

Caerphilly County Borough Council - Integrated Impact Assessment

This integrated impact assessment (IIA) has been designed to help support the Council in making informed and effective decisions whilst ensuring compliance with a range of relevant legislation, including:

- Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011
- Socio-economic Duty – Sections 1 to 3 of Equality Act 2010
- Statutory Consultation v Doctrine of Legitimate Expectation and Gunning Principles
- Welsh Language (Wales) Measure 2011
- Well-being of Future Generations (Wales) Act 2015

PLEASE NOTE: Section 3 *Socio-economic Duty* only needs to be completed if proposals are of a strategic nature or when reviewing previous strategic decisions. See page 6 of the Preparing for the Commencement of the Socio-economic Duty Welsh Government Guidance.

1. Proposal Details			
Lead Officer	Head of Service	Service Area & Department	Date
Andrea West	Sue Richards	21st Century Schools, Education and Corporate Services	01/03/2021

Is this proposal a... (please tick relevant box)											
Policy	<input type="checkbox"/>	Strategy / Plan	<input type="checkbox"/>	Practice	<input type="checkbox"/>	Procedure	<input type="checkbox"/>	Restructure	<input type="checkbox"/>	Project	<input checked="" type="checkbox"/>

What is the proposal to be assessed? *Provide brief details of the proposal and provide a link to any relevant report or documents.*

21st Century Schools and Colleges Programme - Band B Phase 1 - **Trinity Fields School Resource Centre**

Schools in Wales need to be in good condition and suitable for the delivery of education. In some cases, schools can be modernised, repaired, refurbished, extended, or partially rebuilt to meet the standards needed for contemporary teaching and learning. However, some existing schools are no longer in the right place, or fit for the future and in such cases, we might propose new schools or changes to existing schools.

Caerphilly County Borough Council aspires to continue to raise school standards and improve the quality of the learning environment to create fit-for-purpose 21st century schools and give every child in Caerphilly the best possible start in life. The 21st Century Schools and Colleges programme is a major, long-term, strategic capital investment programme. It is jointly funded by the Welsh Government and local authorities and aims to create a generation of 21st century schools in Wales.

Trinity Fields School and Resource Centre has been identified as one of the priority projects in the 21st Century Schools Band B programme.

Trinity Fields Special School is designated as a 'Community Special School' as per the definition in Chapter 4 of Part 1 of the Schools Standards and Framework Act 1998 and is the only special school providing education and specialist facilities for pupils from across the Borough.

The Council wishes to make a 'regulated alteration' to a special school in line with the requirements of the School Standards and Organisation (Wales) Act 2013 and the School Organisation Code 2018.

- To expand the existing Trinity Fields School and Resource Centre, via a new building extension and outdoor play space with an anticipated completion date of September 2022.
 - The proposed new building will provide additional facilities to accommodate growing demand for places and provide additional classrooms, specialist intervention areas and outdoor play space.
 - It is proposed the additional facility will also house a new flexible hall, hydrotherapy pool and soft play facilities to increase provision on site which will also be considered for community use at suitable times in keeping with the curriculum timetable.
- To future proof the current site by ensuring that it can cater for the changing and more complex needs of Additional Learning Needs (ALN) pupils across the Authority, both now and in the future and ensure compliance with the new Additional Learning Needs and Education Tribunal (Wales) Act.
- To agree for officers to proceed to procurement and construction and agree the establishment of an earmarked reserve facility in the Education area of the Council's accounts.

Further information is available on the [21st Century Schools webpages](#)



2. Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011

(The Public Sector Equality Duty requires the Council to have “due regard” to the need to eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity between different groups; and foster good relations between different groups). Please note that an individual may have more than one protected characteristic.

<u>Protected Characteristics</u>	Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?	If there are negative impacts how will these be mitigated?	What evidence has been used to support this view?
Age <i>(people of all ages)</i>	<p>Positive The proposal seeks to cater for pupils aged 3-19 and with plans to support community usage, therefore has the potential to benefit all age ranges.</p> <p>Negative The removal of a council owned pay as you use sports pitch will potentially impact on the delivery of sporting and recreational activities to the local community for people of all ages.</p>	<p>The proposal to develop Trinity Fields School has implications in relation to the identified pitch, but the local provision and activities for young people including Penallta RFC are not ceasing as a result of the proposal.</p> <p>There are still the same breadth of recreational facilities and activities available within the Ystrad Mynach Park boundary as well as enhanced mitigation provision being proposed to assist in the delivery and accessibility to a wider range of sporting provision within the locality.</p>	<p><u>Well-being of Future Generations (Wales) Act 2015</u></p> <p>The Act puts in place seven well-being goals which the local authority must work to achieve.</p> <ul style="list-style-type: none"> • A Prosperous Wales • A Resilient Wales • A More Equal Wales • A Healthier Wales • A Wales of Cohesive Communities

	<p>Negative The removal of a council owned pay as you use sports pitch will potentially impact on Penallta RFC and its membership which ranges across a number of age groups.</p>	<p>Protection of Community and Leisure Facilities is subject to planning criteria as defined in Local Development Plan policy CW8. The land identified for development (Trinity 1 pitch) falls within this classification. Proposals that would result in the loss of a community and/or leisure facility will not be permitted except where a comparable replacement facility can be provided by the developer either on or off site, and within easy and convenient access on foot or by bicycle.</p> <p>In order to compensate for the potential loss of the Trinity 1 pitch, Council Officers have been working closely with officials from Penallta RFC to design a range of mitigations and enhanced provisions. The mitigations proposed will develop an alternative provision of equivalent community benefit locally (0.5miles), avoiding any temporary loss of provision and thereby complying with the requirements of the Local Development Plan CW8 criteria.</p> <p>Sport and Leisure Investment has been made into the Ystrad Mynach locality and local all-weather 3G pitches, in addition to the Centre of Sporting Excellence, all available for</p>	<ul style="list-style-type: none"> • A Wales of Vibrant Culture and Thriving Welsh Language • A Globally Responsible Wales <p><u>Consultation Report</u> This report was produced as per the requirements of the School Organisation Code 2018 to summarise ‘views’ of consultees received as part of the consultation period which took place between 14th September 2020 and the 26th October 2020. As part of findings, community usage and the impact on Penallta RFC has been included in the section entitled ‘areas for consideration’</p> <p>Objection Report Through the formal statutory objections received in written format, the impact on the community for recreational and sporting provision has been addressed as part of the report in greater detail.</p> <p>Mitigation The proposed mitigation will be submitted alongside the formal Objection Report and fully outlines the mitigation actions to fulfil the Planning Policy Wales requirements for Tan16 and the</p>
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		<p>use by sports clubs and the wider community.</p> <ul style="list-style-type: none"> • Centre of Sporting Excellence 0.2 miles from Trinity 1 • Ysgol Gyfun Cwm Rhymni (Gelli Haf) 2.2 miles • Lewis School Pengam 2.8 miles • Blackwood Comprehensive 3.3 miles • Ysgol Gyfun Cwm Rhymni (Y Gwyndy) 4.2 miles • St Cenydd Community School 4.7 miles • Islwyn High School 5.2 miles 	<p>adopted Local Development Plan policy CW8.</p>
<p>Disability (<i>people with disabilities/ long term conditions</i>)</p>	<p>Positive The proposal seeks to increase provision to provide facilities for some of our most vulnerable children and young people, through the provision of modern 21st Century Educational facilities for children and young people with some of the most complex needs.</p> <p>Positive Expansion will also provide for a unified and integrated multiagency input from Health and Social Care which will further compliment the Educational provision. Visiting practitioners will not be permanently based at the Trinity site but will however have access to facilities to</p>	<p>No negative impacts on disability are identified however the following additional information is provided to contextualise the positive impacts.</p> <p>The mitigation relating to the creation of Sue Noake 2 and Trinity 3, the enhancement of Sue Noake 1 and Trinity 2 pitches and the introduction of a sporting hub at Sue Noake will support inclusive recreational and sporting activity. The options proposed for mitigation will be fully accessible. Emergency vehicle access and car parking has been included as part of the mitigation package.</p>	<p><u>Well-being of Future Generations (Wales) Act 2015</u></p> <p>The Act puts in place seven well-being goals which the local authority must work to achieve.</p> <ul style="list-style-type: none"> • A Prosperous Wales • A Resilient Wales • A More Equal Wales • A Healthier Wales • A Wales of Cohesive Communities

	<p>undertake development and intervention activities with children, under a single roof, providing additional support and a better quality of life to the most vulnerable children in the Borough.</p> <p>Neutral The catchment area for Trinity Fields School is the County Borough and this will remain unchanged as part of this proposal. Due to the specialist learning needs, all pupils are transported to site at present, 98% of which reside within the catchment area of the school. The site identified for the expansion is directly adjacent to the existing premises, so existing learner travel arrangements will still be in place should the proposal be taken with a recognised minimal increase.</p>	<p>The facilities proposed as part of the mitigation at Sue Noake are within a 0.5 mile radius from the Trinity 1 site and is currently accessed by a number of clubs including players at Penallta RFC. Whilst it is understood that the route requires crossing of a main road, there is a footpath along the entire route and a pedestrian light-controlled crossing (pelican crossing) adjacent to Ystrad Mynach Primary School.</p>	<ul style="list-style-type: none"> • A Wales of Vibrant Culture and Thriving Welsh Language • A Globally Responsible Wales <p><u>Consultation Report</u> This report was produced as per the requirements of the School Organisation Code 2018 to summarise ‘views’ of consultees received as part of the consultation period which took place between 14th September 2020 and the 26th October 2020.</p> <p>Objection Report Through the formal statutory objections received in written format, the impact recreational and sporting provision has been addressed as part of the report in greater detail. In addition, objections relating to the mitigation options, emergency vehicle access and parking have also been addressed.</p> <p>Mitigation The proposed mitigation will be submitted alongside the formal Objection Report and fully outlines the mitigation actions to fulfil the Planning Policy Wales</p>
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			requirements for Tan16 and the adopted Local Development Plan policy CW8.
<p>Gender Reassignment <i>(anybody who's gender identity or gender expression is different to the sex they were assigned at birth)</i></p>	<p>Neutral No anticipated change</p>	<p>Not applicable because the facility is accessible to people with learning disabilities regardless of other specific protected characteristics</p> <p>The mitigation options linked to the proposal are fully inclusive.</p>	Not applicable
<p>Marriage or Civil Partnership <i>(people who are married or in a civil partnership)</i></p>	<p>Neutral No impact</p>	<p>Not applicable because the facility is accessible to people with learning disabilities regardless of other specific protected characteristics</p> <p>The mitigation options linked to the proposal are fully inclusive.</p>	Not applicable
<p>Pregnancy and Maternity <i>(women who are pregnant and/or on maternity leave)</i></p>	<p>Neutral No impact</p>	<p>Not applicable because the facility is accessible to people with learning disabilities regardless of other specific protected characteristics</p> <p>The mitigation options linked to the proposal are fully inclusive.</p>	Not applicable

