



## **RHONDDA CYNON TAF COUNTY BOROUGH COUNCIL**

### **OBJECTION REPORT**

#### **PROPOSAL TO CLOSE RHIGOS PRIMARY SCHOOL WITH PUPILS TRANSFERRING TO HIRWAUN PRIMARY SCHOOL**

##### **1. Purpose of this Objection Report**

This Objection Report is prepared in accordance with the Welsh Government's (WG's) School Organisation Code (2<sup>nd</sup> Edition) (011/2018). Its purpose is to:

- Inform the outcome of the publication of the Statutory Notice published for this proposal, which was published on 26<sup>th</sup> January 2024 for a period of a minimum of 28 days.
- Include a summary of the statutory objections received and Rhondda Cynon Taf County Borough Council's (RCTCBC's) response to them.

##### **2. The Statutory Notice**

The Statutory Notice to progress this proposal, which was published on 26<sup>th</sup> January 2024, is reproduced below:

#### **RHONDDA CYNON TAF COUNTY BOROUGH COUNCIL**

Education and Inclusion Services, 21<sup>st</sup> Century Schools,  
Valleys Innovation Centre, Navigation Park, Abercynon CF45 4SN

Notice is given in accordance with section 43 of the School Standards and Organisation (Wales) Act 2013 and the School Organisation Code that Rhondda Cynon Taf County Borough Council (RCTCBC), having consulted such persons as required, proposes to:

1. Discontinue the following school currently maintained by RCTCBC:
  - a. Rhigos Primary School, Heol Y Graig, Aberdare CF44 9YY.

RCTCBC undertook a period of consultation before deciding to publish this proposal. A Consultation Report containing a summary of the issues raised by consultees, the proposer's responses and the view of Estyn is available on RCTCBC's website at: <https://www.rctcbc.gov.uk/EN/GetInvolved/Consultations/CurrentConsultations/ConsultationonaproposaltocloseRhigosPrimary.aspx>

it is proposed to close Rhigos Primary School and extend the catchment area of Hirwaun Primary School, Glannant Street, Hirwaun, Aberdare, CF44 9NF, to incorporate the current catchment area of Rhigos Primary School. The pupils of

Rhigos Primary School will instead attend Hirwaun Primary School. It is proposed that Rhigos Primary School will close with pupils transferring to Hirwaun Primary School by no later than September 2024, subject to parent/carer preference. Hirwaun Primary School is a mixed English Medium Community Primary School, for pupils aged 3 to 11. RCTCBC will be the admissions authority and there will be no arrangements for pupil banding.

The capacity of Hirwaun Primary School is 394 plus Nursery. The admission number for pupils aged 4 into the Reception Class at the school is 56. There are 60 nursery places.

Pupils will be provided with transport in accordance with RCTCBC's Transport Policy. RCTCBC provides free transport for pupils who attend their nearest suitable school, or if there is no safe walking route, in accordance with Welsh Government guidance. The term 'nearest suitable' school applies to the catchment area or nearest Welsh, English, dual language or voluntary aided (faith) mainstream school or special school/class as appropriate.

Within a period of 28 days of the date on which this proposal was published, that is to say by 17:00 on 23<sup>rd</sup> February 2024, any person may object to the proposal. Objections should be sent to the Director of Education and Inclusion Services, 21<sup>st</sup> Century Schools, Valleys Innovation Centre, Navigation Park, Abercynon CF45 4SN, or e-mail [schoolplanning@rctcbc.gov.uk](mailto:schoolplanning@rctcbc.gov.uk).

Where objections have been received, RCTCBC will publish a summary of any such objections made (and not withdrawn in writing) within the objection period, together with their observations thereon, within 7 days of the determination of the proposal.

<b>Signed:</b>	<i>Gwynor Davies</i>
Director of Education and Inclusion Services For Rhondda Cynon Taf County Borough Council	
<b>Date:</b>	26 <sup>th</sup> January 2024

### 3. Details of Objections Received

The Statutory Notice was published on the 26<sup>th</sup> January 2024 which triggered the commencement of the objection period. This ran until the 23<sup>rd</sup> February 2024. During the objection period alone, a total of 1,440 objections were received by the closing date of the 23<sup>rd</sup> February 2024. These are broken down below:

- 54 written objections.
- Two petitions signed by 951 and 65 respondents respectively.
- 1,384 respondents individually signed pre-written objections co-ordinated by the 'Save Rhigos Primary School' action committee. The wording of this objection read *'I do not agree with the proposal due to the biased, incomplete and incorrect information contained within the consultation document and the bias of RCT throughout the process.'* The Action Group reported that 1393 objections had been submitted, but on removing the blank submissions, 1384 were counted.

55 objections received during the consultation period which ran between 2<sup>nd</sup> October 2023 and 17<sup>th</sup> November 2023, were requested to be treated as objections and so these have been included in the numbers below and in the written summary that follows.

The table below outlines a summary of the total number of objections received.

<b>Summary of Objections Received</b>	
<b>Period</b>	<b>Number</b>
Objection Period	1,440
Consultation Period	55
<b>Total</b>	<b>1,495</b>

This Objection Report summarises the objections, along with RCTCBC’s response to them. This is in accordance with the WG’s School Organisation Code (2nd Edition) (011/2018). It should be noted that due to the large number of responses received during the consultation period (which ran between 2<sup>nd</sup> October 2023 and 17<sup>th</sup> November 2023) which are now included as formal objections, where applicable the same themes, and in some instances the same responses, have been applied to this report as those that were included within the Consultation Report.

For completeness it should be noted that there were a number of responses received during both the consultation period and the objection period that made statements and comments in relation to political issues, staff conduct, and wider RCTCBC issues that are unrelated to the specific requirements of a school organisation consultation, and as such these comments have not been included within the themes below. For those respondents that wish to raise any further concerns on such matters, there is the opportunity to do so outside of this consultation process. More information on how to make your views known can be found on RCTCBC’s website.

