

# Bassaleg School Formal Objection

**Proposal to increase the capacity from September 2023 in accordance  
with section 42 of the School Standards and Organisations (Wales)  
Act 2013 and the School Organisations Code**

3-25-2021

I confirm I am a resident of [redacted] the 155 properties which immediately adjoins and faces Bassaleg School.

In preparing this formal objection I have reflected and drawn on my previous experience as a Parent Governor, Bassaleg School, Governor, Coleg Gwent and a Professional Advisor to WG on their 21C Schools Capital Approvals Panel.

I have 4no formal objections to the proposal to increase the capacity of the school which I set out below:

### **Objection 1**

#### **Optimum School Size**

The average size of Newport Secondary Schools is in the region of 1,200 pupils (source WG). The average size of an English Secondary School is in the region of 1,000 pupils (source Gov UK)

With a current enrolment of 1,747 pupils Bassaleg is therefore one of the largest secondary schools in Wales and with the addition of a further 303 pupils in UK terms it will effectively become a 'Super-Size' School.

It is said that Supersize Schools can provide quick building solutions, economies of scale, wider curriculums, and strong out of school clubs and activites. However, there are also well documented concerns about the overall wellbeing and educational attainment of pupils in 'Supersize' schools such as Bassaleg.

Some specific examples of these concerns are set out below:

- **Lifeline Projects**, <https://www.lifelineprojects.co.uk/about/> a charity providing mentoring and support for pupils have previously raised concerns about how in supersize schools' vulnerable pupils slip through the support network.
- **The Gates Foundation**, in America has identified that larger schools have some of the toughest discipline problems and that significantly improved behaviour and standards were more frequently observed in smaller schools where it is easier to foster respect.
- **The Calouste Foundation**, <https://gulbenkian.pt/uk-branch/> has sponsored a human scale project of 'schools' within school and helped remodel the 1,800 Brislington Enterprise College in Bristol into five separate learning communities of 300 pupils.

The consultation response suggests that there is no intention to expand numbers beyond the proposed target of 2050 pupils. However, the Council is not a master of its own destiny in this regard. The key driver behind the current proposal to expand pupil numbers is the impact of new speculative residential developments in the school's catchment area.

Whilst the Council have been prepared to resist new residential developments there is no certainty in the future that in the future WG will not overturn a Planning Refusal as they did with the recent 100+ new houses on the former Tredegar Park Golf Club.

In their consultation response the Council state that the *'main housing developments in the catchment area are mostly complete and occupied and the anticipated impact on pupil numbers has been considered'*.

This statement is incorrect because the proposal to expand Bassaleg School coincides with the Councils review of its Local Development Plan (LDP). This means that the Council has issued formal invitation to developers to submit 'candidate sites' for possible future residential development. This invitation cannot exclude the possibility of new housing sites in the Bassaleg School catchment area even though the Council might be minded to refuse planning permission.

In this context for over thirty years Bassaleg has been under pressure from developers to construct new houses in the School catchment area. So, whilst the Council might be prepared to resist future residential development triggered by the LDP Review there is no certainty that their stance might not be overturned by WG either on Appeal or by a Call in of the Plan.

The Council have effectively conceded in their consultation response that they have not considered how the possibility of future residential development review might impact on the continued growth in pupil numbers. In the circumstances how can they answer the following fundamental and strategic questions about overall future school size?

- a) What future growth in pupil numbers can reasonably be expected at Bassaleg School?
- b) When will it become necessary to place a cap on pupil numbers?
- c) Should it be necessary to cap future pupil numbers what alternative options for educational provision might be made to address the school catchment area?

As the Council are silent on these important questions its Business Case for the proposed expansion of Bassaleg School is fundamentally flawed as it merely addresses, the 'here and now' rather than taking a long-term Strategic Outlook on how potentially growing secondary pupil numbers will be met in the Bassaleg catchment area over the next 5, 10, 15 years?

Also, as Post 16 pupils are effectively 'foot loose' what is stopping the School rapidly expanding its sixth form once the proposed new buildings are completed?