<p>Race (<i>people from black, Asian and minority ethnic communities and different racial backgrounds</i>)</p>	<p>Neutral No anticipated change</p>	<p>Not applicable because the facility is accessible to people with learning disabilities regardless of other specific protected characteristics</p> <p>The mitigation options linked to the proposal are fully inclusive.</p>	<p>Not applicable</p>
<p><u>Protected Characteristics</u></p>	<p>Does the proposal have any positive, negative or neutral impacts on the protected characteristics and how?</p>	<p>If there are negative impacts how will these be mitigated?</p>	<p>What evidence has been used to support this view?</p>
<p>Religion or Belief (<i>people with different religions and beliefs including people with no beliefs</i>)</p>	<p>Neutral No anticipated change</p>	<p>Not applicable because the facility is accessible to people with learning disabilities regardless of other specific protected characteristics</p> <p>The mitigation options linked to the proposal are fully inclusive.</p>	<p>Not applicable</p>
<p>Sex (<i>women and men, girls and boys and those who self-identify their gender</i>)</p>	<p>Neutral No anticipated change</p>	<p>Not applicable because the facility is accessible to people with learning disabilities regardless of other specific protected characteristics</p> <p>The mitigation options linked to the proposal are fully inclusive.</p>	<p>Not applicable</p>
<p>Sexual Orientation (<i>lesbian, gay, bisexual, heterosexual</i>)</p>	<p>Neutral No anticipated change</p>	<p>Not applicable because the facility is accessible to people with learning disabilities regardless of specific protected characteristics</p>	<p>Not applicable</p>

		The mitigation options linked to the proposal are fully inclusive.	
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3. Socio-economic Duty (Strategic Decisions Only)

(The Socio-economic Duty gives us an opportunity to do things differently and put tackling inequality genuinely at the heart of key decision making. Socio-economic disadvantage means living on a low income compared to others in Wales, with little or no accumulated wealth, leading to greater material deprivation, restricting the ability to access basic goods and services)

Please consider these additional vulnerable groups and the impact your proposal may or may not have on them:

- Single parents and vulnerable families
- People with low literacy/numeracy
- Pensioners
- Looked after children
- Homeless people
- Carers
- Armed Forces Community
- Students
- Single adult households
- People misusing substances
- People who have experienced the asylum system
- People of all ages leaving a care setting
- People living in the most deprived areas in Wales (WIMD)
- People involved in the criminal justice system

<u>Socio-economic Disadvantage</u>	Does the proposal have any positive, negative or neutral impacts on the following and how?	If there are negative impacts how will these be mitigated?	What evidence has been used to support this view?
<p>Low Income / Income Poverty <i>(cannot afford to maintain regular payments such as bills, food, clothing, transport etc.)</i></p>	<p>Positive Providing educational facilities fit for the future will improve the education and life outcomes of the pupils at Trinity Fields</p> <p>Neutral The facility is accessible to people with learning disabilities regardless of any specific socio-economic disadvantage</p>	<p>Not applicable</p>	<p>Is Wales Fairer? – The state of equality and human rights (EHRC 2018) Equality and Human Rights Commission acknowledge that Socio-economic disadvantage has a knock-on effect on education and health outcomes.</p> <p>The Disability Pay Gap (EHRC 2017). Equality and Human Rights Commission data shows that people with physical impairments generally experience pay gaps in the range of 15% to 28% depending on disability. Men</p>

			with learning disabilities have a pay gap of around 60%. Disabled people are less likely to be in employment and more likely to be on lower pay than non-disabled people.
<u>Socio-economic Disadvantage</u>	Does the proposal have any positive, negative or neutral impacts on the following and how?	If there are negative impacts how will these be mitigated?	What evidence has been used to support this view?
Low and/or No Wealth (<i>enough money to meet basic living costs and pay bills but have no savings to deal with any unexpected spends and no provisions for the future</i>)	Neutral The facility is accessible to people with learning disabilities regardless of any specific socio-economic disadvantage	Not applicable	Not applicable
Material Deprivation (<i>unable to access basic goods and services i.e. financial products like life insurance, repair/replace broken electrical goods, warm home, hobbies etc.</i>)	Positive It is a pre-requisite of Welsh Government funding that Council's optimise the use of infrastructure and resources to enable flexibility for space and facilities to be made available as community assets. Whilst the internal design of the proposed extension is yet to be finalised, subject to Cabinet approval to progress, discussions have included the zoning of the school to support access during school time and after hours to the hydrotherapy pool, hall, gym, soft	The Council has an obligation to provide an alternative provision of equivalent community benefit, made available locally, avoiding any temporary loss of provision. The proposed mitigation at the Sue Noake location is situated closer to the town centre than the existing site which will enable improved access to public transport and other local facilities.	<u>Consultation Document</u> As part of outlining the current proposal, an options appraisal was undertaken to consider the relative desirability, viability and feasibility of the proposal. In addition, information relating to the community usage and community benefit requirement relating to this proposal is outlined in this document. <u>Consultation Report</u> This report was produced as per the requirements of the School Organisation Code 2018 to

	<p>play, family room with kitchenette, rebound therapy room and café and kitchen. The accessible toilets and ‘changing places’ hygiene rooms supporting these spaces would also be available on a booking basis.</p> <p>Neutral The removal of a council owned pay as you use sports pitch will potentially impact on the cost of accessing sport and leisure.</p>		<p>summarise ‘views’ of consultees received as part of the consultation period which took place between 14th September 2020 and the 26th October 2020. As part of findings, community usage and the impact on Penallta RFC has been included in the section entitled ‘areas for consideration’</p> <p>Objection Report Through the formal statutory objections received in written format, the impact on the Community for recreational and sporting provision has been addressed as part of the report in greater detail.</p> <p>Mitigation The proposed mitigation will be submitted alongside the formal Objection Report and fully outlines the mitigation actions to fulfil the Planning Policy Wales requirements for Tan16 and the adopted Local Development Plan policy CW8.</p>
<p>Area Deprivation <i>(where you live (rural areas), where you work (accessibility of public transport))</i></p>	<p>Positive The design process will seek to include measures to enable safe ‘zoning’ of parts of the new school building, including the hall and a multi-functional classroom compliant space which could be</p>	<p>The Council has an obligation to provide an alternative provision of equivalent community benefit, made available locally, avoiding any temporary loss of provision.</p>	<p><u>Consultation Document</u> Information relating to the community usage and community benefit requirement relating to this proposal is outlined in this document.</p>

	<p>adapted for use. The usage of facilities will also be considered for the community at suitable times in keeping with the curriculum timetable. It will also strengthen and safeguard the promotion of inclusivity and wellbeing within the Community</p> <p>Positive Procurement will include Community Benefits as a core requirement e.g. around local targeted recruitment & training, supply chains, community & education initiatives in the provision of the proposed new facility.</p> <p>Neutral The removal of a council owned pay as you use sports pitch will reduce the pitch availability in the immediate vicinity. See mitigation comments in relation to alternative provision.</p>	<p>The propose mitigation at the Sue Noake location is situated closer to the town centre than the existing site which will enable improved access to public transport and other local facilities</p> <p>The mitigations will result in an increase in sporting provision though:</p> <ul style="list-style-type: none"> • The creation of a new Mini and Junior pitch at Trinity 3 with an 84m x 44m marked out pitch with rugby posts available for use in time for the 2021/22 season. • New training lights will be installed alongside the pitch at Trinity 2 to provide winter training opportunities where those don't currently exist. • The provision of an additional 102m x 60m senior pitch at the Sue Noake Leisure Centre available for use in time for the 2021/22 season, with 5m grass run off, partial hard standing barrier, fencing, drainage and enhanced playing surface • Enhancements to the existing 108m x 63m pitch at the Sue Noake Leisure Centre with new hard standing, fencing, drainage and enhanced playing surface. 	<p><u>Consultation Report</u> This report was produced as per the requirements of the School Organisation Code 2018 to summarise 'views' of consultees received as part of the consultation period which took place between 14th September 2020 and the 26th October 2020. As part of findings, community usage and the impact on Penallta RFC has been included in the section entitled 'areas for consideration'</p> <p><u>Welsh Index of Multiple Deprivation (WIMD)</u> Ystrad Mynach is broken down into 3 distinct output areas (as defined by the WIMD). Whilst the data for 'Ystrad Mynach 2' which is the main built up town/shopping area does score a low in relation to the Physical Environment it should not be considered in isolation. The remaining 2 areas identified as 'Ystrad Mynach 1' and 'Ystrad Mynach 3' which includes the area effected by the proposal in addition to Ystrad Mynach Park and Penallta Park, score considerably higher when comparing with other areas within the Borough (110 areas in total).</p> <p><u>Electoral Ward Profile</u></p>
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		<p>In addition, a number of enhancements to the supporting facilities including:</p> <ul style="list-style-type: none"> • Additional changing facilities at Sue Noake Leisure Centre • Temporary training lights in situ at SN1 to be replaced with enhanced permanent LED lighting • Emergency Vehicle access to be created to the pitches at Sue Noake Leisure Centre • Access Path Enhancements at Sue Noake Leisure Centre • Remedial Drainage Works on the Artificial Training Pitch at Sue Noake Leisure Centre to repair a crushed drainage pipe which has contributed to surface water flooding • Subject to Cabinet approval, the Council will apply for Fields in Trust status for the pitches at SN1 and 2 and Trinity 2 and 3, providing additional safeguards against the loss of these four fields moving forward. 	<p>Ystrad Mynach ward profile from the 2011 Census information has been reviewed</p>
<p>Socio-economic Background <i>(social class i.e. parents education, employment and income)</i></p>	<p>Positive Facility is accessible to people with learning disabilities regardless of any specific socio-economic disadvantage</p>	<p>The mitigation proposals for the loss of the pitch at Trinity 1 include the creation of a new Mini and Junior pitch at Trinity 3 and new training lights will be installed alongside the pitch at Trinity 2. The lighting will provide</p>	<p><u>Welsh Index of Multiple Deprivation (WIMD)</u> Ystrad Mynach is broken down into 3 distinct output areas (as defined by the WIMD). Whilst the data for 'Ystrad Mynach 2' which is the main built up</p>

	<p>Positive The proposed facility would include the expansion and further opportunities at Café Oren in Trinity Fields School to for the development of life skills provision to vulnerable pupils and to support and upskill parents and carers</p> <p>Positive Provision for the Borough’s most vulnerable learners will be kept within the borough and fully inclusive and accessible for all at a single, central location.</p> <p>Positive The facility will provide inclusive facilities which will be accessible to vulnerable children and young people alongside supporting the holistic needs of their wider family and supporting their future wellbeing.</p> <p>Negative The removal of a council owned pay as you use sports pitch will potentially impact on the delivery of sporting and recreational activities. A section of the local community have indicated as part of the Consultation responses that they see the removal of the pitch as negative and that the</p>	<p>a viable and safer area within the existing Ystrad Mynach Park where this currently does not exist.</p> <p>The provision of an additional senior pitch and enhancements to the existing pitch at the Sue Noake Leisure Centre, which is within a 0.5mile/10 minute walk of the existing Trinity 1 site and situated closer to the town centre and public transport linnks, along with changing facilities and permanent LED lighting will deliver safe, secure and convenient access to facilities to enable the local and wider community to feel safe and aspire to succeed and live active and healthy lives. The availability of improved transport links could also attract more people to take part in sport and recreation activities.</p>	<p>town/shopping area does score a low in relation to the Physical Environment it should not be considered in isolation. The remaining 2 areas identified as ‘Ystrad Mynach 1’ and ‘Ystrad Mynach 3’ which includes the area effected by the proposal in addition to Ystrad Mynach Park and Penallta Park, score considerably higher when comparing with other areas within the Borough (110 areas in total).</p> <p><u>Electoral Ward Profile</u> Ystrad Mynach ward profile from the 2011 Census information has been reviewed</p> <p><u>Consultation Report</u> This report was produced as per the requirements of the School Organisation Code 2018 to summarise ‘views’ of consultees received as part of the consultation period which took place between 14th September 2020 and the 26th October 2020. As part of findings, community usage and the impact on Penallta RFC has been included in the section entitled ‘areas for consideration’</p> <p>Mitigation The proposed mitigation will be submitted alongside the formal</p>
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	mitigation option in insufficient, inconvenient and disruptive.		Objection Report and fully outlines the mitigation actions to fulfil the Planning Policy Wales requirements for Tan16 and the adopted Local Development Plan policy CW8.
<p>Socio-economic Disadvantage <i>(What cumulative impact will the proposal have on people or groups because of their protected characteristic(s) or vulnerability or because they are already disadvantaged)</i></p>	<p>Positive Expansion will provide for a unified and integrated multiagency input from Health and Social Care which will further compliment the Educational provision. Visiting practitioners will not be permanently based at the Trinity site, but will however have access to facilities to undertake development and intervention activities with children, under a single roof, providing additional support and a better quality of life to the most vulnerable children in the Borough.</p> <p>Positive It is a pre-requisite of Welsh Government funding that Council's optimise the use of infrastructure and resources to enable flexibility for space and facilities to be made available as community assets. Whilst the internal design of the proposed extension is yet to be finalised, subject to Cabinet approval to progress, discussions have included the zoning of the school</p>	<p>The mitigation relating to the creation of Sue Noake 2 and Trinity 3, the enhancement of Sue Noake 1 and Trinity 2 pitches and the introduction of a sporting hub at Sue Noake support inclusive recreational and sporting activities.</p> <p>The facilities proposed as part of the mitigation at Sue Noake are within a 0.5 mile radius from the Trinity 1 site</p>	<p><u>Welsh Index of Multiple Deprivation (WIMD)</u> Ystrad Mynach is broken down into 3 distinct output areas (as defined by the WIMD). Whilst the data for 'Ystrad Mynach 2' which is the main built up town/shopping area does score a low in relation to the Physical Environment it should not be considered in isolation. The remaining 2 areas identified as 'Ystrad Mynach 1' and 'Ystrad Mynach 3' which includes the area effected by the proposal in addition to Ystrad Mynach Park and Penallta Park, score considerably higher when comparing with other areas within the Borough (110 areas in total).</p> <p><u>Electoral Ward Profile</u> Ystrad Mynach ward profile from the 2011 Census information has been reviewed</p> <p><u>Consultation Report</u> This report was produced as per the requirements of the School</p>

