



# **Newport City Council**

## **School Reorganisation Proposal**

### **Consultation Report**

**Proposal to increase the Capacity of Tredegar Park Primary School**

**Formal Consultation Period:**

**25 September 2023 – 12 November 2023**

#### **Purpose**

This report is published in line with the requirements of the School Standards and Organisation (Wales) Act 2013 and the School Organisation Code, November 2018.

This consultation report includes the following sections:

- The Proposal
- Stakeholder Engagement
- Learner Voice
- Drop-in Sessions
- Consultation Responses
- Estyn's Response
- Welsh Language Commissioner's Response
- Impact on the Welsh language
- Assessment of the Proposal
- Recommendations
- Appendices

## The Proposal

This consultation report concerns a proposal to increase the capacity of Tredegar Park Primary School with effect from September 2024.

## Stakeholder Engagement

An invitation to take part in the statutory consultation was issued to the stakeholders outlined below, with a link to the consultation pack on the Council's website sent by e-mail:

- The Headteacher, teachers, staff, and the governing body of Tredegar Park Primary School;
- Pupils at Tredegar Park Primary School;
- Parents, carers, and guardians of pupils attending Tredegar Park Primary School;
- The Headteachers and Governing Bodies of all Newport schools;
- All Newport City Council elected members;
- All Newport Community Councils;
- The Welsh Ministers;
- Assembly Members (AMs) and Members of Parliament (MPs) representing the area served by the school subject to the proposal;
- Other Local Authorities across the South East Wales Consortium region, including relevant Transport departments;
- The South East Wales Education Achievement Service;
- The Church in Wales, Diocese of Monmouth;
- Roman Catholic Archdiocese;
- Estyn;
- Teaching and staff trade unions representing teachers and staff at all Newport schools;
- The Early Years Development and Childcare Partnership
- All non-maintained registered nursery education providers in the local area
- The Police and Crime Commissioner for Gwent;
- Gwent Police;
- South Wales Fire and Rescue Service;
- Aneurin Bevan University Health Board;
- Public Health Wales;
- Newport Serennu Centre;
- SNAP Cymru;
- Gwent Association of Voluntary Organisations;
- Preventative Services.

### Affected Schools

The school directly affected by this proposal is **Tredegar Park Primary School**.

### Distribution of Information

In addition to the formal (main) consultation document, a Children & Young People's Everyday Summary version was also produced. All documents were available bilingually in Welsh and English.

Hard copies of the full consultation document and the Children and Young People's Everyday Summary version were provided to Tredegar Park Primary School.

Hard copies could also be requested by emailing [school.reorg@newport.gov.uk](mailto:school.reorg@newport.gov.uk) or telephoning 01633 656656 and these were available bilingually in Welsh and English. The document was also offered in other languages on request, although no such requests were received.

The consultation information has been shared on the Newport City Council's Facebook and X (Formerly Twitter) accounts, and via Tredegar Park Primary School's website.

### **Learner Voice**

The Council is keen to gain the views of learners, and this was facilitated through a session held with pupils from various year groups at Tredegar Park Primary School on Monday 9th October 2023.

The following attendees were present:

- 10 pupils representing different year groups
- Headteacher
- Education Transformation Manager
- Education Information and Development Officer

The Council officers attending the session introduced themselves to the pupils, and the session was led by the Education Transformation Manager. To start, the Education Transformation Manager explained the proposal to the pupils. The pupils were then given the opportunity to ask questions, which are outlined in the table below.

<b>Question/Comment</b>	<b>Council's Response</b>
Where in the school will the extra classrooms be located?	The private nursery operated by Duffryn Community Link has moved to the front of the Forest Family Centre building. This means that the area of the Forest Family Centre that used to be the private nursery will be used to create additional classrooms which will be used by the younger year groups in the school. The current Year 5 and Year 6 classroom areas will also be remodelled to create an additional classroom.

With the additional pupils, could there be too many pupils on the playground at break times?	The school has a lot of outdoor space for the pupils to use, but timetables could also be put in place so different classes would have different break times, which will reduce the number of pupils being on the playground at the same time.
If there is a fire, would it get too busy?	All classrooms will have an evacuation plan and a planned fire exit, just as they do now.
Could more classrooms/areas be created for extra pupils after this expansion?	No, this will probably be the maximum number of pupils that will be able to attend school on this site.
Will the school days be longer?	No, the proposal won't change the length of the school day.
What if there is no extra space in classrooms for more pupils?	We are not planning on adding extra pupils into the current classrooms. There will be new classrooms for the extra pupils.
What if there are more than 75 pupils each year?	75 pupils per year group would be the maximum that can fit in the school. If more applications are received, unfortunately some will have to be refused and offered places at another school.

The pupils were invited to give their views on the benefits that would come from the proposal. The potential benefits included:

- Opportunities to make new friends;
- More children to play with;
- Opportunities to possibly learn new languages if the new pupils speak other languages;
- More pupils could mean more funding for the school;
- More opportunity for siblings to attend the same school with more spaces available;
- More job opportunities.

The pupils were given the opportunity to complete hard copies of the Consultation Response Pro-forma during the session.

