

**SCHOOL ORGANISATION PROPOSALS: THE PROVISION OF  
ADDITIONAL ENGLISH-MEDIUM PRIMARY SCHOOL PLACES IN  
CYNCOED, PENYLAN AND PARTS OF PLASNEWYDD**

**REPORT OF DIRECTOR OF EDUCATION AND LIFELONG  
LEARNING**

**AGENDA ITEM:9**

---

**PORTFOLIO: EDUCATION & SKILLS (COUNCILLOR JULIA MAGILL)**

**Reason for this Report**

1. This report is to inform the Cabinet of the outcome of the public consultation on the proposal to provide additional English-medium primary school provision in Cyncoed, Penylan and parts of Plasnewydd. The report presents an evaluation of the consultation responses and seeks permission from Cabinet to authorise Officers to publish the statutory notice.

**Background**

2. At its meeting on 17 July 2014, the Cabinet received a report outlining recommendations to respond to demand for English-medium community primary school places in Cyncoed, Penylan and parts of Plasnewydd.
3. The Cabinet authorised officers to consult on establishing a new 2FE English-medium community primary school serving the age range 3-11 on part of the site of the Howardian Community Education Centre, Hammond Way, Cardiff CF23 9NB from September 2015.

**Issues**

4. The consultation ran from 22 October 2014 to 03 December 2014.
5. Parents and others in the local community, together with staff and Governors of the affected schools were invited to respond to the consultation.
6. The consultation process involved:
  - o Distribution of a Consultation Document outlining background, rationale and implications. This document has been distributed to parents, local childcare providers, Headteachers and Chairs of

- Governors of nearby schools, all Members and other stakeholders;
  - Two public meetings at which the proposal was explained and questions answered;
  - Two public drop in sessions where officers were available to answer questions.
  - Workshop sessions were arranged with local primary age children to provide an opportunity for pupils to ask questions and learn more about the proposal and give their views. The School Pupil consultation methodology is attached as Appendix 1 and the Record of the Pupil meeting is attached as Appendix 2.
  - A consultation response slip for return by post or e-mail, attached to the consultation document.
  - An online response form at [www.cardiff.gov.uk/21stCenturySchools](http://www.cardiff.gov.uk/21stCenturySchools)
7. The views expressed at Council organised meetings and on paper or electronically through the appropriate channels, have been recorded.
  8. In total 85 online responses and 36 paper / email responses were received.
  9. Formal written responses were received from Estyn, Local Members, Assembly Members, Rhydypenau Primary School and responses were also received from parents and members of the public.
  10. Formal responses are attached as Appendix 3.
  11. The points raised in the consultation received are set out in *italics* below and have been grouped according to the issues raised where appropriate. The paragraphs following these points contain the Council's response to the consultation and concerns raised.

## **Support for the Proposal**

### **Responses received during the consultation period**

12. Views and concerns expressed on options for increasing English-medium provision in Cyncoed, Penylan and parts of Plasnewydd were noted following the drop in sessions, public meetings and sessions with school pupils, as well as through the response form and online response form.
13. In respect of the proposed provision of additional English-medium primary school places in the area, the majority view expressed during the consultation at meetings and in written correspondence was one of general support; however a number of concerns regarding the proposal were also raised.
14. 77 respondees indicated that they did support the proposal and 40 respondees indicated that they did not support the proposal. 4 respondees did not indicate either way.

15. *The majority view is that an additional English-medium community primary school is needed in the area and that it should be within the current Cardiff High school catchment area although it has been explained during the consultation that the City of Cardiff Council do not operate a 'feeder school' system from primary to secondary schools and it was reaffirmed that Cardiff High applications are considered as a separate application process.*
16. The concerns expressed are set out below and are appraised, clarifying the rationale for decisions and plans for mitigation where appropriate.

### **Establishment of the proposed new school**

#### **Views expressed**

17. *The details of the establishment of the proposed new school caused concern throughout the consultation. The views expressed included:*
  - *how the temporary governing body is established;*
  - *options available if the proposal did not go ahead;*
  - *the timescale for establishing a new school including staffing and admissions;*
  - *examples of new successful English-medium primary schools from within the Central South Consortium;*
  - *how many years the temporary accommodation will need to be used for;*
  - *what facilities will be available at the new school and how the site will be managed when the primary school is built.*

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

18. The Council acknowledges the concerns of staff, pupils and parents regarding the timescales for establishing a new school including the leadership and management for the new school to support the quality and standards of education.
19. The temporary governing body appointment process would start early in 2015 subject to approval to proceed to statutory notice and they would be responsible for staff appointments with support from the LA and CSC.
20. The consultation document appraised a number of alternatives as follows:
  - changing catchment boundaries and not changing existing school buildings;
  - changing catchment boundaries and extending existing school buildings; and
  - establish a new 2 form entry school on the Howardian site and change catchment areas.
21. If the proposal were to proceed, the earliest that parents could apply for a place at the school would be May 2015 (subject to the statutory consultation process having been completed).

22. Currently the City of Cardiff Council is the only Council in the Central South Consortium needing to establish new English-medium schools as other Councils are still addressing surplus places. The same principle of establishing a Welsh-medium school would apply to an English-medium school. The Council has established a number of Welsh-medium schools in the last 6 years: Ysgol Glan Ceubal, Ysgol Gymraeg Nant Caerau, Ysgol Pen Y Pil and Ysgol Gymraeg Pen-y-Groes with the majority receiving good in their inspection reports.
23. In their response to the consultation, Estyn's view was that *"the proposal is likely to maintain the current standards of education in the area"*.
24. One of the priorities for the 21<sup>st</sup> Century Schools programme is to provide Community Focused Schools. If the proposal goes ahead, the details of the school design in respect of this would be discussed with the temporary governing body and newly appointed Headteacher. A list of proposed facilities being considered as part of the design for the new school include:
- Classrooms;
  - Studio;
  - Heads Office;
  - Main Hall;
  - Group Room;
  - Stores;
  - Meeting room;
  - Kitchen/store/office;
  - WC facilities;
  - SEN/Group Room Reception/Admin Changing facilities;
  - SEN/PPA Room Food/DT Room Visitors Lobby/Waiting;
  - Nursery facilities,
  - Cloaks,
  - Staff Room.
25. There is limited capital funding for the new school build but LA Officers are investigating opportunities to provide greater community access. Officers are currently exploring a number of options which include; the relocation of the music provision (currently located in the Howardian Centre) to other retained Council youth provisions across Cardiff, the potential to locate the music studio with another local youth service provider and the potential for Studio 22 to develop as a youth led social enterprise.
26. The City of Cardiff Council has experience in the successful delivery of building projects on occupied sites resulting from the progression of a growing school organisation programme. The school would be established on the Howardian site in existing and/or temporary accommodation. During the construction of the new build accommodation it would need to remain in operation. The Council has experience of delivering new build and refurbishment projects on school sites whilst enabling the continuous delivery of education and maintaining health and safety.

## ***Pupil Projections in the local area***

### **Views expressed**

27. *Concerns were raised regarding the credibility of the forecast numbers and that over the past two years pupil numbers forecast for Rhydypenau Primary have been inaccurate.*

### **Appraisal of views expressed**

28. Projections are based on NHS GP registration data and on historic Number on roll and catchment area information taken from the PLASC (Pupil Level Annual School Census) returns. PLASC data is submitted and verified by schools on a specified census date annually and is therefore the most robust source of pupil data.
29. The data included in the consultation document and presented at consultation meetings clearly detailed the numbers of pupils resident in each of the primary school catchment areas, who are enrolled in any primary school of the relevant language medium, rather than the number of pupils enrolled in each school.
30. The council use of data clearly evidences the need to provide additional school places. In their response, Estyn state that the proposal has appropriately recognised that future demand for primary school places is likely to be greater than that available in the area.
31. All information currently available affirms the need to provide additional English-medium primary school places to serve the areas of Cyncoed, Penylan and Plasnewydd.

## ***Staffing***

### **Views expressed**

32. *Concerns were expressed regarding the temporary leadership and management arrangements for the proposed new school and the process for the appointment of permanent staff.*

### **Appraisal of views expressed**

33. A current Headteacher of an established Cardiff primary school would have management responsibility until the temporary governing body of the new school appoints a permanent Headteacher. The governing body of the school would need to consider the timescales for the appointment of a Headteacher in order that an appropriate staffing structure may be prepared and appointed to. The Headteacher and governing body would also need to consider the HR policies and procedures that it would adopt in relation to recruitment and once the school is established, in relation to the management of staff.

34. The process for establishing a temporary governing body is set out in guidance. The regulations state that any governor appointed to a temporary governing body must be suitably experienced and this is defined as having either current or previous experience as a governor or temporary governor of a maintained school. Governors are able to serve on two governing bodies and also a temporary governing body. If the proposal goes ahead, this process would start as soon as possible to provide the temporary governing body with time to start the staff recruitment process.

### **Catchment areas**

#### **Views expressed**

35. *Concerns were raised regarding the potential implications on catchment areas.*

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

36. The establishment of each individual school catchment area requires the Council to undertake a formal consultation. The Council, in its role as admission authority, consults with schools annually in respect of school admission arrangements, including school catchment areas.
37. Parents may express a preference for a place at any school regardless of where they live and applications would be considered in accordance with the published admissions criteria. Whilst residence in the catchment area is a priority criterion, residing outside of the catchment area does not preclude a pupil from admission.
38. Catchment areas reflect a traditional boundary relative to the location and capacity of a school, and the distribution of demand for admission from its local community at the time of establishment. The catchment areas need to be of a size and geographical area that can sustain schools with the proposed pupil capacities and are sufficiently convenient for the majority of pupils and parents in the locality. The demand and the distribution of both pupils and school places changes over time and catchment areas may therefore be amended to reflect this following consultation.
39. Projections indicate that demand for places at Marlborough from within its catchment will continue to be at high levels in future years and retaining the existing catchment area could therefore result in in-catchment pupils being less able to access a place at their local school. Amending defined catchment areas by adding or removing residential areas must be considered in the context of the wider area, including the supply of and demand for school places, the potential impact upon each school and upon parents.
40. A strategic aim of the Council is to balance the supply of and demand for English-medium primary school places from within each secondary school catchment area. The establishment of a new primary school

would not automatically lead to an increase in the number of children eligible to get into any particular secondary school as the admissions policy is not based on a feeder system; therefore, even if a place is secured within a catchment primary school it does not mean there is an entitlement to a place at a particular secondary school. Instead applications for secondary school are considered specific to where your child lives at the point of application to secondary school.

41. The Council may resolve catchment demand in excess of catchment supply by reducing catchment areas, increasing a school's capacity, or providing a new school.
42. There are new high schools proposed for Cardiff within the life cycle of the Local Development Plan (ending in 2026). As a result secondary school catchment areas across the city are likely to be reconsidered in the future. Decisions regarding secondary school catchment areas would be taken in time to respond to demand appropriately. The immediate priority is to resolve the current insufficiency of places at primary level.

### **Concerns regarding Admission arrangements**

#### **Views expressed**

43. *Older pupils should be admitted to the school as soon as it opens rather than the initial intake being for Nursery and Reception age pupils only.*
44. *There were also questions raised about the waiting list for current schools. Concerns were raised over the admissions arrangements and the demand in the area resulting in siblings attending different schools.*

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

45. It is proposed that children be admitted to the Nursery and Reception age groups from September 2015 with the school filling as children move through the age groups. Pupils would not be admitted into older year groups at the outset as this would have a destabilising effect on surrounding schools and could also be difficult to manage in the proposed new school.
46. The application process cannot commence until May 2015 at the earliest. The proposed new school looks to support the demand for places from within the Marlborough Primary and Roath Park Primary school catchment areas, and therefore it is expected that the proposed new school applicants would include those who have not been successful in their applications for those two primary schools.
47. The Admission to Schools 2015/2016: Information for Parents outlined the information for waiting lists:  
*"Where a place has been refused, the application will be placed on a waiting list. Applications received in the annual allocation of places will remain on the waiting list until the 30 September 2015. Applications*

*received outside of the annual allocation of places for In Year admissions will remain on the waiting list until the end of the term in the academic year to which the application relates. After this time parents will be expected to make a further application for admission.*

*“A child’s position on the waiting list may change as applications may be received that have a higher degree of priority under the admission criteria” (page 17).*

48. The current City of Cardiff Council admissions oversubscription criteria relating to siblings for primary admissions is as follows:  
*“2. (a) Where an older sibling was directed by the Council to an alternative school because the alternative school was previously the catchment area school, if the parent desires, the Council will admit younger siblings to the alternative school. This applies only where the older sibling is in attendance at the alternative school during the academic year to which the application relates. In addition the younger sibling must be residing in the same address (or an address within the catchment area that was the subject of the change before it was implemented) that the older sibling was living at the time of the original application” (page 11).*

### **Traffic, transport and parking**

#### **Views expressed**

49. *Concerns were expressed regarding increased traffic around the proposed site and the congestion that would be caused on surrounding roads, especially Barons Court Road, Hampton Court Road, Hammond Way, Ravenscourt and Turnham Green.*

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

50. It is recognised that there would be potential traffic congestion around the school site at the beginning/end of the school day. However, the Council would work with the Governing Body of the school to develop a Travel Plan to minimise any potential disruption. Traffic and transport implications would be considered as part of the Transport Assessment that would be required in order to achieve planning consent for building works.
51. Cardiff’s Supplementary Planning Guidance (Access, Circulation and Parking Standards 2010) sets out that all new or expanded schools are required to develop a Travel Plan for submission with a planning application. A School Travel Plan is specifically designed to address the transport needs of pupils and staff and will vary according to the nature of the education being provided, any community facilities on site and the catchment area of a school. A Travel Plan is a policy and action plan to:
- manage transport efficiently
  - improve access by all means of travel for employees, visitors, parents and students



- encourage sustainable transport – walking, cycling, public transport and car sharing
  - reduce car use.
52. Cardiff's transport network is under pressure and experiences congestion from commuters driving into the city and people making short local trips by car. Traffic associated with the school run adds to congestion. The City of Cardiff Council's policy is to encourage and promote the increased use of sustainable travel modes and to promote independent travel to school wherever possible.
53. Encouraging active travel to school is a very important means of increasing levels of physical activity in children and tackling the growing problem of childhood obesity. Reducing congestion at the school gate is key to ensuring the safety of pupils and to mitigating impacts on the local neighbourhood.
54. Provision of parent parking places is generally not supported by the City of Cardiff Council. This is because such provision would promote travel to school by car, generate local traffic, contribute to congestion and reduce pupil safety. Parking facilities provided at schools are generally only for staff and to meet operational needs.
55. Any additional concerns raised by the Transport or Highways departments that are not part of the required planning consent would be excluded on the basis that these would be a matter for the Highways department to address in line with their normal development work prioritisation processes.