	<p>to support access during school time and after hours to the hydrotherapy pool, hall, gym, soft play, family room with kitchenette, rebound therapy room and café and kitchen. The accessible toilets and ‘changing places’ hygiene rooms supporting these spaces would also be available on a booking basis.</p> <p>Neutral The removal of a council owned pay as you use sports pitch will potentially impact on the delivery of sporting and recreational activities.</p>		<p>Organisation Code 2018 to summarise ‘views’ of consultees received as part of the consultation period which took place between 14th September 2020 and the 26th October 2020. As part of findings, community usage and the impact on Penallta RFC has been included in the section entitled ‘areas for consideration’</p> <p>Objection Report Through the formal statutory objections received in written format, the impact on the Community for recreational and sporting provision has been addressed as part of the report in greater detail.</p> <p>Mitigation The proposed mitigation will be submitted alongside the formal Objection Report and fully outlines the mitigation actions to fulfil the Planning Policy Wales requirements for Tan16 and the adopted Local Development Plan policy CW8.</p>
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4. Corporate Plan – Council’s Well-being Objectives

(How does your proposal deliver against any/all of the Council’s Well-being Objectives? Which in turn support the national well-being goals for Wales as outlined in the Well-being of Future Generations (Wales) Act 2015. Are there any impacts (positive, negative or neutral? If there are negative impacts how have these been mitigated?) [Well-being Objectives](#)

<p>Objective 1 - Improve education opportunities for all</p>	<p>Positive The needs of children who attend Trinity Fields School are significant and complex and through rigorous assessment it is identified that the most suitable provision can be delivered through a special school. The Council has a responsibility to develop provision to meet need and must review this regularly in line with the requirements of the Additional Learning Needs and Education Tribunal (Wales) Act and is committed to providing all children and young people with high quality education, tailored to meet their needs, which will develop their potential, extend aspiration, promote social inclusion and contribute to the economic regeneration of the area</p> <p>Neutral The relocation of the playing field will change the delivery of sporting and recreational activities. The mitigation options will be in effect prior to any works being undertaken on the proposed new facility.</p>
<p>Objective 2 - Enabling employment</p>	<p>Positive As part of the funding requirements for all 21st Century School proposals, Welsh Government stipulates that Community Benefits are a core requirement of any procurement process related to the award of contracts and will therefore be scored as part of the Quality evaluation. These include a number of targets around local recruitment and training, supply chains, community and education initiatives.</p>
<p>Objective 3 - Address the availability, condition and sustainability of homes throughout the county borough and provide advice, assistance or support to help improve people's well-being</p>	<p>Not applicable to this proposal</p>
<p>Objective 4 - Promote a modern, integrated and sustainable transport system that increases opportunity, promotes prosperity and minimises the adverse impact on the environment</p>	<p>Neutral There is a Statutory duty placed upon the Authority to provide pupils with free transport to their nearest suitable school if they reside beyond 'walking distance' to that school. All pupils are assessed in accordance with the Learner Travel (Wales) Measure 2008. However, the Authority does offer a more generous policy than what is statutorily required by the Measure. 98% of the vulnerable learners arrive by car/taxi/minibus primarily due to the nature of their disabilities.</p> <p>Positive</p>

	<p>Ystrad Mynach's location in the heart of the county borough along with its economic and transport opportunities as identified in the Ystrad Mynach Masterplan May 2019. The proposed mitigation for sports and recreation will create new facilities closer to the centre of Ystrad Mynach Town Centre and public transport, which will further support local business and transport infrastructures .</p>
<p>Objective 5 - Creating a county borough that supports healthy lifestyle in accordance with the Sustainable Development principle with in the Well-being of Future Generations (Wales) Act 2015</p>	<p>Neutral As part of the consultation responses and formal objection process, respondents have raised concerns with regards to the impact of the proposal on Penallta RFC in terms of facilities available to players and income generation for the club. The Council acknowledges that this proposal will impact on the removal of one Council owned pay-as-you use sports pitch, primarily used for the playing of rugby by Penallta RFC, locally referred to as Trinity 1. However the proposed mitigation measures determine a neutral effect.</p> <p>Neutral As part of the consultation responses and formal objection process, respondents have raised concerns with regards to the removal of open green spaces in the Ystrad Mynach area and the potential impact on health and wellbeing from both a recreational perspective, further supported through the creation of the Ystrad Mynach Green Space Group who have engaged in the consultation process. The Trinity 1 pitch falls within the CW8 Community and Leisure Facilities definitions. Trinity 1 is not subject to the CW7 Open Space classification.</p> <p>Positive Extensive mitigation measures will be implemented relating to the enhancement of Trinity 2,3 and additional provision at Sue Noake, subject to Cabinet approval and prior to any works commencing on the Trinity 1 site. Council officers have been working closely with officials from Penallta RFC to design a range of mitigations and enhanced provisions. The intention is to develop an alternative provision of equivalent community benefit locally, avoiding any temporary loss of provision</p>
<p>Objective 6 - Support citizens to remain independent and improve</p>	<p>Positive</p>

their well-being

Expansion will also provide for a unified and integrated multiagency input from Health and Social Care which will further compliment the Educational provision. Visiting practitioners will not be permanently based at the Trinity site but will however have access to facilities to undertake development and intervention activities with children and young people, under a single roof, providing additional support and a better quality of life to the most vulnerable children and young people in the county borough.

Positive

The proposed facility would include the expansion and further opportunities at Café Oren in Trinity Fields School for the development of life skills provision to vulnerable pupils and to support and upskill parents and carers.

Positive

The school operates 6 days a week throughout the year and provides respite services and the School Holiday enrichment Programme to families throughout the borough during holiday periods. The enhanced facilities such as the additional hydrotherapy pool, soft play, hall and rebound rooms will mean this offer can be extended to more families across the community.

Positive

The extensive mitigation and enhancement measures within Ystrad Mynach Park and at Sue Noake, subject to Cabinet approval will provide additional facilities to support physical and mental wellbeing through sport and recreation.

In addition, Penallta RFC and a number of other Ystrad Mynach based clubs are currently exploring the possibility of creating a Community Sporting Hub at the Sue Noake Leisure Centre. The Hub would have the potential to support Rugby, Football, Hockey and Netball as well as a new clubhouse and improved changing facilities. The creation of a sporting hub is not part of the current mitigations for the removal of the pitch at Trinity 1, but the Council is keen to support the clubs to make the hub concept a reality.

4a. Links to any other relevant Council Policy

(How does your proposal deliver against any other relevant Council Policy?)

The proposal contributes the following Strategies:

- **Shared Ambitions Strategy (2019-2022)**

This proposal will deliver upon the Council's ambition to provide every learner with the best life chances through the provision of high quality teaching, learning and leadership across our impressive 21st Century school settings.

- **Caerphilly Sport and Active Recreation Strategy (2018-2028)**

The mitigation measures linked to this proposal relating to the creation of Sue Noake 2 and Trinity 3, the enhancement of Sue Noake 1 and Trinity 2 pitches and the introduction of a sporting hub at Sue Noake support this agenda.

In addition, Penallta RFC and a number of other Ystrad Mynach based clubs are currently exploring the possibility of creating a Community Sporting Hub at the Sue Noake Leisure Centre. The Hub would have the potential to support Rugby, Football, Hockey and Netball as well as a new clubhouse and improved changing facilities. The creation of a sporting hub is not part of the current mitigations for the loss of the pitch at Trinity 1, but the Council is keen to support the clubs to make the hub concept a reality.

- **Caerphilly Strategic Equality Plan**

A statutory document under the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011, this four-year plan explains in straightforward terms what each of the equalities issues actually means and under what wider legislation we have responsibilities as a council.

- **Adopted Local Development Plan and Green Infrastructure Strategy**

The building and related transport infrastructure would be subject to a planning application.

A preplanning application consultation exercise will be carried out as part of the planning application process and all relevant National and Local Planning Policies and all material planning considerations will be taken into account by the Local Planning Authority in the determination of the application.




The planning proposal for the Trinity Fields scheme, will be determined having regard for the adopted LDP, which provides the framework for local decision-making and brings together both development and conservation interests to ensure that any changes in the use of land are coherent and provides maximum benefits. The Green Infrastructure Strategy will form a part of the evidence base for the 2nd Replacement LDP together any other strategies with land use requirements. Therefore, the primary document for determining planning applications is the Adopted LDP until such time as it is superseded by the 2nd Replacement LDP.



