

Appendix 5 Name of Consultation: Reduce the Capacity at ALC Capacity

Redacted Correspondence



	Query/comment	Actioned
1	<p>It is a absolute disgrace that you ARE shutting a perfectly good school. Some of these kids are going to be walking over at least a mile to school every day so tied before even start a day full of lessons, they will also getting to school soaking wet most days then the school will be complaining that kids are having to much time off due to illnesses.</p> <p>I would love to know what you use our council tax for. It's definitely not used on roads. Street lights are turned off at midnight so it's not there. Rubbish is only picked up every 3 weeks so it's not there either. Hardly any street cleaners. Less and less police so you are saving money there. Most council office staff works from home so no offices need lighting or heated. Now you ARE going to close a school because their isn't enough children going there but got money to build more houses. Do you actually realise that 120 spilt between 2 school is 60 extra per school. 6 main years in each school means a extra 10 children in each class, so instead of 20/30 children per class it's going to be 30/40 per class, basically overcrowding. Children are our future and this is how they are treated!</p>	Recorded
2	<p>Consultation Response Proposal to Reduce Capacity and Close Roseheyworth Road Campus Abertillery Learning Community</p> <p>1. Introduction</p> <p>We welcome the opportunity to respond to the consultation regarding the proposal to reduce the physical capacity of Abertillery Learning Community (ALC) by closing the Roseheyworth Road Campus and redistributing pupils across the remaining campuses.</p> <p>It is recognised that the local authority must consider factors such as falling rolls, surplus capacity and estate sustainability. However, decisions regarding the reorganisation of educational provision must also give appropriate weight to:</p> <ul style="list-style-type: none"> • educational standards • community access to education • deprivation and inequality • pupil wellbeing and attendance • long-term life chances for children. <p>This response reviews the proposal against evidence contained within:</p> <ul style="list-style-type: none"> • the Estyn Inspection Report (March 2025) • Estyn's thematic review of All-Age Schools in Wales • the Welsh Index of Multiple Deprivation (WIMD) 2025 • the consultation document itself. 	Recorded

2. Educational Context – Findings from Estyn

The Estyn inspection (March 2025) identifies that Abertillery Learning Community provides:

Strengths

- A caring and inclusive environment
- Positive relationships between staff and pupils
- Strong pastoral care and wellbeing support
- Improved attendance and effective work to reduce persistent absence
- Effective support for vulnerable learners and those with ALN
- Positive partnership working with external agencies (noting that engagement with local community groups remains limited)

These strengths demonstrate that the school has strong foundations in terms of wellbeing, inclusion.

Importantly, Estyn identifies the main areas for improvement as:

- consistency in teaching quality
- improving challenge for pupils
- developing literacy and numeracy across the curriculum
- strengthening improvement planning and monitoring
- improving Welsh language provision in the upper school.

These issues relate primarily to teaching practice and leadership processes, rather than the physical estate configuration of the school sites.

Therefore, the consultation would benefit from demonstrating clear evidence that closing a campus will directly address the specific educational issues identified by Estyn.

At present, that causal link is not clearly evidenced.

3. Evidence from Estyn's All-Age School Review

Estyn's national review of all-age schools in Wales highlights several key points:

Successful all-age schools typically benefit from:

- smoother transition between phases
- strong wellbeing and pastoral systems
- effective sharing of expertise across primary and secondary phases
- consistent curriculum progression.

However, Estyn also notes that many all-age schools operate across multiple sites, sometimes several miles apart.

The success of these arrangements depends primarily on:

- strong leadership

- clear organisational structures
- effective communication across phases
- shared professional practice.

Whilst this evidence suggests that a multi-site structure in itself is not inherently problematic , continuous changes at a leadership level and limited community

engagement has contributed to a sense of mistrust or disengagement from sectors of the community.

4. Deprivation and Community Context

The Welsh Index of Multiple Deprivation (WIMD) highlights that Blaenau Gwent contains some of the most deprived communities in Wales, with significant challenges relating to:

- education
- employment
- income
- health
- access to services.

Roseheyworth lies within a WIMD Lower Super Output Area (LSOA) experiencing deprivation pressures.