### **Concerns regarding the impact on existing local schools**

#### **Views expressed**

56. *Concerns were raised as to whether the proposal would reduce demand for existing local schools and could have a negative impact on their school budgets.*
57. *Concerns were also raised that by providing an additional 2 FE primary school in Pontprennau as well as an additional 2FE primary school in Penylan there is a risk of over-provision within the area. This could jeopardise the pupil numbers in the existing schools.*
58. *There were concerns that the proposed 96 nursery places was too many.*
59. *There were also concerns expressed concerning the school building conditions and temporary accommodation at existing schools that need work.*
60. *An option was put forward for an alternative proposal to extend Rhydypenau Primary to a 3FE school with investment in the building. It was stated that this would require minimal investment and could be achieved for September 2015 and 2016.*

61. *Estyn have raised concern that the consultation proposals have not identified sufficiently how to manage the risks associated with additional nursery provision and other schools.*
62. *Estyn have identified that the information has not sufficiently demonstrated that the council have considered how surplus places in Albany road primary school (sic), the Welsh medium schools or the faith schools could be used to accommodate future demand for primary school places.*

### **Appraisal of views expressed**

63. One of the priorities for the 21<sup>st</sup> Century Schools programme is to provide sufficient places to meet demand. The section in the consultation document, 'How would other schools be affected?' outlines the impact on other schools as being minimal. However, demand for places will be monitored and proposals will be developed in the future as appropriate.
64. The proposal for 96 part time equivalent nursery places reflects the number of places needed for a 2FE primary school to accommodate for the rising 4s and rising 3s and funding will be dependent on demand. The nursery would open with a lower number of 48 until the move into permanent accommodation. Numbers will be monitored throughout this period.
65. Cardiff is a growing city and with the proposed new housing developments the need for primary and secondary school provision under continual review city wide. Any further changes in provision would need to go through a separate process.
66. Albany Primary School falls within a separate secondary school catchment area (Cathays High School). Whilst the demand for places in the Albany Primary School catchment area has increased in recent years, projected demand from within the catchment remains below the school's Published Admission Number. However, the supply of places throughout the Cathays High School catchment area (which also includes the primary school catchment areas of Allensbank and Gladstone primary schools) is sufficient to meet demand and has a small proportion of surplus, and this is projected to continue.
67. The proportion of Reception age pupils enrolled in Welsh-medium education resident in the combined area fell from 15.5% in January 2008 to 11.7% in January 2011, and fell further to 10% in January 2013. The proportion of Reception age pupils enrolled in Faith schools fluctuated between 4.8% and 11.7% in the period 2007 – 2013. The demand for Welsh-medium and Faith schools is sufficient for individual school capacity.
68. All information currently available affirms the need to provide additional English-medium primary school places to serve the areas of Cyncoed, Penylan and Plasnewydd.

## **Concerns regarding what will happen with the Housing development and Public Open Space**

### **Views expressed**

69. *The Penylan ward has a dearth of Public Open Space, many hectares below what was formerly called The National Playing Fields Recommendations, and, when Howardian Comprehensive was closed an assurance was given that the open space that is there now would remain in perpetuity for use by local residents.*

### **Appraisal of views expressed**

70. The green space on the site is not held by the Council as formal Public Open Space. The Education Acts empower the Council to provide open spaces, the use of which can be enjoyed by school pupils. The land has not been used for anything more than sporadic public leisure.
71. Under section 106 with new housing developments there is a requirement for open space, for example if 48 units are built on the site then there would be an open space requirement of 0.38ha.

## **Community Focused Schools**

### **Views expressed**

72. *Adult Community Learning and youth facilities should be co-located on the site. This could be achieved by ensuring that the new school is planned according to community focused school design principles.*

### **Appraisal of views expressed**

73. A community focused school is one that provides a range of services and activities, often beyond the school day, to help meet the needs of its pupils, their families and the wider community which could include adult education, study support, ICT facilities and community sports programmes. These possibilities are currently being explored with ACL, the youth service and partner organisations.
74. Funding delegated to schools for the purpose of providing statutory education cannot be used to subsidise other services.

## **Concerns regarding the future use of the Howardian Centre**

### **Views expressed**

75. *Concerns were raised over the relocation of the current facilities at the centre including the Adult Community Education, Youth Services, Cardiff Print Workshop and Teacher Training.*

## Appraisal of views expressed

76. The following services at the centre are being reviewed but it is envisaged that the building will remain until 2018:
77. **Adult Community Education**  
The Howardian site is owned by the Council and is currently used to deliver a range of services including Adult Community Learning classes; youth centre facility, large meeting facilities and some office accommodation.
78. Initial feasibility studies indicate the potential to locate the proposed new school so that the Howardian Centre can continue in use thus remaining available for Adult Community Learning (ACL) provision. However, the site has already been identified for potential development under the Housing Partnership Programme. Whilst at present, it is not envisaged such development would take place before 2018 this would require consideration to be given to accommodation for ACL.
79. **Youth Service**  
The future of Youth Services is currently being considered as part of a commissioning process. An options paper outlining how Youth Services could be delivered in the future across Cardiff (including information regarding transition from existing service delivery to any new model of youth service provision) is expected to be considered by Cabinet later this year. Following this review consideration would be given to what buildings may be needed should the Youth Centre be demolished.
80. Initial feasibility studies indicate the potential to locate the proposed new school so that the Howardian Centre can continue in use. However, this proposal would result in the demolition of the existing Youth Centre.
81. Set out below are the activities currently accommodated at the Youth Centre.
82. The Duke of Edinburgh Scheme for Cardiff is currently centrally managed from the Howardian Youth Centre. The Scheme stores a large amount of outdoor equipment on site in two large containers. However this could be relocated and there is sufficient time to do this effectively in the event the decision is taken to proceed with this proposal.
83. The Youth Club currently runs for several evenings per week and the music studio in the main Howardian building is also very well used by Youth Services. There is also an Inclusion group that uses the Youth Centre facility once a week. Additionally, the Pupil Referral Unit uses the Youth Centre facilities daily between 9am and 3pm to deliver sessions.
84. Should the Youth Centre be demolished, the Howardian Centre would potentially be available on an interim basis for Youth Services.
85. If the proposal for a new school proceeds, the potential scope for community use including Youth activities would be explored.

86. The PRU would need to be relocated before September 2015.
87. iii). Office Space  
The City of Cardiff Council is undertaking a review of Council building and consolidating buildings.

### **Engagement with children and young people**

88. Officers met with pupils from Marlborough Primary School and Roath Park Primary School to explain the proposals and seek their views.
89. **i). Marlborough Primary Pupils Views**  
Officers met with 8 pupils from years 5 and 6 at Marlborough Primary. Having explained the proposal, officers asked pupils to list what they felt were the advantages and disadvantages of the proposal. Pupils listed the following as the most important advantages: *“Less pollution”* and *“Less stress for parents and children to get into their chosen school”*. Pupils listed the following as the disadvantages that concerned them the most *“very expensive”* and *“traffic”*.
90. **ii). Roath Park Primary Pupils Views**  
Officers met with 12 pupils from years 5 and 6 at Roath Park Primary. Having explained the proposal, officers asked pupils to list what they felt were the advantages and disadvantages of the proposal. Pupils listed the following as the most important advantages: *“Less pollution”* and *“enough schools”*. Pupils listed the following as the disadvantages that concerned them the most *“Not enough places in high school”* and *“impact on younger relatives who might not be able to go to Roath Park primary or Cardiff High School”*.

### **Reasons for Recommendations**

91. To respond to the rising demand for English-medium community primary education in Cyncoed, Penylan and parts of Plasnewydd.
92. There has been an increased demand for primary school places in Cyncoed, Penylan and parts of Plasnewydd in the past five years. Proportionate demand for English-medium primary school places has also increased in the past three years. Projections indicate that the demand for places in Cyncoed, Penylan and in parts of Plasnewydd will exceed the capacity of local schools in future years.
93. As a temporary measure to meet demand, additional places were provided at entry to schools in Cyncoed utilising existing accommodation in September 2012 and September 2013. However, providing additional places at these schools has not benefited families in the Penylan area who were unable to gain places at their local school. Temporary measures have also been provided for September 2014 which have enabled a greater number of Penylan children to be admitted to their local school however there is limited space and therefore a permanent solution is required.

94. The option consulted on and which is recommended to publish a statutory notice is therefore to establish a new 2FE English-medium community primary school serving the age range 3-11 on part of the site of the Howardian Community Education Centre, Hammond Way, Cardiff CF23 9NB from September 2015.

### **Legal Implications**

95. The recommendations seek authority to publish a statutory notice of the proposal, to establish a new 2FE English-medium community primary school serving the age range 3-11 on part of the site of the Howardian Community Education Centre, Hammond Way, Cardiff CF23 9NB from September 2015.
96. The recommendation to publish a statutory notice follows a period of consultation undertaken pursuant to the school organisation code. This report (together with the appendices attached to it) represents the consultation report required by the code to be published within 13 weeks of the end of the consultation period (including setting out Estyn's view as provided in the consultation responses of the merits of the proposal).
97. Due regard must be had by the Cabinet to the responses received during the consultation which took place between 22 October 2014 to 03 December 2014 before a decision is taken on whether to publish a statutory notice of the proposals consulted upon (or as may have been modified to reflect the consultation responses). Formal responses to the consultation are attached in Appendix 2.
98. The Council must if it wishes to proceed publish notice of the proposals within 26 weeks of the end of the consultation period (including delivery of hard copies or e-mail links to the relevant website to various statutory consultees). Such a statutory notice must comply with section 48 of the School Standards and Organisation (Wales) Act 2013 (2013 Act) and the School Organisation Code.
99. Following publication there would be a period for objections of at least 28 days following which a further report would need to be made to the Cabinet summarising the statutory objections and the responses to such objections. It would then be for the Cabinet to review those objections and determine having due regard to the objections and the responses to them whether to implement the proposals.
100. In connection with the proposed partial sale of land at the Howardian site it should be noted that the Council has a legal obligation under Section 123 of the Local Government Act to obtain the best consideration reasonably obtainable from its land disposals.

### **Financial Implications**

101. In November 2011, the Council submitted a 21st Century Schools Programme bid to Welsh Government (WG). The level of Capital

investment contained within that Programme (predicated upon 50% WG funding, 50% Authority funding) was approved in principle in December 2011. The full approval of specific grant funding is subject to approval by WG of detailed Business Cases for specific schemes. The 21st Century Schools Programme is being reviewed and amended to address the current priorities of the Authority.

102. A new-build 2FE primary school at Howardian was not included within the original 21st Century Schools Programme bid, and the Education Directorate will therefore need to seek confirmation from WG that they are content for this scheme to be added into the Programme.
103. As referred to in the pre-consultation report – presented to Cabinet in July 2014 – a review of the 21<sup>st</sup> Century Schools Programme has been undertaken and it is anticipated that this will be reported to Cabinet in February 2015. Positive discussions have taken place with WG, indicating that an increased Capital investment Programme may be able to attract additional WG grant funding, over and above the in-principle approval in December 2011. This is subject to the submission of an updated Strategic Outline Programme to WG.
104. The additional capital grant available could be up to £7.5 million, and this would be predicated upon the Authority identifying an equivalent level of match-funding (to maintain WG's maximum intervention rate of 50%). As highlighted within the pre-consultation report, and the Eastern High School report also presented to Cabinet in July 2014, the Programme has expanded since December 2011 where additional Capital Receipts have been identified. Without the additional WG grant there currently remains a shortfall of £4.5 million against the Howardian Primary School proposal, however it is hoped that the revised Strategic Outline Programme will be able to attract additional grant, and thus make the proposal affordable. If sufficient additional grant is not available, Cabinet will need to consider whether other proposals are displaced to release funds or whether alternative resources can be identified, if the proposal is to proceed. If neither of these options are taken forward then there could be an impact on the Council's overall Capital Programme.
105. If sufficient capital resources are not identified and the scheme does not go ahead then any abortive design or other project costs incurred would become a revenue cost to the SOP Reserve.
106. The grant allocation is also subject to submission by the Authority of detailed Business Cases, and subsequent full approval by WG. The Directorate will need to ensure that expectations arising during the statutory notice period are managed appropriately until the revised Strategic Outline Programme has been endorsed by WG, and until full grant approval is received.
107. The partial sale of land at the Howardian site would generate a Capital Receipt, which can be used to support part of the proposed new-build. An assumed Capital receipt is included within the SOP Consolidated

Financial Model, but until the formalities of the disposal are complete, there remains a risk that the realised value of the receipt may be lower.

108. School budgets are primarily funded by formula funding mechanism which uses as its main driver pupil numbers. Any reduction in pupil numbers of any neighbouring school would reduce the budget share of that individual school.
109. Following conclusion of the statutory notice period Cabinet will need to be presented with robust cost estimates and Financial Implications.

### **Human Resources Implications**

110. A Human Resources Framework has been produced in consultation with key stakeholders including headteachers, governors, representatives of the diocesan authorities and the trade unions. It provides the basis for managing the human resources issues associated with School Organisation Planning and its purpose is to support governing bodies and staff working in schools, through a variety of strategies and with the ultimate aim of minimising compulsory redundancies across schools in Cardiff.
111. There would be a number of Human Resources implications relating to the proposal to establish an English-medium community primary school with nursery provision on the Howardian Community Education Centre.
112. The governing body of the school would need to consider the timescales for the appointment of a Headteacher in order that an appropriate staffing structure may be prepared and appointed to.
113. The Headteacher and governing body would also need to consider the HR policies and procedures that it would adopt in relation to recruitment and once the school is established, in relation to the management of staff. The Council would advocate the adoption of the HR Manual for Schools which has been designed to provide information and guidance to governing bodies, Headteachers and staff, on the human resources issues affecting schools, including a summary of the human resources responsibilities of governing bodies and Headteachers.
114. The full adoption of the HR Manual would ensure that any staffing vacancies at the school would provide opportunities for individuals on the school redeployment register, in line with the Council's Redeployment and Redundancy Policy for schools.
115. There is potential for the establishment of a new school to impact on the catchment areas of other existing schools in the area. If pupil numbers remain similar, the changes in catchment areas for the primary schools should not impact greatly on staffing. Larger changes could be managed through natural turnover of staff and through the effective use of the redeployment process for schools.



## **Traffic and Transport Implications**

116. Traffic and transport implications will be considered as part of the Transport Assessment that will be required as part of the formal planning application and therefore until this is completed it will not be possible to predict the outcomes. The information from this assessment will inform any stipulations made as condition of planning consent should this proposal be permitted to proceed to implementation.
117. Under this proposal there are no plans to change the Council's policy on the transport of children to and from schools. Any pupils affected by these proposals will be offered the same support with transport as is provided throughout Cardiff and in accordance with the same criteria that apply across Cardiff. The Council's transport policy for school children can be viewed on the Council's website ([www.cardiff.gov.uk](http://www.cardiff.gov.uk)).
118. In order to fully establish the Transport requirements for the Howardian site, a Transport Investigation is recommended prior to the Transport Assessment required for the planning process.
119. It is assumed that there would be two entrances to the new site, one from Hampton Court Road and one from Hammond Way. These are both residential streets and are cul-de-sacs.
120. School entrances would require adequate School Keep Clear road markings with associated Traffic Regulation Orders in order to ensure the entrances are kept clear of parked vehicles, and allow easy pedestrian access.
121. A 20mph zone would be required in the vicinity of the school entrances to ensure traffic speeds are appropriate for the changes. Traffic calming features may be required.
122. In order to ensure a school site is accessible for pupils walking or cycling to school, the walking routes to the site should be assessed.
123. With regard to access from the wider area, the existing pedestrian crossing facilities at the junction of Colchester Avenue with Pen-y-lan Road are poor and require upgrading. This is a busy junction, which does not currently have controlled pedestrian crossing facilities, and this may be a barrier to pupils walking to school.
124. Similarly, the junctions of Dorchester Avenue and Winchester Avenue with Waterloo Road require improving. The pedestrian facilities are poor at these junctions and could be a barrier to pupils when walking to school. Junction build-outs and speed tables are required to improve the pedestrian facilities.
125. If there are highways improvements that are stipulated as conditions of any planning permission sought these will be addressed and there has been a nominal amount of funds built into the costs of the proposal to cover this in the event the proposal is permitted to proceed.