The utilisation of this Integrated Impact Assessment will further help support the Council in making informed and effective decisions whilst ensuring compliance with a range of relevant legislation, including:

- Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011
- Welsh Language (Wales) Measure 2011
- Socio-economic Duty – Sections 1 to 3 of the Equality Act 2010
- Well-being of Future Generations (Wales) Act 2015
- Statutory Consultation v Doctrine of Legitimate Expectation and Gunning Principles

5. Well-being of Future Generations (Wales) Act 2015 – The Five Ways of Working (ICLIP)

(Also known as the sustainable development principles. The Act requires the Council to consider how any proposal improves the economic, social, environmental and cultural well-being of Wales using the five ways of working as a baseline)

<u>Ways of Working</u>	How have you used the Sustainable Development Principles in forming the proposal?
<p>Long Term</p> 	<p>The expansion of the highly successful Trinity Fields School provides a platform for the needs of our most vulnerable learners to be met over the long term, through the provision of a custom built and fit for purpose extension to the existing school site. The associated enhancements to the community sporting infrastructure of Ystrad Mynach set out within this report, together with the Council's intention to secure fields in trust status for the stated pitches, will secure sporting opportunity within the locality over the long term.</p>
<p>Prevention</p> 	<p>Providing the most vulnerable of Caerphilly's learners with a custom built expansion of the existing school at Trinity Fields will enable pupils to access a 21st century facility and to receive tailor made learning opportunities designed to meet their specific needs. The enhancements to the sporting infrastructure of Ystrad Mynach will also help increase participation in sport and active recreation with all of the benefits that doing so brings, particularly in relation to health and well-being, mental and physical.</p>
<p>Integration</p> 	<p>The proposal to expand Trinity Fields Special School will impact on Wellbeing Goals 'A Healthier Wales' and 'A More Equal Wales'. The school extension will provide opportunities to directly enhance the way in which Health, Social Care and Education Services can be delivered by providing opportunities to integrate provision on a single site across health and education partners.</p>

<p>Collaboration</p> 	<p>The Council has worked with Penallta RFC to shape many of the proposals to enhance existing facilities. Informal engagement with Sport Wales (Fields in Trust) has also been critical in designing an appropriate mitigation for the potential redevelopment of the community sports pitch, Trinity 1. The Council has also worked with Partners such as ABUHB to provide value added opportunities from the expanded school site.</p>
<p>Involvement</p> 	<p>The School Organisation Code (2018) prescribes a number of explicit consultation and engagement steps and consultees. Above and beyond the prescribed list of consultees stated within the code, the council has already chosen to engage Penallta RFC and Sport Wales (Fields in Trust) in addition to help shape the proposal.</p> <p>Consultation Period A consultation period opened on Monday 14th September 2020 and concluded at midnight on Monday 26th October 2020. Consultees were given at least 42 days to respond to the proposal as outlined in the Consultation Document, with at least 20 of these being school days as defined by Section 579 of the Education Act 1996.</p> <p>Consultees were advised of the proposal and availability of the consultation documentation when it went live on the 14th September 2020 via letter/email and were therefore invited to take part in the statutory consultation to gather their ‘views’ on the proposal as outlined in the consultation document.</p> <ul style="list-style-type: none"> • 1048 responses views were received during the consultation period. • 0 responses were received in the medium of Welsh. • 43% supported the proposal as outlined in the Consultation document • 56% did not support the proposal as outlined • 1% provided a neutral or no comment response. • 3 alternative options were raised by consultees and considered by Education Scrutiny Committee and Cabinet. <p>The Learner Voice was also captured as part of this process. It was acknowledged at an early stage that in order to provide the opportunities for the young people to express their views in relation to this proposal, engaging with staff at Trinity Fields school would be vital. The school’s exemplary levels of care, support and guidance and through utilising the child friendly version of the consultation document and the accompanying video, children were engaged in a familiar environment, at the appropriate comprehension level and in the format of their preference. Many of the children provided comments on what they would like to see in the future and how they felt about the proposal. Many pupils utilised verbal communication, however, evidence of what the pupils felt they wanted were also captured via heatmaps using eye recognition cursor movement, symbols and braille. These comments were included as part of the Consultation Report.</p> <p>Statutory Notice / Objection Period</p>

	<p>Following the decision by Cabinet (9.12.2020) to proceed to Statutory Notice, anyone wishing to make an objection to this proposal was able to do so as per the requirements of the School Organisation Code 2018. To be considered as a statutory objection, objections had to be made in writing or by email and sent to the Council within the 28 days of the date on which the proposal was published. This is referred to as the “objection period” and ran from the 11th January 2021 to the 7th February 2021.</p> <ul style="list-style-type: none"> • 238 Statutory Objections received. <p>It should be noted that this process as prescribed by Welsh Government, provided no opportunity for inclusion of responses in support of the proposal. It should also be noted that the Objection figure quoted includes all responses received irrespective of any duplicates.</p> <p>The Objection Report provides a summary of the findings and original copies of all correspondence are made available to Cabinet Members for consideration as part of the decision making process.</p> <p>Planning Consultation There will be a separate planning application process that will address a number of material planning considerations. This process will enable further involvement and engagement opportunities for interested parties.</p>
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6. Well-being of Future Generations (Wales) Act 2015

<u>Well-being Goals</u>	Does the proposal maximise our contribution to the Well-being Goal and how?
<p>A Prosperous Wales <i>An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work</i></p>	<p>Embodied Carbon / Operational Carbon The 21st Century Schools Band B Programme looks to deliver a combination of new school builds, expansions, amalgamations, relocations and refurbishments, all with the potential to support the Welsh Government and Council’s strategies on decarbonisation and provide a new model of delivery.</p> <p>Childcare: The Foundation Phase provision at Trinity Fields offers full time Education so does not need wraparound childcare provision and in line with the recommendations of many</p>

	<p>eminent researchers, early intervention is essential for pupils with Additional Learning Needs in order to improve their life chances. There are several day nurseries in the local area to Trinity, many of whom are contracted on the Assisted and Supported Places scheme; however this provision would not be accessible for pupils with highly complex medical and learning needs (pupils who require oxygen, nasogastric feeding tubes, gastrostomies etc.). There are strong links between the School, the Local Authority's Early Years Manager and with the Integrated Service for Children with Additional Needs (ISCAN) to ensure pupils have early access the appropriate provision to meet their highly complex needs. In addition, Trinity School is registered as a childcare provider to run holiday childcare provision and had a successful Care Inspectorate Wales inspection last year with an excellent rating. As a result there is limited need to develop childcare provision on site and it is more preferable to upskill providers across the borough to meet needs of children prior to starting in the nursery</p>
<p>A Resilient Wales <i>A nation which maintains and enhances a biodiverse natural environment healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for climate change)</i></p>	<p>Mitigation Outdoor sports facilities including playing pitches are protected under Policy CW8 of the adopted Local Development Plan. CW8 states that where a proposal would result in the loss of a community and/or leisure facility as in the case of this proposal requiring the repurposing of the Trinity 1 pitch for development: "A comparable replacement facility can be provided by the developer either on or off site, and within easy and convenient access on foot or by bicycle."</p> <p>In order to compensate for the potential loss of the Trinity 1 pitch, the intention is to develop an alternative provision of equivalent community benefit locally at Sue Noake, avoiding any temporary loss of provision and thereby complying with the requirements of the Local Development Plan CW8 criteria.</p> <p>Fields in Trust The Council confirmed its commitment to actively seeking Fields in Trust Status in perpetuity for Trinity 2 and 3. However, further investigations have been undertaken relating to Ystrad Mynach Park which included its deed status, something that would normally have been released as part of the separate planning application documentation, the Council can now confirm that areas of Ystrad Mynach Park are already protected from development being subject to a covenant on the land. Deed packages RA3271 and RA1653 have active covenants on the land contained therein which prevents the land being used for any purpose other than for a recreation ground,</p>

children's play area or park. The proposed site for the expansion of the school, Trinity 1 is not included in these deeds and therefore is not subject to these covenants.

Green Flag Status

Discussions have been undertaken with Keep Wales Tidy as a result of consultee concerns, who judge and award the prestigious Green Flag Award based on 27 different criteria. They have indicated that the loss of one rugby pitch in the area would not have any detrimental effect on the park's green flag status going forward.

Further investigations as a result of consultee feedback have been undertaken in relation to the detail of the Ystrad Mynach Park Master Plan, which was the Green Flag application document submitted to Keep Wales Tidy in 2017. The land identified for development as part of this proposal (T1) was not included as part of this application. The document clearly states that the application only relates to the land and facilities within the RA1653 and RA3271 deed package areas. T1 falls outside of these areas and is contained in a separate deed along with Trinity Field School and the adjacent Council building. This further supports the assertion that should the proposal to expand Trinity Fields school be approved, this will not impact on Green Flag Status.

Drainage and Flooding

As part of the mitigations for this proposal, the playing surface for Trinity 3 will be enhanced and will receive verti draining treatments and regular maintenance to enhance its playability. The playing surface for SN1 and the proposed SN2 will also be enhanced and will be made more durable for extended use by an external pitch specialist. A drainage system will also be installed under the playing surface at SN2 to further improve usage.

The Council has also commissioned an external consultant to test the pitch quality at Trinity 1 and SN, Soil samples were carried out which will indicate the soil make up and probe compaction tests carried out with penetrometer that gage compaction to a dept of 12 inches.

Separate to the mitigation work set out within this report, the Council is also undertaking works at Ystrad Mynach Park to alleviate the impact of flooding on the park itself and

	<p>further downstream. The work will seek to introduce attenuation of the stream flows during a storm event by providing storage within the park, specifically within the area proposed to be designated T3. This attenuation will have the effect of reducing the downstream flows to a level that the existing stream course and culvert system are able to accommodate, without surcharging. In practical terms this would mean the T3 field would be enclosed with an earthwork bund which would provide a natural viewing gallery for the pitch as well as holding and then releasing water during and after a storm event in a controlled manner. The duration of the period in which water is retained in this area would depend on the duration of the storm but once passed it would be a matter of hours, possibly a day before the whole area is drained and then a number of further days before the proposed pitch at T3 would be reusable.</p> <p>In addition to this the Council is also proposing to daylight a section of culvert within the park, often the primary source of flooding in the park. The availability of increased upstream storage and the proposed removal of the culvert, the current flooding experienced in the park should be completely alleviated for most extreme storm events, which would also be true of the flooding which currently affects the T2 rugby pitch ensuring greater access and usage through the season.</p>
<p>A Healthier Wales <i>A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood</i></p>	<p>The School: There is growing demand for specialist school provision within Caerphilly county borough. The Local Authority works closely with multiagency professionals in the field as well as the school, Early Years, Flying Start and Health Visitors. A fortnightly placement panel convenes to calculate the number of places that are required on site and utilising data from ISCAN and reviewing the trend data since 2012, growth has been identified as an area requiring action. There is a similar picture across Wales in terms of increasing numbers of pupils accessing special schools. Trinity Fields School and Resource Centre is the only special school in the Authority which provides education and specialist facilities. It caters for a wide range of ages, with pupils from the foundation phase (3-7), school curriculum (7- 14) and learning pathway (14-19). At present the school has 180 pupils on roll with more admissions anticipated and no capacity or space to expand within the current building configuration. The school caters for pupils with a wide range of Special Educational Needs and requirements, ranging from physical and medical difficulties, profound multiple learning difficulties and severe learning difficulties. Trinity Fields School and Resource Centre was purpose built in September 1998, and was considered to be "Innovative", however over the years pupils needs have become more complex and challenging, more opportunities to meet their physical and other needs are</p>

available, and the school's infrastructure is now becoming an obstacle that is preventing the school from developing further in supporting pupils with Additional Learning Needs (ALN) across the county borough. It is the Authority's aim, wherever possible, to educate all pupils within the county borough. This prevents the need for out of county provision, which is not only costly but can also have a significant impact on individual and family well-being. The proposal will benefit pupils across the whole of the Authority as the additional facilities and adaptations will support children and young people who have specialist needs in an appropriate and secure environment that will create a holistic approach towards learning and development.

Mitigation:

In order to compensate for the potential loss of the Trinity 1 pitch, Council Officers have been working closely with officials from Penallta RFC to design a range of mitigations and enhanced provisions.

The current Trinity 1 pitch is 106m x 66m and has hard standing and fencing to two sides of the pitch with barriers to three sides. The pitch is underpinned by drainage and is considered a good and durable playing surface. The pitch does not benefit from any lighting at present. The mitigation proposals for the loss of the pitch at Trinity 1 are described below.

The mitigations centre on:

Trinity 2 & 3

- The creation of a new Mini and Junior pitch at Trinity 3 with an 84m x 44m marked out pitch with rugby posts available for use in time for the 2021/22 season.
- New training lights will be installed alongside the pitch at Trinity 2 to provide winter training opportunities where those don't currently exist.

Sue Noake

- The provision of an additional 102m x 60m senior pitch at the Sue Noake Leisure Centre available for use in time for the 2021/22 season, with 5m grass run off, partial hard standing barrier, fencing, drainage and enhanced playing surface
- Enhancements to the existing 108m x 63m pitch at the Sue Noake Leisure Centre with new hard standing, fencing, drainage and enhanced playing surface.

