



# **Formal Consultation Report- Relating to the proposal to increase the capacity at Ysgol Plas Brondyffryn September 2022**

# Formal Consultation Report

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# Formal Consultation Report

## Contents

|  |    |
|--|----|
| Introduction   | 4  |
| Formal Consultation  | 4  |
| Meetings   | 5  |
| Consultation Responses   | 6  |
| Response Forms   | 7  |
| Response from Estyn  | 8  |
| Conclusion   | 12 |
| The next step  | 12 |
| APPENDIX 1- Consultation Document Recipient List                           | 13 |
| APPENDIX 2- Summary of Comments/ Questions raised in the meetings          | 15 |
| APPENDIX 3- School Council Findings  | 20 |
| APPENDIX 4- Full Governing Body response to the consultation:              | 28 |
| APPENDIX 5- Summary of responses received via Email                        | 30 |
| APPENDIX 6- Summary of responses via the Formal Consultation Response Form | 37 |
| APPENDIX 7- Estyn Response   | 68 |

# Formal Consultation Report

## Introduction

Denbighshire County Council (DCC) have completed a period of formal consultation regarding the proposal to increase Ysgol Plas Brondyffryn's capacity from 116 to 220. The school will move into a brand new purpose built facility in the town of Denbigh to accommodate the increase.

The formal consultation began on 17<sup>th</sup> May 2022 and closed on the 27<sup>th</sup> June 2022.

Following the end of a school organisation consultation period, the Welsh Government's School Organisation Code requires the proposers to publish a consultation report. In this document we have to:

- Summarise each of the issues raised by people we speak to and who write to us;
- Show our response to those issues; and
- Set out Estyn's view of the overall merits of what we are considering.

This report should be considered by decision makers prior to determining whether or not to implement any proposal.

## Formal Consultation

Electronic versions of the Formal Consultation document were sent to **460** recipients. You can see the complete list of recipients in **Appendix 1**.

Hard copies of all documents including response forms were left in Denbigh library. The school were also given a number of hard copies of all documents.

Hard copies of all documents were sent out via the school to 2 parents who were not contactable via email and 1 person contacted the Local Authority during the consultation period requesting for a hard copy to be sent out via post, which was provided.

The Formal Consultation documents were published on DCC's website on 17<sup>th</sup> May 2022. We also produced a Children's and Young person version of the document.

# Formal Consultation Report

All documentation, including the Formal Consultation document, Community, Equality and Welsh language impact assessment, Children and Young peoples' consultation document and the electronic version of the response form were published on the DCC website. All documents were available in both Welsh and English.

To help and encourage people to give us their views, we produced a response document (Formal Consultation Response Form). This Response Form formed part of the Consultation Document and as such was also published on the DCC website. The Formal Consultation Response Form was converted into an online survey; a link to this survey was also published on the DCC website.

## Meetings

In the Consultation document information on booking a 10 minute slot to discuss the consultation was offered for the 24<sup>th</sup> May (between 4-7pm). These were offered as telephone or online sessions- representatives from the school and the Local Authority would have been involved to answer any questions asked. No requests for these were made.

The following meetings were held:

- Ysgol Plas Brondyffryn Governors online- 6<sup>th</sup> June 2022,
- Primary site staff meeting- also open to staff at Ty'r Ysgol site at Ysgol Plas Brondyffryn primary site - Tuesday 7<sup>th</sup> June 2022,
- Secondary site staff meeting which was also open to staff at Ty'r Ysgol at Ysgol Plas Brondyffryn secondary site - Wednesday 8<sup>th</sup> June 2022,
- Primary School Council at Ysgol Plas Brondyffryn primary site- 10<sup>th</sup> June 2022 10am,
- School Council at Ysgol Plas Brondyffryn secondary site – 10<sup>th</sup> June 2022, 11.10am.

A summary of the points raised at these meetings and the responses given at the time is available in **Appendix 2**.

# Formal Consultation Report

Consultation sessions were arranged for the school councils at the school- the primary school council and secondary school council. A summary of both sessions can be found in **Appendix 3**.

## Consultation Responses

In total 93 responses were received during the consultation period and a response was received from Estyn.

The Governing Body for Ysgol Plas Brondyffryn also responded - this can be read in full in **Appendix 4**.

Support of the proposal is as follows:

|                         | Total     |
|-------------------------|-----------|
| For the proposal        | 71        |
| Against the proposal    | 18        |
| Didn't state either way | 4         |
| <b>Total</b>            | <b>93</b> |

The table below shows the methods people used to respond to the consultation:

| Method of contact     | Number of contacts received |
|-----------------------|-----------------------------|
| Online Response Forms | 89                          |

# Formal Consultation Report

|              |           |
|--------------|-----------|
| Letters      | 0         |
| Emails       | 4         |
| <b>Total</b> | <b>93</b> |

Respondents were as follows:

| <b>Responding as:</b>               | <b>Number</b> |
|-------------------------------------|---------------|
| Pupil                               | 0             |
| Parent                              | 20            |
| Staff member                        | 30            |
| Local resident                      | 22            |
| Likely to be a pupil                | 0             |
| Parent/carer of a prospective pupil | 4             |
| Other                               | 7             |
| Did not say                         | 10            |
| <b>Total number of contacts</b>     | <b>93</b>     |

**Appendix 5** summaries the comments received via email.

## Response Forms

The Formal Consultation Response Form was designed to establish:

- whether or not people were in favour of the Proposals;

## Formal Consultation Report

- the capacity in which they were responding;
- If they had any alternative options to the current proposal that they would like the proposers to consider;
- whether they wanted to make any other comments.

A summary of the responses to the Formal Consultation Response Form is set out in **Appendix 6** together with the Proposers' response.

### Response from Estyn

The main points made by Estyn in response to the Proposals and the Proposers' response to them are set out below. The full response from Estyn is set out in **Appendix 7**.

| Estyn Comment  | Proposers' Response   |
|--|---|
| It is Estyn's opinion that the proposal is likely to at least maintain the current standards of education in the area.   | Agreed  |
| The council has presented an appropriate rationale for the proposal.   | Agreed  |
| The nominal capacity at the school is 116, the school currently has 136 pupils on roll and has been over capacity for the last 6 years. The school currently has pupils waiting to attend the school and the council expects the demand to increase over the next few years and suggests that a capacity of 220 is reasonable. | The Local Authority believe that 220 is justified for the new building for the school.<br><br>Currently the school has 136 pupils (September 2021 numbers on roll) with |



## Formal Consultation Report

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| <p>However, there is no explanation as to why the figure of 220 has been chosen.</p>  | <p>10 pupils on the waiting list and a possible further 10 in the system.</p> <p>There are approximately 63 pupils still awaiting assessment due to delays caused by the pandemic. If 40% are admitted to the school then a further 25 pupils would be admitted- this would leave 39 places. Given the impact of the pandemic and the predicted consequence on the demand for these school places we believe that the 220 number is sensible.</p> |
| <p>The council also lists some issues with the conditions of the sites currently being used which a new build facility would address.</p>   | <p>Agreed</p>   |
| <p>The council has provided seemingly appropriate details regarding the timescales for the implementation of the proposal.</p>  | <p>Agreed</p>   |
| <p>The expected advantages of the proposal include increasing the capacity to better meet the demand, all pupils and staff being on the same site, improved transition arrangements and having subject specific rooms. The disadvantages include an increase in</p> | <p>Agreed</p>   |

## Formal Consultation Report

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| <p>traffic to the one site and a potentially noisy play area for all pupils.</p> <p>These seem to be appropriate and reasonable.</p>   |   |
| <p>The mitigation against these risks appears to be mainly appropriate, however the council does not provide sufficient information regarding alternative pathways should they fail to obtain planning and funding approval.</p>   | <p>If funding and planning are not approved the school will continue to be supported by the Local Authority and the capacity will not change.</p> |
| <p>The council has provided suitable reasons for discounting three of these options and choosing the fourth option.</p>  | <p>Agreed</p>   |
| <p>The council iterates that transport arrangements will continue to be made in accordance with the county council's home to school transport policy. This seems to be fair and reasonable.</p>  | <p>Agreed</p>   |
| <p>The council has appropriately undertaken a Welsh language impact assessment. It states that providing an improved educational provision represents an opportunity to strengthen Welsh education in the area and as a result strengthen the Welsh language. It concludes that overall, the</p> | <p>Agreed</p>   |

## Formal Consultation Report

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| <p>proposal would not have a negative impact on the Welsh language</p>   |  |
| <p>The council does not refer directly to how this proposal will support the targets in the Welsh in Education Strategic Plan. It does however comment that Welsh is not used as a language of instruction in any Key Stage or subject, but the school provides the necessary resources for pupils to access the whole curriculum through the medium of Welsh. It would be useful to provide further details regarding this assertion.</p> | <p>Special schools do not have a language designation. Based on the needs of the pupils attending the school, the language of the teaching is provided appropriately.</p> <p>Some teachers at the school can teach through the medium of Welsh if required. This is consistent in the approach set out in Section 6 of Denbighshire’s Welsh in Education Strategic Plan.</p> |
| <p>The council has suitably identified the financial costs for this proposal.</p>  | <p>Agreed</p>  |
| <p>The school has suitably considered the impact of the proposal on the quality and standards in education including the impact of the proposal on teaching and learning experiences, care, support and guidance and leadership and management.</p>  | <p>Agreed</p>  |
| <p>The council has provided a document called “community, equality and Welsh language impact assessment”. Whilst this document suitably considers the impact of the proposal on the community and the Welsh language, it</p>   | <p>The proposal will improve the number of places available to all pupils including those with protected characteristics.</p> <p>The building will be fully accessible.</p>  |

## Formal Consultation Report

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| lacks sufficient consideration of the proposal's impact on vulnerable groups or on pupils that have protected characteristics.  |        |
| The council has appropriately considered that one of the main advantages of this proposal is that construction works would take place away from all current school sites, therefore minimal disruption to pupils learning will occur. | Agreed |

### Conclusion

Having considered all the information gathered to date, it is the view of officers that increasing Ysgol Plas Brondyffryn's capacity from 116 to 220 in a brand new facility in the town of Denbigh will deliver the greatest benefits to pupils, staff and the wider community. The location of the new facility is subject to the planning process.