## **Environmental Assessments**

126. The Statutory Screening Tool (attached at Appendix 4) includes the Equality Impact Assessment (EIA) and Strategic Environmental Assessment (SEA). The SEA carried out in respect of the proposal in accordance with European Legislation concludes that the proposal is compatible with the environmental objectives identified in the SEA of Cardiff's 21st Century: A Strategic Framework for a School Building Improvement Programme. An Environmental Assessment will also be carried out as part of any planning application process.
127. The decision maker must have due regard to the SEA (and other matters referred to in the Statutory Screening Tool) when making decisions.

## **Admission Arrangements**

128. There are no plans to change the Council's policy on the admission of children to schools as a result of this proposal.
129. Admission arrangements for Cardiff schools for the 2015/16 academic year were approved by the Council in early 2014. In accordance with the New School (Admissions) (Wales) Regulations 2006, the Council is consulting on the arrangements which will apply for admissions to the proposed new school.
130. It is proposed that the admission arrangements in the approved policy for existing schools are also applied to the proposed new primary school and that the admission number for the school is 60. As the proposed new primary school, if established, would not have a catchment area at the time of opening the criteria relating to residence in the school's catchment area would not be applicable.
131. Any amendments to admission arrangements such as the establishment and/ or revision of catchment areas could not be implemented until September 2016 at the earliest.
132. If the proposal were to proceed, the earliest that parents could apply for a place at the school would be May 2015 (subject to the statutory consultation process having been completed).
133. Should the proposal to establish a new school proceed, it would be necessary to consult at a later date on revising catchment area arrangements in order to achieve a better match of future catchment populations to the local school capacities.
134. Detailed information regarding admission arrangements is contained in the Council's Admission to Schools booklet, and this information can also be viewed on the Council's website ([www.cardiff.gov.uk](http://www.cardiff.gov.uk))
135. The Council would implement this intake by authorising the admission of pupils in accordance with its published admissions criteria.

## **Equality Impact Assessment**

136. The Council also has to satisfy its public sector duties under the Equalities Act 2010 (including specific Welsh public sector duties). Pursuant to these legal duties Councils must, in the decision making process, have due regard to the need to (i) eliminate unlawful discrimination (ii) advance equality of opportunity and (iii) foster good relations on the basis of protected characteristics, which are:
- (a) Age
  - (b) Disability
  - (c) Gender reassignment
  - (d) Marriage and civil partnership
  - (e) Pregnancy and maternity
  - (f) Race – this includes ethnic or national origin, colour or nationality
  - (g) Religion and belief – this includes lack of belief
  - (h) Sex
  - (i) Sexual orientation
137. An Initial Equality Impact Assessment has been carried out and is attached. The purpose of the Equality Impact Assessment is to ensure that the Council has understood the potential impacts of the proposal in terms of equality so that it can ensure that it is making proportionate and rational decisions having due regard to its public sector equality duty.
138. The decision maker must have due regard to the Equality Impact Assessment in making its decision. The Initial Equality Impact Assessment (attached at Appendix 4) concludes that the proposals would not adversely affect a particular group in society. If the proposals were to proceed, further equality impact assessments would be undertaken including an assessment at the design stage.

## **Sustainability Assessment**

139. A Strategic Environmental Assessment (SEA) of the proposals has been carried out in accordance with European Legislation. The assessment confirms that the proposals are compatible with the environmental objectives identified in the SEA of Cardiff's 21<sup>st</sup> Century: A Strategic Framework for a School Building Improvement Programme. If the proposals were to proceed, an environmental assessment would be carried out as part of the planning process.

## **Community Impact**

140. The following are taken into account when considering a proposal: Public Open space, parkland, noise and traffic congestion. Officers will work with schools and any community groups to ensure that should the proposal proceed it would avoid negative impacts wherever possible. Further information for the impact on traffic and transport can be found in paragraphs 49 to 55; public open spaces can be found in paragraphs 69 to 71; and community services can be found in paragraphs 72 to 74.

## **RECOMMENDATIONS**

The Cabinet is recommended to:

1. Authorise officers to publish a statutory notice to establish a new 2FE English-medium community primary school serving the age range 3-11 on part of the site of the Howardian Community Education Centre, Hammond Way, Cardiff CF23 9NB from September 2015.
2. Authorise consultation on catchment area arrangements, as outlined in the consultation document, for implementation should the proposal proceed.
3. Note that prior to implementation of the proposal a further report will be provided to the Cabinet providing details of any objections received, the proposed responses to those objections and recommendations for implementation or otherwise of the proposal.

### **NICK BATCHELAR**

Director

20 January 2015

*The following appendices to be attached:*

Appendix 1 - Pupil Consultation Methodology

Appendix 2 - Record of Pupil Meeting reports

Appendix 3 - Formal Responses to Consultation

Appendix 4 - Statutory screening tool including Equality Impact Assessment and Strategic Environmental Assessment

*The following Background Papers have been taken into account*

Cabinet Report - School Organisation Planning: Primary school provision in Cyncoed, Penylan and parts of Plasnewydd: 17 July 2014

## **Pupil Consultation Methodology**

### **Consultation on the Provision of Additional English-Medium Primary School places in Cyncoed, Penylan and parts of Plasnewydd**

## **Pupil Consultation Methodology**

Officers ran consultation sessions with primary aged children at Marlborough Primary and Roath Park Primary.

The sessions opened with a brief explanation of the proposal, the work of the Schools Organisation team and how the consultation works.

This was followed by a short presentation which outlined:

- what the proposal is
- why change is needed
- what schools might look like
- benefits
- disadvantages
- catchment area arrangements
- what happens next

Officers worked with children to identify positive aspects of the proposal and any aspects of the proposal that the children had concerns/worries about.

Following this, the children had the opportunity to prioritise the positive aspects of the proposal and the aspects that were a cause for concern/worry using coloured sports.

## Record of Pupil Meeting reports

**Schools Programme  
Record of  
Pupil Meeting  
Marlborough Primary  
14.11.14  
10 am to 11 am**

**Present:**

Rosalie Phillips (Project Officer) and Laura Lloyd-Lewis (Project Officer)

*Please note: The following is not a transcript but a contemporaneous note of the meeting.*

No	Heading	Action
1.	<p>LLL explained why the meeting was being held and the format of the meeting and everyone was introduced.</p> <p>There were 8 pupils at the meeting from Year 5 and 6 from the School Council.</p>	
	<p>LLL explained that pupils could ask questions throughout the session and provided the details of the proposal in a Powerpoint presentation to pupils.</p> <p>The following questions/statements were raised by pupils:</p> <ul style="list-style-type: none"> <li>• Their school was popular and that some children can not go there who want to go there as there are not enough places;</li> <li>• There will be more places at Cardiff High will need more money;</li> <li>• If there are more primary school places would there be enough High school, College and University places;</li> <li>• If there are any changes to the catchment area then it could affect families;</li> <li>• Would their Headteacher be taken away from them to support the new school;</li> <li>• What would happen if the school was not built?;</li> <li>• How will not having older siblings at the new school affect the pupils?;</li> <li>• What would be the school opening times?</li> </ul> <p>RP then asked pupils what they felt the advantages were to the proposals.</p> <p>Pupils gave their comments which were recorded on Post It notes and pupils used stickers to mark which ones were the most important advantages.</p> <p>Pupils identified the following advantages:</p> <ul style="list-style-type: none"> <li>• Enough school places;</li> <li>• Less pollution;</li> <li>• Modern buildings;</li> <li>• Less stress for parents and children to get into chosen school;</li> <li>• More time to get to school;</li> <li>• More opportunities;</li> <li>• Space for intervention groups.</li> </ul> <p>The most important reason was to have less pollution.</p> <p>RP then asked pupils what they felt the disadvantages were to the proposals.</p>	

No	Heading	Action
	<p>Pupils gave their comments which were recorded on Post It notes and pupils used stickers to mark which ones were the most important disadvantages.</p> <p>Pupils identified the following disadvantages:</p> <ul style="list-style-type: none"> <li>• Very expensive;</li> <li>• May not have enough pupils;</li> <li>• Community may not want school;</li> <li>• Building work;</li> <li>• Using up land;</li> <li>• School should be reception to Year 6;</li> <li>• Traffic.</li> </ul> <p>The most important reason was it was very expensive.</p> <p>LLL thanked the pupils for being very interactive with lots of ideas and for taking the time to meet with officers.</p> <p><b>Meeting ended at 11 am.</b></p>	



**Schools Programme**  
**Record of**  
**Pupil Meeting**  
**Roath Park Primary**  
**17.11.14**  
**9.30 am to 10.30 am**



**Present:**

Rosalie Phillips (Project Officer) and Laura Lloyd-Lewis (Project Officer)

*Please note: The following is not a transcript but a contemporaneous note of the meeting.*

No	Heading	Action
1.	<p>LLL explained why the meeting was being held and the format of the meeting and everyone was introduced.</p> <p>There were 12 pupils at the meeting from Year 5 and 6 from the School Council.</p>	
	<p>LLL explained that pupils could ask questions throughout the session and provided the details of the proposal in a Powerpoint presentation to pupils.</p> <p>The following questions/statements were raised by pupils:</p> <ul style="list-style-type: none"> <li>• Their school was popular and that some children can not go there who want to go there as there are not enough places;</li> <li>• There will be more places at Cardiff High will need more money;</li> <li>• If there are more primary school places would there be enough High school, College and University places;</li> <li>• If there are any changes to the catchment area then it could affect families;</li> <li>• Would their Headteacher be taken away from them to support the new</li> </ul>	

No	Heading	Action
	<p>school;</p> <ul style="list-style-type: none"> <li>• What would happen if the school was not built?;</li> <li>• How will not having older siblings at the new school affect the pupils?;</li> <li>• What would be the school opening times?</li> </ul> <p>RP then asked pupils what they felt the advantages were to the proposals.</p> <p>Pupils gave their comments which were recorded on Post It notes and pupils used stickers to mark which ones were the most important advantages.</p> <p>Pupils identified the following advantages:</p> <ul style="list-style-type: none"> <li>• Enough school places;</li> <li>• Less pollution;</li> <li>• Popular city / lots of people want to live here;</li> <li>• Healthier to walk;</li> <li>• Smaller waiting list;</li> <li>• More prosperity;</li> <li>• School won't be overcrowded;</li> <li>• Less traffic / safer roads;</li> <li>• Short distance to school;</li> <li>• Enough schools.</li> </ul> <p>The most important reason was to have less pollution and enough schools.</p> <p>RP then asked pupils what they felt the disadvantages were to the proposals.</p> <p>Pupils gave their comments which were recorded on Post It notes and pupils used stickers to mark which ones were the most important disadvantages.</p> <p>Pupils identified the following disadvantages:</p> <ul style="list-style-type: none"> <li>• Not enough places in high school;</li> <li>• Neighbours might not like it;</li> <li>• Parents need to get to work – traffic congestion;</li> <li>• Friends - go to different reception classes / schools;</li> <li>• Loss of open space;</li> <li>• Impact on younger relatives.</li> </ul> <p>The most important reason was it was not enough places in high school and impact on younger relatives.</p> <p>LLL thanked the pupils for being very interactive with lots of ideas and for taking the time to meet with officers.</p> <p><b>Meeting ended at 10.30 am.</b></p>	



We write in response to the 21<sup>st</sup> Century Schools Consultation Document entitled: "The Provision of Additional English-Medium Primary School Provision in Cyncoed, Penylan and parts of Plasnewydd."

As elected Councillors for Penylan, we broadly support the principle underlying the proposals outlined in the consultation document – which is to ensure a sufficiency of primary school places to meet the demand in the Penylan area.

In response to the consultation document we wish to make the following points:

- We acknowledge that the Council's Schools Service is having to respond to a volatile and rapidly changing demographic situation in Penylan and that, of necessity, the proposals contained in the consultation document will need to be implemented to a time-scale and in circumstances that are less than ideal.
- One of the consequences of this is that interim arrangements will need to be made and it will not prove possible for parents to express a preference in the normal way to send their children to the temporary nursery and reception classes that will be located on the Howardian Centre site in September 2015. We understand that parents should express a preference to send their children to an existing school and that, should the Council's Cabinet approve the proposals in May 2015, parents would then be able to lodge applications for the temporary classes which would be allocated according to the Council's published admissions policy which gives a high priority to proximity considerations. In order that parents living in the existing Marlborough Primary School catchment area do not lose out on places for their children at the temporary provision by default, **we recommend that every family living in the Marlborough Primary School catchment area receives a letter from the Council inviting them to apply for a place at the new temporary provision after the Cabinet decision in May 2015.** Whilst we accept that this will place an additional administrative burden on the Council's Schools Service, we feel it is essential that every family is alerted to the fact that they are eligible to apply for a place for their children at a local school.
- We note that the time-scale for the creation of new school catchment areas and possible consequent adjustments to adjoining school catchment areas is such that the new school in Penylan may not have a dedicated catchment area until September 2017 or later. If this is the case, it is likely that there will be continuing confusion about admission arrangements to primary schools in Penylan for some years. **We recommend that letters are sent to parents living in the catchment area of Marlborough Primary School reminding them of the exceptional arrangements for admission to the new school until such time as a permanent catchment area has been established.**
- We recognise that the unprecedented demand for school places in the Penylan area will impact upon the ability of the local secondary school (Cardiff High School) to make adequate provision in the medium term. Whilst this is beyond the scope of the current consultation document, it is an associated issue which is likely to cause uncertainty and anxiety to families living in the area. **We, therefore, recommend that the Council's Schools Service brings forward proposals to address the increasing pressure on Cardiff High School to accommodate rising pupil numbers at the earliest possible opportunity in order to remove uncertainties within the community and address the concerns that will inevitably arise.**