In addition, a number of enhancements to the supporting facilities including:

	<ul style="list-style-type: none"> • Additional Changing facilities at Sue Noake Leisure Centre • Temporary training lights in situ at SN1 to be replaced with enhanced permanent LED lighting • Emergency Vehicle access to be created to the pitches at Sue Noake Leisure Centre • Access Path Enhancements at Sue Noake Leisure Centre • Remedial Drainage Works on the ATP at Sue Noake Leisure Centre to repair a crushed drainage pipe which has contributed to surface water flooding • Subject to Cabinet approval, the Council will apply for Fields in Trust status for the pitches at SN1 and 2 and Trinity 2 and 3, providing additional safeguards against the loss of these four fields moving forward. <p>Sports Wales: Sports Wales were notified of the proposal both as part of the initial Consultation period and as part of the Objection period. Sport Wales have been made aware of the mitigation options being proposed and have confirmed that they would not object to the proposal to extend Trinity Fields Special School as long as the alternative provision is of equivalent community benefit, made available locally and avoids any temporary loss of provision.</p>
<p>A More Equal Wales <i>A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances)</i></p>	<p>The School: The facility is accessible to people with learning disabilities and the wider community regardless of specific protected characteristics</p> <p>Community Use: Those that attend, work and use the building will benefit from a fit for purpose, innovative 21st Century facility. In addition, the proposal intends to extend access at the new premises to include community use. As part of the 21st Century School remit, consideration must be given for the school to benefit from enabling the facilities to be shared with the wider community. The proposed project will consider the desire to encourage and facilitate community use of the asset. To this end the design process will seek to include measures to enable safe 'zoning' of parts of the new school building, including hydrotherapy pool and soft play facilities which could be adapted for use. The Wi-Fi and Information Technology infrastructure will be established to support public access and community use. The use of outdoor facilities and changing places will also be considered for community access at suitable times, in keeping with the curriculum timetable.</p>

	<p>The proposal to develop Trinity Fields School has implications in relation to the identified pitch, but the local provision and activities for young people including Penallta RFC are not ceasing as a result of the proposal. There are still the same breadth of recreational facilities and activities available within the Ystrad Mynach Park boundary as well as enhanced mitigation provision being proposed to assist in the delivery and accessibility to a wider range of sporting provision within the locality.</p> <p>Protection of Community and Leisure Facilities is subject to planning criteria as defined in Local Development Plan policy CW8. The land identified for development (Trinity 1 pitch) falls within this classification. Proposals that would result in the loss of a community and/or leisure facility will not be permitted except where a comparable replacement facility can be provided by the developer either on or off site, and within easy and convenient access on foot or by bicycle. In order to compensate for the potential loss of the Trinity 1 pitch, Council Officers have been working closely with officials from Penallta RFC to design a range of mitigations and enhanced provisions. The mitigations proposed will develop an alternative provision of equivalent community benefit locally (0.5miles), avoiding any temporary loss of provision and thereby complying with the requirements of the Local Development Plan CW8 criteria.</p>
<p><u>Well-being Goals</u></p>	<p>Does the proposal maximise our contribution to the Well-being Goal and how?</p>
<p>A Wales of Cohesive Communities <i>Attractive, viable, safe and well-connected communities</i></p>	<p>The School: Trinity Fields School caters for pupils with a wide range of Special Education Needs and requirements. Ranging from Physical and Medical Difficulties, Profound Multiple Learning Difficulties and Severe Learning Difficulties and is a highly inclusive community where all pupils feel safe and valued. Pupils play an active and influential role in shaping the life and work of the school. The school's exemplary levels of care, support and guidance mean that nearly all pupils develop as enthusiastic learners who acquire a strong understanding of their rights and responsibilities. The aim of the proposal is to ensure that we continue to build on the mature leadership and expertise at the existing site and develop this even further in ensuring collaboration with health and social care colleagues.</p> <p>The support, knowledge and level of expertise at Trinity Fields School is now being disseminated across the Authority. The specialist facilities at the school, including the independent living areas, are currently being used by the wider school community in a structured and managed way.</p>

Café Oren in Trinity Fields School is currently accessible to the local community, providing basic catering services and supporting the development of life skills provision to vulnerable pupils and upskilling parents and carers.

Mitigations:

Pedestrian Routes

Active travel is important in promoting healthier lifestyles and in reducing the negative impacts of traffic upon our neighbourhoods and communities. The facilities proposed as part of the mitigation at Sue Noake are within a 0.5 mile radius from the Trinity 1 site and is currently accessed by a number of clubs including players of Penallta RFC. Whilst it is understood that the route requires crossing of a main road, there is a footpath along the entire route and a pedestrian light controlled crossing (pelican crossing) adjacent to Ystrad Mynach Primary School.

Lighting

The mitigation proposals for the loss of the pitch at Trinity 1 include the creation of a new Mini and Junior pitch at Trinity 3 and new training lights will be installed alongside the pitch at Trinity 2. The lighting will provide a viable and safer area within the existing Ystrad Mynach Park where this currently does not exist.

Drainage and Flooding of pitches

As part of the mitigations for this proposal, the playing surface for Trinity 3 will be enhanced and will receive verti draining treatments and regular maintenance to enhance its playability. The playing surface for SN1 and the proposed SN2 will also be enhanced and will be made more durable for extended use by an external pitch specialist. A drainage system will also be installed under the playing surface at SN2 to further improve usage.

The Council has also commissioned an external consultant to test the pitch quality at Trinity 1 and SN, Soil samples were carried out which will indicate the soil make up and probe compaction tests carried out with penetrometer that gage compaction to a dept of 12 inches.

Separate to the mitigation work set out within this report, the Council is also undertaking works at Ystrad Mynach Park to alleviate the impact of flooding on the park itself and

further downstream. The work will seek to introduce attenuation of the stream flows during a storm event by providing storage within the park, specifically within the area proposed to be designated T3. This attenuation will have the effect of reducing the downstream flows to a level that the existing stream course and culvert system are able to accommodate, without surcharging. In practical terms this would mean the T3 field would be enclosed with an earthwork bund which would provide a natural viewing gallery for the pitch as well as holding and then releasing water during and after a storm event in a controlled manner. The duration of the period in which water is retained in this area would depend on the duration of the storm but once passed it would be a matter of hours, possibly a day before the whole area is drained and then a number of further days before the proposed pitch at T3 would be reusable.

In addition to this the Council is also proposing to daylight a section of culvert within the park, often the primary source of flooding in the park. The availability of increased upstream storage and the proposed removal of the culvert, the current flooding experienced in the park should be completely alleviated for most extreme storm events, which would also be true of the flooding which currently affects the T2 rugby pitch ensuring greater access and usage through the season.

Public Health concerns at Sue Noake linked to sewage

During the recent Storm Christoph (18th to 20th January 2021) a manhole above a mainline sewer that runs close to the edge of the proposed location of the pitch at SN2, surcharged and sewage was released to the surrounding area.

Welsh Water has responsibility for the sewerage infrastructure and have confirmed there have only been two recorded incidents of manholes in proximity of the Sue Noake site surcharging over the previous ten years. The first of these was in 2014 and the second, the most recent incident in January 2021.

These two isolated incidents have been subsequently verified in separate conversations undertaken with the Head Teacher at Lewis Girls School and staff at Sue Noake Leisure Centre. School and Leisure Centre staff have also confirmed that they have received no other reports from members of the public or centre users of sewerage escaping from these specific manholes during the last ten years. When a breach of this nature occurs, particularly on a trunk sewer, Welsh Water will undertake a detailed investigation, undertake any remedial work to the sewer and reinstate the ground.

	<p>Statement from Welsh Water</p> <p>11 March 2021</p> <p>Re Sue Noake centre</p> <p>We have been called to attend reports of the sewer overflowing near the Sue Noakes Centre during heavy rain and are already carrying out investigations to understand the cause.</p> <p>These have included undertaking a CCTV survey of the sewer with further surveys set to take place this week. Once these are completed, we should be in a better position to determine the cause and then undertake any work that may be required.</p> <p>During the course of our investigations so far, we have found that damage has been caused by a third party to one of our pipes nearby which was allowing water from a stream to enter the network. This in turn was placing additional pressure on the sewer, particularly during heavy rain. We have undertaken a full repair of the damaged pipe.</p> <p>Following the sewer overflowing at the site, we have sent a team on each occasion to carry out a full clean up of the area. We are also keeping Caerphilly County Borough Council informed of our investigations.</p> <p>We do realise the inconvenience a seweroverflowing in this way can cause and apologise to the local community for this.</p> <p>Ends</p>
<p>A Wales of Vibrant Culture and Thriving Welsh Language</p> <p><i>A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation</i></p>	<p>Cultural Heritage and Welsh Language in the Community:</p> <p>The Local Authority is fully aware of its obligations under the Welsh Language (Wales) Measure 2011 and the Council’s Compliance Notice (Welsh Language Standards) and to support the provision of Welsh Language Education as set out in its Welsh in Education Strategic Plan where Caerphilly’s commitment to the promotion of Welsh language and the provision of quality, attractive educational facilities is evident.</p> <p>Further details are found in section 7 of this document.</p> <p>Sport and Recreation Participation</p>

	<p>The extensive mitigation and enhancement measures within Ystrad Mynach Park and at Sue Noake, subject to Cabinet approval will provide additional facilities to support physical and mental wellbeing.</p> <p>In addition, Penallta RFC and a number of other Ystrad Mynach based clubs are currently exploring the possibility of creating a Community Sporting Hub at the Sue Noake Leisure Centre. The Hub would have the potential to support Rugby, Football, Hockey and Netball as well as a new clubhouse and improved changing facilities. The creation of a sporting hub is not part of the current mitigations for the loss of the pitch at Trinity 1, but the Council is keen to support the clubs to make the hub concept a reality.</p>
<p>A Globally Responsible Wales <i>A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being</i></p>	<p>Community Benefits: As part of the funding requirements for all 21st Century School proposals, Welsh Government stipulates that Community Benefits are a core requirement of any contract procurement and will therefore be scored as part of the Quality evaluation. These include a number of targets around local recruitment and training, supply chains, community and education initiatives.</p> <p>Health and Social Services: Expansion will provide for a unified and integrated multiagency input from Health and Social care which will further compliment the Educational provision. Visiting practitioners will not be permanently based at the Trinity site but will however have access to facilities to undertake development and intervention activities with children, under a single roof, providing additional support and a better quality of life to the most vulnerable children in the Borough.</p> <p>Mitigation: Ystrad Mynach’s location in the heart of the county borough along with its economic and transport opportunities as identified in the Ystrad Mynach Masterplan May 2019. The proposed mitigation will create new facilities closer to the centre of Ystrad Mynach town centre, which will further support local business and transport infrastructures .</p>

(The Welsh Language Measure 2011 and the Welsh Language Standards require the Council to have 'due regard' for the positive or negative impact a proposal may have on opportunities to use the Welsh language and ensuring the Welsh language is treated no less favourably than the English language) [insert link to WL Commissioners Policy Making Standards Guidance](#)