Educational deprivation indicators within WIMD include:

- Key Stage 4 attainment
- persistent absenteeism
- progression into education, employment or training.

This context is important because research consistently shows that proximity of educational provision, community engagement and strong family-school relationships play a critical role in improving attendance and life chances in deprived communities.

Estyn's inspection already recognises that ALC has made significant progress in improving attendance, with reductions in persistent absence linked to targeted family support and strong pastoral relationships.

The potential impact of removing a campus within a deprived area should therefore be considered carefully, as it could affect:

- attendance patterns
- parental engagement
- early years access
- community trust in education provision.

5. Consideration of the Proposal

The consultation emphasises several drivers for the proposal:

- falling pupil numbers

- surplus capacity
- backlog maintenance costs
- sustainability of the estate
- concentration of staff across fewer campuses.

While these are valid considerations, it is important to ensure that estate rationalisation does not inadvertently undermine educational or social outcomes.

The proposal would benefit from providing stronger evidence on:

- how redistribution of pupils will affect attendance patterns
- transport and safeguarding implications for younger pupils
- the impact on family engagement
- the potential effect on vulnerable learners
- whether educational outcomes improve following similar campus closures elsewhere.

Without this evidence, it is difficult to conclude that closure is the most effective solution.

6. Alternative Options Worth Considering

Before finalising a decision, it may be beneficial to explore alternative organisational models that retain educational provision while still addressing efficiency concerns.

Option 1 – Phased Educational Model Across Three Sites

A structured three-phase model could be considered:

Roseheyworth Campus Early Years / Nursery / Reception

Tillery Street Lower School

Secondary Campus Upper School

Six Bells Campus Post 16 Vocational Training Centre or an enhanced ALN provision

This approach could:

- maintain early-years access in a deprived community
- strengthen phase-specific leadership
- support smoother progression across stages
- retain community engagement while rationalising provision.
- Offer specialised options meeting identified needs within the community

Option 2 – Roseheyworth as a Family and Early Years Hub extending the catchment criteria

Rather than full closure, Roseheyworth could operate as a specialised provision for:

- nursery and early years
- family engagement programmes
- attendance intervention support

- ALN and nurture provision
- community learning services.

This would align with the school's strongest existing provision in wellbeing and support and offer ways of reconfiguring financial pressures.

Option 3 – Phased Review Approach

Rather than committing immediately to closure by 2027, the authority could adopt a review-based approach using the learning from the turbulence of the opening of the 3-16 model, linking decisions to:

- pupil roll forecasts
- attendance data
- Estyn monitoring outcomes
- community engagement evidence.

This would ensure the decision supports school improvement rather than creating additional disruption during an improvement period.

7. Alignment with the Vision for Education

Blaenau Gwent's Vision for Education states:

"Empowering our communities to be ambitious, ethically informed, life-long learners who lead full and healthy lives."

For communities experiencing deprivation, empowerment requires:

- accessible local education provision
- strong family-school relationships
- inclusive support for vulnerable learners.

Any reorganisation should ensure that educational access and community engagement remain central considerations, alongside estate efficiency.

8. Conclusion

The consultation identifies legitimate pressures relating to falling rolls and estate sustainability. However, the evidence suggests that:

- the key educational challenges identified by Estyn relate to teaching and leadership rather than campus configuration
- ALC's strongest features are attendance, wellbeing support and community relationships
- Roseheyworth serves an area experiencing deprivation pressures
- multi-site all-age schools can operate successfully when organisational structures are strong and benefit from extended periods of stability.

For these reasons, it would be appropriate for the authority to:

- fully assess the educational and community impact of closing Roseheyworth

- consider alternative organisational models
- ensure decisions support school improvement rather than focus primarily on estate rationalisation.

A balanced approach that considers both educational outcomes and community needs will best support the ambition of enabling children and young people in Abertillery to achieve their full potential.

3

Recorded



THE COMMUNITY COUNCIL OF ABERTILLERY & LLANMILLETH
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The Community Council held an extraordinary meeting on Wednesday 18 March to discuss the proposed closure of Roseheyworth school and the Council's response to that proposal.

