



Our Ref – MA/LN/1288/25

Gaynor Davies
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Rhondda Cynon Taf County Borough Council

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15 July 2025

Dear Mrs Davies

**SCHOOL STANDARDS AND ORGANISATION (WALES) ACT 2013 - PROPOSAL TO
CHANGE THE AGE RANGE OF MOUNTAIN ASH COMPREHENSIVE SCHOOL FROM
11-19 TO 11-16 ENDING SIXTH FORM PROVISION**

1. Lynne Neagle MS, Cabinet Secretary for Education, one of the Welsh Ministers, has considered Rhondda Cynon Taf County Borough Council's proposal to change the age range of Mountain Ash Comprehensive School from 11-19 to 11-16, ending all sixth form provision from September 2026.
2. The School Standards and Organisation (Wales) Act 2013 ("the 2013 Act") sets out the legal framework for undertaking school organisation proposals. Proposals to make a regulated alternation to end sixth form provision require the approval of Welsh Ministers under section 50(1)(a) of that Act.
3. Where a proposal requires their approval under section 50, the Welsh Ministers may under section 50(5) of the 2013 Act reject the proposal, approve the proposal as it stands, or approve the proposal with modification.
4. I am directed by the Cabinet Secretary to say that under section 50(4)(b) of the 2013 Act, she has considered the consultation document, the consultation report, the objections, the objection report, advice from Estyn, and additional information provided by the local authority for the purposes of consideration of the relevant factors set out in the School Organisation Code (the Code). In exercise of her powers under section 50(5) of the 2013 Act, the Minister has decided to approve the proposal without modification.
5. Paragraphs 1.3 to 1.6, 1.10 and 1.15 in the current version of the Code (2018) set out the factors to be taken into account by the Welsh Ministers when exercising their

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

functions of determining school organisation proposals. Each paragraph is set out below, followed by an analysis of the extent to which the Cabinet Secretary considers these requirements have been met in relation to this proposal.

QUALITY AND STANDARDS IN EDUCATION

6. The Cabinet Secretary is satisfied that the proposal, under which learners may attend sixth form provision at Aberdare Community School, will deliver outcomes and offer provision at least equivalent to that which is currently available to learners at Mountain Ash Comprehensive School. She notes that Estyn's most recent inspection of Aberdare Community School in March 2018 judged standards to be adequate and needs improvement. She also notes that a follow up report in October 2021 judged the school to have made sufficient improvement. Aberdare Community School also offers a significantly broader A level and vocational choice than currently on offer at Mountain Ash Comprehensive School, where the course offer is significantly reduced without the need of sixth form consortium with Aberdare Community School and St John the Baptist Church in Wales High School.
7. The Cabinet Secretary notes that Estyn's most recent inspection report of Mountain Ash Comprehensive School in November 2018 also judged standards to be adequate and needs improvement. A follow up review judged the school to have made sufficient progress. She notes that in Estyn's response to the consultation that in their view the proposal is *'likely to improve the standard of post-16 provision within the area'*
8. She notes that Aberdare Community School will be able to provide sixth form provision in a 21st Century building and facilities which is also accessible for all learners.
9. The Cabinet Secretary is satisfied that the evidence overall demonstrates that the proposal is likely to at least maintain the current standards of education, and that it is likely that the proposal will have a positive impact for learners in terms of quality of education. She considers that the improved 21st Century Learning environment and wider range of courses available at Aberdare Community School is further likely to have a positive impact on wellbeing for sixth form learners.
10. The Cabinet Secretary is satisfied overall that the proposal will have a positive impact on the School's pupils of statutory school age with ALN, as the School will be providing a Learning Resource Centre for pupils with complex learning needs and autistic spectrum disorder and will no longer need to support sixth form provision by diverting funding intended for years 7 to 11. She trusts that these learners will be supported to transition to the new sixth form arrangements as provided in the consultation document.
11. The Cabinet Secretary notes the Mountain Ash Comprehensive and Aberdare Community School's declining sixth form pupil numbers; and the reduced curriculum options at Mountain Ash Comprehensive, means that the needs of learners are not being met effectively and the school is having to subsidise loss making sixth form courses with the funding intended for pupils of statutory school age.
12. The Cabinet Secretary considers that the evidence on balance demonstrates that the proposal is likely to at least maintain the current standards of education and is likely to have a positive impact on all learners, both of, and above, statutory school age, including vulnerable learners and those with special educational needs.