Requirement	Does the proposal have any positive, negative or neutral impacts on the following and how?	If there are negative impacts how will these be mitigated?	What evidence has been used to support this view? <i>e.g the WESP, TAN20, LDP, Pupil Level Annual School Census</i>
<p>Links with Welsh Government's Cymraeg 2050 Strategy and CCBC's Five Year Welsh Language Strategy 2017-2022 and the Language Profile</p>	<p>Positive A request for education through the medium of Welsh can be accommodated at present as the school employs a number of teachers and teaching assistants who are Welsh 1st language and as such Additional Learning Needs provision through the medium of Welsh could be provided if required. In so doing, there is capacity to meet the language preference and the rights of the individual to receive their education and care through the medium of Welsh.</p> <p>Positive Through an integrated multi-agency approach operating provision from the Trinity Fields site, Welsh language preference could also be provided by engagement with Social Services, Health and Welsh medium organisations.</p>	<p>Not applicable</p>	<p>Caerphilly Welsh in Education Strategic Plan 2017-2020 One of the identified objectives is specific to the 21st Century Schools Programme 'Work with 21st Century Schools team in Welsh Government to identify funding in Band B of 21st Century Schools programme, for the development of sufficient Welsh medium places in areas where they are coming under pressure, in particular Bedwas Trethomas Machen area, and the Islwyn East area.'</p> <p>Technical Advice Note 20 – Planning and the Welsh Language The purpose of TAN20 is to provide guidance on how the Welsh language may be given appropriate consideration in the planning system and on compliance with the requirements of planning and other relevant legislation</p>

			<p>Welsh Language Strategy – Cymraeg 2050. The strategy recognises the need to provide Welsh speakers with easily accessible opportunities to use their skills in social and work settings.</p> <p>Menter Iaith Caerffili : Welsh Language Profile 2016 This profile examines the position of the Welsh language in the County Borough of Caerphilly, and the way that Welsh speakers in the area use the Welsh language in their communities.</p> <p>Pupil Level Annual School Census (PLASC) Statistical Information relating to the numbers of pupils at local authority level and their language medium for education:</p> <p>Welsh Language Impact Assessment – Trinity Fields (included as part of the original Equality Impact Assessment)</p>
<p>Compliance with the Welsh Language Standards. <i>Specifically Standards 88 - 93</i></p>	<p>Positive A request for education through the medium of Welsh can be accommodated at present as the school employs</p>	<p>Not applicable</p>	<p>Welsh Language Strategy – Cymraeg 2050.</p>

	<p>a number of teachers and teaching assistants who are Welsh 1st language and as such Additional Learning Needs provision through the medium of Welsh could be provided if required. In so doing, there is capacity to meet the language preference and the rights of the individual to receive their education and care through the medium of Welsh.</p> <p>Positive</p> <p>Any meetings with the school to discuss provision of education or care through the child / family's preferred language and the right that they have to this under the WL Measure can be accommodated at present as the school employs a number of teachers and teaching assistants who are Welsh 1st language.</p> <p>Positive</p> <p>Through an integrated multi-agency approach operating provision from the Trinity Fields site, Welsh language</p>	<p>There are currently teachers and teaching assistants who are Welsh 1st language</p> <p>All documentation published on the 21st Century Schools website relating to the Trinity Fields proposal has been translated through the CCBC Welsh Language Unit</p> <p>The process during both the Consultation period and Objection period ensured that key consultees were targeted as outlined in the School Organisation Code 2018 because of their vested interest.</p> <p>In addition, as highlighted in the Consultation Document and Consultation Report, the views of children and young people affected by the proposal were consulted with through targeted information and feedback sessions and the production of child friendly versions of the documentation.</p>	<p>The strategy recognises the need to provide Welsh speakers with easily accessible opportunities to use their skills in social and work settings.</p> <p>Welsh Language Impact Assessment – Trinity Fields (included as part of the original Equality Impact Assessment)</p> <p>Trinity Fields Consultation Webpage – Link to Welsh page Page includes all documentation produced as part of the proposal including the key documentation (Consultation Document, Equality and Welsh Language Impact Assessment, Response Forms, Consultation Report, Notification Letters)</p>
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	<p>preference could also be provided by engagement with Social Services, Health and Welsh medium organisations.</p> <p>Positive</p> <p>All documentation including the website relating to the proposal is produced in Welsh and English, further supporting use the Welsh language and treating the Welsh language no less favourably than the English language.</p> <p>Positive</p> <p>All consultation and objection responses were able to be sent and received in Welsh and English ensuring that the Welsh language is treated no less favourably than the English language.</p>		
<p>Opportunities to promote the Welsh language <i>e.g. status, use of Welsh language services, use of Welsh in everyday life in work / community</i></p>	<p>Positive</p> <p>A request for education through the medium of Welsh can be accommodated at present as the school employs a number of teachers and teaching assistants who are Welsh 1st language and as such ALN provision through the medium of Welsh could be provided if required. In so</p>	<p>Not applicable</p> <p>There are currently teachers and teaching assistants who are Welsh 1st language</p> <p>Reception services answer the phone with a bilingual greeting</p>	<p>Welsh Language Strategy – Cymraeg 2050.</p> <p>The strategy recognises the need to provide Welsh speakers with easily accessible opportunities to use their skills in social and work settings.</p>

	<p>doing, there is capacity to meet the language preference and the rights of the individual to receive their education and care through the medium of Welsh.</p> <p>Positive</p> <p>Any meetings with the school to discuss provision of education or care through the child / family's preferred language and the right that they have to this under the WL Measure can be accommodated at present as the school employs a number of teachers and teaching assistants who are Welsh 1st language.</p> <p>Positive</p> <p>All signage in the proposed new extension will be bi-lingual</p>	<p>All documentation published on the 21st Century Schools website relating to the Trinity Fields proposal has been translated through Council's Translation Team</p> <p>Signage will be bilingual</p>	<p>Technical Advice Note 20 – Planning and the Welsh Language</p> <p>The purpose of TAN20 is to provide guidance on how the Welsh language may be given appropriate consideration in the planning system and on compliance with the requirements of planning and other relevant legislation</p>
<p>Opportunities for persons to use the Welsh language <i>e.g. staff, residents and visitors</i></p>	<p>Neutral</p> <p>In relation to this facility, as acknowledged in the recent Estyn inspection report, "All of the pupils are from English-speaking backgrounds". A request for education through the medium of Welsh can be</p>	<p>Not applicable</p> <p>The school employs a number of teachers and teaching assistants who are Welsh 1st language and as such ALN provision through the medium of</p>	<p>Caerphilly Welsh in Education Strategic Plan 2017-2020</p> <p>A Welsh medium education assessment in accordance with the (Wales) Regulations 2013 has been conducted in</p>

	<p>accommodated at present as the school employs a number of teachers and teaching assistants who are Welsh 1st language and as such ALN provision through the medium of Welsh could be provided if required. In so doing, there is capacity to meet the language preference and the rights of the individual to receive their education and care through the medium of Welsh.</p> <p>Positive When considering the expansion of provision by an additional 80 places, in future proofing the school if a request is received for education and care through the medium of Welsh, recruitment and selection processes will reflect the local need.</p>	<p>Welsh could be provided if required.</p> <p>Recruitment and Selection processes include the desirability to have Welsh speakers</p>	<p>accordance with the 3-year cycle requirement.</p> <p>A parental demand survey was also undertaken in 2018 and is updated regularly.</p> <p>Welsh Language Strategy – Cymraeg 2050.</p> <p>The strategy recognises the need to provide Welsh speakers with easily accessible opportunities to use their skills in social and work settings.</p> <p>Welsh Language Impact Assessment – Trinity Fields (included as part of the original Equality Impact Assessment)</p>
<p>Treating the Welsh language no less favourably than the English language</p>	<p>Neutral The school has responsibility to understand and record the home language of all the pupils and actively offer Welsh provision if the home language is Welsh.</p> <p>Neutral</p>	<p>Not applicable</p> <p>Welsh provision is currently offered in the Specialist Resource Base in Ysgol Gynradd Cwm Derwen and Ysgol Gyfun Cwm Rhymni.</p>	<p>Caerphilly Welsh in Education Strategic Plan 2017-2020</p> <p>A Welsh medium education assessment in accordance with the (Wales) Regulations 2013 has been conducted in accordance with the 3-year cycle requirement.</p>

	<p>A request for education through the medium of Welsh can be accommodated at present as the school employs a number of teachers and teaching assistants who are Welsh 1st language and as such ALN provision through the medium of Welsh could be provided if required. In so doing, there is capacity to meet the language preference and the rights of the individual to receive their education and care through the medium of Welsh.</p> <p>Positive</p> <p>Any meetings with the school to discuss provision of education or care through the child / family's preferred language and the right that they have to this under the WL Measure can be accommodated at present as the school employs a number of teachers and teaching assistants who are Welsh 1st language.</p> <p>Positive</p>	<p>The school employs a number of teachers and teaching assistants who are Welsh 1st language and as such ALN provision through the medium of Welsh could be provided if required.</p>	<p>A parental demand survey was also undertaken in 2018 and is updated regularly.</p> <p>Welsh Language Strategy – Cymraeg 2050.</p> <p>The strategy recognises the need to provide Welsh speakers with easily accessible opportunities to use their skills in social and work settings.</p> <p>Welsh Language Impact Assessment – Trinity Fields (included as part of the original Equality Impact Assessment)</p> <p>Trinity Fields Consultation Webpage – Link to Welsh page</p> <p>Page includes all documentation produced as part of the proposal including the key documentation (Consultation Document, Equality and Welsh Language Impact Assessment, Response Forms, Consultation Report, Notification Letters)</p>
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	<p>Through an integrated multi-agency approach operating provision from the Trinity Fields site, Welsh language preference could also be provided by engagement with Social Services, Health and Welsh medium organisations.</p> <p>Positive</p> <p>All documentation including the website relating to the proposal is produced in Welsh and English</p> <p>Positive</p> <p>All consultation and objection responses were able to be sent and received in Welsh and English</p>		
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7a. Having considered the impacts above, how has the proposal been developed so that there are positive effects, or increased positive effects on (a) opportunities for persons to use the Welsh language, and b) treating the Welsh language no less favourably than the English language.

Need and demand

Anticipated demand linked to the more complex and changing needs of the pupils together with the requirements of the Additional Learning Needs (ALN) and Education Tribunal (Wales) Act has led to the urgency to expand the provision further at this School.

The Trinity Fields School proposal seeks to support the local and national agenda in the development of additional learning needs and specialist provision for education at the boroughs only special school.

In addition, expansion will also provide for a unified and integrated multi-agency input from Health and Social care which will further compliment the Educational provision. Visiting practitioners will not be permanently based at the Trinity site, but will however have access to facilities to undertake development and intervention activities with children, under a single roof, providing additional support and a better quality of life to the most vulnerable children in the Borough.

Method and process

The School Organisation Code 2018 is the prescribed process for progressing this proposal. The proposal seeks expand the existing Trinity Fields School. It is proposed that the new school facility would accommodate an additional 80 places providing increased educational opportunities for specialist provision.

Location

The expansion if proposed on the Trinity 1 sports pitch which is directly adjacent to the school site. The proposed development is sensitive to the needs of such communities and there is also a clear understanding from the details provided in this Integrated Impact Assessment and supporting consultation exercises and documentation. Mitigation proposal have been established to ensure alternative provision of equivalent community benefit will be made locally available to the community.

Timing

Subject to Cabinet approval on the 7th April 2021 and a separate full planning application process, it is envisaged that an anticipated occupation date would be circa September 2023. Mitigations against the removal of the Trinity 1 pitch as outlined in the Objection Report and supporting mitigation proposal would be implemented prior to opening to avoid any temporary loss of provision.

8. Data and Information

(What data or other evidence has been used to inform the development of the proposal? Evidence may include the outcome of previous consultations, existing databases, pilot projects, review of customer complaints and compliments and or other service user feedback, national and regional data, academic publications and consultants' reports etc.)