- We note that the interim arrangements for the creation of a new primary school in Penylan may involve the implementation of a temporary management structure at the school. **It is our express wish that any such arrangements do not impact adversely upon the management and day to day operation of Marlborough Primary School.**
- Subsequent to the publication of the consultation document, it has been confirmed that, due to procurement and tendering lead in times, it will not prove possible to complete the first phase of building at the permanent school by September 2016 and that September 2017 is the earliest date by which such provision is likely to be completed. This will mean that temporary provision will need to be made in September 2016 for nursery, reception and year 1 pupils. **It is our expectation that the temporary accommodation provided will be of the highest standard, whether it is housed in the existing Howardian Centre or in alternative buildings, and that the educational facilities on offer to the pupils will be at least on a par with those available to pupils in permanent accommodation elsewhere.**
- The protracted procurement and construction phase associated with the delivery of permanent school accommodation has the potential to create a disruptive school environment which would not be conducive to effective teaching and learning. **It is essential that the Council's Schools Service carefully manages the sequencing of building activities on the site in such a manner as to reduce to an absolute minimum the potential of such activities to compromise the standard and quality of the pupils' education.**
- The time-scale within which the temporary school provision has to be made – i.e. between the Cabinet meeting in May 2015 and the opening of the temporary accommodation in September 2015, is such that exceptional arrangements will need to be put in place to ensure that appropriate and suitable accommodation is provided and that appropriately qualified and experienced staff are in post. **It is our expectation that the standard and quality of education on offer to pupils attending the temporary school is not, in any way, compromised by the contracted time-scale in which the school will need to be operational. We assume that timely arrangements will be put in place to ensure the creation of a temporary governing body.**
- It is apparent that the Council intends to enter into a housing partnership arrangement in respect of the portion of the Howardian Centre site not required for the new school and that residential development is likely to take place post 2018. The consequent demolition of the Howardian Centre, together with the proposed closure of the Howardian Youth Centre will result in the withdrawal of valued Adult Community Learning (ACL) facilities and youth provision from Penylan. **It would, therefore be our preferred option that the new school be provided in tandem with ACL and youth facilities co-located on the site. This could be achieved by ensuring that the new school is planned according to community focussed school design principles. The concept of community focussed schools has a long history in England and Wales. The Welsh Government's paving document, "The Learning Country", expresses the ambition that schools should be at the heart of their communities. Specific guidance on community focussed schools in Wales is provided in the NAFW Circular No. 34/2003 – which outlines how all schools in Wales should build on existing provision to offer additional services and activities to their pupils, families and wider communities. In England, the concept has been taken a stage further and the "English Extended Schools" policy declares that schools must provide a "core offer" of a varied range of activities**

including study support, childcare, activity clubs, parenting/family support, easy access specialist services and community access to school facilities. The construction of a new primary school in Penylan will provide the opportunity to embrace the community focussed school principle by incorporating design features that provide the necessary physical attributes to enable the school to be used for community purposes both during and beyond the school day. The opportunity must not be passed up to foster close working relationships between a range of services, including Schools, Lifelong Learning, the Youth Service and Leisure, to eliminate duplication of provision whilst delivering these services in a more streamlined and cost-effective way.

- It is our expectation that the new school buildings will be fully compliant with the Disability Discrimination Act and that they will conform with the recommendations of the South Wales Fire & Rescue Authority – that all new schools incorporate a comprehensive fire sprinkler system.
- We note the comments in the consultation document (at page 18) which identify the potential for increased traffic congestion around the school site at drop off and pick up times. This is a legitimate concern. It is our view that very careful consideration needs to be given to the location of the main vehicular access gates to the new school and the impact this is likely to have upon traffic circulation in the area. In planning the management of traffic generated by the school, it is important that consideration is given to other likely future developments in the area which might have an impact on traffic circulation. For example, the remainder of the Howardian Centre site is earmarked for a housing partnership scheme post 2018 and the likelihood is that this will be accessed via Hampton Court Road – thus generating significant additional traffic along that thoroughfare. Hammond way is a fairly wide carriageway that currently serves the Howardian Centre. The junction of Hammond Way and Colchester Avenue is regulated by traffic signals. Hammond way is, however, a cul-de-sac and, if it did provide the main vehicular route-way to the new school, it would be desirable if a traffic circulatory system could be provided within the school grounds, with designated drop off and pick up points, in order to avoid vehicles engaging in reversing manoeuvres near the school entrance.
- Every opportunity should be taken to encourage pupils to walk to and from the new school and this must include the implementation of measures that will enhance pedestrian safety in the area. In this respect, we support the comments on page 24 of the consultation document that refer to the need to introduce signage, road markings and a 20 mph zone.
- We also support the comments that stress the need to consider measures in the wider area – including the upgrading of the pedestrian facilities at the junction of Colchester Avenue and Penylan Road and the implementation of measures to improve pedestrian safety at the junctions of Waterloo Road and Dorchester Avenue/Winchester Avenue.
- We note that the disposal of the land at the Howardian Centre site for housing may secure a capital receipt for the Council which could be used, in some measure, to meet the cost of pedestrian and transport facilities. Also, it may be possible to enter into a Section 106 agreement with the future developers of the site to secure additional funding towards such schemes.

We are grateful for the opportunity to comment on the proposed provision of additional primary school provision in the Penylan area and trust that our comments will receive serious consideration as part of the decision making process.

Councillor Joe Boyle  
41, Axminster Road,  
Penylan,  
Cardiff,  
CF23 5AR

Councillor Patricia Burfoot,  
12, Barons Court Road,  
Penylan,  
Cardiff,  
CF23 9DF

Councillor Bill Kelloway,  
40, Dan-Y-Coed Road,  
Cyncoed,  
Cardiff,  
CF23 6NB

**County Councillors - Penylan**



Cardiff Council  
School Organisation Planning Team  
Room 219  
County Hall  
Cardiff CF10 4UW

Schoolresponses@cardiff.gov.uk

Our Ref: 125010/CC/Education

Date: 3<sup>rd</sup> December 2014

Dear Sir or Madam

**21<sup>st</sup> CENTURY SCHOOLS CONSULTATION DOCUMENT 2014**  
**The Provision of additional English-Medium primary School Provision in  
Cyncoed, Penylan and parts of Plasnewydd.**

We are aware of the increased demand for primary school places in Cyncoed, Penylan and parts of Plasnewydd and that many parents living in the relevant catchment areas are unable to secure places for their children.

We note that, whilst the demand for places in the Albany Primary School catchment has increased, and has been fully subscribed at entry in recent years, projected demand from within the catchment remains below the school's Published Admission Number, and the supply of places throughout the Cathays High School catchment areas is sufficient to meet current and projected demand.

However, the primary schools within the Cardiff High School catchment area are over-subscribed with applications from both catchment and out of catchment children, and families who have moved into some new build properties, and into the relevant catchment areas after the initial application for places has been determined, who have been refused admission.

This demand for places within these primary schools also impacts on the capacity of Cardiff High and we are aware that this is already causing concern for families living in its catchment area. We appreciate this is not the subject of the current consultation but, to help allay those concerns, we trust the Council will submit proposals as to how this will be addressed as soon as is practicably possible

---

Jenny Willott MP  
38 The Parade  
Cardiff  
CF24 3AD  
Tel: 029 2046 22756

---

Eluned Parrott AM  
38 The Parade  
Cardiff  
CF24 3AD  
Tel: 029 2043 2326



The demand for primary school places from families living in Cyncoed has been partially met by utilising existing accommodation, which has also enabled children living in Pentwyn and Pontprennau, who live in closer proximity to the schools, to be admitted to Lakeside and Rhydypenau Primary Schools.

However, the temporary measures provided for families living in Penylan and parts of Plasnewydd have not met demand, as this has risen by a greater proportion, which Marlborough and Roath Park Primary Schools are unable to meet. This has impacted on schools in neighbouring catchment areas, such as Albany, Stacey and Gladstone Primary, which have also been fully subscribed at entry in recent years.

A permanent solution is, therefore, required and we welcome the proposal to establish a new 2 FE school providing two classes of 30 children in each year group serving the age range of 3-11 years on part of the site of the Howardian Community Education Centre in Hammond Way from September 2015.

We understand this will enable the admission of 60 pupils at entry to Reception year and up to 96 part-time nursery places, who will be accommodated in existing buildings and/or temporary accommodation as appropriate during the construction of a new build school.

We trust the temporary accommodation will be of a high standard and the construction of the new building will not adversely affect the pupils' education. We also trust the transitional management arrangements will be satisfactory for the operation of both schools.

We appreciate that, owing to time restrictions, interim arrangements will have to be introduced that will not enable parents to express a preference in the normal way as to whether they would wish their children to attend the existing Marlborough and Roath Park Primary Schools or the new Howardian School. We would, therefore, request that every family living in these two school catchment areas, but who have not secured a place at either of them for September 2015, be invited to apply for a place at Howardian. This will ensure that they do not lose a place at Howardian by default. We would also ask that letters be sent to parents living in the Marlborough and Roath Park Primary School catchment areas to remind them of the interim admission arrangements until the new catchment area has been established.

We are, of course, mindful of the fact that this development will involve the demolition of the buildings accommodating the popular Adult Community Learning (ACL) facilities and youth provision. The Welsh Government supports community focussed schools and has provided guidance as to how all schools in Wales should offer additional services and activities to their pupils, families and wider communities.

We trust that accommodation for these facilities will be included in the plans for the new school buildings and they will also comply with the latest DDA requirements and incorporate a fire sprinkler system.

We note that it is assumed that there would be two entrances to the new site; one from Hampton Court Road and one from Hammond Way. As stated, these are both residential streets and cul-de-sacs and we are conscious of potential increased traffic congestion, especially around school commuting times. This is an issue of concern that has been raised with us by local residents.

Obviously, families should be encouraged and facilitated to walk to and from the new school but the designated main vehicular access will have to be seriously considered and carefully implemented, especially in view of proposed future housing developments on the same site, which will also generate an increase in traffic.

Yours sincerely



**Jenny Willott MP**  
**Member of Parliament**  
**Cardiff Central**



**Eluned Parrott AM**  
**Regional Assembly Member**  
**South Wales Central**

## **Estyn response to the proposal by Cardiff council to establish a new 2 form entry English-medium primary school on part of the site of the Howardian Community Centre**

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.

### **Introduction**

This is a consultation proposal from Cardiff council.

The proposal is to provide sufficient capacity to meet the increasing English-medium community pupil demand within the local area by:

- establishing a new 2 form entry English-medium community primary school serving the age range 3-11 on part of the site of the Howardian Community Education Centre from September 2015;
- admitting 60 pupils at entry to Reception Year;
- including up to 96 part time nursery places; and
- establishing an existing and/or demountable accommodation during construction of a new build school.

At the outset all school facilities necessary to accommodate the relevant ages of children (i.e. nursery and reception classes) in the 2015-2016 academic year would be provided on the Howardian site, utilising existing buildings and / or temporary accommodation as appropriate.

### **Summary/ Conclusion**

The proposer has set out a clear rationale for addressing the increase in demand for primary school education in the area and how the proposal intends to meet this demand. However, this proposal was not included in the original 21st Century



Schools Programme bid, and the proposer will therefore need to seek confirmation from Welsh Government that they are content for this scheme to be added into the Programme

It is Estyn's opinion that this proposal is likely to maintain the current standards of education in the area.

### **Description and benefits**

The proposer has provided a clear rationale for the proposal i.e. that a new primary school is needed to address the increase in demand for English medium primary school places in the area.

The proposer has appropriately outlined the expected benefits of the proposal which include ensuring that there is sufficient capacity to meet the increasing English-medium pupil demand within the local area. However it has only identified two potential disadvantages of the proposal which are around disruption caused by traffic and building works. It does not appear to have given sufficient consideration to the disruption caused to the services currently provided at the Howardian centre including adult and community learning, the youth club and the pupil referral unit.

The proposer has suitably considered how the proposals impact on nursery provision and other schools in the area. It has identified risks associated with the proposals but not identified sufficiently how they will manage those risks.

The proposer has suitably considered different options and the potential advantages and disadvantages of each option when compared with the status quo. It has demonstrated why the preferred option was chosen based on the large number of advantages and few disadvantages.

The proposer has appropriately considered that any pupils affected by this proposal as a result of catchment area changes would be offered the same support with transport as is provided throughout Cardiff and in accordance with the Council's transport policy for school children. The council has carried out an initial equality impact assessment and recognised that there is a potential impact on all groups that use the Howardian site.

The proposer has presented a clear breakdown of schools and their capacity in the area as well as the projected pupil demand over the next few years. The proposer has appropriately recognised that future demand for primary school places is likely to be greater than that available in the area. However, the proposer has not sufficiently demonstrated that they have considered how surplus places in Albany road primary school, the Welsh medium schools or the faith schools could be used to accommodate future demand for primary school places.

The authority has stated that there will not be any negative impact on the Welsh Language as a result of these proposals. There appears to be sufficient places in

Welsh medium schools in the area to meet the projected demand. However it isn't clear from the proposal whether the council has undertaken an analysis of the projected demand for Welsh medium education in the area.

### **Educational aspects of the proposal**

The proposer has considered appropriately the outcomes of recent relevant Estyn inspection reports and has provided the consortium categorisation of two local schools. The proposer's summary of outcomes at both schools is concise and clear. Estyn's data analysis supports the local authority's analysis, however the proposer has not considered how these schools compare with other schools with similar levels of free school meal entitlement. The proposer states that the proposed establishment of the new build school would attract high quality leadership, management and teaching. However this has not always been the case when new schools have opened in the authority.

The proposer has suitably considered the impact of the proposals to ensure delivery of the full curriculum at the Foundation Phase and at each key stage. The proposer states that the proposal would mean that pupils would be educated in high quality modern buildings which would be able to support the delivery of a broad and balanced curriculum including the requirements of the National Curriculum and the full Foundation Phase. This assertion is reasonable.

The proposer has recognised that the pupil referral unit would need to be relocated, however no detail of how this will be undertaken is provided. The proposer appropriately states that if the proposal were to proceed, further equality impact assessments would be undertaken including an assessment on the design for any new build accommodation or refurbishment/ adaptation of existing accommodation.

The proposer has not identified any negative impact on learner travel arrangements. However, it has identified potential issues around transport, walking routes and pedestrian crossing facilities. The proposer appropriately intends to investigate these areas further should the proposals proceed.

# Rhydypenau Primary School & Nursery Unit



# Ysgol Gynradd Rhydypenau ac Uned Feithrin

Headteacher  
Prifathrawes: **Mrs Carolyn A. Evans** B.Ed., Dip.Maths., Dip.Eng.

24<sup>th</sup> November 2014

School Organisation Planning Team  
Room 219  
County Hall  
Atlantic Wharf  
CARDIFF  
CF10 4UW

## Consultation on proposals to establish a 2 form entry school on the site of Howardian: a response from the governors of Rhydypenau Primary School.

At a recent meeting, governors expressed strong concerns about the proposed primary school to be established within the site of the Howardian Centre.

Their main concerns are detailed below:

### 1. Governors question the reliability of the data:

While data will undoubtedly have been collected and processed by appropriate methodology and therefore be considered entirely valid, our own experience leads us to question the credibility of the forecast numbers. Over the past 2 years, pupil numbers forecast for our school have been grossly inaccurate:

For example, in February 2013:

- Numbers forecast for September 2013 were 75 pupils within catchment  
There were in fact 60.
- Numbers forecast for September 2014 were 86 within catchment  
There were in fact 60 applications
- Numbers forecast for September 2015 are 69 pupils within catchment
- Numbers forecast for September 2016 are 93

**Governors would appreciate a response to this.**

Cardiff County Council Cyngor Sir Caerdydd



**2. The table on page 7 of the consultation document describes the buildings at Rhydypenau Primary as satisfactory:**

The council is aware that Rhydypenau Primary School has an excellent record of success. However, over half of our 500 children are in currently educated in temporary buildings, many dating back to the 1940s. The school has been forced to accommodate at least 60% of its pupils in temporary buildings for the past 25 years.