It is with some dismay that the Council has heard about this proposal, given the current poor state of education within our area and all the indices that show that Blaenau Gwent is near the bottom nationally in educational achievement. We are also concerned that the Community Council was not brought into the debate around our schools at an early stage. We have heard a great deal recently about the need to work in partnership, but it seems yet again we have not been part of the process. You either treat us as partners and as adults or you don't. This sort of action does nothing to cut off the overall scepticism that has built up about the use of The Charter and "The Deal"

We are aware of the financial difficulties that many local authorities are faced with and that some tough decisions have to be made but the Community Council feels that this proposal flies in direct opposition to the Marmot principles, especially "Give every child the best start in life", that the Council has been espousing in its selling of "The Deal".

We feel that instead of cuts to education, there should be better investment and this proposal smacks of short-termism to plug a current financial gap with no regard for the social and financial costs that this will lead to 5 or 10 years down the line and irrespective of the direct damaging impacts to children and their families.

There are a several things we wish you to note, and we would be pleased to hear your response:

1. We are disappointed that the closure is purely a budgetary decision and not fully considering the quality of the Children's educational needs.
2. Studies have shown that smaller class sizes have a beneficial effect on attainment, albeit small. Closing the school will lead to bigger class sizes elsewhere in the ALC area.
3. As per point 2, a more strategic approach to catchment areas could easily deliver smaller class sizes to ensure our children have a better foundation for their future learning.
4. 30 is the statutory maximum for a primary class. With over 150 children being added to the 2 remaining schools, class sizes will inevitably be close to or above this maximum (excluding numbers in corridors).
5. For comparison the average pupil teacher ratio in Wales is 1 teacher to 21.4 children.
6. Average class sizes in Wales are 24.7 Infant and 26.1 Junior. Surely if Blaenau Gwent children are to improve, they need class sizes below the National Average to give a stronger foundation for learning due to current educational attainment in Blaenau Gwent.
7. Wales has the LOWEST levels of attainment of all the UK nations in the PISA tables. This proposal does nothing to address this issue.
8. From 2024 to 2025, Wales lost 567 Full Time Equivalent Teachers and 785 Full Time Equivalent Support Workers. Surely this trend cannot continue with the PISA results and Blaenau Gwent's results on Educational Attainment.
9. Educational outcomes in Blaenau Gwent are among the worst in Wales! A* to A grades at GCSE in the highest performing authority in Wales is 29.1%. In stark contrast in Blaenau Gwent it's 11.5% and even at A* to C grades the highest is 73.3% compared with a disappointing 56.6% in Blaenau Gwent.
10. Transport is a major issue in this area. School sites are regularly log jammed in the mornings and at the end of school with more vehicles than the area's roads can manage. This will only add to the problems in Tillery Street and Six Bells. Neither site, given the congestion, would be able to accommodate any form of bus transport as access to both sites is severely limited.
11. However if no transport is provided, we will have children as young as 4 having to walk over a mile to get to either of the remaining sites. This cannot be the best way for them to start the day if they are accessing their education tired from the exertion. Do you have figures on the number and age groups of children who will now have to walk to schools?
12. Access to pre and post school clubs and activities will be constrained by the availability (or lack of) of parents to provide transport at different times, and if children are expected to walk this will make their school day exceedingly long and tiring.
13. The only alternative to this is even more concerning in an area of Blaenau Gwent with one of the most financially deprived areas having to pay for taxis or service bus fares at a cost of between approximately £6 and £10 each way per day.
14. Personal consideration for the students at Roseheyworth clearly is not a factor here as far as the Authority is concerned. The children would have many of their friendship groups split, a significant loss of green space for their leisure and free time, problems accessing extracurricular provision and corridor working which, at least one of the remaining sites, is already being