Data/evidence <i>(Please provide link to report if appropriate)</i>	Key relevant findings	How has the data/evidence informed this proposal?
Initial Evidence (National and Regional Data) The Local Authority works closely with multiagency professionals in the field as well as the school, Early Years, Flying Start and Health Visitors. A fortnightly placement panel convenes to calculate the number of	Consultation Document Consultation Report Objection Report Proposed Mitigation	It is the Authority's aim, wherever possible, to educate all pupils within the county borough. This prevents the need for out of county provision, which is not only costly but can also have a significant impact on individual families. Accessing provision out

<p>places that are required on site and utilising data from ISCAN and reviewing the trend data since 2012, growth has been identified as an area requiring action.</p> <p>School based ‘existing evidence’</p> <p>Trinity Fields School and Resource Centre was purpose built in September 1998, and was considered to be “Innovative”, however over the years pupils needs have become more complex and challenging and the school’s infrastructure is now becoming an obstacle that is preventing the school from developing further in supporting pupils with Additional Learning Needs (ALN) across the county borough.</p> <p>The school caters for pupils with a wide range of Special Educational Needs and requirements, ranging from physical and medical difficulties, profound multiple learning difficulties and severe learning difficulties.</p> <p>Consultation Period</p> <p>The consultation period opened on Monday 14th September 2020 (a school day) and concluded at midnight on Monday 26th October 2020. Consultees were given at least 42 days to respond to the document, with at least 20 of these being school days as defined by Section 579 of the Education Act 1996.</p> <p>Consultees were advised of the proposal and availability of the consultation</p>	<p>There is growing demand for specialist school provision within Caerphilly county borough.</p> <p>There is a similar picture across Wales in terms of increasing numbers of pupils accessing special schools</p> <p>The 21st Century Schools and Colleges programme is a major, long-term, strategic capital investment programme. It is jointly funded by the Welsh Government and local authorities and aims to create a generation of 21st century schools in Wales with the priority areas being:</p> <ul style="list-style-type: none"> • Reduce the number of poor condition schools • Ensure that we have the right size schools in the right location <ul style="list-style-type: none"> • Provide enough places to deliver Welsh and English medium education • Ensure the effective and efficient use of the educational estate <p>Trinity Fields School and Resource Centre is the only special school in the Authority which provides education and specialist facilities. It caters for a wide range of ages, with pupils from the foundation phase (3-7), school curriculum (7-14) and learning pathway (14-19). At present the school has 180 pupils on roll with more admissions anticipated and no capacity or space to expand within the current building configuration.</p>	<p>of the county will also be harmful to the environment.</p> <p>The proposal will benefit pupils across the whole of the Authority as the additional facilities and adaptations will support children and young people who have specialist needs in an appropriate and secure environment that will create a holistic approach towards learning and development.</p> <p>The views obtained as part of the Consultation Period and Objection Period support the need for clear mitigating actions to address public concern which will be presented to Education Scrutiny Committee on the 22nd March 2021 and Cabinet on 7th April 2021 alongside this IIA and the Objection Report.</p> <p>As outlined in the Consultation Document, Consultation Report and the Objection Report a separate planning application process including further consultation will be undertaken to address building and transport related issues.</p>
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<p>documentation when it went live on the 14th September 2020 via letter/email and were therefore invited to take part in the statutory consultation to gather their 'views' on the proposal as outlined in the consultation document.</p> <p>The Council was aware that the proposal and preferred delivery option as outlined in the Consultation Documentation would result in the repurposing of a pay-to-use sports pitch and would work closely with interested parties to ensure mitigation could take place should the proposal receive Cabinet approval. Therefore, in addition to advising those we were obliged to under the stakeholder criteria, Sports Wales and Penallta RFC were also advised.</p> <p>Objection Period Following the decision by Cabinet (9.12.2020) to proceed to Statutory Notice, anyone wishing to make an objection to this proposal was able to do so as per the requirements of the School Organisation Code 2018. To be considered as a statutory objection, objections had to be made in writing or by email and sent to the Council within the 28 days of the date on which the proposal was published. This is referred to as the "objection period" and ran from the 11th January 2021 to the 7th February 2021.</p> <p>Of the 238 Statutory Objections received, these were summarised into 5 areas:</p> <ul style="list-style-type: none"> • Statutory Processes 	<p>The School Organisation Code 2018 is made under Sections 38 and 39 of the School Standards and Organisation (Wales) Act 2013 and applies to proposals in respect of maintained schools as defined at Section 98 of the 2013 Act. That is a school in Wales, which is a community, foundation or voluntary school, a community special school or a maintained nursery school. This does not include pupil referral units (PRUs). The School Organisation Code 2018, provides clear statutory guidance as to the processes that need to be adhered to when bringing forward a proposal.</p> <p>The consultation process has followed the Welsh Government requirements as set out in the School Organisation Code 2018.</p> <p>Consultation Period</p> <ul style="list-style-type: none"> • 1048 responses 'view's' were received during the consultation period. • 0 responses were received in the medium of Welsh. • 43% supported the proposal as outlined in the Consultation document • 56% did not support the proposal as outlined • 1% provided a neutral of no comment response. • 3 alternative options were raised by consultees and considered by Education Scrutiny Committee and Cabinet. <p>Full details are provided as part of the Consultation Report</p>	
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<ul style="list-style-type: none"> • Optional Appraisal Process • Loss of Green Space for the Ystrad Mynach Community • Impact on Sporting provision and mitigation options • Other planning considerations <p>The Objection Report and proposed Mitigation provides full details and in addition original copies of all correspondence are made available to Cabinet Members for consideration as part of the decision making process.</p>	<p>Objection Period</p> <ul style="list-style-type: none"> • 238 Statutory Objections were received. • Objections were summarised into 5 areas <ul style="list-style-type: none"> ➤ Statutory Processes ➤ Optional Appraisal Process ➤ Loss of Green Space for the Ystrad Mynach Community ➤ Impact on Sporting provision and mitigation options ➤ Other planning considerations <p>Full details are provided as part of the Objection Report and proposed Mitigation</p> <p>Progression at each stage is subject to scrutiny, review and approval by Cabinet Members and in addition, Welsh Government are engaged in the process as one of the key delivery partners and co-funders.</p>	
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Were there any gaps identified in the evidence and data used to develop this proposal and how will these gaps be filled?
Details of further consultation can be included in Section 9.

In accordance with the ALN and Tribunal Act 2018 schools and local authorities have a statutory duty to identify ALN and appropriate provision to meet that need. As identified in the ALN Act and draft ALN Code the Council and schools have a responsibility to review provision available to meet need within the borough on a regular basis. Respondents as part of the Consultation and Objection periods have indicated concerns relating to lack of specific figures in the proposal documentation related future projected demand. These concerns have been addressed in the Consultation Report and the Objection Report.

There are clear processes which need to be followed as per the requirements of the School Standards and Organisation (Wales) Act 2013 and the School Organisation Code 2018. Respondents as part of the Consultation and Objection periods have indicated concerns relating to lack of consultation with local residents and the wider community. The Council has undertaken stakeholder engagement and produced documentation at the appropriate stage of the process in line with statutory requirements. These concerns have been addressed in the Consultation Report and the Objection Report.

9. Consultation

(In some instances, there is a legal requirement to consult. In others, even where there is no legal obligation, there may be a legitimate expectation from people that a consultation will take place. Where it has been determined that consultation is required, [The Gunning Principles](#) must be adhered to. Consider the [Consultation and Engagement Framework](#). Please note that this may need to be updated as the proposal develops and to strengthen the assessment.

Briefly describe any recent or planned consultations paying particular attention to evidencing the Gunning Principles.

The consultation process will proceed in line with the requirements of Welsh Government Statutory Code document no 011/2018 - School Organisation Code 2nd Edition 2018.

The School Organisation Code 2018 is made under Sections 38 and 39 of the School Standards and Organisation (Wales) Act 2013 and applies to proposals in respect of maintained schools as defined at Section 98 of the 2013 Act. That is a school in Wales, which is a community, foundation or voluntary school, a community special school or a maintained nursery school. The School Organisation Code 2018, provides clear statutory guidance as to the processes that need to be adhered to and the stages to follow.

A prescribed list of recipients (as outlined below) have been written to at either the commencement of the Consultation Period, and/or Objection Period.

All documentation was made available in both Welsh and English throughout the process and other formats were available on request.

Parents, prospective parents, guardians and carers of all pupils of schools directly affected by the proposal

Headteacher, staff and governors of schools directly affected by the proposal

Pupils/Pupil Councils of schools directly affected by the proposal

Directors of Education of all bordering LAs – Blaenau Gwent, Caerphilly, Cardiff, Merthyr Tydfil, Newport, Powys, Rhondda Cynon Taf, Torfaen Catholic Diocesan Board of Education o Church in Wales Diocesan Board

Local Standing Advisory Council on Religious Education (SACRE)

Governing body of other schools which the proposer considers are likely to be affected by the proposal

Local CCBC Members

All Assembly Members and Members of Parliament representing the area served by the schools directly affected by the proposal

Welsh Ministers

ESTYN

Teaching Associations

Support Staff Associations

South East Wales Consortium (EAS)

South East Wales Transport Alliance (SEWTA)

Gwent and South Wales Police and Crime Commissioners

Local Town and Community Councils

Menter Iaith

Early Years Development and Childcare Partnership

Parent Network

Welsh Education Forum

As outlined in the original Equality Impact Assessment Document, the principles of engagement outlined in the Local Authority's Consultation and Engagement Framework 2020 will also be acknowledged and the project team will engage with any additional 'interested parties' as required.

As such, the Council was aware that the proposal and preferred delivery option as outlined in the Consultation Documentation would result in the repurposing of a pay-to-use rugby pitch and has to ensuring mitigation could take place should the proposal receive Cabinet approval. Therefore, in addition to advising those we were obliged to under the stakeholder criteria, Sports Wales and Penallta RFC.

At the commencement of the Objection Period, this list of consultees was extended to also included any respondent who had previously expressed concern as part of their consultation response during the period of 14th September 2020 – 26th October 2020 and included the newly formed Save Ystrad Mynach Green Spaces who were advised of the proposals in writing.

The principles of engagement outlined in the Local Authority's Consultation and Engagement Framework 2020 will also be acknowledged and the project team will engage with any additional 'interested parties' as required.

The School Organisation Code 2018 states that when undertaking a consultation process in connection with a school proposal, the Council must publish information to enable transparent, balanced and open decision making. At time of writing, the process being followed is synergistic with the vision of our Consultation and Engagement Framework 2020-25 and ensures the appropriate level of consultee engagement and transparency.

The proposal is still in the formative stage until a final determination is made by Cabinet who act as the decision making body in this instance.

The Trinity Fields School proposal has progressed through several stages of the process to date:

1) Consultation Period

A consultation period ran from the 14th September 2020 to the 26th October 2020 seeking the views of consultees as defined by the code.

As part of this proposal, the following documentation was published:

- [Consultation Notification Letter](#)
- [Consultation Document](#)
- [Child Friendly Consultation Summary](#)
- [Consultation Video](#)
- Artist's Impression of proposed new school [Image 1](#) / [Image 2](#) / [Image 3](#)
- [Consultation Response Form \(Online\)](#)
- [Consultation Response Form \(Printable PDF\)](#)

- [Equalities and Welsh Language Impact Assessment](#)
- [Consultation Frequently Asked Questions](#)

As part of the initial Equality Impact Assessment undertaken, it was envisaged that a series of targeted sessions would be held over a given day between the hours of 10am and 8pm to provide information and the opportunity to pose questions to designated officers concerning the proposal. Individuals would be required to book 10 minute appointment slots and a translator will be available if required. As part of this process, the target audiences who would be engaged included – Pupils (School Council), School Staff, School Governors, Parents/Guardians and the wider Community. However, due to the implications of COVID-19 at the time this consultation was due to take place and after taking advice from Welsh Government, this consultation process refrained from undertaking any face-to-face consultation sessions to support social distancing and maintain safe working practices for all. It should be noted that there is no obligation to consult face-to-face and therefore a written paper consultation exercise was undertaken to discharge the Council of its duty under the School Organisation Code 2018.