To confirm **all** of the objections received during the objection period, and the preceding Consultation Period, have been reviewed by RCTCBC’s Cabinet Members.

#### **4. Objections and Responses**

The table that follows details the objections received along with their responses.

<b>Objection Theme</b>		<b>Clarification</b>
<b>Additional Learning Needs (ALN)</b>	What support will there be for the pupils with ALN?	All pupils with ALN will continue to be supported. The Additional Learning Needs Education Tribunal (ALNET) Act 2018 provides detailed guidance on the duties and responsibilities of Councils in meeting the ALN of children and young people. Children and young people have ALN if they have a learning difficulty which calls for an additional learning provision to be made for them.

		<p>The ALN Code for Wales (2021) recommends that early years and school settings adopt a graduated response to meeting ALN. A graduated response means that progressively greater expertise and support can be brought in to address the difficulties a child or young person may be experiencing. Additional or different provision should be made depending on the severity of the child or young person's level of need.</p> <p>This duty and responsibility in this regard will be met regardless of which school a child attends.</p>
	The pupils of Rhigos Primary School will get lost in a school the size of Hirwaun Primary School.	<p>As detailed above, there is a duty and responsibility placed on Councils for all pupils to receive the support they need regardless of the size of the school.</p> <p>Creating larger schools can build capacity within staffing structures and enable opportunities for developing more specialist wellbeing and/or family liaison posts which will clearly benefit more vulnerable children and families.</p>
<b>Admissions</b>	My child will not be attending Hirwaun Primary School.	Choosing a school is a parent/carer choice. Applications will be dealt with in accordance with the WG's School Admissions Code 2013 (05/2013).
	What if I don't want my child to attend Hirwaun Primary School?	
	Reports of issues with applying for a place at Rhigos Primary School for September 2024.	<p>During the school application period, between September 1<sup>st</sup>, 2023, to November 10<sup>th</sup>, 2023, RCTCBC received online applications for pre-nursery, nursery and reception places for Rhigos Primary School for the 2024 academic year.</p> <p>To note, there was a period of time during the application period that all parents/carers across Rhondda Cynon Taf (RCT) were unable to apply online due to essential works being undertaken on the online</p>

		<p>system from October 2<sup>nd</sup>, 2023, to October 3<sup>rd</sup>, 2023.</p> <p>RCTCBC's School Admissions Team have confirmed that they did receive a phone call from parent/carer from the Rhigos area requesting a hard copy of the application form, however it transpired that the parent/carer had already successfully applied for a place online. The parent/carer was informed of this at the time.</p>
<b>Extra-curricular Activities</b>	How will pupils' access after school clubs?	<p>After school clubs are the responsibility of the individual schools and whilst these provisions are considered to be important, it should be noted that post school activities are not a statutory requirement.</p> <p>As is the case across RCT, there will be no home to school transport available purely to access after school clubs. Transport will be provided at the start and end of the normal school day only.</p>
	The Consultation Document states the proposal will provide more opportunities for extra-curricular activities but given the transport issues this will be reduced.	<p>This is in reference to the multiple accessible spaces available in Hirwaun Primary School, internally and externally, that can be utilised for such purposes. The fully accessible facilities at Hirwaun Primary School by their very nature do provide more opportunities.</p> <p>As is the case across RCT, there will be no home to school transport available purely to access after school clubs. Transport will be provided at the start and end of the normal school day only.</p>
	There are lots of extra-curricular activities already on offer at Rhigos Primary School.	<p>This is not disputed. The Consultation Document states that the view of RCTCBC is that Rhigos Primary School is a good school. It is noted within the Community Impact Assessment that numerous after school clubs and community events run at both schools.</p>

<b>Breakfast Club</b>	How will pupils access breakfast club?	<p>Breakfast club is the responsibility of the individual schools and whilst this is considered to be important, it should be noted that pre-school activities are not a statutory requirement. Therefore, there will be no home to school transport available purely to access this provision., Transport will be provided at the start and end of the normal school day, as is currently the case for all schools across RCT.</p> <p>However, if any child travelling on the school bus wishes to have a breakfast once they get to school then arrangements will be put in place to ensure that they receive one.</p> <p>The breakfast club operating in Hirwaun Primary School is very popular with an average of 53 pupils receiving a breakfast every day. The average daily number for pupils accessing a breakfast in Rhigos Primary School is 13 so there will be plenty of space available for any pupils wishing to have a breakfast to do so. These figures have been calculated as a daily average of the attendance of the first half term of the 2023 academic year.</p>
	Rhigos Primary School was voted Best Breakfast Club in Wales 2022.	RCTCBC are aware of this impressive achievement and rightly the school community are very proud. A statement of congratulations was provided by RCTCBC's Director of Education and Inclusion Services at the time the award was received. RCTCBC's Catering Services have responsibility for delivering breakfast clubs in partnership with schools.
<b>Building Condition</b>	Why was the property condition survey used four years old?	Property condition surveys are carried out cyclically on a five yearly basis. This aligns with an industry standard timescale, so the property condition survey used is still valid.