The Council is very grateful to the staff and pupils who took part in this session and would like to thank them for their valuable contributions to this consultation process.

## Drop-in Sessions

The Council facilitated two drop-in sessions as outlined overleaf, and these were publicised via the Council's website and within all correspondence and documentation relating to the proposal. The drop-in sessions were an opportunity for attendees to ask questions and for Council officers to explain the proposal in greater detail.

**Table 1: Drop-in Sessions**

Location	Date & Time	Session
Tredegar Park Primary School – Infant Hall	Tuesday 3 October 2023 08:45 – 09:45	Drop-in
Tredegar Park Primary School – Infant Hall	Monday 9 October 2023 14:45 – 15:45	Drop-in

### Drop-in Session 1 – Tuesday 3<sup>rd</sup> October 2023

The first drop-in session, held at Tredegar Park Primary School was supported by the Headteacher of the school and two Council officers from the Central Education Service. Hard copies of the main consultation document, the Children and Young People’s Everyday Summary version and response forms were available at the session in both Welsh and English.

No stakeholders attended this session.

### Drop-in Session 2 – Monday 9<sup>th</sup> October 2023

The second drop-in session, also held at Tredegar Park Primary School was supported by two Council officers from the Central Education service. Hard copies of the main consultation document, the Children and Young People’s Everyday Summary version and response forms were available at the session in both Welsh and English.

Two stakeholders attended this session and took the opportunity to ask questions, which are outlined below:

**Question:** *“Could the increase affect my child who could be attending Nursery from September 2024 by putting them in a large class?”*

**Council’s Response:** *“The proposal would not affect class sizes. Infant Class Size legislation means that Foundation Phase classes must not contain more than 30 pupils. In Key Stage 2, a maximum of 30 children per class is a target that all schools should be working towards”. (The table in the consultation document was used to illustrate the proposed class structure.)*

**Question:** *“Will the proposed increase in the number of places be enough to accommodate the new housing developments being built in the area?”*

**Council’s Response:** *“This proposal is one of three affecting schools in the area, all providing additional places, as the new Welsh-medium primary (Ysgol Gymraeg Nant Gwenlli) will move to its permanent location in Pillgwenlly shortly, and Pillgwenlly Primary School will be relocating to the Whiteheads site. Following these moves, both of these schools will increase in size to provide additional school places.”*

## Consultation Responses

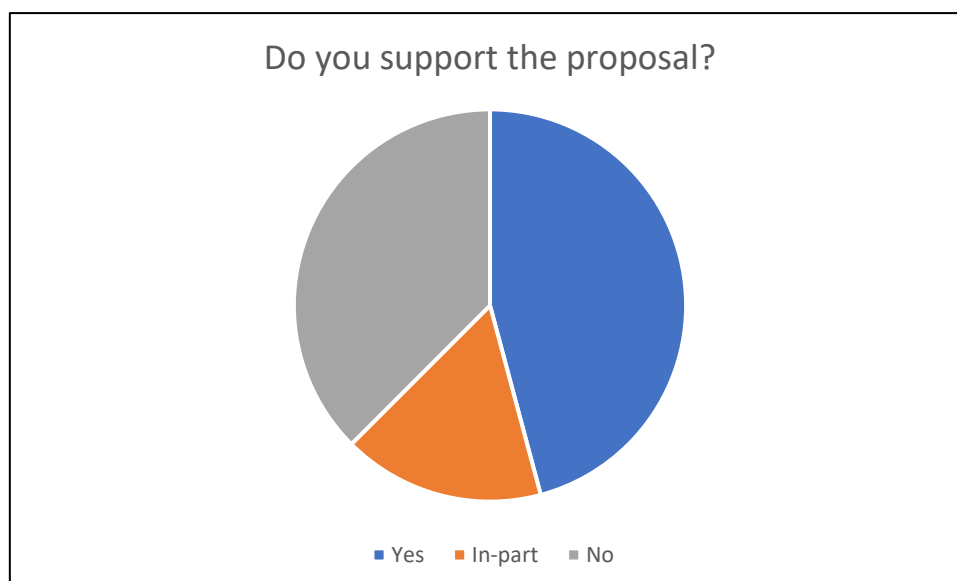
Overall, a total of 27 were received during the consultation period. 24 responses were received via the response pro-forma (see Appendix A) online and via hard copies, by a variety of stakeholders including:

- Parents/Carers
- Local residents
- Pupils

There were also 3 written responses received by email from a Teachers' Trade Union, Estyn (His Majesty's Inspectorate for Education and Training in Wales) and the Welsh Language Commissioner. During the consultation, the Head of Infrastructure also contacted the Education Service to make enquiries around whether the proposal might have a potential impact on home to school transport costs and arrangements. However, the Chief Education Officer confirmed that as the proposal would increase the availability of local school places for local children, this would likely help reduce the number of pupils requiring funded home to school transport assistance.

The response pro-forma offered the opportunity for respondents to answer a direct question in relation to the proposal, as follows:

*'Do you support the proposal to increase the capacity of Tredegar Park Primary School to 2.5 form entry with effect from September 2024?'*



11 out of 24 respondents (46%) supported the proposal, with one response noting that the community has grown hugely in the past few years.