If the brand-new school buildings and support facilities attract even more than the current cohort of 400+ sixth formers, how will this increased interest be capped in future years?

It is concerning that the Councils proposals for Bassaleg effectively ignores current and future pupil numbers associated with Post 16 Education and fails to make even a modest assessment about how future pupil numbers might increase due to the LDP review.

In this respect the current proposal to increase pupil numbers can best be described as an 'ostrich approach' as it 'reactive' rather than 'proactive' and if implemented will merely acting as a 'sticking plaster' to inevitable and long-term growth in pupil numbers.

## **Objection 2**

### **Post 16 Education and Training**

The Councils decision to support the construction of a £90M College in the City Centre to revitalise and support the delivery of Post 16 Education and Training in Newport clearly raises the question as to the long-term future of the current consortia approach for maintaining a viable sixth form at Bassaleg School.

The consequences of this decision in the context of the Councils decision to expand pupil numbers at Bassaleg should not be ignored as the schools sixth form / Post 16 education accounts for over 400 pupils comprising some 20% of the school's overall pupil numbers.

In its Consultation response the Council confirm that if Bassaleg School merely provided a 11-16 education model the existing capacity of the School would be sufficient for its future forecasts i.e., the removal of 400+ sixth formers would negate the need to expand current numbers.

Strangely the Council continue to ignore the impacts that the current 400+ sixth formers have on the functioning of Bassaleg School in terms of Classroom provision, staffing, revenue costs, overall pupil numbers and community impact (such as student car parking in residential streets adjoining the school).

Although the Council maintains its commitment to a school's based 3-18 education delivery model in the recent past, they have been willing to consider alternative models for the future delivery of Post 16 Education.

For example, in November 2010 the Council published a Business Case '*The Future Delivery of Post 16 Education and Training in Newport*' which considered alternative approaches and set the scene for the current East / West split for Post 16 Consortia curriculum delivery.

It is noted that this Business Case considered in detail two alternative options for Post 16 Education shown in the report as **Options D & E** broadly summarised below.

- **Option D: Local Authority Sixth Form Centre** *This option is possible; however, Newport does not currently have surplus capacity in its secondary schools to permit remodelling of accommodation, similarly, whilst meeting investment objectives it is not affordable or politically acceptable.*
- **Option E: Tertiary Learning Centre – New Build** *This option is possible; although it meets investment objectives generally it is not affordable or politically acceptable.*

This raises a question whether the Councils, decision to support the construction of a £90M College in the City Centre to revitalise and support the delivery of Post 16 Education and Training in Newport now in fact resurrects **Options D and E**?

If it does surely the decision to spend circa £28M at Bassaleg should be considered in the light of this new investment proposal and possible change in strategic direction for the delivery of Post 16 Education in Newport. This point is relevant as the Council has already in conceded in their consultation response that should Bassaleg change to a 11-16 education model the existing capacity of the School would be sufficient for its future forecasts and the removal of 400+ sixth formers would negate the need to expand current numbers.

It should be noted that **Options D and E** above would appear to accord with Welsh Government's favoured approach to the provision of Post 16 Education and Training at a centralised College rather than individual secondary schools such as Bassaleg. As this approach is already underway in SE Wales in the Counties of Torfaen and Blaenau Gwent there is now a track record of educational results and experiences for Newport to assess and compare should they choose to do so.

As the Council are seeking financial support from WG both for both the expansion of Bassaleg and the new College it is surely incumbent on both public bodies to ensure overall value for money and the optimum delivery of services.

In this respect the current East / West split for Post 16 Consortia curriculum delivery has meant that the Council has had to engineer and adopted an ad-hoc clustering of schools in the East and West of the City to provide a full curriculum of 'A' Level subjects. The driver for this approach is to ensure that 'A' levels can be provided as economically as possible at each Newport secondary school with viable class sizes etc.

Whilst Bassaleg has an extremely healthy sixth form and range of 'A' Level subjects many of the other Newport secondary schools do not. It is therefore questionable whether the bussing of pupils between the collaborating cluster schools is currently sustainable and acts in the best interest of pupils?