		<p>The WG's School Organisation Code 2018 (011/2018) states that:</p> <p><i>'Information about the quality of accommodation at all existing schools likely to be affected by the proposals including reference to the Local Authority's most recent (property) condition survey using the categories of the original 21<sup>st</sup> Century Schools Survey'.</i></p> <p>This information has been included in compliance with the WG's School Organisation Code 2018 (011/2018). The 2019 property condition survey was the most recent undertaken and so this was used accordingly.</p> <p>To note, a copy of the property condition survey was shared with those who requested it during the consultation period.</p>
	<p>How much work has been undertaken at Rhigos Primary School since the property condition survey was undertaken?</p>	<p>Lots of work has been undertaken at Rhigos Primary School since the property condition survey was undertaken in 2019. Works include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Replacement windows and doors.</li> <li>• New fencing and gates.</li> <li>• New drainage and resurfacing.</li> <li>• Repairs to roof areas.</li> <li>• Mechanical and electrical upgrades.</li> </ul>
	<p>How much money has been spent at Rhigos Primary School since 2019?</p>	<p>Including the cyclical maintenance checks, over £180,000 has been spent at Rhigos Primary School. This can be broken down as follows:</p> <ul style="list-style-type: none"> <li>• Works funded through the Building Maintenance Service Level Agreement (SLA) for repairs and maintenance – £94,084.</li> <li>• Works funded directly by RCTCBC – £79,736.</li> </ul>

		<ul style="list-style-type: none"> <li>• Works funded by Rhigos Primary School's delegated budget – £7,876.</li> </ul>
	<p>Why hasn't the work identified within the property condition survey been undertaken?</p>	<p>Some of the work identified within the property condition survey has been undertaken, as listed above. Works are undertaken proactively and reactively across all 116 school sites across RCT, and as such have to be prioritised within the budgets available.</p> <p>In addition, lots of work has also been undertaken that was not identified in the property condition survey, including health and safety and safeguarding works.</p> <p>The property condition survey identifies the condition of a building at a point in time and is used as a tool for RCTCBC to manage its estate and as such they need to be undertaken in a consistent manner. In total, RCTCBC has 115 schools across 116 sites to manage. Regular visits are undertaken by RCTCBC's Corporate Maintenance Team and issues are flagged up on a priority basis and undertaken when required. Rhigos Primary School has been in regular contact with, and has been visited regularly by, the RCTCBC's Corporate Maintenance Team.</p> <p>The property condition surveys are not updated each time maintenance works are carried out on a school, RCTCBC would not have the finances or the resource to undertake this task.</p>
	<p>Why hasn't RCTCBC looked after its buildings?</p>	<p>RCTCBC has an obligation to ensure that its buildings are safe, watertight and warm, and that is what it has done. As stated above there have been regular visits to Rhigos Primary School by RCTCBC's Corporate Maintenance Team and its contractors, and it also undertakes cyclical maintenance checks and</p>



		<p>surveys of its mechanical and electrical equipment.</p> <p>All schools in RCTCBC buy into a Building Maintenance SLA and work is undertaken and managed through this Building Maintenance SLA. On many occasions, RCTCBC has paid for works at Rhigos Primary School that have been the responsibility of Rhigos Primary School's Governing Body, due to the school not having the required budget for the works to be undertaken.</p>
	<p>Why is one of the buildings at Rhigos Primary School deemed 'end of its life/beyond economical repair'? What does this mean?</p>	<p>The term 'beyond economical repair' is a classification given to an asset where that asset requires repairs likely to be more expensive than its replacement value. It does not mean that the building is unsafe.</p>
	<p>Why was permission denied for a member of the Save Rhigos Primary School Action Group to undertake their own survey during the consultation?</p>	<p>RCTCBC has 115 schools across 116 sites to manage and as such it is important that there is consistency in the way property condition surveys are undertaken so that it can appropriately manage its education estate and prioritise works. A third party looking at one particular school would not be comparable with our in-house procedures given the subjectivity of the property condition survey process.</p> <p>The property condition survey undertaken in 2019 was free from prejudice.</p> <p>Since the conclusion of the objection period, the Council was notified by the Chair of Governors that the governing body have commissioned a third party to undertake a property condition survey at Rhigos Primary School. At the time of writing this Objection Report this property condition survey has not yet been undertaken and the Council are awaiting details of the date the survey is intending to be completed.</p>

		<p>RCTCBC, as the building owner, has requested a copy of the property condition survey report on completion by the third party.</p>
	<p>A purpose-built 21st century school building help children benefit from a learning environment which already nurtures and supports pupils – education it is not about the building.</p> <p>A shiny new building in Hirwaun may offer nicer surroundings for pupils, but evidence suggests this will be at a detriment to their educational attainment. Your proposal consultation document tries to bat this away, totally ignoring the data that it presents from the most recent Estyn report.</p>	<p>The Consultation Document sets out the benefits that a new, purpose built, larger school could offer.</p> <p>Improving educational environments for pupils is at the heart of the WG’s Sustainable Communities for Learning Programme. It is a core current aim for the WG, and its continued investment remains to be a priority. The WG’s Sustainable Communities for Learning Programme lists ‘Transforming learning environments and learner experience’ as well as ‘Improving condition and suitability of the education estate’ as its investment objectives clearly demonstrating the importance of improving the learning environments in our educational settings.</p> <p>In relation to the comments regarding the most recent Estyn reports, in compliance with the WG’s School Organisation Code 2018 (011/2018) the response to the proposal from Estyn was provided in full at Appendix One of the Consultation Document. There has been full transparency in relation to publishing the findings of these inspections.</p> <p>Estyn have considered the educational aspects of the proposal and their conclusion is that the proposal is likely to, at least, maintain the standard of education provision and outcomes for pupils in this area.</p> <p>Estyn’s response further states that the:</p> <p><i>‘Local Authority has set out a clear rationale for its proposal. It outlines strongly the many advantages of</i></p>