### The next step

Following the publication of this consultation report the proposal will be discussed at DCC next Cabinet meeting. If the proposal is given approval a Statutory notice will be published following the decision by Cabinet.

Consultees are advised that, unfavourable comments made during the consultation period will not be treated as objections. Anyone wishing to object will need to do so in writing during the statutory objection period. Comments submitted as part of this consultation process will need to be re-submitted in writing during the statutory objection period if they are to be considered as objections.

# Formal Consultation Report

## APPENDIX 1- Consultation Document Recipient List

| No  | Stakeholder  | Number of recipients    |
|-----|--|-------------------------|
| 1.  | Parents of pupils of Ysgol Plas Brondyffryn  | 131                     |
| 2.  | Teachers and support staff at Ysgol Plas Brondyffryn   | 106                     |
| 3.  | Ysgol Plas Brondyffryn Governing Body  | 17                      |
| 4.  | The School Council of Ysgol Plas Brondyffryn- Primary and secondary  | 2                       |
| 5.  | The Diocese of St Asaph  | 1                       |
| 6.  | The Diocese of Wrexham   | 1                       |
| 7.  | Headteachers and Chair of Governors of all schools in Denbighshire ( Primary, Secondary & Special Schools)     | 50- Chairs<br>51- Heads |
| 8.  | Denbighshire Children and Young People's Partnership and the Early Years Development and Childcare Partnership | 2                       |
| 9.  | NHS Community Paediatric   | 1                       |
| 10. | All Denbighshire County Councillors  | 48                      |
| 11. | Local and regional Assembly Members and MPs  | 10                      |
| 12. | Denbigh Town Council   | 1                       |
| 13. | The Welsh Government   | 1                       |
| 14. | Estyn  | 1                       |
| 15. | Relevant Teaching and support staff Trade Unions   | 8                       |

## Formal Consultation Report

|     |   |            |
|-----|---|------------|
| 16. | North Wales Regional School Effectiveness and Improvement Service               | 3          |
| 17. | North Wales Police and Crime Commissioner                                       | 1          |
| 18. | Welsh language Commissioner   | 1          |
| 19. | Flintshire County Council- Chief Officer for Education and Youth                | 1          |
| 20. | Conwy County Borough Council- Head of Education Services                        | 1          |
| 21. | Wrexham County Borough Council- Chief Officer Education and Early Intervention  | 1          |
| 22. | Denbighshire County Council- Head of Education                                  | 1          |
| 23. | Gwynedd Council- Head of Education  | 1          |
| 24. | Isle of Anglesey County Council- Director of Education, Skills and Young People | 1          |
| 25. | Children and adolescent learning disability Service                             | 1          |
| 26. | National Autistic Society   | 1          |
|     | <b>Total</b>  | <b>460</b> |

# Formal Consultation Report

## APPENDIX 2- Summary of Comments/ Questions raised in the meetings

Online Governors meeting via Teams- Monday 6<sup>th</sup> June 2022

| No | Comment/ Question Raised                                      | Response  |
|----|---|---|
| 1. | How did DCC come up with the number 220 for the new capacity? | The number of 220 was arrived at to ensure that the school is placed to meet future demand. Pupil numbers at the school for the last few years are around 140 and there have been significant challenges to meet demand due to a lack of space at the school. We looked at the numbers currently in the system, awaiting assessment and room for future growth. |
| 2. | How long will it take until we are full once again?           | This is difficult to say with any certainty however we believe the 220 number is a reasonable number taking into account numbers awaiting assessments currently. Future demand in terms of special schools is very difficult to predict   |
| 3. | Impact on the Admissions policy                               | Admission into the school is in accordance to the Admissions policy and all pupils must have a Statement of Education needs indicating autism as the primary need. If the Admissions policy requires review, the Governors will do this in conjunction with the Local   |

## Formal Consultation Report

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|    |   | Authority with any changes being subject to a consultation process.  |
| 4. | When will parents and governors see the latest regarding the design of the new build? | <p>At the moment we are hoping the pre-planning process will start in the summer and will involve a drop-in session at the school where the latest plans can be seen and discussed with members of the project team.</p> <p>Alternatively we can ask Wates to present at a future Governors meeting the latest design.</p> |

Staff meetings- Primary site meeting- also open to staff at Ty'r Ysgol site- Tuesday 7<sup>th</sup> June 2022, Secondary site meeting which was also open to staff at Ty'r Ysgol- Wednesday 8<sup>th</sup> June 2022

| No | Comment/ Question Raised                           | Response  |
|----|--|---|
| 5. | Will we have 220 pupils on day 1 of the new build? | No, the Local Authority believe it will be a gradual increase over a number of years. The growth will be controlled so that pupils and staff can settle into the new building.                          |
| 6. | Will we still be a 'regional centre'?              | The school has traditionally operated as a regional provision since the school was re-established in the early 2000's. The school was considered as a regional provision although the funding model for |



# Formal Consultation Report

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|    |  | <p>the school was solely through Denbighshire.</p> <p>Faced with a growing demand for places and a restricted capacity the short term decision was taken by Denbighshire, pending the outcome of the Band B proposals to restrict admissions to Denbighshire pupils pending the outcome of a long term approach for the school.</p> <p>One of the workstreams of the project will be to review the admission policy to clarify access for out-of-county placements.</p> |
| 7. | Are the building plans set in stone?                       | No, we still need to carry out pre-planning consultation and then submit to full planning.  |
| 8. | How big are the classrooms compared to the classrooms now? | <p>Comparisons are below:</p> <p><b>New build</b>-General Classrooms- approx. 55m<sup>2</sup>,</p> <p>Specialist rooms range from 60m<sup>2</sup> Art to DT 72m<sup>2</sup>, Science Lab 65m<sup>2</sup>, Science Studio 60m<sup>2</sup></p> <p>Primary hall/dining- 122m<sup>2</sup></p> <p>Secondary hall- 145m<sup>2</sup></p>   |

## Formal Consultation Report

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|     |   | <p>Secondary dining- 138m<sup>2</sup></p> <p><b>Current sizes-</b> Classrooms range from 45m<sup>2</sup> to 54m<sup>2</sup></p> <p>Primary dining/hall- 103m<sup>2</sup></p> <p>Park Street site- DT room approx. 58m<sup>2</sup>, Science lab 69m<sup>2</sup></p>   |
| 9.  | <p>How will we manage moving the pupils into a new setting given that some will be unsettled?</p> | <p>During the construction phase there will be opportunities for staff and pupils to visit the site and start familiarising themselves with the new building. As the moving date gets nearer, we will work closely with the contractors and the school to ensure any pupils that need additional visits to the new building can be facilitated.</p>  |
| 10. | <p>How does the project link with Denbigh High- they are losing one of their fields?</p>          | <p>This projects links closely with the Denbigh High project in a number of ways. As this project progresses through the milestones the more certainty and confidence of delivery will ensure a clearer scope for the development of Denbigh High School.</p> <p>The secondary site at Ysgol Plas Brondyffryn will be key to the developments at Denbigh High as this building is in a relatively good condition and will enable Denbigh High to utilise the space either temporarily or</p> |

## Formal Consultation Report

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|     |   | permanently depending on how the Denbigh High project progresses and what works are agreed on the site. This will also include the external areas currently used by Plas Brondyffryn.                                   |
| 11. | What happens if there is a delay with the build- will we be expected to increase our capacity at our current sites? | No, there will be a modification to the Statutory Notice if a delay in the build occurs.  |
| 12. | Who are the architects and do they have experience in designing schools for autistic pupils?                        | The architects on the project are Pozzoni Architects, they are very experienced in designing SEN schools, please see their website for further details:<br><br><a href="http://www.pozzoni.co.uk">www.pozzoni.co.uk</a> |

# Formal Consultation Report

## APPENDIX 3- School Council Findings

### Report on the consultation with the School Councils of Ysgol Plas Brondyffryn- Primary council and Secondary council

The sessions were led by the Local Authority's Engagement and Participation Lead officer and were supported by the staff from the school. In the primary sessions a number of pupils were non-verbal and staff had brought PECS Cards (Picture Exchange Communication System) so they could participate in the session.

Pupils on the secondary school council had taken the questions in the consultation document and discussed it with their class members so had a number of responses for each question- all are detailed below.

#### **How do you feel about the proposal?**

Within the sessions we asked pupils how they felt about all Ysgol Plas Brondyffryn pupils being in the same building and having a new build, below are the responses from the sessions.

Primary School Council:

- Thumbs up
- Excited
- Bit Nervous
- Excited to be together with other pupils
- Good
- Happy
- Ok
- Bit happy, bit nervous
- Cheeky

Secondary School Council:

- Excited-4

# Formal Consultation Report

- I don't mind-2
- Good-4
- Feel cool about it
- Happy-3
- Happy to have a new yard as its too small right now
- Very good as we need more space
- Not sure if there will be enough outdoor space for all pupils to use in the new building.
- Ok-3
- Could be terrible as will be chaotic
- Ok in the same building but I feel a bit uncomfortable on the yard with everyone
- Fine- 1
- Good as easier for taxis.
- It will be more eco friendly
- I can see why we need a new building so we won't be paying bills on each site
- Not sure about us being around smaller, screaming children- will be nosier
- It will be a nice change.
- Get to know other pupils.
- Not bothered
- Very happy as I will be able to see my friends in primary.

## What is important to you about School now?

Within the sessions we asked pupils what was important to them about school.

Primary school council responses:

- Chrome books
- Sensory room
- Friends
- Swings and slides outside
- Garden
- Forest school

# Formal Consultation Report

- Science room
- Drums
- Climbing wall
- Outdoor space
- Cookery
- Medical room
- Bigger classrooms
- Mud kitchen- outdoor classrooms
- Story time
- Cycle path

Secondary school council responses:

- Lessons
- Chrome books
- Access to ICT
- Important to know where you are going
- One dinner hall
- Equipment on the yard- swings missing, green spinners are broken
- Forest school
- The ICT room

## **What don't you like about your school now?**

Primary School Council responses:

- Work
- Loud noises
- No shade on the yard
- There is only one medical room
- No small/ break out rooms

# Formal Consultation Report

Secondary School Council responses:

- Toilets- lots are broken
- Canteen
- Need more toilets
- Need a new yard- too small at the moment

## What are your worries about the plans?

When there are plans to make big changes, it is normal to have concerns about what could happen. Within the sessions we asked pupils if they had any worries about the plan. The responses below will be taken into consideration if the plan is approved.