As this consultation document is very much about the wisdom of expanding pupil numbers and building new facilities to accommodate them it is questionable why the Council have chosen to continue to ignore both the current and future impact of Post 16 Education at Bassaleg.

Whilst this is undoubtedly a 'political hot potato' the current Consortia model of Post 16 Education and Training across the city in different schools is clearly unsustainable and does not meet the WG's preferred long term strategy.

Now the Council have decided to support the construction of a £90M College in the City Centre the issue of Post 16 Education can no longer be ducked otherwise the current proposals for Bassaleg will once again remain as effectively a 'sticking plaster' dealing with the here and now rather than a long-term sustainable strategic plan providing overall value for money.

### **Objection 3**

#### **Insufficient / Weak Options Analysis**

In the Post-consultation assessment, the Council states that '*no information received during the consultation period changes the assessment of the alternative options provided in the consultation document*'.

This is incorrect as my original consultation response contained the following suggested approach that was ignored in the Council's consultation response so to-date remains outstanding.

- A possible merger with Risca Comprehensive School. The 21C Schools Building programme requires Local Authorities to collaborate across borders if it provides enhanced value for money solutions and overall savings to the public purse. As Risca is undersubscribed with pupils could it not become a sixth form college? Or offer an upper or lower school for the 11-16 cohort?

On the 23<sup>rd</sup> November 2020 I submitted a Freedom of Information Request to the Council which sought information on the following:

#### **Alternative Options Considered**

**Reference Page 16 of Council's Formal Consultation Document (1<sup>st</sup> October – 12<sup>th</sup> November 2020) to increase the capacity of Bassaleg School. You confirm that several alternative options have been considered for the project.**

I would be grateful if you would please send me the following:

- a) As required by the Welsh Government Capital Business Case process the dates when the Option Workshops were held to discuss and agree the list of options contained in the Consultation Document.
- b) The names of the attendees who attended these Workshops.
- c) Copies of any minutes or reports that were prepared following and in respect of the Option Workshops.

- d) If an Option Workshop or Workshops were not held details of the alternative process followed by the Council to review and select alternative options. Details of who was involved in this selection process? Copies of any minutes or reports that were prepared for the alternative process of selecting options.

In response to my FOI request the Council provided me with copies of the following documents:

- Project Scoping Workshop – September 2018
- Project Scoping Workshop – November 2018
- Client Stakeholder Meeting – My 2019

A perusal of the above documents confirms that whilst the Council considered five alternative Business Case options this review was at best cursory and the only project that received serious consideration by the workshop participants was the proposed on-site expansion of Bassaleg School.

A perusal of the above documents also confirms the Councils need to spend WG 21C Band B monies within precise annual capital allocations and ensure that the Sec 106 Developers Educational Contributions relating to Bassaleg School are drawn down promptly thereby ensuring legal obligations are met.

Perhaps it is this 'dash for cash' that explains why the Council are so adamant that what is being proposed is the best and only way forward?

However, no evidence has yet been provided by the Council which clearly demonstrates that the proposed Option to spend circa £28M and expand the school by 300+ pupils offer, offers overall best value for money either in terms of capital or revenue expenditure.

The Consultation process also provided the following suggestion:

- That the Council consider the construction of a new secondary school for 1,000 -1200 pupils in and around the Rogerstone area. This would potentially offer the opportunity for an all through 3-16 School incorporating the High Cross, Mount Pleasant, and Rogerstone Primary Schools. Such an approach would in time reduce overall pupil numbers at Bassaleg so that it could absorb future housing developments in the Graig and not suffer the recognised downsides that come with 'Super-Size' status.

The Councils broad response to this point is that *'it does not own sufficient land to accommodate a new secondary school, nor capital resources required to create that new school and replace poor quality buildings in the existing school estate'*.

This statement is incorrect as the Council owns the Bassaleg School Campus which is a considerable land holding and valuable property asset.

