of 25 houses just starting.

The housing landscape and demographic of the village has changed; no amenities have been built to sustain the larger and younger community and there has been no strategic planning or investment. *The County’s planning committee supported arguments that the presence of the school supported approval for housing expansion and expanded housing supports the school.* This strategic thinking has not followed-through, Ysgol Mynyddygarreg has been left adrift.

S106 funds arising from the housing developments has mainly been spent in Cydweli (playing field drainage). It was only due to action by the community itself that any funds at all were received, when the last 28 home development in the village was completed. Finally, a badly needed upgrade of the park and MUGA and the school had an outdoor cabin and alterations to the school yard. S106 funding is meant to bolster and create additional amenities in areas which have had a detrimental impact due to additional housing and resulting population growth. Mynyddygarreg, still growing, has had but a fraction of that which should have come to the village and school. The education funding could have been used directly to repair the school but, lacking in strategic thinking, none was spent.

The Local Development Plan settlement areas do not differentiate between Cydweli and Mynyddygarreg and presumed population growth is indicated for the area together. However, the significant majority of housing growth has and is taking place in Mynyddygarreg, not Cydweli. The new LDP proposal sites for Mynyddygarreg will result in further new homes.

Written support for the retention of the school at Mynyddygarreg has been given by the developer of a new 25 home site in the village. They have stated that their homes are designed for the young family demographic. The eleven homes already sold prior to any building work starting bear this out.

School capacity to deal with population growth

The number of places at the proposed new-build school is 240, which is to account for population growth over the next 50 years (quote CCC officer). The current capacity of both schools combined is 195, which leaves only 45 additional places for population growth plus growth in Welsh medium education places, to fulfil local and national drives to achieve one million Welsh speakers. Pupil numbers for Ysgol Gwenllian are already estimated to be near current capacity by 2025 (only 2 years after the new school will open) and combined with numbers for Ysgol Mynyddygarreg will leave only a small total growth capacity for what is already a popular and growing area to live. Closing Mynyddygarreg removes an additional 55 Welsh medium school places when policy dictates we should be creating more.

Community and Culture Ysgol Mynyddygarreg's Place

The Wellbeing of Future Generations Act provides a legal framework to understand and consider decision making holistically. This means a community view as a whole and not viewing education as one component that can be removed whilst leaving the rest intact. By taking away a school, the fabric of what binds a community is left to fall. Villages are, by their very nature, dynamic communities that have grown up around the amenities they had, which sadly are mostly gone. Where schools remain, villages retain their sense of community, that binding that people share, allowing them to be something more than just a collection of houses.



Ysgol Mynyddygarreg is such a school - involving pupils within the community, bringing together old and young, not just the parents. The community is like a web with the school at its centre, connected by village identity and by the Welsh language to other components of the village that, lacking its school to maintain the web would probably not thrive:

- Neuadd Village Hall, a base for concerts and plays, involvement in events, carnivals, halloween.
- St Teilos Church – services, Christingle, Harvest
- Horeb Chapel – concerts and services
- Rugby Club – sports and duck racing, barbeques
- Senior Citizens – visiting their lunch clubs and seasonal parties

Welsh Language and Culture

Mynyddygarreg is one of the post-industrial villages that retained its strong links to language and culture. The community has maintained traditions and remains a hub of Welsh language and culture. Annual events in the Welsh language always receive a packed house from far and wide, in addition to the strong Welsh community that is synonymous with the village. “West is Best” originated in Mynyddygarreg and remains the proud anchor for the community.

- Mynyddygarreg hosts the annual Eisteddfod competition in May, a practice run for entrants to the main competition and an important cultural event in the area with entries from all schools, adult categories and the awarding of the Chair (a miniature one crafted by a community member).
- A Welsh cultural event takes place every March with acts like Dewi Pws and Dafydd Iwan gracing the stage. Its popularity brings Welsh speakers from miles but also attracts new people into Welsh culture.

Removal of the Welsh Medium school from the village and the long-term impact that will have on what is one of the county’s largest pockets of Welsh speaking and culture is not a decision that should be taken lightly. The growth of the village has brought many non-Welsh speaking young families to the community and having a Welsh medium village school and a culture that embraces Welsh means there is a great opportunity to increase the number of Welsh speakers.