		<i>closing Rhigos Primary School, with all pupils transferring to Hirwaun Primary school'.</i>
	How does Rhigos Primary School not comply with the Equality Act 2010?	<p>In terms of the physical site and the school buildings at Rhigos Primary School, these are largely inaccessible, however, there is scope for improvement. Looking just at the protected characteristic 'disability', Rhigos Primary School's site is largely non complaint. Given the topography and the age of the buildings there will inevitably be some areas of Rhigos Primary School's site that are inaccessible for those with mobility difficulties or for wheelchair users. In addition, there is no hygiene room available at Rhigos Primary School.</p> <p>Building Bulletin 99 (BB99): Briefing Framework for Primary School Projects, is what all Councils in Wales use as a guide to build new schools. BB99 states the following:</p> <p><i>'In the context of classroom layouts 'fully inclusive' means that which enables a pupil using a wheelchair to access all areas of the room, and therefore, all activities easily, without any disruption to classroom layouts.'</i></p>
<b>Community Impact</b>	The Community Impact Assessment is lacking in information.	<p>To confirm, what has been included within the Community Impact Assessment is in line with the requirements of the WG's School Organisation Code 2018 (011/2018).</p> <p>However, as advised in the published Community Impact Assessment, this document has been revisited and updated following a review of the comments received throughout the duration of the consultation process. The updated version of the Community Impact Assessment is available on RCTCBC's website.</p>
	What will happen to the Rhigos Primary School site? It's	Considerations and options of any potential future use of the Rhigos

	<p>mentioned in the Consultation Document that it could be used for the community.</p>	<p>Primary School site will be consulted upon separately.</p> <p>Should the proposal go ahead, colleagues in RCTCBC's Community Development Team will work with the local community of Rhigos to identify any viable and sustainable options for a community use. RCTCBC's Community Development Team will also be able to support any potential community groups to identify and apply for any funding that may be available to secure to develop any provision.</p>
	<p>The children will lose their cultural identity if the school closes; their 'Cynefin'.</p>	<p>There will be many opportunities for all pupils to learn about their local area and cultural identity as they navigate the Curriculum for Wales (CfW) and develop their enquiry based learning.</p> <p>The village of Hirwaun is approximately 2 miles from the village of Rhigos, and so the expectation is that this will not be lost for any pupils.</p>
	<p>If the school closes there will be a negative impact upon the community economically.</p>	<p>There is no direct evidence to support this. If the proposal goes ahead there will be free home to school transport for any pupils wishing to attend to Hirwaun Primary School, so we do not consider this proposal will detrimentally affect house prices or deter new families from moving in to the area. Economic and societal impacts such as these are multi-faceted and are based on a number of factors.</p> <p>We do not consider that the proposal will have a negative economic impact on the local community.</p>
	<p>Will the parent and toddler group currently running at Rhigos Primary School be moved to Hirwaun Primary School?</p>	<p>RCTCBC are aware that there is a parent and toddler group running at Rhigos Primary School for a day a week. There is a dedicated community room available at Hirwaun Primary School so should the group leader want to establish a</p>

		parent and toddler group at Hirwaun Primary School then this can be accommodated.
<b>Educational Outcomes</b>	<p>Pupils from Rhigos Primary School will not have the same educational experience at Hirwaun Primary School.</p> <p>Both schools should be reinspected by Estyn prior to a decision being reached.</p>	<p>In compliance with the WG's School Organisation Code 2018 (011/2018) the response to the proposal from Estyn was provided in full at Appendix One of the Consultation Document.</p> <p>Estyn is not a body which is required to act in accordance with the WG's School Organisation Code (011/2018) and the School Standards and Organisation Act 2013 places no statutory requirements on Estyn in respect of school organisation matters. However, Estyn are a statutory consultee in such matters and as such have provided their opinion on the overall merits of the school organisation proposal.</p> <p>Estyn have considered the educational aspects of the proposal and their conclusion is that the proposal is likely to, at least, maintain the standard of education provision and outcomes for pupils in this area.</p> <p>Estyn's response further states that the:</p> <p><i>'Local Authority has set out a clear rationale for its proposal. It outlines strongly the many advantages of closing Rhigos Primary School, with all pupils transferring to Hirwaun Primary school.'</i></p>
	<p>Why close a 'good' school to one that required 'Significant Improvement'.</p>	<p>The Consultation Document acknowledges that Rhigos Primary School is a good school. That is not disputed.</p> <p>Hirwaun Primary School's Estyn inspection was undertaken in 2018 and the following year, in 2019, a follow up visit was undertaken by Estyn which judged that sufficient</p>

		<p>progress had been made in relation to the recommendations.</p> <p>As a result, Estyn removed Hirwaun Primary School from the list of schools requiring 'Significant Improvement' with no further visits required. An inspection provides a snapshot of the school at that moment in time, Hirwaun Primary School would not have been removed from the category should any of Estyn's concerns remain.</p> <p>It is important to note that school performance and improvement is not static, and this does fluctuate over time. At the time of writing, both schools are accessing core support from the Central South Consortium Joint Education Service. Neither school is deemed to be in need of enhanced support due to presenting issues.</p>
	<p>Ability to successfully deliver the CfW.</p>	<p>The Consultation Document acknowledges that the teachers at Rhigos Primary School are providing pupils with a great education, however it also sets out the challenges in delivering the CfW in a small and aging school.</p> <p>At no point does it state within the Consultation Document that staff at Rhigos Primary School are not delivering upon their obligations in terms of delivering the CfW. The Consultation Document highlights the difficulties of doing so within the defined parameters at Rhigos Primary School in relation to its size and age, and the ongoing challenge this will create in view of the projected falling numbers at Rhigos Primary School. The possibilities for more distributed models of leadership are inevitably more restricted in smaller schools due to the smaller size of the workforce.</p>