Any professional and wide-ranging review of long list options should have considered how a potential capital receipt from the sale of either the whole or part of the site could perhaps provide both a smaller updated Bassaleg School and a potential new school in an around the Rogerstone area of circa 1,000-1,200 pupils each.

Also, at Strategic Business Case, stage it is quite normal to undertake a search of sites not in Council ownership which could facilitate the provision of a new educational establishments. In fact, if minded the Council could do so under their current review of the LDP.

Unfortunately, the Councils response to my Freedom Information of Request relating to the Options Analysis carried out for the expansion of Bassaleg School and the above points can only suggest that scant attention has in fact been paid to the serious consideration of potential alternative and viable options.

This is concerning as Research by the National Audit Office has shown that one of the key reasons for Project Failure is *'The Evaluation of proposals linked to short term affordability rather than longer term value for money'* which appears to underline the Councils approach in this matter.

#### **Objection 4**

##### **Inability to Deliver Project by September 2023.**

On the 23<sup>rd</sup> November 2020 I submitted a Freedom of Information Request which sought information regarding the Planning Application process and overall project delivery

In response to my FOI request you provided me with a copy of the following project delivery timetable:

Task Name	Duration	Start	Finish
LA Pre-App Consultation Meeting	1 day	Fri 18/09/20	Fri 18/09/20
Pre-App Response (LA) Period	25 days	Mon 21/09/20	Fri 23/10/20
Prepare PAC	10 days	Mon 21/09/20	Fri 02/10/20
Client review of Pac	5 days	Mon 05/10/20	Fri 09/10/20
PAC Consultation Process	30 days	Mon 12/10/20	Fri 20/11/20
Review PAC responses	5 days	Mon 23/11/20	Fri 27/11/20
Full App Submission	1 day	Mon 30/11/20	Mon 30/11/20
Full App Assessment (lpa)	68 days	Mon 30/11/20	Wed 03/03/21
Discharge of Conditions (by contractor once appointed)	10 days	Mon 03/05/21	Fri 14/05/21

Based on this Table is clear that that the projects Planning Application should have been submitted by 30<sup>th</sup> November 2020 with an assumed award of Planning Consent and discharge of conditions by 14<sup>th</sup> May 2021.

At the date of writing this objection a Planning Application has not yet been submitted so the project is already running some 4 months behind original anticipated timescale.

In my previous consultation response, I pointed out that the Councils Planning Consultant LRM had presented incomplete and rushed planning statements and studies, particularly in relation to Transport and Ecology studies.

This point has subsequently been confirmed by National Resources Wales who in submitting their PAC response to LRM have requested more detailed surveys on a range of ecology matters which is why the submission of the planning application has already been significantly delayed.

In my previous consultation response, I pointed out that based on its current approach the Council and its Consultant Team run a risk that the community might decide to mount a Judicial Review of the projects Planning and Consultation process particularly if any final Planning Consent is awarded using the current incomplete studies.

Building on this point due to the Councils apparent abuse of correct processes in this matter with other members of the community I have now obtained initial legal advice from solicitors Messrs Watkins and Gunn on how a Judicial Review might ensure that we receive fair treatment and are protected from an abuse of power by the Council.

It is my understanding that the Councils Outline Business Case (OBC) cannot be submitted or determined by WG until Full Planning Consent has been awarded for the project.

It is also my understanding that WG Funding guidelines should prevent the Council from seeking tenders for the construction works until Planning Consent has been awarded.

As the Council are both the applicant and developer of this scheme it also suggests that should they seek tenders before any the Planning Application is determined it would suggest that 'they are minded to grant consent' which of course would be 'Ultra vires'.

If the above points are correct, they raise serious questions as to whether in the face of determined and well-argued planning objections the project can in fact be delivered by September 2023?

In the circumstances the ability to deliver the project by September 2023 is not actually in the Councils gift and has a high degree of risk attached to the proposed outcome.

Given that the best date to enrol pupils is at the start of an academic year i.e., September this suggests there is a need to consider alternative / fall back options as there is no certainty that the preferred date of September 2023 can now be met.

**25<sup>th</sup> March 2021**