	<p>substantially overused.</p> <p>15. Another major consideration is the needs of children with ALN and/or with IDP. The upheaval for these children will be immense and COULD even leave children feeling unable to attend school due to the level of disruption to the routines they rely on to cope with the educational situation.</p> <p>16. Finally, as a minor authority who should be given far more information, if we are really to be considered part of 'The Deal' here in Blaenau Gwent, a full set of Financial details needs to be sent to us alongside a full set of personal and educational implications for our children also, a full report on the student and community impact that this closure will have for our area.</p> <p>17. The proposal only gives the numbers for children of school age, it has not included the numbers of Nursery and Reception children who would have flowed through to Roseheyworth school in the next few years.</p> <p>18. Can you inform us what other proposals were considered within the Blaenau Gwent area to make up the shortfall in the budget?</p> <p>19. We were astonished to see that 13 senior staff at Abertillery Learning community have combined salaries of £ 1.1 million, so can you point out where this top heavy management structure actually helps to educate our children and is this same top heavy management structure duplicated across other schools within the Blaenau Gwent area?</p> <p>Cc: Steve Thomas (Leader of Blaenau Gwent Council) Dave Leech (Deputy CEO Blaenau Gwent Council)</p> <p>Josh Rawcliffe Chair of Council</p> <p>Steve Edwards Clerk of Council</p>	
4	<p>Dear BGCBC 21st Century Schools, Hope this finds you well?</p> <p>I do not support the proposal to close Rosehayworth School</p> <p>I am a former volunteer "Friend of the Classroom" and would regularly help our pupils with their reading and writing, our local schools, pupils, teachers and support staff are all fantastic and are a credit to our community</p> <p>I do not support the closer of Rosehayworth School many of the pupils have additional learning difficulties and some have Individual Development Plans, as a child growing up with trauma I am very aware of the detrimental effect I feel is going to be imposed upon our most vulnerable pupils because as I see it top heavy management structure</p>	Recorded

	<p>I feel that now would be a great opportunity to do something different not do the same thing and waste money and get the same results</p> <p>How can the 13 top salaries be over £1,000,000 per annum? Would it be better to reduce the highest payroll and use the savings to run and maintain a better Abertillery Learning Community?</p> <p>I am a former Recruitment and training officer, I worked with the Welsh Development Agency and education service providers such as BBC Education and NACRO and helped bring Japanese, American and international businesses into our area, I'm off to Japan tomorrow</p> <p>Why haven't we got these international links in our schools? This I believe would encourage better citizens and bring much needed employment and international links into our community?</p> <p>I also worked on the pilot series of The Biz (dragons den) with the WDA, Welsh Government and BBC Wales, it would i feel be brilliant to link this to the Rosehayworth School Entrepreneurial Program?</p> <p>I have documents and reports about the Abertillery Learning Community and how things could be improved moving forward, I'm happy to have a meeting to discuss</p> <p>If ALC goes backwards it will not look good for you</p> <p>I have also started back the Abertillery Film Academy which had a very successful night at the Met, would be brilliant to put a film together and contact the BBC to show all the positive work that is being done in Abertillery?</p> <p>I'm really looking forward to your response</p>	
5	<p>Response to School Consultation on the Proposal to Reduce Capacity at Abertillery Learning Community – Primary Phase</p> <p>1. Class Sizes and Capacity Management</p> <p>Should the proposed closure of the Roseheyworth Road Campus proceed, further clarification is required regarding the anticipated class sizes for each year group at both the Six Bells Campus and the Tillery Street Campus.</p> <p>While the consultation document confirms that all pupils can be accommodated within the remaining two primary campuses, it does not explain how class sizes will be managed, nor does it provide explicit assurance that class sizes will remain within the statutory maximum of 30 pupils per class. This omission is particularly significant given the potential impact on teaching quality, staffing capacity, and pupil wellbeing.</p> <p>Clear and explicit assurances on class size limits must form part of the decision-making process. In addition, the consultation should provide detailed information addressing the following:</p> <p>What are the projected class sizes at the Six Bells and Tillery Street campuses following pupil redistribution?</p>	

Will the number of mixed-age classes increase as a result of the proposal?

How will additional pupils impact teacher workload, classroom management, and the availability of teaching assistants?

Will specialist support, including Additional Learning Needs (ALN/SEN) provision and pastoral support, be maintained at current levels, or reduced?

What is the current educational performance of each campus, and how is it anticipated that this may change following reorganisation?

Without this information, parents and stakeholders are unable to properly assess whether the proposal can be implemented without detriment to educational standards, staff capacity, or learner support.

2. Nursery Provision and Early Years Capacity

The consultation also fails to adequately consider the impact on nursery provision across the primary campuses. While it is acknowledged that the consultation formally relates to statutory school-age pupils (Reception to Year 6), nursery provision is an integral component of the Abertillery Learning Community and cannot be realistically separated from wider capacity and infrastructure planning.