	<p>Teacher/parent/carer interactions will be lessened, and relationships will be diminished as a result of the pupils being transported to school on a bus.</p>	<p>There are already children from the community of Penderyn who travel to Hirwaun Primary School on home to school transport and so the school has well established systems in place to ensure that parents/carers are kept fully informed of any issues that have arisen during the school day, and should the proposal go ahead this communication will continue in order to support both the new pupils joining the school and their families.</p>
	<p>The CfW lends itself well to vertical learning, meaning that current arrangement of mixed age learning is a sustainable educational model.</p> <p>It states children being taught in vertically streamed classes creates challenges for teaching and learning. Where's the evidence of this?</p>	<p>Currently Rhigos Primary School has three classes that are vertically streamed, with two of the three classes teaching pupils across three year groups. Given the projected reduction in pupil numbers at the school, this situation will become even more challenging in time.</p> <p>There are challenges to teaching vertically grouped pupils. In what is considered to be a standard size class of pupils there will always be a range of abilities that need to be catered for through effective differentiation to ensure that the work meets the pupils' needs, to ensure that they make strong progress in their learning and are suitably challenged. In a small school, such as Rhigos Primary School, where there are vertical groups and a wide range of abilities it can prove to be even more challenging for the teaching and support staff to meet the wide range of academic, as well as the social and emotional needs, of all the pupils. It is acknowledged in the Consultation Document that Rhigos Primary School offers pupils positive learning experiences. Nevertheless, the teaching of multiple year groups within one classroom environment can be a significant challenge. Clearly, this can be tackled through highly effective teaching and learning and extensive differentiation, this is not</p>

		<p>disputed, but this challenge is compounded when you have up to three year groups within one classroom.</p> <p>It should be noted that the school will only be funded for a Headteacher and two teachers from the 2024 academic year as the number of statutory school aged children (in reception to year six) continues to fall. If Rhigos Primary School does not have enough additional funding to employ a third teacher from its own budget, then this will again add to the teaching, learning, assessment and workload challenge as outlined and <i>may</i> require the number of year groups included within each class to increase from three to four. All of the issues cited in respect of three year groups together then become magnified and intensified by then having four year groups together.</p>
<p><b>Pupil Numbers and Capacity</b></p>	<p>How are the pupil projections calculated?</p>	<p>In terms of pupil projections, RCTCBC collects birth data from Cwm Taf Morgannwg University Health Board covering the Rhondda, Cynon and Taf Ely areas. This provides the births and postcode for each child. There is also an allowance for new housing developments and existing pupils on roll allowing for predictions to be accurate.</p> <p>In relation to the pupils already in school the cohort survival method is utilised, where the number of pupils in each year group is assumed to be the number in the preceding year group during the previous academic year multiplied by a constant.</p>
	<p>Why was Hirwaun Primary School built with so much capacity?</p>	<p>RCTCBC's current Local Development Plan (LDP), adopted in 2011, has a significant housing allocation identified as part of a strategic site within the current Hirwaun Primary School catchment area. In addition, at the time the new</p>



		<p>school in Hirwaun was being developed there were tourism and commercial opportunities being designed, as well as the plans for the dualling of the A465. Given the attention that was and still is focussed upon this specific area on a regional scale, it would have been remiss of us not to include additional capacity at that juncture.</p> <p>RCTCBC's revised LDP is currently being prepared and since the conclusion of the objection period, the draft LDP is now available on RCTCBC's website and is being consulted upon. It should be noted that the draft LDP includes no housing allocation identified within the current Hirwaun Primary School catchment area, however, it remains as a key site for employment and tourism.</p> <p>Comments made in relation to the size of Hirwaun Primary School being anything other than to plan for the pupil places required for the growth that was envisaged at the time of construction are refuted.</p>
	<p>There is surplus capacity in a lot of schools across RCT, why is just Rhigos Primary School affected.</p>	<p>There is a statutory duty placed on Councils to effectively manage its school places. All school places, capacities, admissions and projections are kept under constant scrutiny. RCTCBC has implemented reorganisation proposals affecting over 40 schools over the last 10 years and all schools will continue to be reviewed.</p> <p>Information on the capacity of all schools affected by proposal must be included within all school organisation documents in compliance with the WG's School Organisation Code 2018 (011/2018). Without the inclusion of this information the consultation would not be valid.</p>

		<p>This proposal has been prepared for consultation for a number of reasons, the rationale for closure is not purely based on one thing alone. The capacity of Rhigos Primary School is included for information, amongst many other data sets, as it provides stakeholders with a wider picture of the proposal presented.</p>
	<p>Why have nursery pupils not been included?</p>	<p>Nursery pupils have been included. The information within the Consultation Document contains information on both 'statutory' school aged children (in reception to year six) and 'non-statutory' school aged children (in pre-nursery and nursery).</p> <p>The numbers of the current non-statutory nursery pupils on roll at both Rhigos Primary School and Hirwaun Primary School, as well as the nursery projections, are included in the Consultation Document. There are also references to the number of statutory school aged pupils on roll at both Rhigos Primary School and Hirwaun Primary School, as well as the statutory age projections.</p>
	<p>Pupil projection methodology not accurate</p>	<p>Pupil projections are just that, they are projections and are always based on best estimates with the information available at any given time.</p> <p>To note, on an annual basis over the last five years, the variance between RCTCBC's primary pupil projections, and actual primary pupil numbers, averages at less than 1.0%.</p>
<p><b>Rural School Categorisation</b></p>	<p>Why isn't Rhigos Primary School classed as a rural school?</p>	<p>The WG's School Organisation Code 2018 (011/018) contains a list of rural schools for the procedural presumption against the closure of rural schools. As such, it is specified within the WG's School Organisation Code 2018 (011/2018) that The National Statistics Urban Rural classification has been used as the</p>