If, however, there is no school in the village then parents can choose between larger English or Welsh schools in Cydweli and, as they do now, many will opt to select the English medium school because it is easier and the English medium Ysgol Y Castell is closer to Mynyddygarreg. The option of a village school is attractive to people living in a village – and the children will learn Welsh and likely choose Welsh medium secondary education also, firmly embedding them in Welsh language and culture for their future generations. Take away Ysgol Mynyddygarreg and this opportunity to grow new generations of Welsh speakers is forever lost.



Carbon Footprint

Carmarthenshire Council's policies such as Active Travel, Safer Routes to Schools, LDP and Net Zero Carbon by 2030, all aim to decrease carbon footprint and promote eco-friendly lives. This is also enshrined within the Wellbeing of Future Generation Act. Taking a decision in the context of education, without accounting for wider consequences and indeed the wider expense to the Council contradicts those policies.

Retaining Ysgol Mynyddygarreg meets these aims:

- Refurbishing Ysgol Mynyddygarreg keeps an existing building in use and has a lower carbon footprint than new build
- Existing and new home owners in the village can make contributions to Active Travel and Net Zero Carbon by 2030
- Parents will walk children to school, saving approx. 610 car journeys per week travelling to new Gwenllian school
- School transport is not required for pupils to travel to school
- Maintaining the school works towards connected communities as set out in Carmarthenshire Local Development Plan

The Proposal

- Establish a new school for Ysgol Gwenllian only (fully supported by Gwenllian Governing body)
 - Survey and properly cost the Ysgol Mynyddygarreg's building for upgrading works. As our independent survey showed, this could be done speedily without causing further delay to the grant application.
 - Establish a business plan for both schools as a Formal Federation on two sites, giving parents the choice of a smaller school setting, which could also benefit pupils that would thrive in a smaller setting but don't really achieve in a larger school.
 - Obtain funding from 21st Century schools for both settings.
 - Reduce starting age to 3 for pupils attending Mynyddygarreg
 - Recognise the essential parts that small schools play in community cohesion, over and above the education of pupils and establish a mechanism for additional funding for this purpose, which would bolster the community asset.
- GIVE CERTAINTY TO THE FUTURE OF YSGOL MYNYDDYGARREG

The Plan

Creating an up-to-date Building

An independent building survey conducted in February 2021 has indicated the worst-case scenario cost to bring Ysgol Mynyddygarreg up to a good standard for the future would be £417,000 (appendix).

The cost of a new school for Gwenllian is £6.5m and for Ysgol y Castell £7.4m, a total of £13.9 million spent on education in Cydweli whilst Ysgol Mynyddygarreg requires a modest investment of £417,000 to allow it to continue providing excellent Welsh Language education in the area.

Welsh Government 21st Century Schools provides 65% funding for schools and the remainder would come from Carmarthenshire Council. The Welsh Government confirm that it is not unusual and perfectly permissible within their grant rules to obtain funding for refurbishment.

$35\% \times £417k = £145k$ over 25 years, which is just £5,800 per year to save the focus of the community for a generation. Put in context, the school has already spent £3,600 this year alone, patching the existing leaking roof.

This is a fraction of the overall cost of investing £13.9million in the area for the two new urban schools and represents a 3% addition to the total grant applications for the two Cydweli schools.

The Mynyddygarreg community deserves a proportionate share of investment. It has borne the majority of new housing and population growth in the area and needs the certainty over the next 25-year period of sufficient Welsh medium school places.

It also makes up for past neglect.

The Business Case to 21st Century Schools Funding for new school for Gwenllian should include £417,000 for repair to Ysgol Mynyddygarreg to retain 55 Welsh medium school places in the growing village.

Addressing Pupil Numbers

Ysgol Mynyddygarreg's capacity is 55 pupils. Over many years pupil numbers have remained fairly stable, at around 38-42 pupils, with estimated pupil numbers at 39 in 2025. A constantly thriving Meithrin, based within the school means that age 4 children have a seamless transition into Foundation Phase; parents need not worry about their child settling in to a different school, a new generation's adoption of Welsh language is automatic and any siblings follow the same path

Children in surrounding schools are able to start pupils at age 3. For a great many local parents this is the time when they will look to take their child out of Meithrin and switch to a nursery place at a different school. Once settled in that school it is difficult to make that change back. As a result, the children in Meithrin do not automatically move on to Ysgol Mynyddygarreg.