**Governors would appreciate a response to this.**

**3. Governors question whether there is a need for an additional 2 form entry school, in addition to the school due to open in Pontprennau in September 2015.**

Governors believe that there is a risk of over-provision within the area. They question whether there will be a risk of other primary schools within the catchment area of Cardiff High School losing children to the new school, thereby jeopardising numbers at these existing schools.

Governors would like the council to consider an investment in the buildings of Rhydypenau Primary, enabling them to accommodate at least one additional class each year. This could be achieved in September 2015 and 2016 with minimal investment, affording opportunities for the LA to plan an additional build in time for September 2017 and make the necessary consultations re catchment areas. Arguably, this alternative plan would make more efficient use of Local Authority and Welsh Government resources in a time of financial austerity.

**Governors would appreciate a response to this.**

Yours sincerely



Nonny Matthewson  
Chair of Governors

## Cardiff Council Statutory Screening Tool Guidance

If you are developing a strategy, policy or activity that is likely to impact people, communities or land use in any way then there are a number of statutory requirements that apply. Failure to comply with these requirements, or demonstrate due regard, can expose the Council to legal challenge or other forms of reproach.

For instance, this will apply to strategies (i.e. Housing Strategy or Disabled Play Strategy), policies (i.e. Procurement Policy) or activity (i.e. developing new play area).

Completing the Statutory Screening Tool will ensure that all Cardiff Council strategies, policies and activities comply with relevant statutory obligations and responsibilities. Where a more detailed consideration of an issue is required, the Screening Tool will identify if there is a need for a full impact assessment, as relevant.

---

The main statutory requirements that strategies, policies or activities must reflect include:

- **Equality Act 2010 - [Equality Impact Assessment](#)**
- **Welsh Government's [Sustainable Development Bill](#)**
- **Welsh Government's Statutory Guidance - [Shared Purpose Shared Delivery](#)**
- **[United Nations Convention on the Rights of the Child](#)**
- **[United Nations Principles for Older Persons](#)**
- **[Welsh Language Measure 2011](#)**
- **[Health Impact Assessment](#)**
- **[Habitats Regulations Assessment](#)**
- **[Strategic Environmental Assessment](#)**

This Statutory Screening Tool allows us to meet all the requirements of all these pieces of legislation as part of an integrated screening method that usually taken no longer than an hour.

---

The Screening Tool can be completed as a self assessment or as part of a facilitated session, should further support be needed. For further information or if you require a facilitated session please contact the Policy, Partnerships and Citizen Focus Team on 2078 8563 e-mail: [siadavies@cardiff.gov.uk](mailto:siadavies@cardiff.gov.uk). Please note:

- **The completed Screening Tool must be submitted as an appendix with the Cabinet report.**
- **The completed screening tool will be published on the intranet.**

## Statutory Screening Tool

<b>Name of Strategy / Policy / Activity:</b> Primary school provision in Cyncoed, Penylan and parts of Plasnewydd	<b>Date of Screening:</b> December 2014 (update)
<b>Service Area/Section: Education &amp; Lifelong Learning</b>	<b>Lead Officer:</b> Nick Batchelar
<b>Attendees:</b> Self assessment	
<b>What are the objectives of the Policy/Strategy/Project/Procedure/ Service/Function</b>  <u>Proposal</u>  To provide sufficient capacity to meet the increasing English-medium community pupil demand within the local area by: <ul style="list-style-type: none"> <li>• Establishing a new 2 FE English-medium community primary school serving the age range 3-11 on part of the site of the Howardian Community Education Centre, Hammond Way, Cardiff CF23 9NB (formerly Howardian High School) from September 2015</li> <li>• The school to admit 60 pupils at entry to Reception Year</li> <li>• The school to include up to 96 part time nursery places</li> <li>• The school to be established in existing and/or demountable accommodation during construction of a new build school.</li> </ul> <p>At the outset all school facilities necessary to accommodate the relevant ages of children (i.e. nursery and reception classes) in the 2015-2016 academic year would be provided on the Howardian site, utilising existing buildings and / or temporary accommodation as appropriate.</p>	<b>Please provide background information on the Policy/Strategy/Project/Procedure/Service/Function and any research done [e.g. service users data against demographic statistics, similar EIAs done etc.]</b>  There has been an increased demand for primary school places in Cyncoed, Penylan and parts of Plasnewydd in the past five years. Proportionate demand for English-medium primary school places has also increased in the past three years.  Projections based upon NHS data received in 2013 indicate that the number of English-medium community places entering Reception will continue to increase in future years until at least September 2016, the latest year for which data are available.  When considering likely demand for places across the area a number of factors have been used to inform projections and forecasts, including: <ul style="list-style-type: none"> <li>• Recent and historic populations known to be living in each area utilising NHS data</li> <li>• Recent and historic Numbers on roll taken from verified PLASC (Pupil Level Annual Census) for Cardiff schools</li> <li>• Recent and historic percentages of children attending English-medium and Welsh-medium community and faith places.</li> </ul> <p>Forecasts have been prepared based on:</p> <ul style="list-style-type: none"> <li>• likely demand if take up patterns were to remain consistent with the most recent years applying these trends to the relevant populations coming through in future years.</li> <li>• known populations along with a potential 3.6% annual uplift in English-medium places by comparison with recent take up patterns between 2011-2013 across the combined Marlborough and Roath Park catchment area</li> </ul> <p>Taking all relevant factors into account a 3.6 % uplift is considered the most appropriate.</p>



In addition, forecasts have taken into account:

- current residential populations with the 3.6% uplift in English-medium places and
- likely populations from the future residential developments currently in construction and proposed.

Full information regarding projections and forecasts prepared relevant to the area and the methodology used to establish likely demand are set out in the Appendices of the Cabinet Report: 'Schools Organisation Planning - Primary school provision in Cyncoed, Penylan and parts of Plasnewydd' July 2014.

#### **Summary forecasts of demand for places at entry to Reception**

The work undertaken to establish the likely demand across the area shows that there will be an overall projected shortfall of 62 - 87 Reception places in the Cardiff High School catchment area based on existing housing. There is a projected shortfall of English-medium places in the Marlborough and Roath Park catchment areas and a broad balance in the supply of and demand for English-medium places in the Lakeside and Rhydypenau Primary School catchment areas.

When compared to the existing supply of places at Reception age, projections for September 2015 and 2016 indicate:

- a deficit of 52 English-medium community school places in September 2015, rising to a deficit of 60 in September 2016, in the combined Marlborough and Roath Park catchment areas, should the take-up of places continue at existing levels
- alternatively, a deficit of 73 English-medium community school places in September 2015, rising to a deficit of 85 in September 2016, in the combined Marlborough and Roath Park catchment areas, should the uplift of 3.6% in the take-up of English-medium places continue
- A surplus of 3 English-medium community school places in September 2015, followed by a deficit of 2 places in the combined Lakeside and Rhydypenau catchment areas.

#### **Howardian site**

The Howardian site has been identified as a potential site for housing. It is proposed that the new school is established on part of this site.

## Part 1: Impact on outcomes and due regard to Sustainable Development

Please use the following scale when considering what contribution the activity makes:		
<b>+</b>	Positive	Positive contribution to the outcome
<b>-</b>	Negative	Negative contribution to the outcome
<b>ntrl</b>	Neutral	Neutral contribution to the outcome
<b>Uncertain</b>	Not Sure	Uncertain if any contribution is made to the outcome

	Has the Strategy/Policy/Activity considered how it will impact one or more of Cardiff's 7 Citizen focused Outcomes?	Please Tick				Evidence or suggestion for improvement/mitigation
		+	-	Ntrl	Un-Crtn	
<b>1.1</b>	<p><b>People in Cardiff are healthy;</b>  <i>Consider the potential impact on</i></p> <ul style="list-style-type: none"> <li><i>the promotion of good health, prevention of damaging behaviour, promote healthy eating/active lifestyles etc,</i></li> <li><i>vulnerable citizens and areas of multiple deprivation</i></li> <li><i>Addressing instances of inequality in health</i></li> </ul>	x				<ul style="list-style-type: none"> <li>- See 1.2 below – encouraging walking, cycling and use of public transport</li> <li>- See 1.3 below re crime prevention - Secure by Design</li> </ul>
<b>1.2</b>	<p><b>People in Cardiff have a clean, attractive and sustainable environment;</b>  <i>Consider the potential impact on</i></p> <ul style="list-style-type: none"> <li><i>the causes and consequences of Climate Change and creating a carbon lite city</i></li> </ul>	x				<ul style="list-style-type: none"> <li>- Any standalone new build accommodation should achieve an overall rating of BREEAM 'Excellent' for the project.</li> <li>- If possible, Passivhaus design principles and methodology would be applied and adopted which result in facilitating most of the school classroom windows facing North/South orientation, limiting and optimising summer and winter sun respectively. This minimises the use of energy for heating or cooling a room.</li> <li>- The wall construction and key junction details would be carefully developed to achieve a highly air tight building.</li> <li>- Wherever possible the design would promote, specify and use locally sourced materials which have a commitment to sustainability and the environment.</li> </ul>
	<ul style="list-style-type: none"> <li><i>encouraging walking, cycling, and use of public transport and improving access to countryside and open space</i></li> </ul>	x				<ul style="list-style-type: none"> <li>- The limited scope for parking would encourage walking and cycling to school.</li> <li>- Consideration would be given to improving the road, infrastructure, walking routes and public transport.</li> <li>- A travel plan would be submitted along with the planning</li> </ul>



	Has the Strategy/Policy/Activity considered how it will impact one or more of Cardiff's 7 Citizen focused Outcomes?	Please Tick				Evidence or suggestion for improvement/mitigation
		+	-	Ntrl	Un-Crtn	
						application, detailing proximity to public transport and walking and cycling routes.
	<ul style="list-style-type: none"> <li>reducing environmental pollution (land, air, noise and water)</li> </ul>			x		As part of the BREEAM process, an acoustic report would be prepared to ascertain the site acoustic levels and the acoustic impact of the proposed school. A further report would be prepared for the proposal in line with the BB93 Acoustics for School requirements.
	<ul style="list-style-type: none"> <li>reducing consumption and encouraging waste reduction, reuse, recycling and recovery</li> </ul>	x				<p>The following could be incorporated into the design of the scheme:</p> <ul style="list-style-type: none"> <li>Sustainable urban drainage system</li> <li>Solar hot water</li> <li>Photovoltaic</li> <li>Natural Ventilation</li> <li>Control of solar gains</li> <li>Rainwater Harvesting</li> <li>A or A+ rated materials in accordance with BRE Green Guide to Specification</li> </ul> <p>Cardiff Council, Waste Management would advise on the provision of waste and recycling collection at the site.</p>
	<ul style="list-style-type: none"> <li>encouraging biodiversity</li> </ul>				x	<p>A Phase 1 survey (Preliminary Ecological Assessment) of the Howardian site could be required to identify the main habitats and whether any detailed surveys for protected species are needed. If more detailed surveys are required recommendations to mitigate any impacts on biodiversity would be considered as part of the planning application.</p> <p>A new build provides the opportunity to consider innovative ways to encourage biodiversity through the integration of the Eco-schools initiative into new build schemes.</p>
<b>1.3</b>	<b>People in Cardiff are safe and feel safe;</b>	x				The South Wales Police's Crime Prevention Design Advisor

	Has the Strategy/Policy/Activity considered how it will impact one or more of Cardiff's 7 Citizen focused Outcomes?	Please Tick				Evidence or suggestion for improvement/mitigation
		+	-	Ntrl	Un-Crtn	
	<p><i>Consider the potential impact on</i></p> <ul style="list-style-type: none"> <li><i>reducing crime, fear of crime and increasing safety of individuals</i></li> <li><i>addressing anti-social behaviour</i></li> <li><i>protecting vulnerable adults and children in Cardiff from harm or abuse</i></li> </ul>					would be consulted and the recommendations considered and incorporated where practicable. It is the aim that the building would meet the Secure by Design standard.
<b>1.4</b>	<p><b>Cardiff has a thriving and prosperous economy;</b></p> <p><i>Consider the potential impact on</i></p> <ul style="list-style-type: none"> <li><i>economic competitiveness (enterprise activity, social enterprises, average earnings, improve productivity)</i></li> <li><i>Assisting those Not in Education, Employment or Training</i></li> <li><i>attracting and retaining workers (new employment and training opportunities, increase the value of employment,)</i></li> <li><i>promoting local procurement opportunities or enhancing the capacity of local companies to compete</i></li> </ul>	x			x	<p>The school would provide employment.</p> <p>Consideration would be given to using local sub-contractors and suppliers.</p>
<b>1.5</b>	<p><b>People in Cardiff achieve their full potential;</b></p> <p><i>Consider the potential impact on</i></p> <ul style="list-style-type: none"> <li><i>promoting and improving access to life-long learning in Cardiff</i></li> <li><i>raising levels of skills and qualifications</i></li> <li><i>giving children the best start</i></li> <li><i>improving the understanding of sustainability</i></li> <li><i>addressing child poverty (financial poverty, access poverty, participation poverty)</i></li> <li><i>the United Nations Convention on the Rights of a Child and Principles for Older persons</i></li> </ul>	x  x  x			x	<p>The facility would provide education (every child has the right to education)</p> <p>Investment in buildings enables schools to be best placed to provide the opportunities for learners to achieve their potential.</p> <p>Potentially the school buildings could be used to deliver community provision including life-long learning activities outside of school hours.</p> <p>If the proposal were to proceed, an equality impact assessment would be carried out at the design stage to identify any reasonable adjustments that could be made to improve accessibility to the accommodation used to establish the school in the first instance and on the accessibility of the new build accommodation. The equality impact assessment would take into account policies such as the Equality Act 2010, TAN 12: Design June 2009 as well as building regulations such as, BS8300, Part M and relevant Building Bulletins.</p>

	Has the Strategy/Policy/Activity considered how it will impact one or more of Cardiff's 7 Citizen focused Outcomes?	Please Tick				Evidence or suggestion for improvement/mitigation
		+	-	Ntrl	Un-Crtn	
1.6	<b>Cardiff is a Great Place to Live, Work and Play</b> <i>Consider the potential impact on</i> <ul style="list-style-type: none"> <li>promoting the cultural diversity of Cardiff</li> <li>encouraging participation and access for all to physical activity, leisure &amp; culture</li> <li>play opportunities for Children and Young People</li> <li>protecting and enhancing the landscape and historic heritage of Cardiff</li> <li>promoting the City's international links</li> </ul>			x		Using the Council's online sources there are no cultural heritage receptors recorded within the site boundary.
1.7	<b>Cardiff is a fair, just and inclusive society.</b> <i>Consider the potential impact on</i> <ul style="list-style-type: none"> <li>the elimination of discrimination, harassment or victimisation for equality groups</li> </ul>	x				See Equality Impact Assessment below and attached.  Recruitment of school staff: The Council's recruitment process would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.
	<ul style="list-style-type: none"> <li>has the community or stakeholders been engaged in developing the strategy/policy/activity?</li> <li>how will citizen participation be encouraged (encouraging actions that consider different forms of consultation, through more in depth engagement to full participation in service development and delivery)?</li> </ul>			x		<ul style="list-style-type: none"> <li>Engagement through public consultation with relevant stakeholders</li> <li>Design Commission for Wales (DCfW) Review Panel</li> <li>The Design Equalities Advisory Group (DEAG) and/or the Cardiff Council Access Focus Group (CCAFG) that includes representatives from external groups would be given the opportunity to comment at the design stage.</li> <li>Relevant departments in the Council</li> <li>South Wales Police's Crime Prevention Design Advisor</li> <li>Ecological Appraisal - external surveyors if appropriate</li> </ul>
<b>EQUALITY IMPACT ASSESSMENT (This is attached on page 12)</b>						
1.8	<b>The Council delivers positive outcomes for the city and its citizens through strong partnerships</b> <i>Consider the potential impact on</i> <ul style="list-style-type: none"> <li>strengthening partnerships with business and voluntary sectors</li> </ul>				x	Modern school facilities can provide flexible spaces for partnership working (integrated services) and use as valuable community assets (potential for efficiency savings).  This has been observed at a recently completed template school;

Has the Strategy/Policy/Activity considered how it will impact one or more of Cardiff's 7 Citizen focused Outcomes?	Please Tick				Evidence or suggestion for improvement/mitigation
	+	-	Ntrl	Un-Crtn	
<ul style="list-style-type: none"> <li><i>the collaboration agenda and the potential for shared services, cross-boundary working and efficiency savings</i></li> </ul>					Nant Talwg, in the Vale of Glamorgan which has the hall space and associated facilities at the front of the school enabling the school to remain secure while offering community use outside of school hours.