4 out of 24 respondents (17%) supported the proposal in part. The comments raised via these responses have been summarised, together with a response from the Council as follows:

<b>Comment / Question</b>	<b>Number of Similar Comments</b>	<b>Council's Response</b>
It would be beneficial for the Duffryn area to have a new primary school built due to the current school being near capacity.	2	The Council does not possess a suitable plot of land in the area for another school. Pupil forecasts indicate that the current planned expansions would be sufficient to cope with the expected demand from the area and the new housing developments.
The provision of additional places is supported, but I have concerns about the traffic levels in the area and how any expansion would have a negative effect on traffic and parking.	2	The school site can be accessed from both Kestrel Way/Duffryn Drive and Partridge Way/Lighthouse Road. Most homes within the catchment area are within walking distance, and the school is actively working with Sustrans and the Council's Highways Team to encourage parents and carers not to drive to school.
I have concerns about class sizes and that the learning environments are too full for children to learn in a calm environment.	1	It is not proposed that any class will have more than 30 pupils. However, the proposed expansion will ultimately require the school to run a small number of mixed-age classes where the number of pupils in a year group exceeds 60 pupils, as is normal in 2.5 form-entry schools. Following the conclusion of the consultation period, the Headteacher has confirmed that all Foundation Phase classes are arranged to have 30 pupils or less.

9 out of 24 respondents (38%) did not support the proposal; some of these respondents put forward additional views and questions, which have been outlined below:

<b>Comment / Question</b>	<b>Number of Similar Comments</b>	<b>Council's Response</b>
The school is already loud and noisy. If more children attend this will only increase.	1	There is a possibility of timetables being put in place so that different classes would have different break times, therefore reducing the number of pupils on the playground at onetime, and this could negate any increase in noise levels.
The classrooms are too full for adequate concentration and support.	1	The proposed expansion will ultimately require the school to run a small number of mixed-age classes where the number of pupils in a year group exceeds 60 pupils, as is normal in 2.5 form-entry schools. It is not proposed that any single class will have more than 30 pupils. Following the conclusion of the consultation period, the Headteacher has confirmed that all Foundation Phase classes are arranged to have 30 pupils or less.

<p>Adding additional pupils will add further pressure onto walkways going into the school which are narrow and constantly flooded, meaning children and parents have to walk on grass and muddy areas. Traffic and parking issues will also be made worse if the number of pupils is increased.</p>	<p>2</p>	<p>Newport City Homes is working to address the drainage and flooding issues in this area. This will allow the paths to be used without the need to walk on the grass and muddy areas. Most homes within the catchment area are within walking distance, and the school is actively working with Sustrans and the Council's Highways Team to encourage parents and carers not to drive to school.</p>
<p>Ysgol Gymraeg Nant Gwenlli is due to move to its permanent location in Pillgwenlly in 2024. This should be promoted to encourage local children to enrol their children there.</p>	<p>1</p>	<p>Newport City Council recognises the need to promote Welsh-medium education and there is a specific multi agency group in place which has a strong focus on the promotion of Welsh-medium education. These promotion activities include:</p> <ul style="list-style-type: none"> <li>• Updates to Newport's 'Becoming Bilingual' campaign;</li> <li>• Promotion at Flying Start run information sessions for expectant parents in the city;</li> <li>• Collaboration with the Regional Welsh-medium Education Promotion Champion;</li> <li>• Sharing of promotional information with colleagues in Aneurin Bevan University Health Board;</li> <li>• Promotion work undertaken in the Pillgwenlly area to promote the new school to local residents, coordinated and planned by Menter Iaith Casnewydd and key partners;</li> <li>• Promotional video projects;</li> <li>• Communication with Early Years groups.</li> </ul>

The response received from a Teacher's Trade Union was **partly supportive** of the proposal. The full response is included at Appendix B but includes the following:

*The NASUWT is pleased that no negative impact on staffing features in the proposal. Additional staff will need to be appointed at Tredegar Park Primary School to accommodate the additional pupil numbers. The Headteacher and the Governing Body will manage this in line with agreed recruitment processes. In order to support the proposal, however, we would be seeking an explicit reassurance that this proposal would have no indirect impact upon staffing requirements at other schools. This includes both primary and secondary schools within and outside the catchment. In order to maintain a high quality of teaching and learning, it is essential that class sizes do not increase. We are also concerned that the increase in PAN needs to be appropriately funded.*

The response also referenced data obtained from the *My Local Schools* website in support of these comments by stating that:

*There has consistently been a pupil teacher ratio (PTR) at this school that is less favourable than both the local authority and Wales averages in the five years from 2018. The data*



*shows that the amount of funding provided on average, per pupil, was lower than that of other primary schools in Newport in four out of the last six years.*

*Finally, the impact of the building work upon the day-to-day running of the school needs to be considered if this proposal is approved. Appropriate planning needs to be put into place to ensure that there is a continuity of learning during the building work. The priority must be to minimise disruption for learners and teachers at the school.*

### **Response from Newport City Council:**

There is no anticipated impact on other schools. The proposal to incrementally increase the capacity of the school over seven years means the likelihood of pupils transferring from other schools to Tredegar Park Primary is very low. There are no plans to reduce the capacity of any other school within The John Frost School cluster as a result of this proposal.