		<p>basis of the designation of rural schools for this purpose.</p> <p>The rural schools listed were identified as being located within villages in the sparsest context, other (hamlet or dispersed) in sparsest context and other (hamlet or dispersed) in less sparse context. There are no schools in RCT on the list of rural schools as there are no schools that meet the above classifications for this singular purpose.</p> <p>For clarification, on the Office of National Statistics website, Rhigos itself does have a rural classification, as in fact does Hirwaun, but neither meet the specified criteria to be included on the list as defined above.</p>
	<p>RCTCBC was in receipt of a Small and Rural School Grant from the WG that was allocated to Rhigos Primary School, this demonstrates that RCTCBC acknowledges its rural status.</p>	<p>This is correct. Rhigos Primary School was one of the schools in receipt of funding awarded via this grant. Since 2017/2018 there have been 13 schools across RCT that have been a recipient of this grant.</p> <p>Given that there are no designated 'rural' schools in RCT, this grant was awarded due to the small pupil numbers at the schools in receipt of the funding.</p>
<p><b>Transport and Travel</b></p>	<p>The home to school transport costs have not been made available.</p>	<p>There will inevitably be a cost for home to school transport and this has been acknowledged in the Consultation Document and listed as a disadvantage in the assessment of the proposal.</p> <p>Should the proposal go ahead, any new home to school transport contract will be competitively tendered. As the number of pupils attending Hirwaun Primary School will factor into the size of the transport required and consequently have an impact upon the service costs, this financial information remains unavailable.</p>

		<p>If, for example, a large school bus (up to 70 seats) was required, then the cost for this would equate to approximately £400.00 per day. However, if a smaller vehicle would be required (which has been intimated in the responses received throughout both the consultation period and objection period that this would be the case), then the home to school transport costs would significantly reduce.</p>
	<p>There will be no active travel opportunities for those pupils who currently walk to school.</p>	<p>RCTCBC acknowledges that pupils living in Rhigos will need to travel to Hirwaun Primary School either by bus or by car. This information is included within the Community Impact Community Impact and is not in dispute, however what is also included within the Community Impact Assessment is how this will be partly mitigated by the opportunities the new school will provide given the many outdoor facilities at Hirwaun Primary School.</p> <p>The Community Impact Assessment states:</p> <p><i>‘Those pupils that will be travelling by bus or car under the new arrangements will still have the opportunity to experience the outdoors and gain plenty of fresh air given the plentiful opportunities on the Hirwaun Primary School site. External canopies, the outdoor classroom, the spacious yard, the MUGA, the sports field, gardens etc all present multiple opportunities to support and nurture health and well-being for pupils and staff’.</i></p>
	<p>Hirwaun Primary School is further away than Rhigos Primary School so the carbon footprint will be increased.</p>	<p>Given the distance between Hirwaun Primary School and Rhigos Primary School, all pupils residing in the current Rhigos Primary School catchment area will qualify for home to school transport, therefore</p>

		<p>negating the need for numerous car journeys to the school.</p> <p>If the proposal were to go ahead, RCTCBC will close an energy inefficient building with pupils moving to an existing energy efficient building, so implementing this proposal will have an overall positive impact upon the carbon footprint.</p>
	<p>If there is an emergency, how will my child get home if I don't have a car?</p>	<p>There are already children from the community of Penderyn who travel to Hirwaun Primary School via home to school transport and so Hirwaun Primary School has well established systems in place to ensure that parents/carers are kept fully informed of any issues that have arisen during the school day. Should the proposal go ahead this communication will continue in order to support both the new pupils joining the school and their families.</p> <p>Hirwaun Primary School, along with all other schools, have a duty of care in relation to the care and wellbeing of all pupils. If any issues or emergencies arise during the school day, as is currently the case, the staff at Hirwaun Primary School will ensure that they do all they can to support any families that cannot attend Hirwaun Primary School.</p>
	<p>The traffic outside Hirwaun Primary School is already busy.</p>	<p>Hirwaun Primary School has been built with a dedicated staff and visitor car park, as well as an onsite bus drop off facility. As part of the planning obligations for the project, an off-site school drop off/community car park was constructed. This additional parking has significantly reduced the congestion outside Hirwaun Primary School at the start and end of the school day. To note Rhigos Primary School has neither a dedicated staff nor community car park within the vicinity.</p>

		<p>In addition, work on the second phase of the Safe Routes in the Community initiative has been designed, which includes installing two new Zebra crossings in the village, to encourage more pupils attending Hirwaun Primary School to walk to school safely in turn reducing the number of car journeys. A decision by the WG on the funding application to deliver these works should be made shortly.</p> <p>Given that all pupils currently residing in the Rhigos Primary School catchment will qualify for home to school transport, there is an expectation that the impact upon the traffic, as a result of the proposal, is minimal.</p>
	<p>I'm not happy for my child to travel unaccompanied on a school bus.</p>	<p>RCTCBC's Integrated Transport Unit successfully transports thousands of children a day to schools throughout RCT from the ages of three to 19. Understandably there can be a great deal of anxiety for all parents/carers when their child travels on a school bus for the first time, this can also be the case for pupils travelling for the first time, however there is strict criteria in place that transport providers must adhere to in order to ensure the safety and safeguarding of the pupils, which is of paramount importance to us.</p>
	<p>The cost and frequency of public transport from Rhigos to Hirwaun is prohibitive for regular use.</p>	<p>Unfortunately, the cost and operation of the public transport in the area is not within the remit of RCTCBC to manage.</p> <p>As all pupils living in Rhigos will have the opportunity to utilise the home to school transport we anticipate the number of journeys required on public transport to be minimal.</p>
	<p>There is no sheltered bus stop outside Rhigos Primary School so where would children and parents</p>	<p>Should a decision be made to implement the proposal, then suitable pick up and drop off points would be identified by RCTCBC's</p>