Primary school council:

- Mixing with the bigger children
- Bullies
- People pushing- need wide corridors

Secondary school council:

- Taxis- it will be chaos
- Lunch time arrangements
- Not knowing the way around the building
- It might be difficult for staff to keep pupils from different sites apart- need strong doors with codes so can't be pushed open between different areas.
- Concerned that we will lose forest school

## What would you like to see in the new school?

Within the sessions we asked pupils what they would like to see in the new school if the plans for the new school were agreed, below are the suggestions from the sessions.

- A stage room.

# Formal Consultation Report

- Computer room-3
- Gaming room- 2
- Acting room.
- A Playground.
- Bigger playground-2
- Swings on the playground and a better playground.
- A gym.
- A second small playground with trampolines.
- Better computers with photoshop.
- Mediation area.
- Need a lift for disabled people.
- Have a field of our own.
- Have a canteen on our own-2
- Drinking fountains in the corridor so we don't have to ask staff-2
- Need a better playground.-3
- Better art room, science labs and toilets.
- More technology.
- A sports hall
- Grass on the playgrounds.
- All weather football pitch.
- Swings.
- Trampoline-2
- Climbing wall.
- Basketball hoop- 2
- Mini house.
- Separate area for pupils who do not attend lessons etc as it stops other pupils using facilities.
- Football posts.
- Updated computing system and greater ICT space.
- Updated D&T and art facilities.
- More GSCE options.
- More appropriate sports facilities.
- Lockers for pupils in corridors.



# Formal Consultation Report

- Soft play area.
- Relaxing area for staff.
- Better school WI-FI.

## Questions?

We asked pupils if they had any questions about the plan. Below are the pupil's questions and responses.

| Question   | Response   |
|--|--|
| Will there be enough space on the playground?  | Yes, the playground areas are split up into sections depending on what age you are in the school. Some classrooms will have direct access into an outdoor area. There will also be a small woodland and forest school area and equipment such as swings and trampolines will be available for all pupils to use. |
| Is there going to be separate breakout/ group rooms?                                   | Yes many of the classrooms have group rooms within them so they are easy for pupils and staff to get to.   |
| Will there be maps of the new school to help students and staff find their way around? | If maps would be useful this can be arranged for your first day in the new building.<br><br>Pupils and staff will be invited to visit the site as the building progresses so they can get used to the layout and visit areas of the new build that they are  |

## Formal Consultation Report

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|  | interested in.   |
| How will the taxis be able to line up?       | <p>Taxis and minibuses will enter the site from Ystrad Road and line up within a secure zone next to the school. Pupils will only exit the taxi once everyone is stationary. This process will be managed by school staff and vehicles will only leave the zone once all pupils are safely inside.</p> <p>If a taxi is late they would queue up in the staff parking area before being allowed through to the main drop off zone. There are also 2 areas either end of the school where taxis can drive onto the school yard itself and drop off those pupils who maybe experiencing difficulties exiting the car that day.</p> <p>During the school day this secure taxi drop off zone can be used by the school for cycling lessons and highway awareness.</p> |
| Will all the school finish at the same time? | <p>This will be decided and agreed by the headteacher and governors.</p> <p>It is likely that there will be a small time gap between the primary and secondary pupils leaving the building.</p>  |
| How will playtime/lunchtime be               | The primary pupils will have their own   |

## Formal Consultation Report

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| <p>allocated? Same times or different?</p> <p>How will dinner time be arranged?</p> | <p>dining area in the primary hall and will probably be served food just before the secondary pupils. The secondary pupils have their own separate dining area away from the younger pupils. Times will be decided by the headteacher.</p> <p>Playtimes will also be agreed by the headteacher- it is important to say that pupils will have their own specific areas to play in and older pupils will not be on the same area of yard as the younger ones.</p> |
|---|---|

# Formal Consultation Report

## APPENDIX 4- Full Governing Body response to the consultation:

This submission to the consultation process regarding the new build school for Plas Brondyffryn is from the full Governing Body and was agreed unanimously at the Governors Meeting tonight, 27-06-2022 Alison Duncan (chair), Simon Humphreys (vice-chair), David Price (Head teacher), Hannah Maddock, Louise Hollingworth, Joanne Morris, Eirlys Parry, Ali Ballantyne, Haydn Owen, Nathalie Thomas, Sian Evans, Mark Adams, Richard Crowther, Cheryl Cooper (Absent tonight but provided a written response in support of this statement)

The present capacity of the school is 116 pupils. According to the most recent records, the current number of pupils in the school is 139, i.e. 23 above its stated capacity - 81 below the planned increase to 220 pupils. The school is at present under a high degree of strain given the many compromises which have had to be introduced in order to accommodate the increase in pupil numbers. This increase is not a blip, but steady and ongoing. More and more young people are receiving a diagnosis of autism and there is a constant demand for places. Quite recently, the LA agreed that new admissions to the school would be limited to priority situations only. This decision did reduce the volume of new admissions which helped stabilise the organisation of the school but undoubtedly caused harm to those young people desperately needing to be admitted to the school.

The compromises I have referred to are not matters of minor tinkering with school arrangements, but significant alterations which have made the numbers manageable but have reduced in a worrying way the quality of educational provision. Thus, the range of special rooms or areas (break-out areas, play areas, sensory areas, quiet areas) which, in addition to ordinary classrooms, are an essential part of any special school, have been whittled away, till they have become pale shadows of what is actually needed and what once existed. This has led to, at times, an increase in unsettling behaviours, all the more challenging because the well-recognised and well-established processes for dealing with these have been compromised, simply because of a lack of physical space. Classes are regularly above the national guidelines for special schools of eight pupils.

## **Formal Consultation Report**

It is therefore self-evident that the school needs more room not only to accommodate the existing pupils, and enable them to thrive, but also to reach out to the pupils who are already knocking at the door as well as the others, yet to be identified, but coming our way soon. It is the Governors' strong belief that a larger, better resourced school is urgently needed now, and that, given ever-pressing demand, the new school will have reached its capacity of 220 within the next decade.

# Formal Consultation Report

## APPENDIX 5- Summary of responses received via Email

| Summary of Comments  | Proposers Response   |
|--|--|
| <p>Concerned around loss of green spaces and increased volume of traffic.</p>  | <p>Please see Appendix 6- section 3 for a full response</p>  |
| <p>In favour in principle.</p> <p>Must question the logic of site selection. Not only will it deprive the adjacent school of valuable playing fields and open space, but as the majority of pupils will inevitably be delivered and collected by some form of transport, this will significantly add to congestion in the area.</p> <p>Surely a site outside of town would be more appropriate, which could have adequate off-road space for parking, setting-down and picking-up, without depriving other schools of playing fields and making it more difficult for parents.</p> | <p>Please see Appendix 6- section 3 for a full response</p>  |
| <p>I think the impact of the school on the physical education provision at Denbigh high will be significant due to the additional time it will take pupils to get to the farthest fields away. How will this be mitigated?</p>   | <p>The mitigation of this will be a consideration in the design for the remodelling of Denbigh High.</p> |

## Formal Consultation Report

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| <p>If the proposal does go ahead will the LA consider modernising and amalgamating Ysgol y Parc and Ysgol Frongoch on the current Frongoch site?</p>   | <p>There is currently no proposal to amalgamate Ysgol y Parc and Ysgol Frongoch.</p>   |
| <p>There has been significant investment in main stream schools (Rhyl, Glan Clwyd, Brynhyfryd etc.) right across the county but this has not been reflected in Denbigh and it should be.</p>   | <p>The Band B proposals for the Sustainable Communities for leaning programme- previously 21<sup>st</sup> Century Schools and College programme is focused on the town of Denbigh with the following 3 projects being proposed:</p> <ul style="list-style-type: none"> <li>• Proposal to rebuild Ysgol Pendref,</li> <li>• Proposal to increase the capacity at Ysgol Plas Brondyffryn via a new purpose built facility,</li> <li>• Proposal to refurbish Denbigh High school.</li> </ul> <p>If all 3 proceed there would be £46.6 million investment in the town.</p> |
| <p>As it is proposed to build this facility on part of the existing Denbigh High School playing field, I consider this is a near-sighted proposal that will in the long term prove to be detrimental to the pupils and residents of Denbigh.</p> | <p>Please see Appendix 6- section 3 for a full response</p>  |

## Formal Consultation Report

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| <p>Open recreational space is extremely valuable to the physical and mental health of the community, and regrettably since the creation of the footpath/ cycleway around the perimeter of the proposed site, which included fencing off the Denbigh High School fields, the public access to the playing fields and athletics facilities has been severely limited.</p> <p>Many individuals/ groups previously used the athletics track out of hours for training, the wider fields for running and walking, however as noted in your response to queries on my behalf to Dr James Davies MP, there is now little booked activity there - unsurprising as there has been a Covid-19 pandemic; and the once freely accessible fields presumably now incur a usage charge via the leisure centre.</p> |  |
| <p>The consultation document refers to the outdoor space requirements being less than at available at present by Denbigh High School; has this taken into account the long term population growth estimates? Given the considerable number of new houses built and current planned house building projects, presumably the Council believes the local population is likely to increase, which will increase pupil</p>   | <p>The current proposal to enable the increase in capacity of Ysgol Plas Brondyffryn includes consolidating provision on a single site. This would involve the building of a new facility on one of the two fields currently used by Denbigh High School.</p> <p>The field proposed for development is currently used by Denbigh High predominantly in the spring / summer term for athletics, football and rugby-</p> |