It is not proposed that any individual classes will have more than 30 pupils. The proposed capacity of 525 pupils would be accommodated across 18 classes, each with 30 pupils or less.

Colleagues in the Council's Finance Team have confirmed that the school budget per pupil figure taken from *My Local School* should not be relied upon for an accurate comparison to other schools as it is a simple calculation of the total school budget divided by the number of pupils on roll and does not consider other factors which affect funding, such as the size and condition of buildings and grounds. The Age Weighted Pupil Unit (AWPU) is the rate the Local Authorities set to allocate basic entitlement funding for pre-16 pupils in mainstream schools. Basic entitlement is a compulsory factor which must be used in the funding formula and the AWPU rate is the same value per year group/category across all Newport schools. In their most recent inspection report (October 2022) Estyn note that the school's leaders "manage the school's budget and pupil development grant well, linking spending appropriately to needs and improvement activities".

The Council entirely agrees that minimising disruption to teachers and learners is essential. For this reason, the Council will work with the school to ensure that any disruptive capital works are completed by arrangement, so that the school is either closed or those areas affected are not occupied.

### **Estyn's Response**

The full response from Estyn is included at Appendix C of this report. However, in summary, the response states that the proposal is likely to, at least, maintain the standard of provision in the school.

The Estyn response states that '*The council has provided a table which outlines the stages and duration for the consultation process but has not included any proposed dates in this table. It has also not referred to whether there would be a need for any interim arrangements necessary for implementation of the proposal*' and that '*The council has identified four risks of the proposal and listed how they would be mitigated against. However, there appears to be insufficient detail as to these mitigations*'.

### **Response from the Council:**

The Council acknowledges that the consultation document did not include proposed dates in the table outlining the process. This was a conscious decision because dates can be affected by a number of factors and are therefore subject to change. However, the Council can confirm that the proposed capacity increase will be implemented in a phased manner and that the school buildings already provide sufficient accommodation to support the first phases of expansion. As such, no interim measures are required to support the implementation.

In relation to risk mitigation, the Council's Planning of School Places group is a cross-departmental group that monitors pupil numbers and projections continually on a local area basis. One of the key purposes of this group is to consider and recommend measures in response to anticipated situations, such as creating additional capacity or proposing to reduce a school's published admission number (PAN).

*The Estyn response also states that 'The council has identified the cost of the proposal as being £1m via approved Welsh Government funding. It has further identified that the 105 additional places will cost approximately £360,000 per year and states that the cost increase will be funded through the school's delegated budget. However, the council does not appear to have considered what the impact on the budget would be if the additional places are not taken up. The local authority has not provided a Welsh Language Impact Assessment as part of this proposal. The local authority has not provided a Community Impact Assessment as part of this proposal'.*

*The final point from Estyn notes that 'The council has provided a 'Fairness and Equalities Impact Assessment' as a separate document. In the school's last inspection report, 19.2% of children were identified as having additional learning needs and 7.5% of pupils were identified as having English as an additional language. These are above national averages yet there is no evaluation of the impact of the proposal on these groups'.*

### **Response from the Council:**

The capacity increase will be accommodated by re-purposing existing space within the school, so any budget pressures will relate to staffing costs and learning resources associated with additional pupils.

A summary Welsh language impact assessment was included on page 19 of the consultation document, and the separate FEIA provides further detail on the likely impact on Welsh language, and notes that the proportion of children with English as an additional language (EAL) is significantly below the Newport average. The school's last inspection report noted that pupils with ALN have good support and the Council believes that more pupils will be able to benefit from the school's inclusive ethos and capabilities if the capacity is increased. Following feedback from stakeholders, the Welsh language impact section of the FEIA has been revised to provide further consideration and detail on this element.

## Welsh Language Commissioner's Response

The full response from the Welsh Language Commissioner is included at Appendix D of this report.

The Welsh Language Commissioner's response states that *'In the 'Impact on Welsh language provision' section it is noted that the proposal to expand Tredegar Park Primary School will not affect the Council's plans for growing Welsh-medium education provision across Newport. The Equalities and Fairness Impact Assessment explains that there are sufficient places in the Welsh-medium sector in the area and that this is expected to continue when Ysgol Gymraeg Nant Gwenlli is moved to its permanent location as a growing school. However, we have concerns about this. The catchment area of Tredegar Park Primary School will be within the catchment area of Ysgol Gymraeg Nant Gwenlli. It is noted that there are currently 75.3% of surplus places at Ysgol Gymraeg Nant Gwenlli. In the context of the expansion of Tredegar Park Primary School, which starts a year before Ysgol Gymraeg Nant Gwenlli moves to the catchment area, has the Council considered how it will promote Ysgol Gymraeg Nant Gwenlli in order to ensure that it reaches its potential in terms of increasing capacity?'*

The response goes on to say that *'As the Council favours expanding Tredegar Park Primary School specifically to deal with future pressures from new housing developments, we ask what consideration has the Council given to the potential of Ysgol Gymraeg Nant Gwenlli in this context? Does the Council have plans to promote the benefits of Welsh-medium education to the families who will move into those new homes? It should be ensured that Welsh-medium education is presented as a valuable choice for the families that will settle in those housing developments. The Council should consider the extent to which the expansion of Tredegar Park Primary School could affect the WESP target achievement, particularly Outcomes 1 and 2, which are so dependent on the success of Ysgol Gymraeg Nant Gwenlli. Should the Council decide to implement the proposal, we would strongly recommend that it establishes clear and robust mitigation measures to ensure that the expansion of Tredegar Park Primary school does not have a detrimental effect on the development of Welsh-medium education in the catchment area. As you know, the Welsh language standards require local authorities to give full and conscientious consideration to the potential impact of policy decisions on the Welsh language'*.