**SUMMARY OF APPRAISAL (highlight positive and negative effects of the policy / plan / project being assessed, demonstrating how it contributes to the economic, social and environmental sustainability of the city):**

**Economic**

- The school would provide employment.
- Consideration would be given to using local sub-contractors and suppliers.
- Potential efficiencies if the school facilities were used to deliver community provision outside of school hours.

**Social**

- Investment in buildings enables schools to be best placed to provide the opportunities for learners to achieve their potential.
- There could be the potential for community use of school facilities outside of school hours.
- The proposal should have a positive impact on the environment and the health and well-being of pupils. The new proposal would establish primary school provision to serve the local area. This should minimise the outflow of pupils to other areas of Cardiff thereby reducing the use of cars or public transport and encouraging walking and cycling to and from school.
- Secure by Design
- Accessibility has been considered. See Equality Impact Assessment section 3.2.

**Environmental sustainability**

- It is proposed that the design achieves BREEAM Excellent or above.
- The limited scope for parking would encourage walking and cycling to school.
- Consideration would be given to improving the road infrastructure, walking routes and public transport.
- A travel plan would be submitted along with the planning application, detailing proximity to public transport and walking and cycling routes.
- A Phase 1 survey (Preliminary Ecological Assessment) of the Howardian site could be required to identify the main habitats and whether any detailed surveys for protected species are needed. If more detailed surveys are required recommendations to mitigate any impacts on biodiversity would be considered as part of the planning application.

**WHAT ACTIONS HAVE BEEN IDENTIFIED OR CHANGES BEEN MADE TO THE POLICY / PLAN / PROJECT AS A RESULT OF THIS APPRAISAL:**

Recommendations made in the Equality Impact Assessment /Traffic Assessment at the design stage and any Ecological appraisal would be taken into account in the planning application Design & Access Statement and any Environmental Assessment respectively.

## Part 2: Strategic Environmental Assessment Screening

		Yes	No
2.1	Does the plan or programme set the framework for future development consent?	x	
2.2	Is the plan or programme likely to have significant, positive or negative, environmental effects?		x

<p><b>Is a Full Strategic Environmental Assessment Screening Needed?</b></p> <ul style="list-style-type: none"> <li>▪ If yes has been ticked to both questions 2.1 and 2.2 then the answer is yes</li> <li>▪ If a full SEA Screening is required then please contact the Sustainable Development Unit to arrange (details below)</li> </ul>	<b>Yes</b>	<p><b>No</b> X An SEA has been undertaken (attached)</p>
---	------------	--

If you have any doubt on your answers to the above questions regarding SEA then please consult with the Sustainable Development Unit on 2087 3228 [sustainabledevelopment@cardiff.gov.uk](mailto:sustainabledevelopment@cardiff.gov.uk)

## Part 3: Habitat Regulation Assessment (HRA)

		Yes	No	Unsure
3.1	Will the plan, project or programme results in an activity which is known to affect a European site, such as the Severn Estuary or the Cardiff Beech Woods?		x	
3.2	Will the plan, project or programme which steers development towards an area that includes a European site, such as the Severn Estuary or the Cardiff Beech Woods or may indirectly affect a European site?		x	
3.3	Is a full HRA needed?		x	

Details of the strategy will be sent to the County Ecologist on completion of the process to determine if a Habitat Regulation Assessment is needed. For further information please phone 2087 3215 or email [biodiversity@cardiff.gov.uk](mailto:biodiversity@cardiff.gov.uk)

## Appendix 1 – Statutory Requirements

It is possible that the Impact Screening Tool will identify the need to undertake specific statutory assessments:

- **Equality Impact Assessment:** *This assessment is required by the Equality Act 2010 and Welsh Government's Equality Regulations 2011.*
- **Sustainable Development Bill:** *The Bill, when it comes into effect, will require sustainable development (SD) to be a central organising principle for the organisation. This means that there is a duty to consider SD in the strategic decision making processes.*
- **Shared Purpose Shared Delivery-** *The Welsh Government requires local authorities to produce a single integrated plan to meet statutory requirements under a range of legislation. Cardiff Council must therefore demonstrate its contribution towards Cardiff's own integrated plan; "What Matters".*
- **United Nations Convention on the Rights of the Child:** *The Children Act 2004 guidance for Wales requires local authorities and their partners to have regard to the United Nations Convention on the Rights of a Child.*
- **United Nations Principles for Older Persons:** *The principles require a consideration of independence, participation, care, self-fulfillment and dignity.*
- **The Welsh Language Measure 2011:** *The measure sets out official status for the Welsh language, a Welsh language Commissioner, and the freedom to speak Welsh.*
- **Health Impact Assessment:** *(HIA) considers policies, programmes or projects for their potential effects on the health of a population*
- **Strategic Environmental Impact Assessment:** *A Strategic Environmental Assessment (SEA) is an European Directive for plans, programmes and policies with land use implications and significant environmental effects.*
- **Habitats Regulations Assessment:** *The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007 provides a requirement to undertake Habitats Regulations Assessment (HRA) of land use plans.*

## Equality Impact Assessment

### Corporate Template



<b>Policy/Strategy/Project/Procedure/Service/Function Title:</b>  Primary school provision in Cyncoed, Penylan and parts of Plasnewydd
<b>New/Existing/Updating/Amending</b>  Proposal stage (update following public consultation)

<b>Who is responsible for developing and implementing the Policy/Strategy/Project/Procedure/Service/Function?</b>	
Name: Janine Nightingale	Job Title: Head of Schools Organisation, Access & Planning
Service Team: Schools Organisation Planning (SOP)	Service Area: Education
Assessment Date: December 2014	

**1. What are the objectives of the Policy/Strategy/Project/ Procedure/ Service/Function?**

Proposal

To provide sufficient capacity to meet the increasing English-medium community pupil demand within the local area by:

- Establishing a new 2 FE English-medium community primary school serving the age range 3-11 on part of the site of the Howardian Community Education Centre, Hammond Way, Cardiff CF23 9NB (formerly Howardian High School) from September 2015
- The school to admit 60 pupils at entry to Reception Year
- The school to include up to 96 part time nursery places
- The school to be established in existing and/or demountable accommodation during construction of a new build school.

At the outset all school facilities necessary to accommodate the relevant ages of children (i.e. nursery and reception classes) in the 2015-2016 academic year would be provided on the Howardian site, utilising existing buildings and / or temporary accommodation as appropriate.



2. **Please provide background information on the Policy/ Strategy / Project / Procedure / Service / Function and any research done [e.g. service users data against demographic statistics, similar EIAs done etc.]**

**(What is the basis for the proposal?)**

Projections based upon NHS data received in 2013 indicate that the number of English-medium community places entering Reception will continue to increase in future years until at least September 2016, the latest year for which data are available.

When considering likely demand for places across the area a number of factors have been used to inform projections and forecasts, including:

- Recent and historic populations known to be living in each area utilising NHS data
- Recent and historic Numbers on roll taken from verified PLASC (Pupil Level Annual Census) for Cardiff schools
- Recent and historic percentages of children attending English-medium and Welsh-medium community and faith places.

Forecasts have been prepared based on:

- likely demand if take up patterns were to remain consistent with the most recent years applying these trends to the relevant populations coming through in future years.
- known populations along with a potential 3.6% annual uplift in English-medium places by comparison with recent take up patterns between 2011-2013 across the combined Marlborough and Roath Park catchment area

Taking all relevant factors into account a 3.6 % uplift is considered the most appropriate.

In addition, forecasts have taken into account:

- current residential populations with the 3.6% uplift in English-medium places and
- likely populations from the future residential developments currently in construction and proposed.

Full information regarding projections and forecasts prepared relevant to the area and the methodology used to establish likely demand are set out in the Appendices of the Cabinet Report: 'Schools Organisation Planning - Primary school provision in Cyncoed, Penylan and parts of Plasnewydd' July 2014.

**Summary forecasts of demand for places at entry to Reception**

The work undertaken to establish the likely demand across the area shows that there will be an overall projected shortfall of 62 - 87 Reception places in the Cardiff High School catchment area based on existing housing. There is a projected shortfall of English-medium places in the Marlborough and Roath Park catchment areas and a broad balance in the supply of and demand for English-medium places in the Lakeside and Rhydyphenau Primary School catchment areas.

When compared to the existing supply of places at Reception age, projections for September 2015 and 2016 indicate:

- a deficit of 52 English-medium community school places in September 2015, rising to a deficit of 60 in September 2016, in the combined Marlborough and Roath Park catchment areas, should the take-up of places continue at existing levels

- alternatively, a deficit of 73 English-medium community school places in September 2015, rising to a deficit of 85 in September 2016, in the combined Marlborough and Roath Park catchment areas, should the uplift of 3.6% in the take-up of English-medium places continue
- A surplus of 3 English-medium community school places in September 2015, followed by a deficit of 2 places in the combined Lakeside and Rhydypenau catchment areas.

#### Howardian site

The Howardian site has been identified as a potential site for housing. It is proposed that the new school is established on part of this site.

### 3 Assess Impact on the Protected Characteristics

#### 3.1 Age

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative/]** on younger/older people?

	Yes	No	N/A
3 to 11 years	<b>+ve in terms of the provision of a new primary school</b>		
11 to 18 years	<b>Potential impact on all groups currently using the Youth Centre which would need to be managed accordingly.</b>		
18 - 65 years			
Over 65 years			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

#### **Educational provision (Age 3-11)**

This proposal would provide:

- Sufficient capacity to meet the increasing English-medium community pupil demand within the local area.
- High quality, sustainable modern buildings which would be able to support the delivery of a broad and balanced curriculum.
- A 2FE primary school. When compared with smaller schools:
  - the scale of a two form entry primary school permits greater flexibility and opportunity for pupils due to an extended, more enhanced and secure financial resource base.
  - A two form entry school can provide a greater degree of stability at all levels of leadership including maintaining a full and stable complement of school governors.
  - The ability to employ more teaching and support staff would allow the two form entry school to cover a wider range of curriculum expertise.
- The provision of nursery places makes it possible for a child to remain on the same site and in familiar surroundings for their primary education (subject to a successful application to the primary school).

#### **Impact on the delivery of education (Age 3-11)**

The school would be established on the Howardian site in existing and/or temporary accommodation. During the construction of the new build accommodation it would need to remain in operation. The Council has experience of delivering new build and refurbishment projects on school sites whilst enabling the continuous delivery of education and maintaining health and safety.

### **Catchment area (Children attending primary or secondary school)**

The proposal would result in catchment area changes. These are revised in order to better match supply to demand across the city and provide local schools for local children.

### **Potential impact on community provision (All Ages)**

#### *Adult Community Learning (ACL)*

Initial feasibility studies indicate the potential to locate the proposed new school so that the Howardian Centre can continue in use thus remaining available for Adult Community Learning (ACL) provision. However, the site has been identified for potential development under the Housing Partnership Programme. Whilst at present, it is not envisaged such development would take place before 2018 consideration would need to be given to accommodation for ACL.

#### *Groups using the Youth Centre*

The proposal would result in the demolition of the existing Youth Centre.

The activities currently accommodated at the Youth Centre are as follows:

- The Duke of Edinburgh Scheme for Cardiff is currently centrally managed from the Howardian Youth Centre. The Scheme stores a large amount of outdoor equipment on site in two large containers. However this could be relocated and there is sufficient time to do this effectively in the event the decision is taken to proceed with this proposal.
- The Youth Club currently runs for several evenings per week and the music studio in the main Howardian building is also very well used by Youth Services. There is also a Mental Health group that uses the Youth Centre facility once a week. Additionally, the Pupil Referral Unit uses the Youth Centre facilities daily between 9am and 3pm to deliver sessions.

The PRU would need to be relocated before September 2015.

#### *Use of external facilities/green space*

The green space on the site is not held by the Council as formal Public Open Space. The Education Acts empower the Council to provide open spaces, the use of which can be enjoyed by school pupils. The land has not been used for anything more than sporadic public leisure.

The Council is aware that there has been some informal use by dog walkers. If a school were to be built on this site, dog walkers would need to use established facilities in the wider locality.

However, the Housing Partnership Programme is proposing a new housing development on part of the site. Under Section 106, new housing developments are required to provide some Public Open Space (POS) e.g. for a 48 unit development there would be a requirement of 0.38 hectares of POS.

**What action(s) can you take to address the differential impact?**

## **Groups using the Youth Centre**

Should the Youth Centre be demolished, the Howardian Centre would potentially be available on an interim basis.

The future of Youth Services is currently being considered as part of a commissioning process. An options paper outlining how Youth Services could be delivered in the future across Cardiff (including information regarding transition from existing service delivery to any new model of youth service provision) is expected to be considered by Cabinet later this year.

Following this review consideration would be given to what buildings may be needed should the Youth Centre be demolished.

### *Community use of school facilities*

If the proposal for a new school proceeds, the potential scope for community use of the school building including Youth activities would be explored.

### **If no differential impact, explain the reason(s) for this assessment:**

#### *Transport and traffic*

The proposal for a new school should have a positive impact on the environment and the health and well-being of pupils.

If the demand for school places in an area of the city is not met, pupils without places travel outside of their locality to attend school and are more likely to use polluting modes of transport. Congestion is also exacerbated due to the volume of traffic transversing the city.

The proposal would establish primary school provision to serve the local area. This would minimise the outflow of pupils to other areas of Cardiff thereby reducing the use of cars or public transport and encouraging walking and cycling to and from school.