## Formal Consultation Report

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| <p>numbers at Denbigh High School, requiring a greater outdoor footprint.</p> | <p>the school principally use the all-weather pitch at the leisure centre during the winter months.</p> <p>This site is fenced off for school use and can only be accessed by the community if they book it through the leisure centre.</p> <p>At present the space provided by these 2 external pitches area for Denbigh High School is in excess of what is required for current pupil numbers and its capacity. Based on the school capacity there is a requirement of approximately 45,000 sqm for pitches and the school at present has an overall area of approximately 70,000 sqm including the all weather pitch.</p> <p>During construction of Ysgol Plas Brondyffryn and then following completion of works, pupils at Denbigh High School would retain access to the second field and the all weather pitch.</p> <p>The field that would be retained by Denbigh High School together with the continued use of the All Weather Pitch at the Leisure Centre would give Denbigh High access to the equivalent of approximately 46,000</p> |
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## Formal Consultation Report

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|  | <p>sqm. This would be in line with the suggested size for the school.</p> <p>Survey works have started on the field next to Denbigh Town FC to establish whether any remedial works are needed to ensure Denbigh High are able to continue to use it for PE.</p> <p>We will be working with the school to ensure the field is accessible to pupils from the leisure centre where they currently change. There will need to be a temporary route during the construction phase and then a permanent solution once the project is completed as this will impact on the Denbigh High project.</p> <p>Based on this we are of the view that for school pupils at Denbigh High there will remain appropriate access to sports pitches for the full delivery of physical exercise and this will allow the school to continue to address agendas such as childhood obesity etc.</p> |
| <p>Will the remaining sports field be upgraded to develop a 400 m track and all the other field -events facilities as well? If not this will disadvantage Denbigh pupils from training</p> | <p>Please see Appendix 6- section 3 for a full response</p>  |

## Formal Consultation Report

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| <p>and competing compared with their local peers in Ruthin and St Asaph, as well as local athletics groups who wish to train competitively.</p>   |  |
| <p>Can I request confirmation that the Council has fulfilled all the requirements of the Welsh Government document:</p> <p><a href="https://gov.wales/playing-field-disposal-guidance">https://gov.wales/playing-field-disposal-guidance</a></p> <p>In particular Sections 8.7-9.12</p>                               | <p>The Local Authority is not granting any estate in the land and we are not 'disposing' of the land.</p> <p>As part of the pre-planning and planning process Sports Council for Wales and Fields in Trust will be consulted. Informal discussions have already taken place.</p> |
| <p>While I am in not opposed to the proposal to merge the three schools onto one campus, it should not be at the expense of the sporting opportunities, and potential detriment to the physical health of Denbigh school students, and the loss of the sole publically -accessible athletics facility in Denbigh.</p> | <p>Please see Appendix 6- section 3 for a full response</p>  |
| <p>I would like to propose that an alternative location be considered: the recently purchased, council -owned site, namely the former North Wales Hospital campus, which is currently being re-developed for further proposed housing.</p>  | <p>The site is currently owned by DCC however there is a Development Agreement with Jones Bros.(JB) in place. As part of that agreement they currently have right to occupy the site and an obligation to provide security.</p>  |

## Formal Consultation Report

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| <p>If some land there were to be set aside and the new school built there, this could be an ideal alternative for the Brondyffryn schools, without the loss of the Denbigh High School sports fields. Additionally it is very close to the Gerddi Glasfryn residential site; this could allow the residents the opportunity to walk to their school, instead of requiring a daily short trip in a vehicle, with the benefit of reducing the council's carbon footprint.</p> | <p>JB have submitted an outline planning application to renovate and convert the main range listed building into 34 apartments and construct houses on the site in order to fund the restoration. Members have resolved to grant outline planning consent subject to a section 106 agreement being signed.</p> <p>JB are currently in the process of developing a section 106 which sets out the detail of the development.</p> <p>The site is outside DCC's development boundary and planning consent was only granted on the principal of enabling development.</p> <p>Even with the enabling development there is still a viability funding gap and funding application have been submitted as part of DCC's Vale of Clwyd Levelling Up Funding bid and Growth Deal.</p> |
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# Formal Consultation Report

## APPENDIX 6- Summary of responses via the Formal Consultation Response Form

**Question 1** Are you in favour of the Proposals?

|           | Total |
|-----------|-------|
| Yes       | 70    |
| No        | 18    |
| No answer | 1     |
|           | 89    |

**Question 2:** Please tell us whether you are responding as a:

| Type                               | Total |
|------------------------------------|-------|
| Pupil                              | 0     |
| Parent/Carer                       | 20    |
| Teacher/ Staff Member              | 30    |
| Local Resident                     | 22    |
| Prospective pupil                  | 0     |
| Parent/ Carer of prospective pupil | 4     |

## Formal Consultation Report

|                  |    |
|------------------|----|
| Other            | 6  |
| Skipped Question | 7  |
|                  | 89 |

**Question 3:** Please provide comments regarding the proposal and any suggestions on alternative proposals which should be considered:

These responses have been grouped into themes below alongside a response or point of clarification from the local authority:

| Summary of Comments  |
|--|
| <b>General support for the proposal</b><br>14 Respondents raised   |
| <p>My daughter has come from a mainstream school to YPBD and although she still has challenging times she is much more fully supported by YPBD than she ever was at mainstream. Autistic pupils with a Statement of Special Education Needs will not thrive in a mainstream environment as the staff are not sufficiently trained to deal with the demands / challenges faced by autistic pupils, they're deemed as "problematic" and take up too much time. They are also more likely to be bullied in a mainstream than their peers because they are "different". In a specialist school / environment such as YPBD the staff nurture each individual child and support them so they can become the best they possibly can enjoying school life which was a challenge to them before. They accept each other as they are all equals. The staff at YPBD are excellent and as well as supporting their pupils they also support the parents too - its one big family. Whilst the increase in pupil numbers will need a match in increasing staff numbers its important that the right staff are found as it can be quite challenging for the staff emotionally and mentally due to the challenging needs of some of the pupils who</p> |

## Formal Consultation Report

attend YPBD, including my daughter. That said the pupils have a high regard / respect for all their teachers and each other and every milestone they meet is a proud moment for them, the teachers and their parents. Their recent Eisteddfod performance at this year's Urdd confirms this.

I agree the proposal should go ahead it's a fantastic school and more children should be given the opportunity to access the school

I think the proposal should go ahead it will give 116 other children access to the school

Spaces should be increased in all SEN provision. There are so many children with ALN in mainstream schools who simply can't access the curriculum, the schools themselves are massively under staffed and the child's needs are not being met. Nobody seems to listen and nobody seems to care. Very little is done in terms of transferring pupils from mainstream into a specialist setting, and opening up these spaces will provide a welcomed opportunity for so many children.

As education in Wales is evolving, it provides a wonderful opportunity to provide learners who have ASC to develop in a new and exciting environment that takes into account the unique needs of the learners. There are many pupils who need to have the security of the amazing support that Brondyffryn provides but are currently denied. In order to help all pupils in Denbighshire achieve their potential, I feel this is an incredible opportunity to ensure ASC pupils are highly challenged and supported.

Ysgol Plas Brondyffryn is essential for children with ASD, as all their learning, social and personal needs are met accordingly, whereas their needs may not be met in the same way as a main stream school. More children should have access to our exceptional facilities.

As a parent of a child who is currently benefiting hugely from being at Brondyffryn, I am completely for the proposal. As a teacher in a local primary school, I know of several children who would thrive in Brondyffryn as our child is, but unfortunately there isn't enough capacity as it stands. Our family life has completely changed for the better since our child started at Brondyffryn. Our child is much happier and settled which of course has a massive effect on us as a whole family. Our child is now reaching his full

## Formal Consultation Report

potential thanks to this specialist school and its staff. Surely every child in the same situation as ours deserves this opportunity to reach their full potential and to be in an environment that's suitable for their specific needs? The fact that all school sites would be on one site is also very important for continuity for these pupils.

I am for the proposal as I think every child with ASD deserves a chance to go to a school that will fully understand them.

I think that the proposal offers a positive education provision which will serve to benefit even more children. Having all phases of the school on one site will clearly have many benefits too. The fact that there are children currently waiting for places at the school it shows that there is need for such a provision to be made. I believe that the proposal to increase numbers to 220 is excellent. It means that more children will benefit from the specialist education on offer. There shall be benefits to the community in terms of creating jobs and also have the chance for a community cafe. I believe that the larger school size would be a real asset to Denbighshire County Council.

I think this is a fantastic proposal to give children like my son a chance to thrive in an environment suitable to his needs. My son started in September and had come on leaps and bounds. I know lots of children that our in main stream school that should be in a sen school but there are no places available.

It's needed.

Completely agree with the proposal a new school is needed as the numbers will continue to increase. Hopefully two years will allow a gradual change for our pupils as we support them to move over to a new building.

My niece has been attending this school since September and she has become a completely different child!! She now skips into school whereas before whilst in a mainstream school she would hold onto her mother's clothes and not want to go inside!! Ysgol Plas Brondyffryn is, in my opinion, an essential part of any autistic child's (or children with other disabilities) development.



## Formal Consultation Report

This is a very positive opportunity for all pupils and staff as well as future pupils, more space, opportunities to learn more new skills such as serving the community in the new school café and having all our pupils and staff in the one site, is beneficial in a supportive and interactive way.

I fully support the preferred option of the proposal to increase the capacity of the school and to bring the school sites together on a new purpose built school building, although the capacity increase to 220 pupils could become oversubscribed in just a few years given the growing demand for places.

### **Response:**

Points noted.

### **Loss of playing fields/ green space/ athletics track:**

19 Respondents raised

Will other playing fields be found?

The proposed site would require the loss of the playing fields adjacent to Denbigh Leisure Centre. I cannot support, condone, or understand the decision to remove this asset from the community. The playing fields are currently underused in my opinion. The recent installation of perimeter fencing has removed the use of the field by the casual public, and the ability for children to play freely in a large open space. I believe the current usage is purely by prior arrangement with Denbighshire Leisure Ltd, and is primarily school PE lessons. The proposal for a new school build on this field relies on the transfer of open play/sports space to an area adjacent to Middle Parc and the football ground. I would state that this is unacceptable as the land is neither flat/level, not large enough to house a suitable 400m running track. It is worth stating for a moment that the provision of athletics is essential to a modern PE curriculum, and to suggest that the school pupils of Denbigh should 'make do' with a second-rate sports space is wholly inadequate. Another point worth noting is that there are no athletics

## Formal Consultation Report

track in Denbighshire. Conwy, Flintshire, Ynys Mon, etc, all provide these facilities for their communities, and each has spawned sports clubs at these venues.