The Council acknowledged that the voice of young people is about involving them as active participants in the development, delivery, management and improvement of their educational and student experience and needs to be at the heart of planning, provision and evaluation; Learner Voice. A summary version of the main consultation document was also prepared, published and targeted specifically at children and young people.

[Child Friendly Consultation Summary](#)

This summary version was released online as part of the consultation pack and hardcopies were made available on request.

As identified in the Consultation Document, nearly all the pupils attending Trinity Fields School have a statement of special educational needs for severe learning difficulties, physical and medical difficulties, profound and multiple learning difficulties or autistic spectrum disorders. Trinity Fields School has a very active school council and is a highly inclusive community where all pupils feel safe and valued. Pupils play an active and influential role in shaping the life and work of the school. It was acknowledged at an early stage that in order to provide the opportunities for the young people to express their views in relation to this proposal, engaging with staff at the school would be vital. The school's exemplary levels of care, support and guidance and through utilising the child friendly version of the consultation document and the accompanying video, children were engaged in a familiar environment, at the appropriate comprehension level and in the format of their preference. Many of the children provided comments on what they would like to see in the future and how they felt about the proposal. Many pupils utilised verbal communication, however, evidence of what the pupils felt they wanted were also captured via heatmaps using eye recognition cursor movement, symbols and braille.

Notes from each session were recorded and have been included as part of the consultation responses which will be made available to Cabinet. Where answers were provided in other formats, these have been transcribed ad-verbatim and summarised in the Consultation Report.

2) Statutory Notice / Formal Objection Period

A 'Statutory Notice' was published and the formal 'Objection Period' opened on the 11th January 2021 and closed on 7th February 2021.

Notices were published on the 11th January 2021 as follows:

- A [Statutory Notice was published](#) on the [council website](#)
- A [Statutory Notice](#) was displayed in several locations, on or near the main entrance of the school which was subject to the proposal
- The school was provided with hardcopies of the Statutory Notice to distribute to pupils, parents/carers and staff.
- Prescribed consultees as listed in the School Organisation Code 2018 were notified in writing and sent a copy of the [Statutory Notice Notification Letter](#)
 - Social Media Messages were released on Facebook and Twitter to advise of the publication of the Notice and direct interested parties to the Council website

The School Organisation Code 2018 states that *“It is essential that proposers seek and achieve high standards both in the information that underpins school consultations and in the consultation documents that are published. These will be examined closely by communities, school staff and parents, and errors in details can easily undermine confidence in a proposal.”*

There is no requirement for proposers to hold consultation meetings although there will be circumstances where proposers will consider that meeting with certain groups of consultees will assist greatly in the dissemination of information and provide a suitable platform for the consultees to make their views known.

Proposers may use other ways to engage consultees as they think appropriate.

The proposal is still progressing through the Statutory process as prescribed by the School Organisation Code and at time of writing, no final determination has been made.

The key finding of the initial consultation exercise were summarised in a Consultation Report that was presented to Scrutiny and Cabinet for consideration.

This Consultation Report is the prescribed method as outlined by the School Organisation Code 2018 for reflection, review and assessment to provide Cabinet with the information to make an informed decision as to whether to proceed with the proposal to the next stage, amend the proposal taking into account further information that has come forward through the consultation process or to close this proposal with no further actions taken. The Report is divided into several sections with the aim to:

- Outline the consultation processes undertaken
- Provide clarification in relation to the information provided and consultee engagement

- Summarise each of the issues raised by consultees
- Set out Estyn’s response to the consultation in full
- Respond to issues raised by means of clarification, amendment to the proposal or rejection of the concerns, with supporting reasons
- [Consultation Report Notification Letter](#)
- [Consultation Report](#)
- [Child Friendly Consultation Report](#)
- [Estyn’s Response](#)
- [Notice of Cabinet Decision from the meeting held on Wednesday 9th December 2020](#)

The outcome of the Objection Period has been summarised in an Objection Report that will be presented to Education Scrutiny Committee for review on the 22nd March 2021 and then formally presented to the decision making body ‘Cabinet’ at its meeting on the 7th April 2021 for final determination.

As part of the development of the proposal, a number of benefits and disbenefits were identified as outlined in the Consultation Document. The consultation process was an opportunity to consult with relevant stakeholders to understand what they see as positive outcomes and what negative consequences may be delivered. An Equality and Welsh Language Impact Assessment and a Community Impact Assessment were carried out to initiate discussion and invite comments as to whether the principles for the proposal are supported.

All comments have been recorded and will be made available for Cabinet as a separate annex to this Consultation Report and the Gunning Principles have been applied throughout the process ensuring:

1. that consultation must be at a time when proposals are still at a formative stage;
2. that the proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response;
3. that adequate time is given for consideration and response; and
4. that the product of consultation is conscientiously taken into account when finalising the decision.

10. Monitoring and Review	
How will the implementation and the impact of the proposal be monitored, including implementation of any amendments?	The programme is managed by a Project Board comprising of the Corporate Director – Education and Corporate Services, Head of Education Planning and Strategy, Chief Education Officer, Cabinet Member for Education and Achievement, Interim Head of Property Services and 21 st Century Schools Manager. The Project Board provides the overall direction,

	<p>management and control for the Programme, being accountable for the success of the Programme and is the ultimate decision making body for the Programme.</p> <p>A Project Management Team comprising of the Head of Education Planning and Strategy, and resources and staff from Property Services will oversee the day to day development and implementation of each constituent project, reporting to the Board and other relevant senior officers, as appropriate.</p> <p>Key personnel have received Equality Impact Awareness and Equalities Awareness Training and attended training and information sessions undertaken by Welsh Government. Training needs will be constantly reviewed throughout the process and addressed when the need is evident.</p> <p>In addition, the 21st Century Schools Manager and Principal Officer have met with representatives from the Equalities, Welsh Language and Consultation Team to take guidance where required.</p>
<p>What are the practical arrangements for monitoring?</p>	<p>The Council recognises that the whole organisation must be skilled in making the very best use of available resources. Good project management is recognised as being an essential ingredient to success in tackling our strategic work programme.</p> <p>Project management principles will be followed (Prince2 and MS Project) throughout the programme. Programme management principles will be employed for the overarching Band B programme and the project will utilise the experience of the project team involved in the Band A project. This will commence with a Programme execution plan that will define the programme objectives, responsibilities, dependant actions and risks. The latter will include risk elimination or mitigation actions and risk owner. An overall programme monitoring tool will integrate and coordinate procurement, design and construction programmes and will highlight key dependencies and the critical path.</p> <p>In addition to the numerous reports that need to be produced in line with the requirements of the School Organisation Code 2018 and internal Caerphilly County Borough Council decision making processes, A business case model is followed to secure Welsh Government funding.</p>

	<p>An initial Outline Business Case / Strategic Outline Business Case was developed at the concept stage based on the five key areas that underpin the Better Business Case Process (Five Cases Business Model).</p> <p>The Business Case focused on:</p> <ul style="list-style-type: none"> • the strategic justification and investment objectives for the project (Strategic Case) • the reasoning behind reduction of the long list to a short list of options and analysis of the options appraisal and benefits (Economic Case) • the outline cost of the project and details of match funding and profile of spend (Financial Case) • the proposed management structure (Management Case) • the commercial strategy (Commercial Case) <p>Approval to secure the funding in principle is agreed by Welsh Government at this point prior to the proposal progressing through the consultation processes.</p> <p>As the proposal progresses through the consultation processes, regular meetings with 21st Century Schools Officers in Welsh Government are held to update them on progress.</p> <p>Once a final determination is made on the proposal by Cabinet, a Full Business Case will be submitted to Welsh Government which will solely focus on the tendered costs unless anything has changed since agreement to the original business case was submitted. At this point, with the approval of Welsh Government, the funding is released to implement the proposal.</p> <p>Should the proposal then be implemented (based on approval as outlined above), on completion of the works a Welsh Government Closing Report is produced, supported with full project costings and analysis as to whether the community benefits have been achieved.</p> <p>The 21st Century Schools team are required to monitor projects for their first five years through completion of post occupancy evaluation workshops with pupils and staff. This is also reported to Welsh Government and supports the Council in considering best practice and any areas for improvement on future projects.</p>
<p>How will the results of the monitoring be used to develop future proposals?</p>	<p>The Council produces a protocol document for each school opening/closure/amalgamation project. This outlines individual and team responsibilities for the full list of actions required over the 3 stages of design and pre-construction, construction and school occupation and decommissioning.</p>

	<p>Regular monitoring meetings take place and typically involve 21st Century Schools Team, Headteachers, Education advisers, Property Services, Catering Services, ICT, Traffic Management, Procurement and Audit representation. Relevant stakeholders will also be involved in post project evaluation to review outcomes to ensure improvements are made for future projects.</p> <p>Benefits Realisation will be monitored by the project team and Caerphilly County Borough Council and reported to Welsh Government through the project closure report and other relevant documentation. Community benefits will be reported quarterly and yearly and when the project ends.</p> <p>The project will be subject to gateway review as required by the funding agreement. The review is one by which independent practitioners from outside the programme/project use their experience and expertise to examine the progress and likelihood of successful delivery of the programme or project. Any recommendations of the review team will be taken on board and implemented as appropriate.</p> <p>A post contract review will also be undertaken.</p>
<p>When is the proposal due to be reviewed?</p>	<p>Further to review at Education Scrutiny Committee on the 22d March 2021, this document will be considered in full at a Cabinet meeting due to be held on 7th April 2021.</p> <p>Decisions (in relation to proposals which require approval or determination) must be made and issued in the form of a decision letter. The decision letter must set out clearly the reasons for the decision with reference to the School Organisation Code 2018. The Decision letter will be published electronically on the Council's website and the consultees as outlined in Section 5.6 of the School Organisation Code will be advised by letter/email of the availability of the document.</p>

Who is responsible for ensuring this happens?	<p>Cabinet Members will be asked to review the proposal and make the final determination as to whether to implement the proposal as outlined below: To relocate Ysgol Gymraeg Cwm Gwyddon to a new purpose-built Welsh medium provision school to be situated at the former Cwmcarn High School site.</p> <p>If approved, it will be the responsibility of the Author of this report (or nominated officer within their section) to ensure the Integrate Impact Assessment and proposal is reviewed and any mitigating actions followed up on and actioned.</p>
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11. Recommendation and Reasoning	
<input type="checkbox"/>	Implement proposal with no amendments
<input checked="" type="checkbox"/>	Implement proposal taking account of the mitigating actions outlined
<input type="checkbox"/>	Reject the proposal due to disproportionate impact on equality, poverty and socio-economic disadvantage

Have you contacted relevant officers for advice and guidance?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
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2.	Andrea West	<p>As part of the Statutory processes being followed in relation to the Trinity Fields School proposal as per the requirements of the School Organisation Code 2018, at this stage in the process, a formal 'Objection Report' will be presented to Education Scrutiny Committee on the 22nd March 2021, with the final decision making body (Cabinet) meeting after the 31st March 2021.</p> <p>To ensure compliance with the new socio-economic duty set out in section 1 of the Equality Act 2010, which comes into force on 31st March 2021, this newly established Integrated Impact Assessment (IIA) template has been utilised to act as the update and revision to the existing Equality Impact Assessment and Community Impact Assessment to include the relevant information highlighted through the statutory consultation processes.</p>	01.03.2021
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Integrated Impact Assessment Author

Name:	Andrea West		
Job Title:	21 ST Century Schools Manager		
Date:	<i>A.West</i>		

Head of Service Approval

Name:	Sue Richards		
Job Title:	Head of Education Planning and Strategy		
Signature:	<i>S.Richards</i>	Date:	8.3.2021