

**BRIDGEND COUNTY BOROUGH COUNCIL****OBJECTION REPORT****REPORT OF THE CORPORATE DIRECTOR - EDUCATION AND FAMILY SUPPORT****SCHOOL MODERNISATION PROGRAMME: OUTCOME OF THE PUBLIC NOTICE IN RESPECT OF THE PROPOSED REGULATED ALTERATION TO COETY PRIMARY SCHOOL, FFORDD YR HEBOG, COITY, BRIDGEND, CF35 6DH BY ENLARGING THE SCHOOL FROM 2-FORM-ENTRY TO 2.5-FORM-ENTRY, WITH EFFECT FROM THE SPRING TERM JANUARY 2025****1. Purpose of report**

- 1.1 This report details two objections received in respect of the statutory proposal to make a regulated alteration to enlarge Coety Primary School, Ffordd Yr Hebog, Coity, Bridgend CF35 6DH from a 2-form-entry to 2.5-form-entry school.

**2. Background**

- 2.1 On 18 October 2022, Cabinet approval was received to commence a statutory consultation process in respect of the proposed enlargement to Coety Primary School. Under the proposal, the school capacity would increase from 420 to 525 places for pupils aged 4 to 11 years, with an 88 full-time-equivalent nursery. The published admission number (PAN) of the school would be 75.
- 2.2 The proposal was subject to a consultation process which was carried out between 12 December 2022 and 25 January 2023, in accordance with the statutory School Organisation Code, 2018. It provided an opportunity for prescribed consultees as well as members of the local community to learn about the proposal. The consultation document invited views and opinions to be submitted in respect of the proposal in order for the Council's Cabinet to hear the views of all those with an interest so that they can be considered before decisions are made.
- 2.3 In May 2023, a summary of the views and opinions received in respect of the proposal were presented to Cabinet in a consultation report and approval was received to publish the report. A copy of the consultation report was made available on the Council's website:
- <https://www.bridgend.gov.uk/my-council/consultations/closed-consultations/coety-primary-school-consultation/>
- 2.4 Following consideration of the consultation report, the Council's Cabinet determined to progress the proposal and approve the publication of a statutory public notice. A statutory notice outlining the proposals was subsequently published on 5 June 2023 for a period of 28 days and formal written objections were invited during this time, as prescribed by the School Organisation Code, 2018.

### **3. Objection to the proposal**

3.1 The Council received two objections via email during the statutory notice period.

#### **3.2 Objection one**

“I would like to object to the expansion of Coety school or at least I would raise my concerns about how the expansion will be done.

My children attend Coety primary school. I think having 2.5 forms per year group will mean that it is difficult to cater for low achieving children. My eldest son whose ability is lower than his age will really struggle to cope in a mixed year group.

I think the building work will cause a lot of disruption for the current pupils. My children loves playing football in the yard. Where are the classrooms going to be put to ensure the children can enjoy their breaks?

I do not understand why the school was not built initially to accommodate the children anticipated to be living in the estate. I feel that the expansion of the school will not be big enough to accommodate the ever growing population of Parc Derwen. Although, I really valued and use the field by the school, could part of this be utilised to provide more space for the new school building and to accommodate a new yard?

In addition, the traffic in Parc Derwen during school drop off and pick up is very busy so will only get worse following the expansion. The lack of parking at the school creates a very dangerous environment as cars tend to bump up on the pavement.

I think expanding the school will cause the lunchtimes in the hall to become even more hectic. During covid times, my children eat their lunch early (11.30am) which I feel is too early. By pick up time they were very hungry.

I really would appreciate if my concerns can be considered and I await a response”.

#### **3.3 Local authority response to the objection**

Thank you for your email in relation to the expansion of Coety Primary School. Please find below the local authority’s response in respect of the concerns raised:

##### **School capacity**

Coety Primary School was constructed during Band A of the School Modernisation Programme and opened in November 2015. The adopted Supplementary Planning Guidance (SPG) 16, applicable at that time, was used to calculate the size of provision required. However, a 2019 review of pupil yield rates from new housing developments demonstrated a higher pupil-yield figure compared to the rates contained in the then Bridgend County Borough Council (BCBC) adopted SPG16. SPG16 has since been updated and the revised rates have been adopted by the Council.

Coety Primary School’s catchment area has been subject to major housing developments (that is, Parc Derwen and the Taylor Wimpey and Persimmon sites at

Brackla northeast) and there is an increasing need for additional capacity at the school. Over several years, some pupils who reside within close proximity to Coety Primary School have been unable to secure a place at the school as there is insufficient capacity available.