I support improvements to Plas Brondyffryn but have concerns about the loss of playing fields at the proposed site.

The field is used for physical exercise and the destruction of green space for buildings hardly a good thing for the environment and residents wellbeing.

What consideration has been given for the needs of Denbigh High School after the land has been used for Ysgol Brondyffryn - whether consideration has been given for the needs of green land resources, sports/athletics resources for the school and the wider community due to a change of use of the proposed land?

I am opposed as the proposed site will use playing fields and green space used by the community and the proposed site is the only running track available in Denbigh and only full sized running 400m track in the Vale of Clwyd.

The location of the new building takes away the precious green spaces that are so lacking in Denbighshire for sport and other physical activities. The school is the only 400m flat track in the county, it is always sport that suffers and this is seen time and time again where 3g pitches are put over long jump run ways, schools have less playing fields to work with.

I fully support the building of a new school, however I cannot agree that this location is the best place for it. Denbigh has experienced so much new building in the past few years. 2-3 years ago, when I walked down towards Brookhouse I used to be surrounded by fields - this is no longer the case. There are houses on each side of the road - so all I have to look at is bricks. At the moment when I walk alongside the Leisure Centre I enjoy watching Denbigh High School children playing football, rugby, hockey and athletics. I enjoy the great expanse of green grass to look at. If this new school building goes ahead then all I will see is bricks. This is not good for the wellbeing of Denbigh residents - these are our leisure areas - surely we should be allowed some areas where we can enjoy green spaces?

## Formal Consultation Report

Whilst I understand the need for a new site, it seems like a very small number of families who will benefit compared to those who will lose out by building the school on the main playing fields in Denbigh. I would be in support of the proposal if it wasn't for the location. We know that obesity is increasing and getting kids to exercise is a big challenge - this area of Denbigh gives my child and many others the opportunity to see green spaces rather than concrete. Denbigh doesn't have the luxury of plenty of open space within the Crown and outside the town is surrounded by fields with limited access. I love driving down Ystrad road with the amazing view from the playing fields, and my child loves scootering round the lovely path - which is fairly new and presumably the council spent a lot of money on - to the playground at the back of the tennis courts. This whole area isn't perfect by any means but imagine how many children could be encouraged outside if it was dedicated to encouraging them to be outside even more than it does already and the council built some facilities to get kids outside and away from screens. Once this open space is lost then we'll never get it back and I believe this would have a negative effect on the young people of Denbigh.

Do not think taking the area designated is right. There is very little playing GB areas in Denbigh and to take the green space would minimise this even more.

I do not agree with building the school on green land. Playing fields and green spaces are important to our community and I do not think we should build on them. I wonder if there are any brown sites which require redevelopment which could be used as an alternative?

The proposed site is the only flat field for sports and a running track in Denbighshire. This proposal would mean getting rid of even more of the green space in lower Denbigh which should be protected rather than built on. Until recently the sports field was very well used by local residents for over 30 years for family sports, picnics, running track youths having a kick around and generally making use of the limited green space. This was of course stopped once Denbighshire Leisure, which is basically a part of DCC fenced off the field and started to charge for the use, which ultimately has helped claims in the proposal that the field is not used. Only last week a group of

## Formal Consultation Report

youths were playing football in the car park rather than on the fields that are all fenced off and locked. Where are youths supposed to go?

I wonder if there is an alternative place to build rather than use more green space.

Denbigh High School and the community who pay to use the current playing field will lose this green space, the athletics track and a football field if the build were to go ahead. Is this fair for the community of Denbigh?

The playing field that the proposed building is set to occupy is far more than just a playing field. It is the areas only dedicated grass running track and is pivotal in training runners who in some cases represent North Wales in races. It would be an absolute travesty to assume this is a mere playing field and treat it with such little regard. The decision to build on it will negatively impact the sporting representation of Denbighshire and north wales. I beg of you please give us all the continued chance to run for and represent the place we love in the sport we love.

Reducing green space and access to sports and play areas is not in keeping with initiatives to improve health and increase physical activity. Consolidating the schools and increasing capacity is great, but this would be better located on an existing site that does not reduce green space.

The proposed site for the new build is, currently, Denbigh High School's athletics track/football pitch. This green space is also used by the community ( they hire it). Losing this green space would mean that Denbigh High School and the young people of the community would be at a disadvantage. There are two other fields belonging to Denbigh High School, the rugby field but this field is on a slope and uneven, also much further from the Leisure Centre. The County is putting profit in front of the wellbeing of our young people and adults. This new proposal is definitely a money making scheme for the County rather than the county looking at the needs its community and this is why I am against this proposal. We have very little green space for adults and children and young people in Denbigh and this new build would mean we have nothing for an athletic Club to hire ...

## Formal Consultation Report

Estyn have commented on the lack of green space at Denbigh high yet Denbighshire county council don't seem to think that taking more of their green space away is a problem ??

There is not sufficient green space for existing school children at Denbigh High School, this has been highlighted during a recent Estyn report however you still propose to build the school on the current school field depriving the children of even more grassed area.

### **RESPONSE:**

It is important to note that this formal consultation is in regards to the increase in capacity at Ysgol Plas Brondyffryn and not the location of the new build. This will be subject to the planning process for which there will be a public consultation before any decision is made.

The current proposal is to build on 1 of Denbigh High's fields. This field currently is used by Denbigh High predominantly in the summer term for athletics, football and rugby. The school principally use the all-weather pitch at the leisure centre.

This site is also currently fenced off and can only be accessed by the community if they book it through the leisure centre. Prior to taking any booking, the leisure centre has to check with the school if it is available and gain their permission to use the area. The area is accessed by a junior running club Saturday mornings and Tuesday evenings but there are no other bookings on this area other than the junior section of Denbigh Harriers Running Club.

Survey works have started on the other Denbigh High field next to Denbigh Town FC to establish whether any improvement works are needed to ensure Denbigh High are able to continue to use it for PE and to ensure it is available for controlled community use.

We will be working with the school to ensure the field is accessible to pupils from the leisure centre where they currently change. There will need to be a temporary route

## Formal Consultation Report

during the construction phase and then a permanent solution once the project is completed as this will impact on the Denbigh High project.

### **Capacity of the school:**

16 Respondents raised

I welcome this proposal to increase capacity at this important school.

The proposal for the increase in education capacity at Plas Brondyffryn is worthy and would be a superb upgrade from the current situation for the pupils, parents and teachers of the school. I am in full support of this idea.

In principle I support the need for increasing capacity for Brondyffryn Special School. I understand and support the need for resources that are suitable for the 21st century ensuring extensive and suitable resources for all pupils at the school to support education that is suitable and of the highest quality. I am pleased to see that the proposal ensures capacity for the future not only in the short term but also for the long term as well.

A huge need for more capacity - need for specialist provision.

I feel that more specialist placements are required to meet the increasing demand for our young people with autism. Increasing the number of places at the school will hopefully help to meet this increasing demand, for Denbighshire pupils and for pupils from outside the County also.

More places are desperately needed. I have many parents approach me who's children are struggling in mainstreams which are not suitable to meet the child's needs, resulting in a hugely detrimental effect on the young persons mental health. Also as we are aware a 3-18 setting provides continuity, nurturing, and the best academic outcomes. Please approve the new school.

## Formal Consultation Report

There is a desperate need for ASD provision and increasing the school capacity by the way of a new build is definitely necessary.

We are in favour of the proposal with reservations. Whilst the idea of better facilities is very attractive we are concerned that the whole point of moving our younger son to YPD was for him to enjoy a quieter, less busy environment with fewer pupils and to be able to thrive instead of feeling permanently anxious. I'm sure many other families are in the exact same situation. We are concerned that a doubling of pupils will be a very serious increase in the noise and bustle and will impact his experience of a quiet school.

I'm not surprised there is already a waiting list for further pupils to join YPBD, it is an excellent school. It makes sense to bring all sites together to a more modern building to accommodate and fulfil their needs educationally and mentally. Other schools have been brought into modernisation to accommodate demands, YPBD is no different. I support the increase in pupil numbers and the new build.

The current situation in the school is totally unacceptable in terms of space. It is becoming increasingly difficult to create the environment pupils need to thrive. The school is so crowded there are very few opportunities for the flexibility and personal space that autistic pupils need. I know too that we are saying "no" to a lot of pupils who should be coming to us.

The current school buildings are no longer fit for purpose and they don't offer enough accommodation for the numbers of students who need specialist schooling.

Increasing the capacity would ensure that all pupils needing the provision would be able to access it.

Because capacity is not enough currently. The system... waiting lists... everything is all wrong. Children should not have to wait to be at a suitable setting.

The school has been over capacity with regards to pupils for a number of years and as a result there isn't enough space. Classrooms are too small and there aren't enough safe spaces to have inclusion or therapy rooms to support the needs of the pupils.

# Formal Consultation Report

I think increasing the school capacity is a great idea! There is a desperate need for more specialist education placements in the local area.

At present the school is too small, we already have too many pupils attending the school and not enough space.

## **RESPONSE:**

As detailed in the formal consultation document the school is currently facing difficulties due to the amount of pupils it has. The demand for places at the school has increased and a waiting list is growing. The Local Authority believe this proposal will ensure the school can meet the growing demands now and in the future.

## **Facilities at the new building**

5 Respondents raised

Outside areas are very important to my son. Currently it's very small and 'prison like'. It would be lovely to have a variety of different play / break areas, grassed/ natural areas, veg patches, a view of the surroundings. Their own sports area and equipment so it's not shared, and their own dining facilities.

Would the new building be likely to lead to wider use e.g. for a summer school? After school provision?

There appears to be no facility for sports day events such as running, field sports etc.