### Response from the Council:

It is unfortunate that the incremental increase in the capacity of Tredegar Park Primary School will temporarily reduce the percentage of Welsh-medium places offered as a proportion of all places in the area for one academic year. It will not however have any impact on the availability of a sufficient number of Welsh-medium school places to enable continued growth in numbers accessing Welsh-medium education provision, in line with the Council's Welsh in Education Strategic Plan (WESP). Although English-medium provision may increase, the Council is committed to the same incremental increase in the % of uptake across the Welsh-medium sector as per the WESP targets, and the actual number will be proportionate to the cohort size year on year. The WESP target is a percentage of the relevant year's cohort and not percentage of places available.

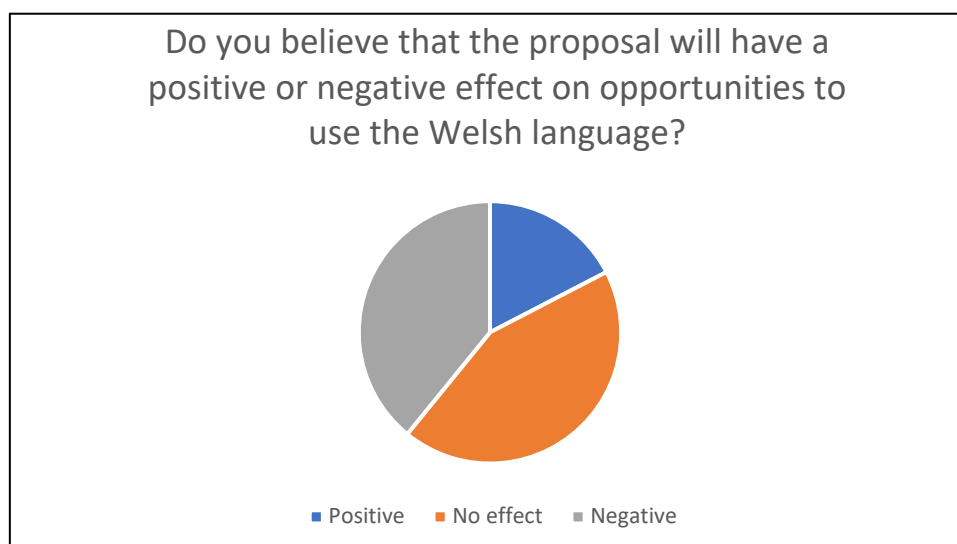
It is acknowledged that some households will live within easy walking distance of an English-medium school but be further from Ysgol Gymraeg Nant Gwenlli. Some of these will live within 2 miles of the Welsh-medium catchment school and therefore not be eligible for funded school transport. This dis-incentive to choose Welsh-medium education will be countered by our promotion campaign which will highlight to families the various benefits of Welsh-medium education. Newport's Welsh-language promotional activities include:

- Updates to Newport's 'Becoming Bilingual' campaign;
- Promotion at Flying Start run information sessions for expectant parents in the city;
- Collaboration with the Regional Welsh-medium Education Promotion Champion;
- Sharing of promotion information with colleagues in Aneurin Bevan University Health Board;
- Promotion work undertaken in the Pillgwenlly area to promote the new school to local residents, coordinated and planned by Menter Iaith Casnewydd;
- Promotional video projects;
- Communication with Early Years groups.
- Routine distribution of 'Becoming Bilingual' information to parents/carers of children invited to apply for nursery and school places

## Impact on the Welsh language

The consultation response pro-forma also asked respondents to give their views on the likely impact of the proposal on the Welsh language.

'Do you believe that the proposal will have a positive or negative effect on opportunities to use the Welsh language?'



4 out of 24 respondents (17%) answered 'Positive'. 10 respondents (42%) answered 'No effect', and 9 respondents (38%) answered 'Negative'. Comments provided from those who answered 'Negative' are summarised below. 1 respondent did not provide an answer to this question.