A freedom of information request has provided information that there are currently 22 3-4 year olds in Mynyddygarreg catchment, who are unable to attend Ysgol Mynyddygarreg until age 4. Attendance at Welsh or English medium primary education in Cydweli and Mynyddygarreg area is approx. 50% each. Assumption is made that 50% of the 22 would choose English medium, which leaves 11 additional pupils for Ysgol Mynyddygarreg that cannot currently choose Mynyddygarreg due to the age 4 start. With Age 3 start this additional number would take the school up to 50 pupils and although still not at capacity would provide the additional income to create a budget surplus.

If the change is enacted, 3 year olds will have full time care with half day at Meithrin and half at school, all in the same building. An attractive offer for working parents.

A number of years ago the school requested a change to age 3 status so that it could address budget issues. This request was blocked by the Council, stating that there was enough provision elsewhere in the area. This stance has, predictably, undermined the budget position in Mynyddygarreg and very effectively prevented the school from solving the key issue that has now led to threatened closure.

A decision was taken at December 2020 Carmarthenshire Council Executive Board that Swiss Valley school entry age should be lowered to 3 to "bring it into line with others in the area" in direct policy contradiction to the stance taken with Ysgol Mynyddygarreg. It is fully expected that this decision can also be made for Ysgol Mynyddygarreg, allowing the two federated schools to offer the same service of starting at age 3.

The school already has an excellent standard of teaching and leadership and has already proven itself over the last 6 years. ***The certainty against threat of closure of the school and an investment in the fabric of the building would bring additional pupils to the school.***

A Formal Federation with Ysgol Gwenllian

A Federation is about schools pooling resources to improve performance, raise standards of attainment and achieving more for the children, whether that is providing access to opportunities and facilities children would not normally be able to access, or to share resources. This would be a two-way interaction in that, as shown previously, pupils at Ysgol Gwenllian could also benefit from visiting the Mynyddygarreg “campus” including the nature trail.

Both Ysgol Gwenllian and Ysgol Mynyddygarreg have been in an informal federation for the last year. The shared Head has ensured that the schools work closely together and staff have built up a good working relationship. Within the two months pre-COVID the schools shared Vlogging Workshops and competed in Netball and Football tournaments (something that hadn't taken place for many years at Mynyddygarreg due to the numbers being too low to create a team). Once schools can return to normal then they will be sharing more activities and developing their own relationships with each other.

Between January and March 2020 the schools' two governing bodies held a number of meetings to discuss how we could work together. Meetings were somewhat rushed due to County Council timescales relating to the new school, but there was a strong desire to work together. There will be further discussions, outside of false deadlines, which will enable the two schools to enter a formal federation - to the benefit of both schools.

Funding

Funding projections for the next three years are set out below. Due to the complexity of education funding it has only been possible to demonstrate an estimate of funding, so this has been based on the current year spend as the most up-to-date information available. Potential funding for future Pupil Deprivation Grant has not been included, nor has any future estimates for Additional Learning Needs, etc.

County Council funding per pupil for 2020/21 is £3870 per nursery age pupil. By changing the age status of Ysgol Mynyddygarreg from 4 to 3 an additional 11 nursery pupils would attend (as previously calculated as one half of the available 22 3-4 year olds in the catchment area, currently not able to attend Mynyddygarreg). As three year olds attend part time, the figure would be £1935 per pupil. This has been entered into the annual budget for 2022/23 as it is estimated that due to the statutory process lead-time to lower the starting age it is unlikely nursery pupils would start until December 2021.

These additional pupils will create the new higher baseline pupil figure for future years. As most children tend to stay at the same school, we can be confident that once started, these numbers will be maintained for each school year group, bolstering capacity for future years.