Children who would have attended the Roseheyworth Road Campus nursery will still require accessible and appropriate early years provision should the closure proceed. However, the consultation does not demonstrate how nursery-age children would be safely or sustainably accommodated at the remaining campuses.

In particular, there is a lack of information regarding:

- Anticipated nursery numbers at the Six Bells and Tillery Street campuses;
- Whether sufficient physical space exists to accommodate additional nursery pupils;
- Whether staffing levels and early years resources are adequate to absorb additional demand.

This information is essential to ensure continuity of early years provision and to provide parents with confidence that capacity pressures are being responsibly and sustainably managed across all age groups, not solely statutory-age pupils.

3. Capacity, Infrastructure, and Capital Investment

Should the closure of the Roseheyworth Road Campus proceed, the consultation does not adequately explain how the capacity and infrastructure of the Six Bells and Tillery Street campuses will be affected.

In particular, clarification is required on:

- Whether temporary or additional classrooms will be required;
- Whether existing facilities (toilets, dining areas, playgrounds and circulation space) are adequate for increased pupil numbers;

- How dining arrangements will be expanded or reorganised to accommodate additional pupils without reducing quality or increasing supervision risks;
- What investment or capital works are planned at the receiving campuses to support increased demand.

The absence of this information makes it difficult to assess whether the proposal is practically deliverable without placing undue strain on facilities that are already in use.

4. Safe Routes, Accessibility, and Learner Travel

The consultation states that parents will be free to choose whether their child attends the Six Bells Campus or the Tillery Street Campus. However, it does not identify, assess, or evidence safe walking routes to either site.

There is particular concern for pupils attending the Six Bells Campus who live north of Station Hill, where young children would be required to cross busy roads and negotiate a complex junction. Without a formal assessment of safe walking routes and clearly identified mitigation measures (such as controlled crossings, traffic calming, or supervised crossings), it is difficult to see how parental choice can be exercised meaningfully or safely.

Where a safe walking route cannot be clearly demonstrated, home-to-school transport should be provided for pupils attending that campus. This issue should be addressed directly within the consultation, rather than assumed.

5. Transport Eligibility and Equity

The consultation highlights that home-to-school transport will generally only be considered where walking distance exceeds 1.5 miles. While this criterion is noted, the consultation itself acknowledges that a significant number of pupils attending the Roseheyworth Road Campus reside within the Cwmtillery ward, one of the more deprived areas in the borough, with low levels of car ownership. Families in this area are therefore more likely to rely on walking as their primary mode of travel.

Guidance on learner travel and active travel makes clear that distance alone is not determinative. Factors such as gradient, route safety, route complexity, and physical exertion—particularly for younger pupils—must be considered collectively. A route that appears acceptable on distance alone may still be unsuitable for daily pedestrian use.

This is particularly relevant for households in Arael View and the surrounding area. While the walking distance to the Six Bells Campus may fall within the 1.5-mile threshold, pupils would face a significant uphill return journey, which would be especially challenging for younger children and early years pupils.

The physical demands of such a route, combined with weather conditions and road safety considerations, raise concerns about sustainability and possible impacts on attendance and punctuality.

Accordingly, the application of a strict distance-based threshold without proper consideration of topography, safety, and socioeconomic context is inappropriate and risks disproportionately disadvantaging families in deprived communities.

6. Lack of Adequate Parking and Highway Impact

A further concern relates to parking and highway safety around both the Six Bells and Tillery Street campuses. Both sites already experience insufficient parking capacity for drop-off and collection at peak times.

Recent examples, particularly at the start of the academic year, have seen residents of Newall Street unable to leave their properties due to pavement parking and blocked entrances. In some cases, residents have been delayed in collecting their own children as a result.

The issue has been sufficiently serious that police have been required to attend on multiple occasions during the current academic year to monitor parking behaviour and discourage unsafe practices, highlighting that this is an ongoing and recognised safety issue.

Despite this, the consultation does not address how existing parking pressures will be managed, nor how the Council intends to prevent these problems from worsening if additional pupils are transferred to the remaining campuses. There is no parking capacity assessment, no traffic management strategy, and no reference to highway safety mitigation.