NEED FOR PLACES AND THE IMPACT ON ACCESSIBILITY OF SCHOOLS

13. The Cabinet Secretary is satisfied that the evidence shows that Aberdare Community School will have sufficient capacity for learners moving from Mountain Ash Community School to attend sixth form provision. She notes that Aberdare Community School will provide accommodation of at least equivalent quality or better for existing and projected pupil numbers. She notes again that both school's sixth form provision has suffered from declining pupil numbers over a long period. She also considers that the 21st Century School premises and bespoke facilities at Aberdare Community School are likely to be a significant improvement to those currently provided at the Mountain Ash Community School and that the proposal will provide improved access to facilities for disabled people.
14. The Cabinet Secretary is satisfied that no learner will have a one-way journey of more than an hour to alternative sixth form provision. Although the consultation did not provide an adequate assessment of other sustainable travel, such as walking or cycling, she notes the information provided that it is likely that all learners will be eligible for free home to school transport. She also notes that a high percentage of current sixth form learners are already being transported to Aberdare Community School throughout the day to access sixth form provision.
15. The Cabinet Secretary notes that follow-up information provided by the local authority that there are safe walking and cycling routes, should learners want to use alternative travel arrangements. In accordance with the School Organisation Code, proposers should clearly demonstrate the assessment of alternative travel arrangements, including active travel. This would ensure that the proposal fully reflects the Code's emphasis on learner well-being, accessibility and equality of opportunity. This would strengthen the proposal and reassure the community that all reasonable alternatives have been considered.

RESOURCING OF EDUCATION AND OTHER FINANCIAL IMPLICATIONS

16. The Cabinet Secretary notes that in January 2024, Mountain Ash Comprehensive School had 981 pupils on roll, a capacity of 1394 places and 29.6% significant surplus places. She recognises that removal of the sixth form will increase the surplus places at the school but notes the local authority's plans to implement a new Learning Resource Base from September 2025 and further exploration of how the school building can be used in future. The Cabinet Secretary notes that in January 2024, Aberdare Community School had 1,259 on roll with a capacity of 1,574 and 20% surplus capacity. The Cabinet Secretary considers that surplus places will reduce at Aberdare community School because of the proposal.
17. The Cabinet Secretary notes that the capacity and admission number for Mountain Ash Comprehensive School will not change.
18. The Cabinet Secretary notes that additional transport costs of approximately £3.20 per pupil per day will arise because of the proposal. The local authority has confirmed it will meet these additional costs. She notes that this will reduce travel journeys and costs during the school day.
19. The Cabinet Secretary notes that whilst no direct savings are anticipated because of this proposal, the removal of the sixth form will mean that Mountain Ash Comprehensive School will no longer need to subsidise loss making courses and will be able to channel its resources appropriately into 11-16 provision at the school. She notes that the

proposal will not result in any redundant sites.

20. The Cabinet Secretary notes that it is likely that if the proposal does not go ahead, the school will continue to need to subsidise loss making sixth form courses with funding intended for compulsory school aged learners and may struggle financially in the future. This is not an appropriate use of resources, and she considers that removal of the sixth form will put the school on a firmer financial footing.

OTHER GENERAL FACTORS

21. The Cabinet Secretary notes that the local authority has considered the impact of the proposal on learners from economically disadvantaged backgrounds and has conducted a socio-economic impact assessment. She also notes that concerns were raised in the consultation report regarding additional costs and travel for learners. She also notes that there were concerns that this could discourage post-16 participation, especially among those who may already face socio-economic challenges.
22. The Cabinet Secretary notes that Aberdare Community School and Mountain Ash Comprehensive School, serve some of the most economically deprived areas. She notes learners, if not all, will be entitled to free school transport and have access to a broader post-16 curriculum offer that would better meet their needs.
23. The Cabinet Secretary notes that learners will need to buy a new school uniform. She notes that the sixth form uniform at Mountain Ash Community School is different to the compulsory age uniform and would need to purchase a new uniform in any event if provision is to stay and students are to continue in the school for their sixth form education. She notes that Aberdare Community School facilitates a school uniform exchange service where good quality used uniform can be access by those who need it.
24. The Cabinet Secretary notes the declining sixth form pupil numbers generally and reduced curriculum options at Mountain Ash Comprehensive mean that sixth form provision is not effectively meeting the needs of its learners. Similarly, having to subsidise loss making sixth form courses with the funding provided for pupils of statutory school age impacts on the school's ability to raise outcomes for these learners.
25. The Cabinet Secretary therefore considers that the evidence on balance demonstrates that the proposal is likely to at least maintain the current standards of education for all learners and is in fact likely to have a positive impact on learners, including those from economically deprived backgrounds.