			Running total
2021/22			
Funding allocation based on 36 pupils 2020/21	£171,635		
Additional funding for 11 nursery pupils from Jan 2021 50% part time schooling			
Funding for additional primary pupils from Jan 2021 remains the same			
Total Funding for 2021/2022	£171,635		
Total Expenditure based on 20/21	£193,469		
Surplus/deficit	- £21,834.00	-£21,834.00	36 on roll
2022/23			
Funding allocation based on 36 pupils 2020/21	£171,635		
Additional funding for 11 nursery pupils from Jan 2022 50% part time schooling	£21,285		
Funding for 6 additional primary pupils from Jan 2021 (parents already registered and pledged to start)	£23,568		
Formal Federation additional funding	£6,000		
Total Funding for 2022/2023	£222,488		
Total Expenditure based on 20/21	£193,469		
Surplus	£29,019.00	£7,185.00	53 on roll
2023/24			
Funding allocation based on 36 pupils 2020/21	£171,635		
Additional funding for 8 nursery pupils from Jan 2023 50% (reaching school capacity)	£15,480		
Funding for 11 additional primary pupils from Jan 2023 (from nursery;) 6 pupils leaving	£43,208		
Formal Federation additional funding	£6,000		
Total Funding for 2023/2024	£230,323		
Total Expenditure based on 20/21	£193,469		
Surplus	£36,854.00	£44,039.00	55 on roll (capacity)

Assumptions:

Pupil values, income and expenditure for each year are based on the Ysgol Mynyddygarreg 20/21 budget figures for 36 pupils (the most current available data). Additional £6,000p/a formal federation. Early Years Pupil Deprivation Grant will also be available for additional pupils that qualify but has not been included in the calculation. Pupil values: Primary £3928; Nursery £3,870 (50%)

Timescales

May 2021 – Commence statutory process for age 3-11 for Ysgol Mynyddygarreg

May 2021 – Discussions recommence with Gwennllian Governors regarding a formal federation.

May 2021- Business Case to Welsh Government 21st Century Schools for new school for Gwennllian and refurbishment of Ysgol Mynyddygarreg

July 2021 – Commence building work on Ysgol Mynyddygarreg as roof repairs are urgently required.

January 2022 – Ysgol Mynyddygarreg starts taking pupils from age 3

Appendix Building Survey Estimates

Ysgol Mynyddygarreg Capital Works

Works Description	Work Type	Rate	Unit	Approx Qty	CAPITAL
External Boundary Walls	Boundary/ Retaining Walls	£800.00	item	100	£20,000.00
Floor replacement to Staff room	Soft wood floor replacement	£190.00	m2	19	£3,610.00
Concrete tiled roof and valleys/ Hips	Roofing, to include trusses, insulation roof coverings, PVC rain water goods, plasterboards, skim and emulsion to ceilings	£225.00	m2	800	£180,000.00
Scaffolding	Scaffolding	£25,000.00	item	1	£25,000.00
Windows	Windows to the School	£20,000.00	item	21	£20,000.00
Damp Walls	Treat Damp walls, render wall finish	£10,000.00	item	1	£10,000.00
Suspended ceiling -classrooms/Multi-Purpose room	replace suspended ceilings	£35.00	m2	200	£7,000.00
Decoration to school	Paint all walls in school	£15,000.00	item	1	£15,000.00
HWS Cylinder storage & control valve	Mechanical	£2,500.00	item	1	£2,500.00
Toilet upgrades 2no Boys and 2no Girls	Refurbishment	£7,500.00	item	4	£30,000.00
Playground Resurfacing	External Works	£25,000.00	item	1	£25,000.00
Kitchen servery area	Kitchens	£25,000.00	item	1	£25,000.00
Oil Line Replacement	Mechanical	£4,000.00	item	1	£4,000.00
Intruder Alarm	Electrical	£5,000.00	item	1	£5,000.00
Distribution Upgrade	Electrical	£15,000.00	item	1	£15,000.00
Rewire/ emergency lighting	Electrical	£30,000.00	item	1	£30,000.00