Comment / Question	Number of Similar Comments	Council's Response
Invest the funding for this proposal to support the refurbishment of the current Pillgwenlly Primary School which will be the permanent home of Ysgol Gymraeg Nant Gwenlli	2	There is a specific budget set aside for the refurbishment of the current Pillgwenlly Primary School building before Ysgol Gymraeg Nant Gwenlli moves in. Investment at Tredegar Park Primary School will not affect that budget allocation.
There should be more promotion to attract local families to Ysgol Gymraeg Nant Gwenlli which can accommodate more pupils than the proposed increase in capacity at Tredegar Park Primary School.	1	<p>Newport City Council recognises the need to promote Welsh-medium education, but also needs to provide sufficient places to accommodate parental choice. There are four sub-groups that monitor the implementation of the Welsh in Education Strategic Plan and the 'Grow' group, covering Outcomes 1 and 2, has a strong focus on promotion of Welsh-medium education. Promotion includes:</p> <ul style="list-style-type: none"> <li>• Updates to Newport's 'Becoming Bilingual' campaign;</li> <li>• Promotion at Flying Start run baby showers for expectant parent in the city;</li> <li>• Collaboration with the Regional Welsh-medium Education Promotion Champion;</li> <li>• Sharing of promotion information with colleagues in Aneurin Bevan University Health Board;</li> <li>• Promotion work was undertaken in the Pillgwenlly area to promote the new school to local residents, coordinated and planned by Menter Iaith Casnewydd;</li> <li>• Promotional video projects;</li> <li>• Communication with Early Years groups.</li> </ul> <p>The "Grow" sub-group which meets on a termly basis is chaired by a representative of Cymraeg I Blant.</p>
The proposal is to increase capacity in an English-medium school.	1	The number of surplus places available in The John Frost School cluster in 2023 was at 3.8%. The nearest cluster to The John Frost School is the Bassaleg cluster which in 2023 was at a 0.9% surplus. Welsh Government recommend a 10% surplus. The Council is committed to growing Welsh-medium education provision across Newport as outlined in the 10-year Welsh in Education Strategic Plan. Promotion of Ysgol Gymraeg Nant Gwenlli, which will eventually provide 420 Welsh-medium education places in the area local to Tredegar Park Primary, is central to the delivery of this plan.

In response to the question 'Do you believe that the proposal will treat the Welsh language less favourably than the English language?' 6 respondents answered 'Yes'. No further comments were received.

During the consultation period, the Council was contacted by a member of Newport's Welsh Education Forum who shared a view that the Welsh Language Impact Assessment contained within the Fairness and Equalities Impact Assessment (FEIA) had not evidenced due consideration of the effects of the proposal on the Welsh language and on Welsh-medium education. The FEIA has been revised and updated following consideration of these comments and now provides further detail around the potential impact of this proposal on the Welsh language.

## **Assessment of the Proposal**

Following the formal consultation period, the Council maintains the view that the proposal represents the best and most achievable contribution to increase the number of English-medium primary school places in the Duffryn area. The potential impact of the proposal on the Welsh language has been considered in detail and the measures being employed as part of the Council's Welsh language promotion strategy and WESP implementation plan are deemed sufficient to mitigate any perceived negative impact. The proposal is still preferred over the alternative options available.

## **Recommendations**

It is recommended that permission be sought to move this proposal forward by publishing a statutory notice. This decision will be referred to the Cabinet Member for Education and Early Years and taken through the Council's agreed democratic process.

---

In accordance with the School Organisation Code (2018) this report is published electronically on Newport City Council's website at [www.newport.gov.uk/schoolreorganisation](http://www.newport.gov.uk/schoolreorganisation)

To request a hard (paper) copy of this document please contact Newport City Council's Education Information and Development Officer on 01633 656656 or email [school.reorg@newport.gov.uk](mailto:school.reorg@newport.gov.uk)

## Appendix A - Consultation Response Pro-forma

**This response relates to the proposal to increase the capacity of Tredegar Park Primary School to 2.5 form entry with effect from September 2024.**

Your views matter. Please tell us what you think about the proposal by completing this questionnaire and returning it to the Education Information and Development Officer, Newport City Council, Room 425W, Civic Centre, Newport NP20 4UR. Alternatively, you can complete this form online at [www.newport.gov.uk/schoolreorganisation](http://www.newport.gov.uk/schoolreorganisation) or email your response to [school.reorg@newport.gov.uk](mailto:school.reorg@newport.gov.uk)

**The closing date for the submission of responses to this consultation is midnight on 12 November 2023.** Please note that negative responses made to this consultation will not be counted as objections to the proposal, they will be recorded as adverse comments. Objections can only be registered following the publication of a statutory notice.

### 1) Do you support the proposal to:

Increase the capacity of Tredegar Park Primary School to 2.5 form entry with effect from September 2024.

Yes  No  In part

**Please use the box below to provide comments or explain which element of the proposal you do/do not support.**

The Council has a duty to consider and identify all the possible effects a policy decision may have on opportunities for persons to use the Welsh language or treating the Welsh language no less favourably than the English language.

### 2) Do you believe that the proposal will have a positive or negative effect on opportunities to use the Welsh language?

Positive  Negative  No effect

### 3) If you think it will have a negative effect, what steps could we take to lessen or remove this and improve positive effects?

4) Do you believe that the proposal will treat the Welsh language less favourably than the English language?