Is there plans for a garden area and plenty of space for the children with the more complex needs of ASD. The children currently have a huge outdoor area and this plays an important part in keeping them happy, content and ensuring they have the space and privacy they need. The garden at the Ty'r Ysgol site will be such a massive loss to the children who spend a lot of time on the swings/ trampolines and they are highly



# Formal Consultation Report

used as a method of redirecting pupils who are unsettled. Maybe we could take the swings with us and create an area for them.

It will be amazing for the whole school to be together and the pupils will have a purpose built school for their autism.

## RESPONSE:

The design of the external areas of the new build are informed by Building Bulletin guidance- in relation to SEN schools this is BB104. This guides the type of spaces needed and areas required based on 220 pupils. BB104 guidance state a minimum area of and the current design shows we are considerably over the minimum amount. There will be a mixture of hard surface, soft and habitat area.

Dining areas- the building will have it owns dining facilities meaning pupils will not have to share these with other schools.

The Governors and the head teacher would decide on the after school provision provided and the summer school offer. The Local Authority would hope that the building will be utilised outside of school hours.

## Class sizes

5 Respondents raised

I would like the class sizes to remain small with the proposed increase of pupils on roll.

More classes with fewer pupils.

I am in favour as long as it does not see class sizes get bigger as a result because this has a detrimental effect on both the pupils and staff /teacher wellbeing and stress.

I am all for expanding the school to cater for more children with Autism like my son as I am completely aware of the shortage of setting within Wales and UK . However my

## Formal Consultation Report

concern and my husband the current class sizes and teachers per class would this cause a shortage of teachers if you where to increase class sizes. My son requires small class sizes and as much 1-2-1 support as possible. I would like to assume you would put more classes in places and to keep the class sizes at a minimum.

What will be the ideal class size per classroom?

Classes are regularly above the national guidelines for special schools of eight pupils. It is therefore self-evident that the school needs more room not only to accommodate the existing pupils, and enable them to thrive, but also to reach out to the pupils who are already knocking at the door as well as the others, yet to be identified, but coming our way soon. It is the Governors' strong belief that a larger, better resourced school is urgently needed now, and that, given ever-pressing demand, the new school will have reached its capacity of 220 within the next decade.

### **RESPONSE:**

The new school is being designed to have a maximum of 8 pupils in each classroom.

The school believe that small groups of 8 or less allow them to use person centred approaches so that each pupil has an individual and/or bespoke plan. The new building design also has a number of group/ break out rooms in order to deliver individual interventions/ therapies.

### **Advantages of bringing the school together**

5 Respondents raised

Bring YPB under one site would support developing closer and more complex relationships with health, especially therapies and developing an increasingly integrated approach to care between health and education, in keeping with the new ALN act. It would support the training and development of staff with special skills, e.g. ABA, makaton, physical intervention etc. for children with complex needs.

## Formal Consultation Report

This seems to be the sensible and long overdue decision to transform Brondyffryn into a centre of excellence with adequate resources and a completely fit for purpose site.

As a member of staff at YPBD I am fully aware of the growing need for specialist provision for pupils with ASD. Incorporating all three (current) sites into one will be highly beneficial for the progression of our pupils also.

PB has been split across sites for years. This meaning our pupils can only access one of the sites were in reality some of our pupils would benefit greatly on being able to access at least two of them for different activities and having a curriculum that will work for them so every pupil can access an education that suits them. As a member of staff being able to work on one site as a team will be beneficial to us all. We are proud to work in such an amazing school and to be able to help more children with autism - as I'm sure the community of Denbigh will be too.

Agree with the plans to have all pupils at one site which will also help with transitions.

### **RESPONSE:**

The Local Authority agree that there will be many benefits of bringing all staff and pupils into one building, including appropriate training and the development of specialist skills.

### **Alternative proposal**

7 Respondent raised

As an alternative proposal, I would put forward the idea of building the new school on the land behind the skatepark and the land currently used for Denbigh Town FC. Included in the development would be the installation of a modern synthetic athletics track behind the leisure centre, with a small covered spectator stand. This would house the football club in the winter months, and provide far superior sports facilities than the community currently has access to.

## Formal Consultation Report

Surely there is a better proposal for a brown site or doing better with Denbigh High School itself.

A site outside town would be more appropriate. No loss of existing playing fields, and no additional traffic congestion and pollution.

Has consideration has been given to the possibility of expanding existing locations for increasing capacity as needed?

Probably impossible but the land up at Gerddi would surely offer the peace and quiet these children crave?

I don't think having the school spread across different sites is a bad thing and I like that it gives the pupils similar experiences of transition as their mainstream counterparts (I.e. changing setting moving to high school). Despite change being more challenging for pupils with ASD it is an unavoidable part of life and managing change in a supported manner is a good learning experience for the children. I wonder if there would be the ability to extend the schools on their current sites?

I am unsure why the current Denbigh high school rugby fields haven't been investigated and thought off before disrupting Denbigh high school learners.

### **RESPONSE:**

In 2019 a feasibility report looked at options regarding the development of Ysgol Plas Brondyffryn. As part of that study the current Ty'r Ysgol site was looked at as an option, however the site is steeply sloping and to accommodate the volume of new building accommodation would require a massive amount of excavation. The site also has listed buildings.

Another option examined was to refurbish the existing secondary site utilising some parts of Denbigh High school- this option assumed Denbigh High was vacant and that the works could be done without disrupting the pupils too much.

# Formal Consultation Report

## Travel/ traffic concerns

10 Respondents raised

Please consider any active travel routes to the school and link in with other routes if possible.

How and where is the building likely to be located - will this likely increase transport along Ystrad Road? Will this likely have a negative impact on the trumpet route (walking and cycling)

The only criticism we have ever had of the school is the taxi/car debacle at drop-off and collection. The hope is that this ridiculous situation will cease and a real workable solution is achieved.

The impact on the local infrastructure in terms of the increase of traffic is also a concern.

Current Primary site has no walkway from the car park or the car park entrance side of the school to drop off children, will this be provided on the new site?

Given that the council are proposing to increase pupil numbers, how do they envisage the passenger transport accessing the site? Again Park Street and the junction onto Ruthin Road is not suitable for this amount of traffic and there would need to be significant improvement in the current road layout to make this a safe junction...given the amount of passenger transport I have seen queuing to get into the site on Rhyl Road, many impatient taxi drivers who can't wait to drop off their load.

I am also concerned about the extra traffic that would be necessary to accommodate the increase in school children should this new build go ahead. The volume of traffic during some periods of the day - at both Ty'n Fron and Park Street - is tremendous and to think that this will be increased is worrying. The Denbigh High school area is all ready congested with traffic - buses, taxis etc, the junctions just can't take much more traffic

## Formal Consultation Report

Another concern is the increased traffic on Ystrad Road which is already a fairly narrow twisty road - and characterful because of it - this is going to totally change this end of Denbigh for the worse. If this went ahead, the top end of Denbigh is going to be affected by the long term building work at the old mental hospital at the same time as the bottom end (Ystrad Road) is going to be affected by building the school.

I am very concerned as a local resident how the increased traffic to this site will be managed, currently the taxis at Plas Brondyffryn juniors park up at the current site so where will the safe entry be for the vehicles to access the new proposed site?

Access to the site will be overcrowded and present additional dangers to pedestrians and school children attending both school areas. The higher proportion of vehicles including buses will present additional problems to the already busy infrastructure.

### **RESPONSE:**

The current proposal is to take all vehicles off the highway so there will be no queuing on Ystrad Road. The drop off will take place within a secure zone directly adjacent to the school. Students will only exit the vehicles once everyone is stationary. This process will be managed by school staff and vehicles will only leave the zone once all pupils are safely inside.

The drop off area will be used to accommodate all anticipated taxis and minibuses. Any late arrivals would stack up in the teaching staff parking and not on the road. There is a separate area for the SSP pupils to be dropped off and for the occasional student unable to exit the vehicle. 16 visitors spaces and 17 staff parking spaces are accessible at all times- the remaining of the car park spaces for staff are in a controlled area to assist the safe drop off of all pupils in the 'stationary drop off' area. This strategy has been discussed in partnership with the school.

DCC 's highways department will be involved in ensuring the plans are safe and complaint.

# Formal Consultation Report

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| <b>Community Use</b>   |
| 1 Respondents raised   |
| I am also pleased to see proposals such as expanding potential use of the resources for the local community also being considered in the scheme particularly the reference to a community café that may be available for the local sports and leisure provision.   |
| <b>RESPONSE:</b>   |
| The Governors are keen that the new building will be accessible to the community to use out of hours. The Café is an existing opportunity for the school to establish a relationship between them and the community. Pupils will be able to learn hospitality and social skills through controlled and gentle interaction with members of the public who use the cycle and walking route surrounding the school site, and individuals within the community will have opportunities to meet pupils experiencing a range of additional learning needs, to better appreciate their challenges and difficulties. |
| <b>Future Use of current buildings</b>   |
| 3 Respondents raised   |
| What plans have been considered for the use of the existing, relatively new buildings, within the community?   |
| What does the council propose to do with the old building next to Ysgol Frongoch, is this to be made suitable for use by the other schools next to it or will it just become a white elephant?   |
| Concern over the amount of buildings being unused which is waste such as the previous Brondyffryn site at the Ystrad road and what will happen to the old buildings now.   |

# Formal Consultation Report

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| <b>RESPONSE:</b>   |
| <p>Discussions regarding the 3 sites that will be vacated if the project progresses is ongoing. In terms of the primary site options around Ysgol Frongoch utilising the vacated space will be examined.</p> <p>The secondary site next door to Denbigh High will form part of the Denbigh High developments and will allow the school to be reconfigured and refurbished utilising the extra space internally and externally. The Ty'r Ysgol site is next door to the residential provision Gerddi Glasfryn which is currently being reviewed and may form part of any developments around this. The charity SENSE have also moved onto the site and refurbished 2 other buildings and they may look to expand provision.</p> |
| <b>Environmental considerations</b>  |
| 2 Respondents raised   |
| <p>Has there been consideration given to the materials / building methods that would be used especially given the DCC's carbon impact agenda.</p> <p>Clearly we need to build for the future and time proof ourselves as much as we can in terms of heating and running costs as well as allowing ample storage space and communal areas.</p>  |
| <b>RESPONSE:</b>   |
| <p>DCC are committed to the following in regards to any new build projects:</p> <ul style="list-style-type: none"><li>• Net Zero carbon in construction</li><li>• Net Zero carbon in operation</li><li>• Net Zero carbon in whole life</li></ul>   |



# Formal Consultation Report

The design for the new build will embrace all of the above requirements as a core part of the design work.