Without a clear plan, the proposal risks exacerbating congestion, increasing conflict between residents and parents, and undermining safe access for pupils.

7. Alternatives to Closure

The consultation refers to a list of options considered; however, further clarity is required on:
What genuine alternatives to full closure were fully explored;

Whether partial closure or phased reduction was considered in greater detail;

Whether the use or rental of surplus space was explored;

Whether catchment changes were considered as a demand-management tool;

Why these options were ultimately rejected.

More transparency on the appraisal of these alternatives is required to demonstrate that closure is the only viable option.

Conclusion

Given the concerns outlined above, particularly around class sizes, early years provision, infrastructure capacity, transport safety, equity of access, and parking impacts, we do not consider that the proposed closure of the Roseheyworth Road Campus can be supported at this stage.

The issues raised in this response require further evidence, clarification, and mitigation before the consultation process moves forward or any decision is taken.

	Councillor Keith Chaplin/ Councillor Ross Leadbeater	
6	<p>Estyn response to the proposal to reduce the capacity at Abertillery Learning Community Primary Phase</p> <p>Introduction</p> <p>This report has been prepared by His Majesty's Inspectors of Education and Training in Wales. Under the terms of the School Standards and Organisation (Wales) Act 2013 and its associated Code, proposers are required to send consultation documents to Estyn. However, Estyn is not a body which is required to act in accordance with the Code and the Act places no statutory requirements on Estyn in respect of school organisation matters. Therefore as a body being consulted, Estyn will provide their opinion only on the overall merits of school organisation proposals.</p> <p>Estyn has considered the educational aspects of the proposal and has produced the following response to the information provided by the proposer.</p> <p>Summary/conclusion</p> <p>The proposal to reduce the physical capacity of Abertillery learning Community by closing Roseheyworth Road Campus and moving pupils to the remaining campuses (Six Bells Campus and Tillery Street Campus) is likely to at least maintain the standard of education provision and outcomes for pupils in the school.</p> <p>Description and benefits</p> <p>The local authority has provided a clear rationale for the proposal and provided detailed descriptions of their aims and timetables for statutory procedures.</p> <p>The proposal outlines associated benefits and disadvantages clearly. The local authority have considered suitable alternatives and provided reasons why these have been discounted. These appear to be reasonable and equitable.</p> <p>The proposal identifies and considers associated risks suitably. The local authority have considered the impact that changes will have on learner travel and pledge to continue to provide free transport for children attending their nearest suitable school in line with existing policy arrangements.</p> <p>The consultation outlines how the preferred option will reduce the number of surplus places appropriately. The consultation has taken sufficient account of the impact of the proposals on Welsh medium provision within the local authority, stating that the proposal will not have an impact on the availability of Welsh-medium school places. This appears reasonable.</p> <p>The proposal considers the financial costs of the proposal suitably noting that Abertillery Learning Community is facing a significant deficit projection for the 2025/26 financial year. The proposal considers that if no action is taken, the deficit is expected to increase significantly over the next five years, placing the school in an unsustainable financial position. Taking into account the figures provided, this appears to be a reasonable consideration.</p>	Recorded

The proposal notes that an estimated cost of £100,000 will be required to increase the accommodation at the remaining two campuses. This will be financed from existing maintenance budgets.
 The local authority has provided a Welsh Language Impact Assessment as part of this proposal.
 The local authority has provided a Community Impact Assessment as part of this proposal.

Educational aspects of the proposal

The local authority appears to have considered the educational aspects of the proposal appropriately. The proposal includes sufficient commentary regarding the expected impact of the proposal on pupil outcomes, wellbeing and attitudes to learning, teaching and learning experiences, care, support and guidance and leadership and management. The local authority considers that reducing provision from three campuses to two would allow resources to be used more efficiently via professional collaboration and practitioner-to-practitioner working. This appears to be reasonable.

The proposal includes a link to the most recent Estyn inspection report along with relevant text from the report. Following inspection, Estyn placed Abertillery Learning Community in the statutory follow up category of requiring special measures. This does not appear to have been highlighted.

The proposal considers that the proposal will not negatively impact provision for ALN pupils. This also appears to be reasonable.