This proposal to enlarge Coety Primary School is part of a wider strategy to increase pupil places to serve the Bridgend northeast area which has been subject to this significant development. The Council has adopted a phased approach to expanding primary provision.

An options appraisal process was undertaken to determine the size of the school. The outcome was to increase the school to 2.5-form-entry, that is, 525 pupil places and a nursery with 75 full-time places and 9 full-time-equivalent part-time places.

### **Mixed classes**

A Published Admission Number (PAN) of 75 results in there being a need to mix year groups (for example, two Year 6 classes and a mixed Year 5/6 class). Classrooms will be suitably designed to accommodate 30 pupils. However, class organisation is a matter for the school to determine. You can be assured that the school will be focused on ensuring that the individual needs of all children are met. There are many schools within Bridgend and beyond that successfully operate mixed classes and this has been standard practice in schools for a long time.

### **Construction work – disruption**

The team will work closely with the headteacher, governors and staff by planning the programme around the needs of the school to limit disruption during the construction phase. However, the school will need to remain open during the work and the local authority has extensive experience of managing construction contracts on live sites. Health and Safety will be of paramount importance and restrictions will be placed on the contractor to ensure that safety is maintained at all times. There will be time restrictions in place to limit contractor movements and deliveries during the school day.

### **Location of classroom extension**

At this stage of the project, the site layout and general internal arrangement drawings have been produced to demonstrate site fit, that is to demonstrate that a four-classroom extension is achievable within the space available. If approval is received to proceed with the scheme, the design and development stage will involve further stakeholder engagement and consultation sessions to ensure that the extension achieves the needs and requirements of the school and pupils. The proposed four-classroom extension may be attached to the eastern side of the existing school building with the additional yard space to the east of the extension. However, the location would require further consultation with the school.

## Playground space and 4G pitch

The existing yard would be extended to the foot of the bank, creating an additional net gain of 380m<sup>2</sup>. The local authority will aim to provide as much additional yard area as possible. The games courts will be painted on the yard, which will allow for different games to be played (for example, basketball, netball and football). The games court will not have any fences or barriers.

As a result of the consultation process the local authority will explore options for a secure access point to the 4G pitch, to allow pupils a safe route to additional play space. Officers will work with the school to ensure the yard space is sufficient and will be consulting formally with staff in the future regarding design requirements, if approval for this scheme is received from Cabinet.

## Traffic concerns

If approval is received to progress this scheme, a full traffic impact assessment (TIA) will be undertaken. A TIA will identify what mitigation measures are required. The TIA will be considered by the local authority's Highways Department, and they will ensure that any improvements suggested are taken forward as part of the planning process. Officers will also work with the school to develop a School Travel Plan, which will promote sustainable ways to travel to and from school, by promoting walking, cycling, public transport and car sharing.

## Catering

Lunchtime service will be continuous, instead of staggered, and will operate from 11:30am. Continuous service will ensure that all pupils are served on time, on a rota system and potentially with an extended lunchtime when the national Universal Primary Free School Meals (UPFSM) initiative is rolled out. To accommodate the additional UPFSM, the school will require a longer lunch period. Catering Services has indicated that there is potential to improve the meal service by providing an additional free-standing servery. The kitchen can batch cook foods throughout a continuous service to ensure that the food is at optimal nutrition and quality. In addition, continuous service and rotation of pupils will accelerate the service time.

### 3.4 Objection two



Swyddfa o bell RhAG,  
Tir na Nog,  
21 Llanthewy Road,  
Casnewydd,  
NP20 4JR.

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July 3, 2023

Dear XX,

Re: making a regulated change to Coety Primary School, Hebog Road, Coety, Bridgend CF35 6DH by expanding the school from 2 entry classes to 2.5 entry classes

1. We refer you to our response to the consultation on this plan on January 24, 2023, which noted that we disagree with the proposals to extend the school as it stands, as no full and transparent study of the full impact on the Welsh language was presented and in particular the impact on Ysgol Gymraeg Bro Ogwr, Ysgol Gyfun Llangynwyd or on the WESP for the county in general. We ask that our previous comments are reiterated for the purposes of this statutory objection.
2. RhAG's view is that Bridgend Council has failed to adequately consider the negative impact that increasing numbers in English medium education at Coety School will have on parents' opportunities to consider choosing Welsh medium education for their children in the area and on the work of the WESP. Indeed, the development of excellent Welsh medium Education is currently being undertaken by county officials, but at the same time increasing the capacity of English medium education in an area where the proposal for Welsh medium education is not equal will undermine the work of the county's own officers and all those who contribute to this work.
3. We are not convinced that the consultation has taken account of RhAG's comments when it was noted that:

*Upon reading the consultation document on the change to Coety Primary School, we were disappointed that the quality of the document which measures the potential impact of this scheme on the growth of Welsh-medium education in the area and in particular on the developments of Ysgol Gymraeg Bro Ogwr and Ysgol Gyfun Llangynwyd and also the latest developments for Welsh medium education in the Pencoed area, is not thorough enough nor does it give enough consideration to the very vulnerable situation in this area of the county.*

*While an impact study on the Welsh language is included in the consultation document, it is low in quality and demonstrates a lack of understanding of the act of measuring the impact on language and more importantly, it does not offer any mitigating action of substance when negative effects are identified.*

4. The consultation also failed to adequately consider our comment on addressing capacity issues, where it was noted that: If “addressing capacity problems at Coety Primary School” is the purpose of this scheme, has consideration been given to how Welsh medium provision would be able to assist with this?” We are still awaiting a response to this comment.
5. Section 3.4 of the Welsh Government's School Organisation Code, states that:

***Welsh in Education Strategic Plan***

- *to what extent would the proposal support the targets in the approved WESP.*
- *how would the proposal expand or reduce the Welsh language provision. If the provision is to be reduced, please state why the provision will be reduced.*

There is no information to satisfy the second bullet point of the code's requirement.

The code also states the following:

Where any school involved or affected provides teaching through the medium of Welsh the following information **must** be included in the consultation document:

- an assessment of the impact of proposal on the Welsh language ( a Welsh language impact assessment must be included either in the main part of the consultation document or as an Annex ); and
- an explanation of how the proposal forms part of the WESP.

<https://www.gov.wales/sites/default/files/publications/2018-10/school-organisation-code-second-edition.pdf> Section 3.4, page 34 School Organisation Code, Welsh Government.

- The code is clear that the impact on the Welsh language **must** be assessed. All schools in Wales provide some education through the medium of Welsh, even our English medium schools. The Welsh medium schools in the area are also an integral part of this consultation and therefore I would have expected to see a comprehensive impact assessment as part of this consultation documentation.
- Local Authorities are required to measure the impact themselves first of all, to demonstrate the potential impact and offer ways to mitigate this impact as part of the consultation from the outset. And when proposals for mitigation are submitted in response, these are expected to be reflected in the report and considered further in a forum such as a Welsh medium education forum. We reiterate again that we as a forum were not offered an opportunity to discuss this plan.

6. You acknowledge that the extension of this provision is likely to attract parents who live closer to this school. This proves that the county is fully aware of the risk of extending this provision but not bold enough to implement significant mitigating measures to overcome these challenges. Does the county remember: by increasing the capacity of English medium schools and by not increasing the capacity of Welsh medium schools, the percentage of outcome 2 will fall?

“There are no specific Welsh language groups that are particularly likely to be affected by the policy. At the moment, places at Coety Primary School are generally overcrowded. Therefore, with the increase in the number of places available to pupils in the school's catchment area, it is not unreasonable to assume that parents who are considering a Welsh medium education for their child in one of the local authority's Welsh medium primary schools (the nearest is 1.7 miles away) as an alternative to Coety Primary School, will see the creation of additional places at the school as an opportunity to consider educating their child closer to home in an English medium school. Therefore, there is a risk that the proposal could mean that parents do not consider Welsh medium education in the future.”

7. We ask for your help in reconsidering this plan as soon as possible. We believe that the scheme will weaken the Welsh medium education offer in the Pencoed area and undermine the county's own work through the developments of the

Welsh in Education Strategic Plan.

**We oppose this scheme.**

**3.5 Local authority response to the objection**

Thank you for your email, we acknowledge your objection to the statutory notice to expand Coety Primary School.

1. The impact of increasing English-medium places at Coety Primary School has been considered and a full and transparent Welsh Language Impact Assessment (WLIA) was carried out. Following the outcome of the consultation process, the assessment was updated.
2. This scheme was subject to an options appraisal. The options were systematically evaluated to confirm the preferred option. A full public consultation process was undertaken according to the School Organisation Code.

All proposals should ensure that the balance of school provision reflects the balance of demand.