Transport and traffic implications would be considered as part of the Transport Assessment that is required in order to achieve planning consent.

Limited scope for parking will encourage walking and cycling to school.

A travel plan will be submitted along with the planning application, detailing proximity to public transport and walking and cycling routes.

- Emphasis is placed on travel by active modes where this is possible and on providing the facilities and opportunities at school for students to travel by walking, cycling and public transport. Encouraging active travel to school is a very important means of increasing levels of physical activity in children and tackling the growing problem of childhood obesity. Reducing congestion at the school gate is key to ensuring the safety of pupils and to mitigating impacts on the local neighbourhood.
- Provision of parent parking places is generally not supported by Cardiff Council. This is because such provision would promote travel to school by car, generate local traffic, contribute to congestion and reduce pupil safety. Parking facilities provided at schools is generally only for staff and to meet operational needs.
- Consideration would be given to providing safe walking routes to existing designated parking in the wider locality.

- Management of access to the school site prior/during parent drop off and pick up times would help with health & safety.
- Cardiff's Supplementary Planning Guidance (Access, Circulation and Parking Standards 2010) sets out that all new or expanded schools are required to develop a Travel Plan for submission with a planning application. A Travel Plan is a policy and action plan to:
  - o manage transport efficiently
  - o improve access by all means of travel for employees, visitors, patients and students
  - o encourage sustainable transport – walking, cycling, public transport and car sharing
  - o reduce car use.
- A School Travel Plan is specifically designed to address the transport needs of pupils and staff and will vary according to the nature of the education being provided and the catchment area of the school.

### Employed age group

#### *Redeployment opportunities*

There may still be a perception that redeployment opportunities to the new school could be affected by age. The Council's procedure for managing staffing changes arising from reorganisation would be used in implementing any changes as a result of this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

## 3.2 Disability and Access

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on disabled people?

	Yes	No	N/A
Hearing Impairment	Potential impact on all groups currently using the Youth Centre which would need to be managed accordingly.  See Section 3.1 of this Equality Impact Assessment.		
Physical Impairment			
Visual Impairment			
Learning Disability			
Long-Standing Illness or Health Condition			X
Mental Health			X
Substance Misuse			X
Other			X

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

Potential impact on all groups currently using the Youth Centre which would need to be managed accordingly. See Section 3.1 of this Equality Impact Assessment.

**What action(s) can you take to address the differential impact?**

See Section 3.1 of this Equality Impact Assessment.

**If no differential impact, explain the reason(s) for this assessment:**

If the proposal were to proceed, an equality impact assessment would be carried out at the design stage to identify any reasonable adjustments that could be made to improve accessibility to accommodation used to establish the school and on the accessibility of the new build accommodation. The equality impact assessment would take into account policies such as the Equality Act 2010, TAN 12: Design June 2009 as well as building regulations such as, BS8300, Part M and relevant Building Bulletins.

**New build accommodation**

The design would take into account the needs of the following:

- Those with a hearing impairment – e.g. appropriate acoustics, British Sign Language images/symbols and portable/static hearing loops.
- Those with a visual impairment - e.g. the use of colour to differentiate between the function of spaces, tactile maps and Braille language on signs.
- Those with a physical impairment – e.g. level threshold doors, lifts with disabled access
- Those with learning disabilities – e.g. quiet spaces

The design stage would give consideration to future proofing the accommodation in terms of accessibility. For example, space could be provided to enable accessible toilets to be modified without significant structural changes being required.

Special Educational Needs (SEN) School Action support is provided in the classroom. However, there may be occasions where pupils are withdrawn from a classroom to receive an intervention.

If the new build accommodation is a standardised design, further discussion would be needed on the design approach and how it caters for pupils with SEN (School Action).

**Transport**

Transport for pupils with a disability would not be affected as it would be provided if required to meet the child's needs in accordance with the SEN Code of Practice.

**3.3 Gender Reassignment**

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on transgender people?

	<b>Yes</b>	<b>No</b>	<b>N/A</b>
<b>Transgender People</b> (People who are proposing to undergo, are undergoing, or have undergone a process [or part of a process] to reassign their sex by changing physiological or other attributes of sex)	Potential impact on all groups currently using the Youth Centre which would need to be managed accordingly. See Section 3.1 of this Equality Impact Assessment.		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

Potential impact on all groups currently using the Youth Centre which would need to be managed accordingly. See Section 3.1 of this Equality Impact Assessment.

**What action(s) can you take to address the differential impact?**

See Section 3.1 of this Equality Impact Assessment.

<b>If no differential impact, explain the reason(s) for this assessment:</b>
The Council's procedure for securing staffing requirements to implement this proposal would be used in implementing this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

### 3.4. Marriage and Civil Partnership

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on marriage and civil partnership?

	Yes	No	N/A
Marriage			X
Civil Partnership			X

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
<b>What action(s) can you take to address the differential impact?</b>
<b>If no differential impact, explain the reason(s) for this assessment:</b>
N/A

### 3.5 Pregnancy and Maternity

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on pregnancy and maternity?

	Yes	No	N/A
Pregnancy	Potential impact on all groups currently using the Youth Centre which would need to be managed accordingly.  See Section 3.1 of this Equality Impact Assessment.		
Maternity			N/A

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
Potential impact on all groups currently using the Youth Centre which would need to be managed accordingly. See Section 3.1 of this Equality Impact Assessment.
<b>What action(s) can you take to address the differential impact?</b>
See Section 3.1 of this Equality Impact Assessment.
<b>If no differential impact, explain the reason(s) for this assessment:</b>
The Council's procedure for securing staffing requirements to implement this proposal would be used in implementing this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.  If the proposal were to proceed, an equality impact assessment would be carried out at the design stage to identify any reasonable adjustments that could be made to improve accessibility to accommodation used to establish the school and on the accessibility of the new build accommodation. The equality impact assessment would take into account

policies such as the Equality Act 2010, TAN 12: Design June 2009 as well as building regulations such as, BS8300, Part M and relevant Building Bulletins.

### 3.6 Race

Will this Policy/Strategy/Project//Procedure/Service/Function have a **differential impact [positive/negative]** on the following groups?

	Yes	No	N/A
White	Potential impact on all groups currently using the Youth Centre which would need to be managed accordingly.  See Section 3.1 of this Equality Impact Assessment.		
Mixed / Multiple Ethnic Groups			
Asian / Asian British			
Black / African / Caribbean / Black British			
Other Ethnic Groups			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

Potential impact on all groups currently using the Youth Centre which would need to be managed accordingly. See Section 3.1 of this Equality Impact Assessment.

**What action(s) can you take to address the differential impact?**

See Section 3.1 of this Equality Impact Assessment.

**If no differential impact, explain the reason(s) for this assessment:**

The proposal would not have a differential impact upon one particular ethnic group as the provision would be available to all.

### 3.7 Religion, Belief or Non-Belief

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on people with different religions, beliefs or non-beliefs?

	Yes	No	N/A
Buddhist	Potential impact on all groups currently using the Youth Centre which would need to be managed accordingly.  See Section 3.1 of this Equality Impact Assessment.		
Christian			
Hindu			
Humanist			
Jewish			
Muslim			
Sikh			
Other			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

Potential impact on all groups currently using the Youth Centre which would need to be managed accordingly. See Section 3.1 of this Equality Impact Assessment.

**What action(s) can you take to address the differential impact?**

See Section 3.1 of this Equality Impact Assessment



<b>If no differential impact, explain the reason(s) for this assessment:</b>
The senior staff in a school would be best placed to manage diversity in terms of belief (e.g. provision of a space for prayer).

### 3.8 Sex

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on men and/or women?

	Yes	No	N/A
Men	Potential impact on all groups currently using the Youth Centre which would need to be managed accordingly.  See Section 3.1 of this Equality Impact Assessment.		
Women			

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
Potential impact on all groups currently using the Youth Centre which would need to be managed accordingly. See Section 3.1 of this Equality Impact Assessment.
<b>What action(s) can you take to address the differential impact?</b>
See Section 3.1 of this Equality Impact Assessment
<b>If no differential impact, explain the reason(s) for this assessment:</b>
The Council's procedure for securing staffing requirements to implement this proposal would be used in implementing this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

### 3.9 Sexual Orientation

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on the following groups?

	Yes	No	N/A
Bisexual	Potential impact on all groups currently using the Youth Centre which would need to be managed accordingly.  See Section 3.1 of this Equality Impact Assessment.		
Gay Men			
Gay Women			
Heterosexual			

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
Potential impact on all groups currently using the Youth Centre which would need to be managed accordingly. See Section 3.1 of this Equality Impact Assessment.
<b>What action(s) can you take to address the differential impact?</b>

See Section 3.1 of this Equality Impact Assessment
<b>If no differential impact, explain the reason(s) for this assessment:</b>
(Fears that recruitment opportunities could be affected by sexual orientation)  Evidence collated by the Stonewall lobby group alleges that Lesbian, Gay, Bisexual people are likely to be discriminated against in workplace recruitment.  The Council's procedure for securing staffing requirements to implement this proposal would be used in implementing this proposal. This would ensure that good practice is followed, including the application of the Council's policies on equal opportunities.

### 3.10 Language

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on Welsh Language?

	Yes	No	N/A
Welsh Language	Potential impact on all groups currently using the Youth Centre which would need to be managed accordingly.  See Section 3.1 of this Equality Impact Assessment.		
Other languages			

<b>Please give details/consequences of the differential impact, and provide supporting evidence, if any.</b>
Potential impact on all groups currently using the Youth Centre which would need to be managed accordingly. See Section 3.1 of this Equality Impact Assessment.
<b>What action(s) can you take to address the differential impact?</b>
See Section 3.1 of this Equality Impact Assessment
<b>If no differential impact, explain the reason(s) for this assessment:</b>
Proposals are brought forward to meet demand for English-medium or Welsh-medium education.  If the proposal proceeds, signage and other way finding techniques would be considered when establishing the school in existing and/or temporary accommodation and as part of the design for the new build school.  It is Cardiff Council policy to provide signage in English and Welsh but not in other spoken languages. Therefore, additional way-finding methods would be considered including the use of colour to differentiate between the function of spaces, tactile maps, Braille language on signs and British Sign Language images/symbols.

### 4. Consultation and Engagement

What arrangements have been made to consult/engage with the various Equalities Groups?

If the proposal proceeds, the Design Equalities Advisory Group (DEAG) and/or the Cardiff Council Access Focus Group (CCAFG) would be given the opportunity to comment at the design stage.
--

**5. Summary of Actions [Listed in the Sections above]**

<b>Groups</b>	<b>Actions</b>
Age	See Generic over-arching actions below
Disability	
Gender Reassignment	
Marriage & Civil Partnership	
Pregnancy & Maternity	
Race	
Religion/Belief	
Sex	
Sexual Orientation	
Language	
Generic Over-Arching [applicable to all the above groups]	<p>Should the Youth Centre be demolished, the Howardian Centre would potentially be available on an interim basis.</p> <p>If the proposal for a new school proceeds, the potential scope for community use including Youth activities would be explored.</p> <p>The future of Youth Services is currently being considered as part of a commissioning process. An options paper outlining how Youth Services could be delivered in the future across Cardiff (including information regarding transition from existing service delivery to any new model of youth service provision) is expected to be considered by Cabinet later this year.</p> <p>Following this review consideration would be given to what buildings may be needed should the Youth Centre be demolished.</p> <p>If the proposal were to proceed, an equality impact assessment would be carried out at the design stage to identify any reasonable adjustments that could be made to improve accessibility to accommodation used to establish the school in the first instance and on the accessibility of the new build accommodation. The equality impact assessment would take into account policies such as the Equality Act 2010, TAN 12: Design June 2009 as well as building regulations such as, BS8300, Part M and relevant Building Bulletins.</p>

**6. Further Action**

Any recommendations for action that you plan to take as a result of this Equality Impact Assessment (listed in Summary of Actions) should be included as part of your Service Area's Business Plan to be monitored on a regular basis.

**7. Authorisation**

The Template should be completed by the Lead Officer of the identified Policy/Strategy/Project/Function and approved by the appropriate Manager in each Service Area.

Completed By: Clive Bailey	Date: December 2014
Designation: Policy, Equalities and Reports Officer	
Approved By: Michele Duddridge-Hossain	
Designation: SOP Team Manager	
Service Area: Education	

## **Environmental Report: Sustainability Appraisal (SA) Incorporating Strategic Environmental Assessment (SEA) of the School Organisation Planning proposal to establish a 2 FE primary school on part of the site of the Howardian Community Education Centre, Hammond Way, Cardiff CF23 9NB.**

### **Background**

In 2008, a retrospective Strategic Environmental Assessment (SEA) of Cardiff's 21<sup>st</sup> Century: A Strategic Framework for a School Building Improvement Programme (published in 2006) was carried out based on the guidance that supports the European SEA Directive 2001/42/EC.

The retrospective approach to assessment was quality assured by an external consultant and their independent compliance review determined that the report detailing the assessment on the strategic framework met the key requirements set out for reporting the SEA process as required by the SEA Directive.

The retrospective assessment provides the basis for assessing current and future school organisation proposals at a strategic level.

If a proposal were to proceed, an environmental assessment would be carried out as part of the planning application process.

**To request a copy of the assessment on the Strategic Framework please contact Clive Bailey, 029 2087 3166, [CBailey@cardiff.gov.uk](mailto:CBailey@cardiff.gov.uk)**

### Proposal

To provide sufficient capacity to meet the increasing English-medium community pupil demand within the local area by:

- Establishing a new 2 FE English-medium community primary school serving the age range 3-11 on part of the site of the Howardian Community Education Centre, Hammond Way, Cardiff CF23 9NB (formerly Howardian High School) from September 2015
- The school to admit 60 pupils at entry to Reception Year
- The school to include up to 96 part time nursery places
- The school to be established in existing and/or demountable accommodation during construction of a new build school.

At the outset all school facilities necessary to accommodate the relevant ages of children (i.e. nursery and reception classes) in the 2015-2016 academic year would be provided on the Howardian site, utilising existing buildings and / or temporary accommodation as appropriate.

There has been an increased demand for primary school places in Cyncoed, Penylan and parts of Plasnewydd in the past five years. Proportionate demand for English-medium primary school places has also increased in the past three years.

Projections based upon NHS data received in 2013 indicate that the number of English-medium community places entering Reception will continue to increase in future years until at least September 2016, the latest year for which data are available.

When considering likely demand for places across the area a number of factors have been used to inform projections and forecasts, including:

- Recent and historic populations known to be living in each area utilising NHS data
- Recent and historic Numbers on roll taken from verified PLASC (Pupil Level Annual Census) for Cardiff schools
- Recent and historic percentages of children attending English-medium and Welsh-medium community and faith places.

Forecasts have been prepared based on:

- likely demand if take up patterns were to remain consistent with the most recent years applying these trends to the relevant populations coming through in future years.
- known populations along with a potential 3.6% annual uplift in English-medium places by comparison with recent take up patterns between 2011-2013 across the combined Marlborough and Roath Park catchment area

Taking all relevant factors into account a 3.6 % uplift is considered the most appropriate.

In addition, forecasts have taken into account:

- current residential populations with the 3.6% uplift in English-medium places and
- likely populations from the future residential developments currently in construction and proposed.