	<p>wait in adverse weather conditions?</p>	<p>Integrated Transport Unit and the transport providers.</p> <p>There are already pick up and drop off points utilised for school transport in Rhigos utilising existing bus stops so it seems logical that these would remain as the location for any transport required to Hirwaun Primary School.</p>
	<p>Should the pupil numbers attending Hirwaun be lower than expected, would the home to school transport be cancelled?</p>	<p>No, in compliance with distance criteria contained within the WG's Learner Travel Measure, this transport would remain in place regardless of the numbers of pupils transported.</p>
<p><b>Impact on Pupils</b></p>	<p>Transition arrangements.</p>	<p>If the proposal were to go ahead, there will be targeted support for all pupils from Hirwaun Primary School and Rhigos Primary School. Meaningful and positive transition is an integral part of ensuring that pupils settle into their new school setting with little disruption to their well-being and education. This is supported by providing effective pastoral and academic support and structured opportunities for pupils to become familiar with the new school environment and staff.</p> <p>Advice and support will be provided by RCTCBC to both schools involved to ensure that the transition process is as smooth and seamless as possible.</p>
	<p>Pupil well-being has not been considered.</p>	<p>The well-being of all pupils has been considered and is paramount. The transition arrangements that will be delivered, as noted above, ensure there will be lots of opportunities to help the pupils navigate the change and happily settle into their new school as quickly as possible.</p> <p>Further information is included within the Equality Impact Assessment. In addition, RCTCBC considers that the proposal benefits the children and</p>

		<p>young people in accordance with the seven core aims set out within the United Nations Convention on the Rights of the Child.</p>
	<p>The children from Rhigos will feel like outsiders as they attend a school outside of their community.</p>	<p>Hirwaun Primary School already welcomes children from other communities. The catchment area was extended to include pupils from Penderyn in 2021 and there are also a number of pupils that attend from outside the current catchment area. The new pupils from Penderyn were welcomed into the Hirwaun Primary School family and they have successfully settled into their new school. To provide reassurance we can confirm that they are not treated any differently which will also be the case for any pupil from Rhigos wishing to attend Hirwaun Primary School.</p>
<b>Impact on Staff</b>	<p>What support is available for staff?</p>	<p>RCTCBC has well established Human Resource (HR) policies and procedures that give reassurance to staff and employers about the management of organisational change.</p> <p>RCTCBC's HR Team have already visited all staff in Rhigos Primary School, and all are aware of the processes that may follow and the operational and personal support that is on offer.</p>
<b>Impact on Parents/Carers</b>	<p>What about the cost implications of new uniforms etc?</p>	<p>RCTCBC acknowledges that, should the proposal be approved, there would be cost implications of new uniforms. Where necessary parents/carers will be signposted to the School Essentials Grant which provides assistance to families on lower incomes for the purchase of school uniform.</p> <p>At Hirwaun Primary School there is a uniform exchange service available, where good quality, pre-used uniform can be accessed by those that need it.</p>



<b>Finance/Effective Financial Management</b>	This is a money saving exercise by RCT	As has been stated many times, the reasons for the proposal is multi-faceted and is explained within the Consultation Document.
	<p>There is no detailed breakdown of the figures included in the consultation document so their accuracy cannot be challenged.</p> <p>The figures are based on assumptions.</p>	<p>The figures included in the Consultation Document are based on the pupil numbers and the information available at both Rhigos Primary School and Hirwaun Primary School at the time the Consultation Document was compiled.</p> <p>As has been previously stated, the Consultation Document sets out RCTCBC's proposal for change, and so has to be written from the perspective of the proposal being implemented so that the impact of the proposal can be clearly set out for scrutiny.</p> <p>In this regard, elements of the Consultation Document have to be written with the assumption that the proposal will be realised in order that the financial implications of the implementation of the proposal can be calculated.</p>
<b>Alternative Options</b>	We do not consider that the options included within the consultation document were ' <i>consciously considered</i> '.	<p>In accordance with the WG's School Organisation Code 2018 (011/2018) there were a number of options considered, as well as the expected benefits of the proposal and disadvantages when compared with the status quo.</p> <p>Some of the benefits and disadvantages contained within the Consultation Document have been repeated, which was cited as a criticism in some responses, but that does not make them irrelevant or less valid.</p>
	Why is there no funding available for a new school in Rhigos?	The funding used for Hirwaun Primary School was secured via the WG's Sustainable Communities for Learning Programme, (previously known as the 21 <sup>st</sup> Century Schools and Colleges Programme). There are funding parameters levied by the WG

		<p>that need to be met in order to secure funding via the WG's Sustainable Communities for Learning Programme, as well as being able to robustly demonstrate that the project will deliver value for money. This is a competitive process across the whole of Wales.</p> <p>When funding for Hirwaun Primary School was secured, it was rated one of the worst condition buildings in RCTCBC's building portfolio. The project met the WG's investment objectives, the need for investment was successfully evidenced, and funding approval was secured. The project was delivered under budget.</p> <p>RCTCBC has an obligation to invest in, and maintain, all of its 115 schools across 116 sites and so projects for inclusion in the new WG's Sustainable Communities for Learning Programme are prioritised in relation to various criteria including demonstrating need, viability and value for money.</p> <p>Funding a new school for Rhigos Primary School is not a priority for RCTCBC when other school sites in the RCT are more acutely in need of investment. In addition, given the falling pupil projections at Rhigos Primary School, demonstrating value for money on a cost per pupil basis would be extremely challenging, if not impossible.</p>
<p><b>Legitimacy of the Consultation Process</b></p>	<p>The consultation period was too short.</p>	<p>The WG's School Organisation Code 2018 (011/2018) sets out the parameters for the consultation. It states that consultees must be given at least 42 days to respond to the Consultation Document. For this proposal, consultees were given 47 days which exceeds the statutory obligation placed upon us in this regard.</p>