Yes  No

Please indicate who you are (e.g. parent/carer of a child attending a local nursery)

--

Please select your Ethnic group			
White British		Asian-Bangladeshi	
White Irish		Asian-Indian	
Any other White background (please state): _____		Asian-Pakistani	
		Any other Asian background	
Gypsy or Irish Traveller		Black Caribbean	
White and Asian		Black African	
White and Black African		Any other Black background	
White and Black Caribbean		Arab	
Any other Mixed background (please state): _____		Chinese	
		Any other ethnic group (please state): _____	
Asian-Bangladeshi		Prefer not to say	
Asian-Indian			
Asian-Pakistani			

Welsh language			
<b>Do you consider yourself a Welsh speaker?</b>			
Yes		No	Prefer not to say

Caring Responsibilities			
<b>Do you care for children of school age?</b>			
Yes		No	Prefer not to say
<b>Do you care for children of pre-school age?</b>			
Yes		No	Prefer not to say
<b>Do you care for a dependent adult or child above school age?</b>			
Yes		No	Prefer not to say

If you wish to be notified of the publication of the consultation report, please supply your contact details:

E-mail: \_\_\_\_\_

Postal address: \_\_\_\_\_



## Appendix B – Response from the NASUWT

The NASUWT is pleased that no negative impact on staffing features in the proposal: Additional staff will need to be appointed at Tredegar Park Primary School to accommodate the additional pupil numbers. The Headteacher and the Governing Body will manage this in line with agreed recruitment processes (p.18)

In order to support the proposal, however, we would be seeking an explicit reassurance that this proposal would have no indirect impact upon staffing requirements at other schools. This includes both primary and secondary schools within and outside the catchment.

In order to maintain a high quality of teaching and learning, it is essential that class sizes do not increase. According to MyLocalSchool data, there has consistently been a pupil teacher ratio (PTR) at this school that is less favourable than both the local authority and Wales averages in the five years from 2018. This means that learners here have been disadvantaged by having access to less teachers than the average primary school in Wales. OECD data shows that high teacher: pupil ratios are consistently an indicator of higher pupil performance. Increasing the published admission number needs to ensure that this PTR is not worsened.

We are also concerned that the increase in PAN needs to be appropriately funded. According to MyLocalSchool, data shows that the amount of funding provided on average, per pupil, was lower than that of other primary schools in Newport in four out of the last six years. Increasing the published admission number needs to ensure that this funding situation is not worsened.

Finally, the impact of the building work upon the day-to-day running of the school needs to be considered if this proposal is approved. Appropriate planning needs to be put into place to ensure that there is a continuity of learning during the building work. The priority must be to minimise disruption for learners and teachers at the school.

## Appendix C – Estyn’s Response

### Introduction

This report has been prepared by His 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.

### Summary / Conclusion

The proposal is by Newport city council. It will allow the school to increase the published admission number from 60 to 75 and increase the total capacity for pupils of statutory school age from 420 to 525. The nursery admission number would not change under the proposal. The capacity increase will be made possible by using an area in the Forest Family Centre recently vacated by Duffryn Community Link. Some changes to the use of existing spaces in the main school building will also be necessary. The school currently has surplus places, and the proposal could significantly increase this number. The council is relying heavily on these surplus places being taken up through future housing developments. They have not provided sufficient information as to how they would address the issue should the surplus places not be taken up.

Overall, Estyn considers that the proposal is likely to maintain the standard of education provision and outcomes for pupils in the school.

### Description and benefits

The proposer’s rationale for the proposal is clear. It is to meet expected growing demand for primary school places in the Tredegar Park, Gaer and Pillgwenlly wards of Newport. The increased demand is expected following new housing developments established in the surrounding area of the school.

The council has provided a suitably detailed description of the proposal. The proposal will provide an additional 105 pupil spaces at Tredegar Park Primary School, an additional 15 places per year group (Reception to Year 6). It is proposed that the capacity increase will be made possible by repurposing an area of the Forest Family Centre and parts of the existing Tredegar Park Primary School to create additional teaching space. Much of the facilitating works for this expansion were completed in 2018-2019.

The council has provided a table which outlines the stages and duration for the consultation process but has not included any proposed dates in this table. It has also not referred to whether there would be a need for any interim arrangements necessary for implementation of the proposal.

The council has considered two alternative options. The options are either to do nothing or to expand a different primary school. It has listed the expected advantages and disadvantages of each option. These appear to be valid and reasonable. Following consideration of these options, the council has stated that its preferred option is as per the proposal and has listed the expected benefits of this proposal. The key benefit appears to be the increased number of pupil places at the school. The council has not identified any disadvantages for this proposal.

The council has identified four risks of the proposal and listed how they would be mitigated against. However, there appears to be insufficient detail as to these mitigations. For example, the council has stated for three of the risks that “The Planning of School Places group will continue to monitor projections and act accordingly”. It is not clear exactly what this means or how this will be carried out.

The council has stated appropriately that this proposal will not affect current travel arrangements. Safe walking routes to the existing school sites are already established. Free home to school transport is provided to all primary aged pupils of statutory school age who live 2 miles or more from their catchment school, or nearest available school.

The council has provided tables that show past and projected numbers at the school. It intends to increase capacity at the school year by year until September 2030, when the full capacity of 525 pupils will be realised. However current projections show that there will only be 385 pupils at the school in 2029-2030. This could mean a surplus of 140 pupils or 27% surplus places. The council relies heavily on these surplus places being taken up through future housing developments. They have not provided sufficient information as to how they would address the issue should the surplus places not be taken up.