Full information regarding projections and forecasts prepared relevant to the area and the methodology used to establish likely demand are set out in the Appendices of the Cabinet Report: 'Schools Organisation Planning - Primary school provision in Cyncoed, Penylan and parts of Plasnewydd' July 2014.

### **Summary forecasts of demand for places at entry to Reception**

The work undertaken to establish the likely demand across the area shows that there will be an overall projected shortfall of 62 - 87 Reception places in the Cardiff High School catchment area based on existing housing. There is a projected shortfall of English-medium places in the Marlborough and Roath Park catchment areas and a broad balance in the supply of and demand for English-medium places in the Lakeside and Rhydypenau Primary School catchment areas.

When compared to the existing supply of places at Reception age, projections for September 2015 and 2016 indicate:

- a deficit of 52 English-medium community school places in September 2015, rising to a deficit of 60 in September 2016, in the combined Marlborough and Roath Park catchment areas, should the take-up of places continue at existing levels
- alternatively, a deficit of 73 English-medium community school places in September 2015, rising to a deficit of 85 in September 2016, in the combined Marlborough and Roath Park catchment areas, should the uplift of 3.6% in the take-up of English-medium places continue
- A surplus of 3 English-medium community school places in September 2015, followed by a deficit of 2 places in the combined Lakeside and Rhydypenau catchment areas.

### **Howardian site**

The Howardian site has been identified as a potential site for housing. It is proposed that the new school is established on part of this site.

Key:

<b>xx</b>	<b>= very incompatible; very negative effect</b>
<b>x</b>	<b>= incompatible; negative effect</b>
<b>✓</b>	<b>= compatible; positive effect</b>
<b>✓✓</b>	<b>= very compatible; very positive effect</b>
<b>0</b>	<b>= no links; neutral effect</b>
<b>? and/or mitigation</b>	<b>= uncertain effects</b>
<b>DNA</b>	<b>= data not available</b>

See table headers below: \* Comparison of the preferred option to a possible alternative option(s) are required in a SA/SEA.

SEA objective	Proposal to establish a 2 FE primary school on part of the site of the Howardian Community Education Centre, Hammond Way, Cardiff CF23 9NB		*Alternative 1: Meet demand by directing pupils to neighbouring schools and/or revising catchment areas		*Alternative 2: Do nothing	
	Rating	Commentary/ explanation of compatibility with SEA objective	Rating	Commentary/ explanation of compatibility with SEA objective	Rating	Commentary/ explanation of compatibility with SEA objective
<p>1. Promote a greener economy by delivering a sustainable pattern of schools across Cardiff</p> <p><i>(the phrase "promote a greener economy" describes the aspiration to minimise the combined carbon footprint of Cardiff's schools through new build, maintaining a low level of surplus capacity, and where possible, introducing energy/water efficiency measures)</i></p>	✓	<p>Achieved by establishing a new school with sufficient capacity to meet the projected shortfall of places in the locality.</p> <p>Achieved by providing a new build school that is BREEAM Excellent or above.</p> <p>Achieved by designing water efficient measures into the building design and addressing drainage through Sustainable urban drainage systems (SUDS). Since 2010, SUDS have been compulsory for new build schemes.</p>	x	<p>Schools in neighbouring areas, such as Llanedeyrn Primary School and Springwood Primary School (within the Llanishen High School catchment) have a significant proportion of surplus places at entry to Reception and catchment projections indicate that this will continue until at least September 2016 (the latest date for which data are available).</p> <p>Projections for September 2015 and 2016 indicate:</p> <ul style="list-style-type: none"> <li>a surplus of 39 English-medium community school places in September 2015, rising to a surplus of 54 in September 2016, in the combined Llanedeyrn and Springwood catchment areas.</li> </ul> <p>Whilst surplus places remain available in these schools, these are considered to be not suitably located as they are distant from the seat of the demand for English-medium places, and few parents resident in the catchment areas of Marlborough and Roath Park have taken up places at these schools in recent years. Allensbank Primary School (within the Cathays High School catchment) also has a significant proportion of surplus places at entry to Reception and catchment projections indicate that this will continue until at least September 2016:</p> <ul style="list-style-type: none"> <li>a surplus of 10 English-medium</li> </ul>	x	<p>Doing nothing is not an option as additional capacity is needed to meet the demand for places.</p>

SEA objective	Proposal to establish a 2 FE primary school on part of the site of the Howardian Community Education Centre, Hammond Way, Cardiff CF23 9NB		*Alternative 1: Meet demand by directing pupils to neighbouring schools and/or revising catchment areas		*Alternative 2: Do nothing	
	Rating	Commentary/ explanation of compatibility with SEA objective	Rating	Commentary/ explanation of compatibility with SEA objective	Rating	Commentary/ explanation of compatibility with SEA objective
				<p>community school places in September 2015, rising to a surplus of 20 in September 2016, in the Allensbank catchment area.</p> <p>However, the projected demand for English-medium places at schools neighbouring Allensbank (which include Gladstone, Rhydypenau and Ton-Yr-Ywen primary schools) also exceeds the supply of places. Allensbank is therefore well placed to meet excess demand from these areas rather than the excess demand from the Marlborough and Roath Park catchment areas.</p> <p>Proposals have also been brought forward to meet the excess demand from within the catchment areas of English-medium schools South of Newport Road and schools in this area could not serve the excess demand from the Marlborough and Roath Park catchment area.</p> <p>It is therefore considered that the revision of catchment areas does not present a suitable alternative to providing additional capacity in the Marlborough and Roath Park catchment areas to meet the local shortfall of places.</p>		

SEA objective	Proposal to establish a 2 FE primary school on part of the site of the Howardian Community Education Centre, Hammond Way, Cardiff CF23 9NB		Meet demand by directing pupils to neighbouring schools and/or revising catchment areas		*Alternative option 2: Do nothing	
	Rating	Commentary/ explanation of compatibility with SEA objective	Rating	Commentary/ explanation of compatibility with SEA objective	Rating	Commentary/ explanation of compatibility with SEA objective
<p>2. Reduce greenhouse gas emissions through:</p> <p>a) Energy efficient building design and disposing of poor quality surplus accommodation</p> <p>b) Promoting sustainable modes of transport and integrated transport systems</p>	<p>✓</p> <p>✓</p>	<p>a)</p> <p>Achieved by providing a new build that is BREEAM Excellent.</p> <p>b)</p> <p>The proposal for a new school should have a positive impact on the environment and the health and well-being of pupils.</p> <p>If the demand for school places in an area of the city is not met, pupils without places travel outside of their locality to attend school and are more likely to use polluting modes of transport. Congestion is also exacerbated due to the volume of traffic transversing the city.</p> <p>Limited scope for parking will encourage walking and cycling to school.</p> <p>Traffic and transport implications including measures to encourage walking and cycling would be considered as part of the Transport Assessment for the proposal.</p> <p>A travel plan will be submitted along with the planning application, detailing proximity to public transport and walking and cycling routes.</p> <ul style="list-style-type: none"> <li>- Emphasis is placed on travel by active modes where this is possible and on providing the facilities and opportunities at school for students to travel by walking, cycling and public transport. Encouraging active travel to school is a very important means of increasing levels of physical activity in children and tackling the growing problem of childhood obesity. Reducing congestion at the school gate is key to ensuring the safety of pupils and to mitigating impacts on the local neighbourhood.</li> <li>- Provision of parent parking places is generally not supported by Cardiff Council. This is because such provision would promote travel to school by car, generate local traffic, contribute to congestion and reduce pupil safety. Parking facilities provided at schools is generally only for staff and to meet operational needs.</li> <li>- Consideration would be given to providing safe walking routes to</li> </ul>	N/A	N/A see comments next to SEA Objective 1 above	x	<p>Doing nothing is not an option as additional capacity is needed to meet the demand for places.</p> <p>If the demand for school places in an area of the city is not met, pupils without places have to travel outside of their locality to attend school and are more likely to use polluting modes of transport. Congestion is also exacerbated due to the volume of traffic transversing the city.</p>



<b>SEA objective</b>	Proposal to establish a 2 FE primary school on part of the site of the Howardian Community Education Centre, Hammond Way, Cardiff CF23 9NB		Meet demand by directing pupils to neighbouring schools and/or revising catchment areas		<b>*Alternative option 2:</b> Do nothing	
	<b>Rating</b>	<b>Commentary/ explanation of compatibility with SEA objective</b>	<b>Rating</b>	<b>Commentary/ explanation of compatibility with SEA objective</b>	<b>Rating</b>	<b>Commentary/ explanation of compatibility with SEA objective</b>
		<p>existing designated parking in the wider locality.</p> <ul style="list-style-type: none"> <li>- Management of access to the school site prior/during parent drop off and pick up times would help with health &amp; safety.</li> <li>- Cardiff's Supplementary Planning Guidance (Access, Circulation and Parking Standards 2010) sets out that all new or expanded schools are required to develop a Travel Plan for submission with a planning application. A Travel Plan is a policy and action plan to: <ul style="list-style-type: none"> <li>o manage transport efficiently</li> <li>o improve access by all means of travel for employees, visitors, patients and students</li> <li>o encourage sustainable transport – walking, cycling, public transport and car sharing</li> <li>o reduce car use.</li> </ul> </li> <li>- A School Travel Plan is specifically designed to address the transport needs of pupils and staff and will vary according to the nature of the education being provided and the catchment area of the school.</li> </ul> <p>School safety zones would be set up to address health and safety concerns from increased traffic flows in the school vicinity</p>				

SEA objective	Proposal to establish a 2 FE primary school on part of the site of the Howardian Community Education Centre, Hammond Way, Cardiff CF23 9NB		Meet demand by directing pupils to neighbouring schools and/or revising catchment areas		*Alternative option 2: Do nothing	
	Rating	Commentary/ explanation of compatibility with SEA objective	Rating	Commentary/ explanation of compatibility with SEA objective	Rating	Commentary/ explanation of compatibility with SEA objective
3. Promote health and wellbeing by protecting and enhancing Public Open Space (POS) and improving access to POS	0	<p>The green space on the site is not held by the Council as formal Public Open Space. The Education Acts empower the Council to provide open spaces, the use of which can be enjoyed by school pupils. The land has not been used for anything more than sporadic public leisure.</p> <p>The Council is aware that there has been some informal use by dog walkers. If a school were to be built on this site, dog walkers would need to use established facilities in the wider locality.</p>	N/A	N/A see comments next to SEA Objective 1 above	0	N/A (See comments next to SEA Objective 1. above)
4. Minimise air, light and noise pollution associated with building development and traffic congestion	<p>0</p> <p>X</p> <p>Mitigation</p>	<p>a) Builders would be encouraged to minimise air, light and noise pollution during the construction period.</p> <p>The design of the new build would seek to minimise any adverse impact on access to natural light for neighbouring properties.</p> <p>As part of the BREEAM process, an acoustic report would be prepared to ascertain the site acoustic levels and the acoustic impact of the proposed school.</p> <p>b) An increase in the number of children attending the school could increase the volume of traffic in the vicinity of the school.</p> <p>Locating provision central to the area it would serve should reduce this outflow of pupils to schools elsewhere in Cardiff, minimise the use of polluting modes of transport such as cars and buses and encourage walking and cycling to and from school.</p> <p>To reduce congestion and associated pollution the following would be considered:</p> <ul style="list-style-type: none"> <li>▪ Formalising the parking regime outside the school to discourage unsafe parking and help with enforcement.</li> <li>▪ The school agrees to a Travel Plan which includes schemes such as the Park Safe / Walk Safe scheme which encourage parents to park further away from the school.</li> </ul>	N/A	N/A see comments next to SEA Objective 1 above	x	If the demand for school places in an area of the city is not met, pupils without places have to travel outside of their locality to attend school and are more likely to use polluting modes of transport. Congestion is also exacerbated due to the volume of traffic transversing the city.

SEA objective	Proposal to establish a 2 FE primary school on part of the site of the Howardian Community Education Centre, Hammond Way, Cardiff CF23 9NB		Meet demand by directing pupils to neighbouring schools and/or revising catchment areas		*Alternative option 2: Do nothing	
	Rating	Commentary/ explanation of compatibility with SEA objective	Rating	Commentary/ explanation of compatibility with SEA objective	Rating	Commentary/ explanation of compatibility with SEA objective
5. <i>Protect</i> and enhance biodiversity, flora and fauna	?	A Phase 1 survey (Preliminary Ecological Assessment) of the Howardian site could be required to identify the main habitats and whether any detailed surveys for protected species are needed. If more detailed surveys are required recommendations to mitigate any impacts on biodiversity would be considered as part of the planning application.  A new build provides the opportunity to consider innovative ways to encourage biodiversity through the integration of the Eco-schools initiative into new build schemes.	N/A	N/A see comments next to SEA Objective 1 above	0	N/A (See comments next to SEA Objective 1. above)
6. <i>Protect</i> and enhance the landscape (habitats/visual amenities)	?		N/A	N/A see comments next to SEA Objective 1 above	0	N/A (See comments next to SEA Objective 1. above)
7. Conserve water resources and increase water efficiency in new developments and promote sustainable urban drainage systems	✓	Achieved by designing water efficient measures into the building design and addressing drainage through Sustainable Urban Drainage Systems (SUDS).	N/A	N/A see comments next to SEA Objective 1 above	0	N/A (See comments next to SEA Objective 1. above)
8. <i>Promote</i> regeneration by delivering inclusive schools that will improve equality of opportunity and access for all	0	Achieved by making schools community focused - opening facilities to the public e.g. evening classes.  If the proposal were to proceed, an equality impact assessment would be carried out at the design stage to identify any reasonable adjustments that could be made to improve accessibility to accommodation used to establish the school in the first instance and on the accessibility of the new build accommodation. The equality impact assessment would take into account policies such as the Equality Act 2010, TAN 12: Design June 2009 as well as building regulations such as, BS8300, Part M and relevant Building Bulletins.	N/A	N/A see comments next to SEA Objective 1 above	0	N/A (See comments next to SEA Objective 1. above)
9. <i>Protect and enhance</i> designated historic assets	0	There are no registered historic assets within the proposed site.	N/A	N/A see comments next to SEA Objective 1 above	0	N/A (See comments next to SEA Objective 1. above)

## Conclusion

The proposal has been assessed to be largely compatible with the environmental objectives used to assess the goal and principles of the "21st Century Schools: A Strategic Framework for A School Building Improvement Programme" that underpin school organisation proposals. The proposal for a new build school should have a positive impact on the environment. If the demand for school places in an area of the city is not met, pupils without places travel outside of their locality to attend school and are more likely to use polluting modes of transport. Congestion is also exacerbated due to the volume of traffic transversing the city. The new build accommodation should achieve an overall rating of BREEAM 'Excellent' for the project.

A Phase 1 survey (Preliminary Ecological Assessment) of the Howardian site would be required to identify the main habitats and whether any detailed surveys for protected species are needed. If more detailed surveys are required recommendations to mitigate any impacts on biodiversity would be considered as part of the planning application.

Where the assessment has identified a potential negative environmental impact in terms of an increase in the volume of traffic (see Objective 4), measures to mitigate the effect are detailed.