Bridgend County Borough Council's view is that it has adequately considered the potential negative impact that increasing numbers in English-medium education at Coety Primary School will have on Welsh-medium education. As highlighted in the WLIA "this proposal creates additional English-medium places in the catchment area and the parents of pupils in this area who might currently be considering a Welsh-medium education due to some of the difficulties in securing a place for their child at Coety Primary School due to the oversubscription at the school, may no longer consider this. This is because the chance of them securing a school place increases, as the pupil admission number is proposed to increase from 60 to 75, meaning an additional 15 places in each year group".

There is a duty placed on the local authority to ensure there is a sufficient supply of English and Welsh pupil places, in accordance with Bridgend County Borough Council's Starting School Prospectus 2022/2023, which states:

"In relation to admissions to primary schools (excluding nursery classes), junior schools and secondary schools (including sixth-forms), the local authority has a statutory duty to have regard to the general principle that pupils are to be educated in accordance with the wishes of their parents/carers, so far as that would be compatible with the provision of efficient education and the avoidance of unreasonable public expenditure (S.9 Education Act 1996).

The local authority applies the same principle of parental preference to applications for non-statutory, nursery education in a local authority-maintained school".

3. The school was constructed during Band A of the School Modernisation Programme and opened in November 2015. The adopted Supplementary Planning Guidance (SPG) 16, applicable at that time, was used to calculate the size of provision required. However, a 2019 review of pupil yield rates from new housing developments demonstrated a higher pupil-yield figure compared to the rates

contained in the then Bridgend County Borough Council (BCBC) adopted SPG16. SPG16 has since been updated and the revised rates have been adopted by the Council.

Coety Primary School's catchment area has been subject to major housing developments (that is, Parc Derwen and the Taylor Wimpey and Persimmon sites at Brackla northeast) and there is significant demand for English-medium places in this area in general. Over several years, some pupils who reside within close proximity to Coety Primary School have been unable to secure a place at the school as there is insufficient capacity available. There is a significant oversubscription of pupil places and only six places available in the school (that is in Year 4 and 6). Every year, the local authority has to refuse places in Nursery and Reception. This is an issue that has been raised regularly by local members and parents

As noted above, this scheme was subject to an options appraisal to determine how those additional pupils could be accommodated. The options were systematically evaluated to confirm the preferred option of a four-classroom extension. This would meet the demand for English-medium places from within the catchment area. Without it, pupils must be transported to alternative schools, which can impact negatively on school transport revenue budgets.

A full public consultation process was undertaken according to the School Organisation Code, 2018. During the consultation process, it was reported that only one pupil who could not get a place at Coety Primary School has opted for a Welsh-medium education. It is important that the local authority respects parental preference in their choice of school for their child/ren.

The impact of this scheme on the growth of Welsh-medium education in the Coety and Pencoed areas and on the developments of Ysgol Gymraeg (YG) Bro Ogwr form part of a wider strategy to increase pupil places to serve the Bridgend northeast area which has been subject to this significant development. The Council has adopted a phased approach to expanding primary provision:

- Welsh-medium capacity being addressed as part of Band B of the School Modernisation Programme with Cabinet approval being received to relocate YG Bro Ogwr (that is, a 2.5-form-entry Welsh-medium primary school that serves Bridgend town, Valleys Gateway and Pencoed areas) to a new site, which is located near the existing school site. The new school site is located in the Bridgend northeast area.
- Proposed enlargement of Coety Primary School to 2.5-form-entry school to increase provision.

Use of the residual YG Bro Ogwr as a 1-form-entry primary school (language media to be determined).

The above strategy addresses the longer-term demand for pupil places in the Bridgend northeast area of the county.



The local authority is conducting an options appraisal in respect of Ysgol Gyfun Gymraeg Llangynwyd with a view to enlarging the provision and locating it centrally within the county borough.

As you will be aware, the local authority's 10-year Welsh in Education Strategic Plan (WESP) identifies that a 1-form-entry Welsh-medium primary school will be delivered in the southeast of the county borough.

In recognition of the impact that this increase in English places may have on Welsh-medium provision, the local authority confirms that it would endeavour to rebalance this proposed increase at Coety Primary School by providing additional Welsh-medium places elsewhere during the 10-year WESP period.

4. It is important that the local authority respects parental preference in their choice of school for their child/ren. If parents choose a Welsh-medium education for their children there are sufficient places available in the County Borough.