The council has considered the impact of the proposal on Welsh medium provision and suitably concluded that it has no impact on the council’s plans for growing Welsh-medium education provision across Newport as outlined in their 10-year Welsh in Education Strategic Plan (WESP).

The council has identified the cost of the proposal as being £1m via approved Welsh Government funding. It has further identified that the 105 additional places will cost approximately £360,000 per year and states that the cost increase will be funded through the school’s delegated budget. However, the council does not appear to have considered what the impact on the budget would be if the additional places are not taken up.

The local authority has not provided a Welsh Language Impact Assessment as part of this proposal.

The local authority has not provided a Community Impact Assessment as part of this proposal.

NB. Estyn provides their opinion only on the overall merits of school organisation proposals and does not evaluate the Welsh Language Impact Assessment or the Community Impact Assessment.

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

The council has referred to the most recent Estyn inspection report for Tredegar Park primary school in October 2022 and appear to have mainly suitably considered the impact of the proposal on quality and standards in education. They have provided sufficient commentary on the impact of the proposal on the separate aspects of learning, wellbeing and attitudes to learning, teaching and learning experiences, care, support and guidance and leadership and management. These appear to be fair and reasonable.

The council has provided a 'Fairness and Equalities Impact Assessment' as a separate document. In the school's last inspection report, 19.2% of children were identified as having additional learning needs and 7.5% of pupils were identified as having English as an additional language. These are above national averages yet there is no evaluation of the impact of the proposal on these groups.

The council has recognised the fact that additional staff will need to be appointed at the school to accommodate the additional pupil numbers. The proposal explains that The Headteacher and the Governing Body will manage this in line with agreed recruitment processes.

## Appendix D – Welsh Language Commissioner’s Response

Thank you for the opportunity to contribute to the consultation on the expansion of Tredegar Park Primary School from September 2024. We are writing to discuss the proposal for this English-medium school in the context of the Council’s plans for Welsh-medium education in the same catchment area.

It is noted in the consultation document that there is an increasing demand for primary school places in the wards of Tredegar Park, Gaer and Pilgwenlly as a result of major housing developments locally. It is explained that the Council favours expanding Tredegar Park Primary School specifically to deal with future pressures from these developments.

The Council has plans to locate a Welsh-medium primary school, Ysgol Gymraeg Nant Gwenlli, in the same catchment area in 2025. That school has already been established as a fledgling school on a temporary site since 2021. The original intention, according to the Welsh in Education Strategic Plan for 2022-2023 (WESP), was to move the school to its permanent location in Pilgwenlly in September 2024. This new school is central to the Council's plans for expanding Welsh-medium education, by increasing the number of Welsh-medium primary places available across the city by 54%. It is noted in the consultation document that Ysgol Gymraeg Nant Gwenlli will move to its permanent location, namely the site of Pilgwenlly Primary School, in 2025. Pilgwenlly Primary School, which is an English-medium school, will move to a new building that will allow that school to also increase its capacity.

In the 'Impact on Welsh language provision' section it is noted that the proposal to expand Tredegar Park Primary School will not affect the Council's plans for growing Welsh-medium education provision across Newport. The Equalities and Fairness Impact Assessment explains that there are sufficient places in the Welsh-medium sector in the area and that this is expected to continue when Ysgol Gymraeg Nant Gwenlli is moved to its permanent location as a growing school. However, we have concerns about this. The catchment area of Tredegar Park Primary School will be within the catchment area of Ysgol Gymraeg Nant Gwenlli. It is noted that there are currently 75.3% of surplus places at Ysgol Gymraeg Nant Gwenlli. In the context of the expansion of Tredegar Park Primary School, which starts a year before Ysgol Gymraeg Nant Gwenlli moves to the catchment area, has the Council considered how it will promote Ysgol Gymraeg Nant Gwenlli in order to ensure that it reaches its potential in terms of increasing capacity?

As the Council favours expanding Tredegar Park Primary School specifically to deal with future pressures from new housing developments, we ask what consideration has the Council given to the potential of Ysgol Gymraeg Nant Gwenlli in this context? Does the Council have plans to promote the benefits of Welsh-medium education to the families who will move into those new homes? It should be ensured that Welsh-medium education is presented as a valuable choice for the families that will settle in those housing developments.

The Council should consider the extent to which the expansion of Tredegar Park Primary School could affect the WESP target achievement, particularly Outcomes 1 and 2, which are so dependent on the success of Ysgol Gymraeg Nant Gwenlli. Should the Council decide to implement the proposal, we would strongly recommend that it establishes clear and robust mitigation measures to ensure that the expansion of Tredegar Park Primary school does not have a detrimental effect on the development of Welsh-medium education in the catchment area. As you know, the Welsh language standards require local authorities to give full and conscientious consideration to the potential impact of policy decisions on the Welsh language.

We would be pleased to hear from the Council regarding how it will take action to promote Ysgol Gymraeg Nant Gwenlli and ensure that it succeeds in achieving its potential as a Welsh-medium school and realising the objectives of the WESP.