## **Links with Denbigh High/ Denbigh Leisure**

6 Respondents raised

How much consultation has been undertaken with Denbigh High School and Denbigh Leisure and the impact the change will have on their provision.

The building on the proposed site will reduce sporting opportunity and amenity for Denbigh High School Students.

I am unsure about putting the specialist provision next to the high school. Many children have had negative experiences of mainstream provision before attending the special school and I feel that it may be difficult for them being so close to a setting/cohort that may have caused them distress/trauma. I also think that the local authority need to be aware that young people can be very cruel and the interface between the mainstream high school and the specialist provision, particularly for those with more complex needs, will need to be carefully managed and consistently and comprehensively monitored.

I also object because of the Impact on Denbigh High School. As a parent of 3 students in Denbigh High School I am disgusted that once again they are being let down by DCC and the LEA. I feel there are plenty of other more suitable locations for a new school that should be considered. The fact that DLL/DCC fenced off the fields 12-18 months ago is of concern as it suggests this proposal was always on the cards. Additionally the extra traffic on Ystrad Road/leisure centre would impact on local residents.

Denbigh High pupils already have to cross a road (clwyd avenue ) to get to their pe lessons and with this proposal where will the pupils new field be ? across a public footpath?, this wasn't allowed in rhyl high due to various safe guarding issues so surely

## Formal Consultation Report

can't happen in Denbigh, not to mention the class time wasted to walk to the lesson across the fields, operationally it will be a lot of wasted time.

The first language English schools seem to be under-represented and the poor relations when it comes to any funding or development of a new school site. The current Denbigh High school is no longer fit for purpose, showing its age and impractical to attract new pupils. The improvements for the school through a new building are long overdue. The access to the school playing fields for children of Denbigh High School will include crossing two gated areas onto a public cycle footpath to participate in their sporting activity. This was not allowed to take place during the recent construction of a new building at Rhyl High School so can not be acceptable at Denbigh. Where is the safeguarding protection around child safety considered in this expectation. It will reduce the current timetable of children and make sporting activities less inclusive for the curriculum of children at Denbigh High who will be left disadvantaged by the new sites. This development should be opposed and reconsidered as it is not a viable option for children in Denbigh High who will lose out significantly if this planning is given consent.

### **RESPONSE:**

Denbigh High is part of the Local Authorities Band B projects and is inevitably linked with the proposal around Ysgol Plas Brondyffryn.

Given the specialist nature of Plas Brondyffryn and the need for any construction works to be away from the current sites due to the cohort of pupils at the school, it was agreed that this proposal would move forward first. The current pressures the school currently faces in terms of the lack of capacity was also a major factor in ensuring this project was progressed first.

If the secondary provision at Ysgol Plas Brondyffryn vacates the Denbigh High site as part of the Denbigh High School project, they will not only have their building but also additional yard space and improved access to the schools other field which will be used solely for PE lessons.

## Formal Consultation Report

The flow of Denbigh High is not currently ideal and condition of the building is overall rated D. The likely options of refurbishment, remodelling, demolition and rebuild will be complimented by the option of refurbishment and utilising of the better conditioned vacated Plas Brondyffryn building. This will enhance the offer for Denbigh High pupils and provide greater flexibility for the Denbigh High project.

Currently Denbigh High and the secondary pupils at Ysgol Plas Brondyffryn utilise the leisure centre facilities quite heavily- both schools use the main hall, dance studio, the field, all weather pitch and the swimming pool. The 2 schools work together to ensure the facilities are timetabled in a way that suits both schools. Denbigh High has a Dual Use agreement with the leisure centre and then Ysgol Plas Brondyffryn work with Denbigh High on appropriate use. As part of this agreement the All weather pitch is available to the schools term time everyday 8.45-17.00. The Ysgol Plas Brondyffryn primary pupils and high needs pupils who are on different sites only access the leisure centre for swimming. If the proposal goes ahead as planned Ysgol Plas Brondyffryn pupils would only access the leisure centre for swimming in the future as all PE lessons would be delivered from the new facility.

Officers from Denbighshire Leisure are aware of the project and are kept up to date regularly. Both Ysgol Plas Brondyffryn and Denbigh High projects are entwined with the leisure centre and are important partners in delivery of PE in both schools.

### **Integration with mainstream**

4 Respondent raised

The proposal to have a combined site for all age groups reduces opportunities for integration with main stream students, especially for primary aged students.

The school already utilises existing sites. The separation of these sites has met pupils needs well on the basis of both learning and behavioural needs. The division has been based on ability and management needs (behavioural). Many of the pupils placed are out of county, provision should be made for local pupils to local inclusion. Segregation

## Formal Consultation Report

of pupils now seems dated and units within mainstream sites promote inclusion and knowledge around disability needs from peer groups, staff groups and community alike.

The Primary - aged pupils at Brondyffryn should be integrating into a primary school / junior/ infant school for some subjects e.g. P. E. , Art. At the moment they are next door to Ysgol Frongoch, Ysgol Twm o'r Nant and not too far from Ysgol y Parc. On the Denbigh High school site they would be much further ... this makes no sense.

The Primary Department of Ysgol Brondyffryn is, currently, near Ysgol Fron Goch and Ysgol Twm o'r Nant. It is convenient for the integration of pupils from Ysgol Brondyffryn into a mainstream class for certain subjects such as P.E. or Art or other subjects which an individual with autism would benefit from being with mainstream pupils. Moving these pupils to the new proposed site would mean longer travelling times between schools, less time for education.

### **RESPONSE:**

In regards to the primary site currently there is no physical joining of the school to Ysgol Frongoch. The pupils from both schools share the dining room for lunch every day but that is the extent of collaboration. As far as pupils utilising the mainstream school this has not happened in a number of years.

The secondary site is joined to Denbigh High School by a corridor but the door that connects the two is always locked. However some pupils do spend time at Denbigh High. Pupils may study a subject that Denbigh High offer and Plas Brondyffryn do not and they wish to go to college in the future to study this. Other pupils who may benefit from time spent in the 'mainstream' setting to prepare for what is to come when they leave Ysgol Plas Brondyffryn are those pupils who are on target for solid Level 2 GCSE grades. This year, 4 Year 10 pupils started GCSE courses in DHS, supported by our TAs.

Moving to the site proposed for the new build will not impact on this at all and this aspect of integration will continue exactly as it is now. The physical inter-connection between the 2 schools is irrelevant because pupils currently have to enter Denbigh

# Formal Consultation Report

High through the public foyer and sign-in. The route from the proposed new site to Denbigh High is actually shorter, simpler and safer than the existing one.

## Location

6 Respondents raised

I think the area designated for the school is very cramped and hemmed in. There is no room for possible expansion to the site to accommodate more students as we are already over capacity on the current site and the same will more than likely happen on the new site.

Of concern is also the location. Situated behind the high school where the pupils are loud and boisterous will also increase noise levels. There is also the issue of the boundary between the two schools and the potential for name-calling through fencing etc.

This should all have been thought of prior to the resitting of the current junior element of Plas Brondyffryn and the council should have been forward thinking to envisage that the school and needs of the children would change. In addition to siting it next to a mainstream school was short sighted.

I have no objections to the building of the new school and can understand the need for it. But I feel the location need more consideration.

I strongly believe an alternative site should be chosen.

I strongly object to this proposal, due to the proposed location for the school.

I also am unsure why you would build a school for children who might have sensory needs as well as other complex needs on the middle of a busy public footpath and a sports pitch which is used frequently.

# Formal Consultation Report

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| <b>RESPONSE:</b>   |
| <p>As mentioned previously this proposal is around increasing the capacity at Ysgol Plas Brondyffryn, and not the location of the new build- this will be subject to the planning process.</p> <p>The Local Authority believe that Denbigh is the right location for the school, the school has always been in the town and given the catchment of pupils to the school Denbigh is considered central and ensures travel times to those in the north and south of Denbighshire are reasonable to the school.</p> <p>The design of the external areas will consider the proximity of the cycle/ path and majority of the areas will be screened by some means to ensure pupils privacy.</p> |
| <b>Gerddi Glasfryn</b>   |
| 1 Respondent raised  |
| <p>I believe Gerddi Glasfryn should remain under the control of Brondyffryn. I am aware the reasons as to why this break away is being proposed. I believe that the constraints placed around the school prohibiting the disclosure of Gerddi Glasfryn to prospective and existing families is a travesty. Most of the time these resources are going under-used. However this is not a reflection of the need! Families all too often are reaching crisis point before adding support is even considered.</p>   |
| <b>RESPONSE</b>  |
| <p>This proposal does not include the residential provision Gerddi Glasfryn. This provision is still accessible to Ysgol Plas Brondyffryn. The future of the provision is currently being discussed with the Governors and the Local Authority but is not linked with increasing the capacity of the school.</p>   |

# Formal Consultation Report

## Admissions

3 Respondents raised

I am highly concerned about upcoming proposals in the future around admissions policy changes. The children at the school desperately need this provision. Being funded 75% by Welsh Government and 25% DCC, I fear that it will become a postcode lottery. I have heard language such as "lets look at what's in the local area first" and "tightening up admissions". This is a mistake as locally there has been such significant under-investment for so long that there are no there suitable settings that can come anywhere near close to Brondyffryn and what it provides the pupils, Brondyffryn are unrivalled (in my humble opinion).

ASC provision in Denbighshire is woefully inadequate and none of the mainstream high schools are able to provide a suitable environment for autistic kids to thrive - which will place more pressure on YPB. As well as expanding YPB you should also consider making mainstream high schools neurodiversity friendly (they are not at the moment) so that every child can have access to good quality education. You should really ask Autistic experts to help you with this - (rather than Autism experts) since the people with lived experience are the ones who really understand what's needed.