In response to the question "has consideration been given to how Welsh-medium provision would be able to assist with capacity problems at Coety Primary school" - legislation in Wales provides that parents and carers have a right to say which school they would like their child to go to, the local authority does not try to influence that choice. The local authority ensures there is sufficient information on its website for parents to make an informed decision on which choosing a suitable place for their child. If parents want to choose Welsh-medium education there are plenty of available places in the borough. As evidence has shown during the consultation process, it was reported that only one pupil who could not get a place at Coety Primary School has opted for a Welsh-medium education.

As outlined in the consultation document Coety Primary School is enthusiastic in its promotion of Welsh language and culture.

5. A full public consultation process was undertaken according to the School Organisation Code. As part of this process, RhAG were invited to express any views and opinions.

It is evident that there is a high demand for additional pupil places in the Bridgend northeast area. However, the potential implications of the linguistic nature of the provision requires consideration and a decision is required in terms of whether those additional places are English or Welsh-medium. The following high-level observations need to be considered in terms of decision making:

- Demographic data and data from successive statutory school admission rounds (including in-year transfers), supports the creation of additional English-medium places in the northeast of the county borough. Unless the local authority is content in a significantly higher risk of additional transport being required in the future to transport pupils in this area to schools in other parts of the county borough (which would result in revenue implications for school transport), there will be a requirement to ensure there is a sufficient supply of places for English-medium pupils in the northeast as well as support for the growth of Welsh-medium places. This has previously been an accepted way forward.

- Changing Coety Primary School to a Welsh-language school would mean a significant policy shift for the local authority. However, such a change would result in insufficient English-medium places being available in the area which is likely to be contentious and will undoubtedly receive significant objections and possible legal challenge. Currently, there is no legal requirement for the local authority to deliver such a policy change.
  - Increasing the number of English-medium pupil places is unlikely to have a detrimental impact on achieving the Welsh in Education Strategic Plan Outcome 2 percentage target (as set by Welsh Government) for the local authority. This is because the proposed expansion of Coety Primary School meets current demand for pupil places. The proposal does not create places to encourage growth. Regardless of whether these pupils are eventually admitted to Coety Primary School or another school in Bridgend, as they already exist within the 'system' they already contribute to the WESP target denominator.
6. Unless the legislation in Wales changes, parents will always have the choice of sending their children to the nearest available school.

There is no evidence to suggest that any parent considering a Welsh-medium education will choose to send their child to Coety Primary School if expanded and you cannot assume that this will be case.

The number of in and out of catchment children that were declined an admission place at Coety Primary School for Nursery and Reception from 2016 to 12 July 2023, who were offered Welsh-medium placement are detailed below:

<b>Nursery</b>	<b>Welsh-medium placement</b>
124	10
<b>Reception</b>	<b>Welsh-medium placement</b>
35	1

This evidence suggests there is no risk of this happening.

7. As part of the statutory process, a consultation report is formally published which includes all responses received during the consultation process. Cabinet will consider the consultation report when deciding on whether to approve, reject or approve the proposal with modifications, as per the School Organisation Code.

The Cabinet is responsible for making major decisions and policies in Bridgend County Borough and they have the final decision on school modernisation proposals. The decision to progress this scheme was made after hearing all of the responses to the consultation documents.

#### 4. Conclusion

- 4.1 The local authority concludes that the proposal would have a positive impact on education provision and standards and deliver suitable and sufficient accommodation that meets the needs of staff and learners at Coety Primary School.

- 4.2 The proposal would result in appropriate teaching and learning environments that would promote pupil wellbeing and attitudes to learning. The school extension and external areas would be designed to meet the needs of learners and would provide access to the curriculum and extra-curricular activities.
- 4.3 The proposal would ensure the Council is able to meet its statutory duty to provide sufficient school places that meets the needs of the learners.

Copies of this report are available on request in the following ways:

**Telephone:** (01656) 643 643

**Email:** [edsu@bridgend.gov.uk](mailto:edsu@bridgend.gov.uk)

**Online:** [www.bridgend.gov.uk/consultation](http://www.bridgend.gov.uk/consultation)

**Post:** Education and Family Support Directorate, Directorate Support Unit (EDSU), Bridgend County Borough Council, Civic Offices, Angel Street, Bridgend, CF31 4WB.

Alternative formats are available upon request.

*This report is subject to the call-in procedures as set out in the Council's constitution which allows decisions taken by Cabinet, but yet to be implemented, to be reviewed. Should a call in of the report take place, all stakeholders would be informed.*