£417,110.00

Appendix B

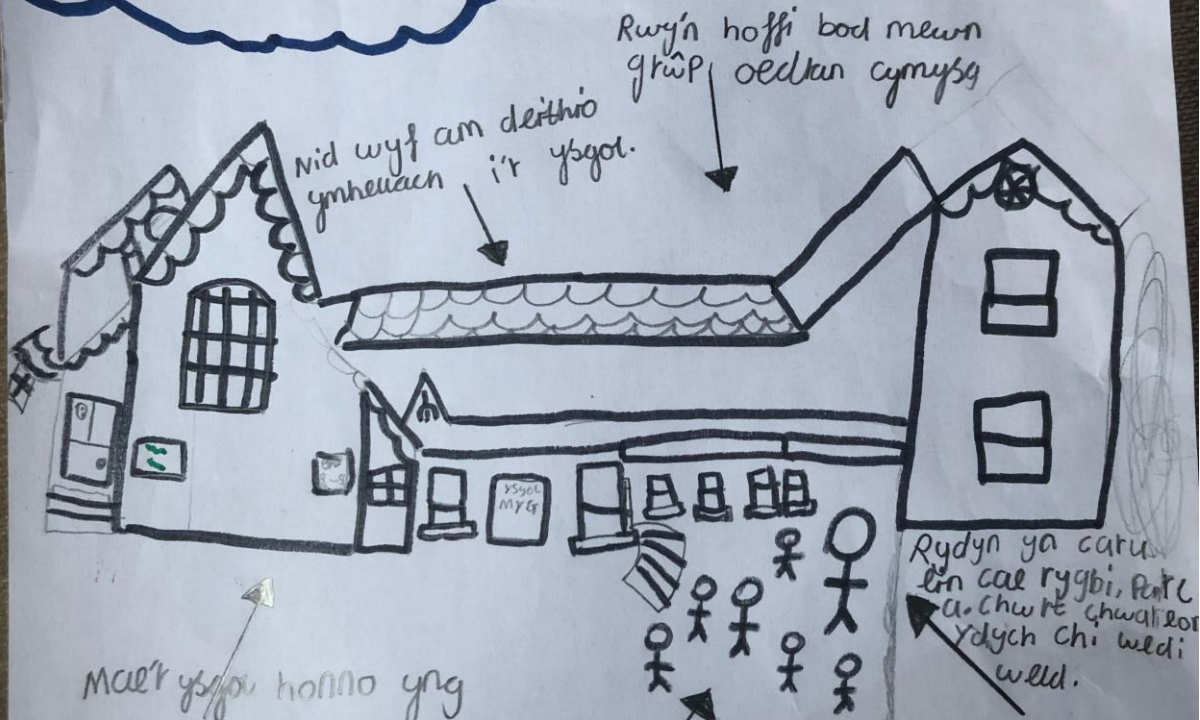
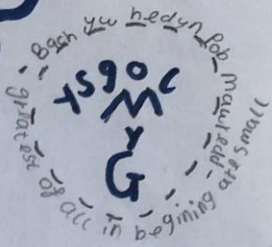
Pupil Submissions



carmarthenshire.gov.uk



Peidiwch gou ein ysgol



Nid wyf am deithio ynheuach i'r ysgol.

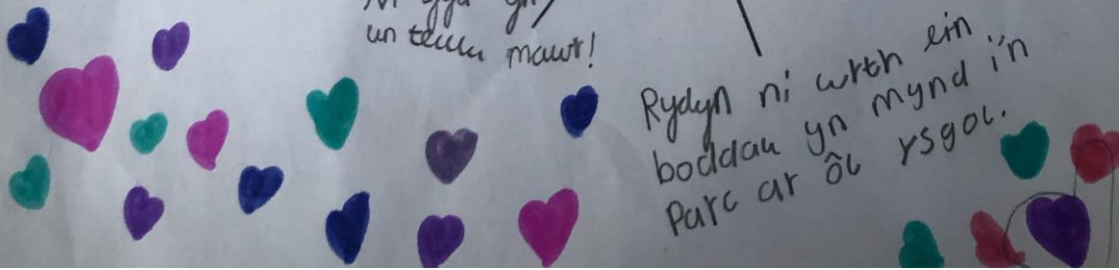
Rwy'n hoffi bod mewn grŵp oedtan cymysg

Rydyn yn caru ein cal rygbi, Parc a chwre chwalestr ydych chi weldi well.

Mae'r ysgol honno yng nghanol y gymuned.

Ni gyd yn un teulu mawr!

Rydyn ni wrth ein boddau yn mynd i'n Parc ar ôl ysgol.



Achub yr Ysgol



Fy enw i yw Martha
rwy'n 5 oed.

Dyma fy ysgol.

Peidiwch â chau fy ysgol. Rwy'n caru fy ysgol,
Rwy'n caru fy athrawon, Rwy'n caru fy ffrindiau.
Peidiwch â mynd â ni oddi wrthym ni.