	<p>The information presented in the Consultation Document is biased in favour of Hirwaun Primary School.</p>	<p>The purpose of the Consultation Document is to present a proposal, and the fact that this is just a proposal at this point in time is clearly referenced. To confirm, all information presented has been done in accordance with the WG's School Organisation Code 2018 (011/2018).</p> <p>Some responses specifically question the choice of the images used in the Consultation Document. To clarify, the same data for both Rhigos Primary School and Hirwaun Primary School has been included in the 'Where we are now' section of the Consultation Document, with external images of both Rhigos Primary School and Hirwaun Primary School included. Further information and images on Hirwaun Primary School were included within the 'Where we'd like to be' section of the Consultation Document, as this sets out the perceived benefits of moving pupils from Rhigos Primary School to Hirwaun Primary School. There is no bias intended, merely the logical and coherent setting out of the proposal.</p> <p>RCTCBC refutes this comment.</p>
	<p>The data presented within the Consultation Document has discrepancies and is out of date.</p>	<p>The data presented within the Consultation Document is in compliance with the WG's School Organisation Code 2018 (011/2018).</p> <p>All data sets provided were the most up to date at the time of writing. Those included are in accordance with the information prescribed within the WG's School Organisation Code 2018 (011/2018). To clarify, in terms of the pupil numbers reported, there is a distinction made between statutory aged pupils and non-statutory aged pupils.</p> <p>The Estyn information included in the Consultation Document is taken from the most recent inspections</p>

		<p>undertaken in Rhigos Primary School and Hirwaun Primary School in 2018 and 2019 respectively. This is in accordance with the WG's School Organisation Code 2018 (011/2018) where it states a Consultation Document must contain:</p> <p><i>'Information from the most recent Estyn reports for each school.'</i></p> <p>The property condition survey information included in the Consultation Document is taken from the most recent property condition survey undertaken in 2019. This is in accordance with the WG's School Organisation Code 2018 (011/2018) where it states that:</p> <p><i>'Information about the quality of accommodation at all existing schools likely to be affected by the proposal including reference to RCTCBC's most recent condition survey'.</i></p>
	<p>The information presented in the Children and Young People's Consultation Document is biased in favour of Hirwaun primary School.</p>	<p>RCTCBC has acknowledged that the voice of children and young people is about involving them as active participants in the development, delivery, management, and improvement of their educational experience.</p> <p>Children and young people have a right to express their views in all matters affecting them and for their views to be heard and considered in accordance with their age and maturity. As such, RCTCBC's 21<sup>st</sup> Century Schools Team ensured that suitable arrangements were made to involve children and young people as active participants throughout this consultation process.</p> <p>RCTCBC consulted with the children and young people who attend Rhigos Primary School and Hirwaun Primary School. This was done by producing</p>

		<p>a children and young people's version of the Consultation Document and Consultation Response Form.</p> <p>RCTCBC's 21<sup>st</sup> Century Schools Team held meetings with the School Councils of Rhigos Primary School and Hirwaun Primary School to discuss the proposal and guide the School Councils through the document itself and through the children and young people's version of the Consultation Response Form. The Consultation Document was discussed page by page with the pupils at both Rhigos Primary School and Hirwaun Primary School and was done so within the context of the consultation process. It was explicitly explained on numerous occasions during the sessions at both Rhigos Primary School and Hirwaun Primary School that no decisions on the proposal had been made.</p> <p>These consultation sessions had the support of school-based specialist staff to support pupils and assist with the engagement process. Feedback from these meetings was collated, summarised and incorporated into the Consultation Report.</p>
<p><b>General Objection</b></p>	<p>I do not agree with the proposal due to the biased, incomplete and incorrect information contained within the consultation document and the bias of RCT throughout the process.</p>	<p>This is a generic objection that does not specifically reference which elements within the Consultation Document it refers to.</p> <p>However, for clarity, the information included within the Consultation Document was factual and was the most up to date information available at the time the consultation commenced.</p> <p>RCTCBC refutes the claim to the information being biased.</p>

**LOCAL GOVERNMENT ACT 1972**

**AS AMENDED BY**

**THE LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985**

**RHONDDA CYNON TAF COUNTY BOROUGH COUNCIL**

**CABINET**

**29<sup>TH</sup> APRIL 2024**

**REPORT OF THE DIRECTOR OF EDUCATION AND INCLUSION SERVICES IN DISCUSSION WITH THE CABINET MEMBER FOR EDUCATION, YOUTH PARTICIPATION AND WELSH LANGUAGE (COUNCILLOR R LEWIS)**

**ITEM: PROPOSAL TO CLOSE RHIGOS PRIMARY SCHOOL WITH PUPILS TRANSFERRING TO HIRWAUN PRIMARY SCHOOL**

**BACKGROUND PAPERS**

**18<sup>th</sup> September 2023**

**CABINET: STATUTORY SCHOOL ORGANISATION – PROPOSAL TO CLOSE RHIGOS PRIMARY SCHOOL WITH PUPILS TRANSFERRING TO HIRWAUN PRIMARY SCHOOL**

**14<sup>th</sup> December 2023**

**EDUCATION AND INCLUSION SCRUTINY COMMITTEE: PRE-SCRUTINY OF A DRAFT CABINET REPORT: ‘PROPOSALS TO CLOSE RHIGOS PRIMARY SCHOOL WITH PUPILS TRANSFERRING TO HIRWAUN PRIMARY SCHOOL’**

**18<sup>th</sup> December 2023**

**CABINET: PROPOSAL TO CLOSE RHIGOS PRIMARY SCHOOL WITH PUPILS TRANSFERRING TO HIRWAUN PRIMARY SCHOOL**

**11<sup>th</sup> January 2024**

**OVERVIEW AND SCRUTINY COMMITTEE: CALL-IN: PROPOSAL TO CLOSE RHIGOS PRIMARY SCHOOL WITH PUPILS TRANSFERRING TO HIRWAUN PRIMARY SCHOOL**

**Other Information:**

**Relevant Scrutiny Committee:**

Education and Inclusion Scrutiny Committee.  
Overview and Scrutiny Committee.

**Officer to Contact:**

Lisa Howell, 21<sup>st</sup> Century Schools Business and School Organisation Manager