The school is at present under a high degree of strain given the many compromises which have had to be introduced in order to accommodate the increase in pupil numbers beyond the reported capacity of 116 pupils for the school. This increase is not a blip, but steady and ongoing. More and more young people are receiving a diagnosis of autism and there is a constant demand for places. Quite recently, the LA agreed that new admissions to the school would be limited to priority situations only. Whilst this decision did reduce the volume of new admissions which has helped to stabilise the organisation of the school but has undoubtedly caused harm to those young people desperately needing to be admitted to the school. The compromises I have referred to are not matters of minor tinkering with school arrangements, but significant alterations which have made the numbers manageable but have reduced in a worrying way the quality of educational provision. Thus, the range of special rooms or areas (break-out

## Formal Consultation Report

areas, play areas, sensory areas, quiet areas) which, in addition to ordinary classrooms, are an essential part of any special school, have been whittled away, until they have become pale shadows of what is actually needed and what once existed. In order to meet the needs of pupils at Ysgol Plas Brondyffryn it is extremely important to provide a low arousal environment, and the facilities, space and opportunities for sensory breaks as and when these are needed. The current building does not have capacity to provide this for the number of pupils that are in attendance. This has led to, at times, an increase in unsettling behaviours, all the more challenging because the well-recognised and well-established processes for dealing with these have been compromised, simply because of a lack of physical space.

### RESPONSE

As a Local Authority we will continue to work with all our mainstream schools to ensure pupils with autism, if possible, can remain in mainstream with the correct support.

Pupils who are already at the school will move over into the new build. As part of the project one of the workstreams will be to review the admission policy to clarify access for out-of-county placements. Consultation on the revised admission policy will take place with colleagues from across the region.

### Finance

4 Respondents raised

With the increase in pupils in the school how will this affect the provision for each child currently set at £26k per pupil. Will this decrease? What affect will this have on the pupils?

How many of the proposed students are Denbighshire residents? The current student population has a high proportion of out of county students if this trend continues it is



## Formal Consultation Report

unclear how this benefits Denbighshire residents apart from out of county payments. Perhaps DCC should be up front about this.

Building a new school here for Ysgol Brondyffryn is a money- making scheme for Denbighshire County Council. Out-of -county pupils bring in a great amount of money ... at the detriment of our local children ... it's not right.

Many of Ysgol Brondyffryn's pupils are not Denbighshire pupils... they come out of County. The County receives a great sum money for each pupil they accept.

### RESPONSE

Ysgol Plas Brondyffryn is funded in accordance with Denbighshire County Council's funding formulas and will receive resources in the same basis as any other school within the County Council, based on the new schools pupil numbers and facilities.

As the table below reflects in recent years the amount of Out of County placements at the school has reduced and currently is 16%.

| Child resides...     | Jan 2022   | Jan 2021   | Jan 2020   | Jan 2019   | Jan 2018   | Jan 2017   | Jan 2016   |
|----------------------|------------|------------|------------|------------|------------|------------|------------|
| in Denbighshire      | 111        | 112        | 97         | 103        | 95         | 79         | 65         |
| Outside Denbighshire | 21         | 28         | 29         | 31         | 45         | 49         | 58         |
| <b>Total</b>         | <b>132</b> | <b>140</b> | <b>126</b> | <b>134</b> | <b>140</b> | <b>128</b> | <b>123</b> |

## Formal Consultation Report

|                      |     |     |     |     |     |     |     |
|----------------------|-----|-----|-----|-----|-----|-----|-----|
| % from out of county | 16% | 20% | 23% | 23% | 32% | 38% | 47% |
|----------------------|-----|-----|-----|-----|-----|-----|-----|

Faced with a growing demand for places and a restricted capacity the short term decision was taken by Denbighshire, pending the outcome of the Band B proposals to restrict admissions to Denbighshire pupils pending the outcome of a long term approach for the school. This will be reviewed and managed once the new build is open as the school will have an increase in capacity.

### Construction concerns

2 Respondents raised

The construction traffic will have to pass by Denbigh Infirmary, a road that currently is not suitable for that amount of traffic, due to local residents parking and the configuration of the junction onto Ruthin Road, plus the access needed on occasion for emergency vehicles. In addition there will be a substantial amount of construction dust believe all construction comes with dust and I don't believe any construction company that says there isn't. This dust will -dependant on weather conditions blow towards the Infirmary meaning that there will be occasions when the windows of the Infirmary cannot be opened. Dust requires extra cleaning in place and I wonder how the council will mitigate for this. The noise from the construction including traffic is not good for the patients either. I feel for the local residents whose houses back onto this playing field who will also have to put up with months of noise and dust.

There is no consideration for residents who will be exposed to increased traffic, risk, noise and disruption in the area.

### RESPONSE

## Formal Consultation Report

Construction traffic to the proposed site would not go past Denbigh Infirmary- it would access the site off Ystrad Road.

As with all DCC builds the contractors will need to minimise dust and noise and keep nearby residents informed of any works that will be disruptive.

# Formal Consultation Report

## APPENDIX 7- Estyn Response

**Estyn response to Denbighshire County Council's proposal to increase the capacity at Ysgol Plas Brondyffryn from 116 to 220.**

### Introduction

This report has been prepared by Her Majesty's Inspectors of Education and Training in Wales.

Under the terms of the School Standards and Organisation (Wales) Act 2013 and its associated Code, proposers are required to send consultation documents to Estyn.

However, Estyn is not a body which is required to act in accordance with the Code and the Act places no statutory requirements on Estyn in respect of school organisation matters. Therefore, as a body being consulted, Estyn will provide their opinion only on the overall merits of school organisation proposals.

Estyn has considered the educational aspects of the proposal and has produced the following response to the information provided by the proposer.

### Summary/ Conclusion

The proposal is by Denbighshire County council. It is to increase the capacity at Ysgol Plas Brondyffryn from 116 to 220. The school would move into a brand-new purpose-built facility in the town of Denbigh to accommodate the increase.

It is Estyn's view that this proposal is likely to at least maintain the standard of education provision and outcomes for pupils in the area.

# Formal Consultation Report

## Description and benefits

The council has presented an appropriate rationale for the proposal. It is to increase the capacity of the school to meet the growing demand for provision for pupils with Autism Spectrum Condition (ASC). The nominal capacity at the school is 116, the school currently has 136 pupils on roll and has been over capacity for the last 6 years. The school currently has pupils waiting to attend the school and the council expects the demand to increase over the next few years and suggests that a capacity of 220 is reasonable. However, there is no explanation as to why the figure of 220 has been chosen. The school currently caters for pupils from across Denbighshire and beyond with pupils from Flintshire, Wrexham and Gwynedd also receiving education from the provision. The provision is currently located over four sites and the proposal would rationalise this from three of these sites onto one site with new purpose-built provision. The council also lists some issues with the conditions of the sites currently being used which a new build facility would address. The council has provided seemingly appropriate details regarding the timescales for the implementation of the proposal.

The expected advantages of the proposal include increasing the capacity to better meet the demand, all pupils and staff being on the same site, improved transition arrangements and having subject specific rooms. The disadvantages include an increase in traffic to the one site and a potentially noisy play area for all pupils.

## Formal Consultation Report

These seem to be appropriate and reasonable.

The council includes three main risks with the proposal. These include failure to obtain statutory approval to implement the proposal, reduced demand for provision and integration of pupils into the new school building. The mitigation against these risks appears to be mainly appropriate, however the council does not provide sufficient information regarding alternative pathways should they fail to obtain planning and funding approval.

The council has provided details of the four options considered as part of this consultation process. These options were to do nothing, to do the minimum by clearing the maintenance backlog at each site, an intermediate option and the preferred option. The council has provided suitable reasons for discounting three of these options and choosing the fourth option.

The council states that the proposed site is already in the local authority's ownership and is still in the town of Denbigh, therefore travel times for pupils will not be significantly different. In addition, the council iterates that transport arrangements will continue to be made in accordance with the county council's home to school transport policy. This seems to be fair and reasonable.

The council has appropriately undertaken a Welsh language impact assessment. It

## **Formal Consultation Report**

states that providing an improved educational provision represents an opportunity to strengthen Welsh education in the area and as a result strengthen the Welsh language. It concludes that overall, the proposal would not have a negative impact on the Welsh language. The council does not refer directly to how this proposal will support the targets in the Welsh in Education Strategic Plan. It does however comment that Welsh is not used as a language of instruction in any Key Stage or subject, but the school provides the necessary resources for pupils to access the whole curriculum through the medium of Welsh. It would be useful to provide further details regarding this assertion.

The council has suitably identified the financial costs for this proposal. It falls within Band B of the Welsh Government's Sustainable Communities for Learning programme and was approved by Welsh Government in September 2020. The programme included an overall allocation of £23.8m for this project. Subject to the approval of the relevant business cases, the Welsh Government will provide 75% of the funding with the remaining 25% to be provided by Denbighshire County council. There will be no capital receipts from this proposal as the current sites share with other facilities.

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

The school has suitably considered the impact of the proposal on the quality and

## Formal Consultation Report

standards in education including the impact of the proposal on teaching and learning experiences, care, support and guidance and leadership and management. The council summarises this by expressing its view that, should the proposal be implemented, it would at least maintain the current standard and quality of education. The new building will be equipped to provide all pupils with a broad and balanced curriculum from foundation phase to post-16. Bringing together all pupils and staff into a provision that is purpose built for their needs can only have a positive influence on pupil wellbeing and attitude to learning.

The council has included the findings from the school's most recent Estyn inspection report which was in July 2016. This inspection returned judgements of good for all 3 key questions and for the school's current performance and its prospects for improvement.

The council has provided a document called "community, equality and Welsh language impact assessment". Whilst this document suitably considers the impact of the proposal on the community and the Welsh language, it lacks sufficient consideration of the proposal's impact on vulnerable groups or on pupils that have protected characteristics.

The council has appropriately considered that one of the main advantages of this



## **Formal Consultation Report**

proposal is that construction works would take place away from all current school sites, therefore minimal disruption to pupils learning will occur.