Any equality issues, including those identified though equality impact assessments

26. The Cabinet Secretary agrees that the fully accessible 21st Century premises at Aberdare Community School will have a positive impact on learners living with a disability. However, she notes concerns raised for learners with additional learning needs and the impact on change of routine and a new unfamiliar environment and teachers. She is satisfied that the information provided and the local authority's plans, that the local authority and the schools will support these learners to transition should they want to pursue post-16 provision.
27. The Cabinet Secretary notes that children with additional learning needs will need to travel further and as previously noted, most learners, if not all, will be eligible for free school transport.

28. The Cabinet Secretary notes that the schools in the proposal are not subject to a trust or charitable interests that might be affected by this proposal.

SPECIFIC FACTORS TO BE TAKEN INTO ACCOUNT FOR PROPOSALS TO REORGANISE SECONDARY SCHOOLS OR TO ADD OR REMOVE SIXTH FORMS

29. The Cabinet Secretary is satisfied that the significantly greater breadth of course choices available in 21st Century premises at Aberdare Community School is likely to lead to an improvement in the educational or training achievements of persons who are above compulsory school age but below the age of 19. She notes that subject choice at Mountain Ash Comprehensive School is not sufficient to provide an appropriate sixth form curriculum if it were not part of the sixth form consortium with two other schools. There is a wide range of A level subject choices at Aberdare Community School as required under the Learning and Skills (Wales) Measure 2009. The school also offers a range of full-time vocational courses that will enable learners to progress into employment or Higher Education if preferred.
30. The Cabinet Secretary is satisfied that the proposal supports the post-16 offer and promotes parity of esteem between vocational and general post-16 education.
31. The Cabinet Secretary notes that in Estyn's response the local authority had not properly considered the impact of the proposal on compulsory school-aged learners. However, she is satisfied that the proposal will have a positive effect on 11-16 provision at Mountain Ash Comprehensive School and a neutral effect on 11-16 provision in Aberdare Community School, given that the closure of the school's sixth form will allow Mountain Ash Comprehensive School to focus all its available resources on raising outcomes for learners of statutory school age.
32. The Cabinet Secretary is satisfied that the proposal will not affect the viability of other institutions already providing good quality post-16 provision. She notes that Engineering is a subject that is provided at Mountain Ash Comprehensive School only, and should learners want to pursue that, there is also an option to consider Ysgol Coleg Cymoedd and they would also be able to apply for free transport in accordance with the local authority's transport policy.
33. The Cabinet Secretary is satisfied that the proposal will provide additional learner benefits compared to the status quo. Learners will be able to access a far greater A-level and vocational choice at Aberdare Community School. She notes that the local authority's other considered options would not be sustainable to address the appropriate use of funding at Mountain Ash Comprehensive School.
34. The Cabinet Secretary notes that the proposal will not affect the discretionary transport provision the local authority already provides to learners above compulsory school age. She is aware that the authority provides free transport to learners who reside over three miles from the nearest school or college in which a suitable programme of study is available and that this will not change under the proposal.

FACTORS TO BE TAKEN INTO ACCOUNT IN APPROVING/DETERMINING SCHOOL ORGANISATION PROPOSALS

35. The Cabinet Secretary is satisfied that there are no related proposals.

Must ensure that the statutory consultation has been conducted in accordance with this Code

36. The Cabinet Secretary is satisfied that the statutory consultation was conducted in accordance with the Code in most parts. In terms of the quality of the consultation undertaken by the local authority, she notes that Estyn stated that the local authority had not sufficiently considered the impact of the proposal on compulsory school aged learners. An example being that siblings may decide to go to Aberdare Community School, even though they live in the Mountain Ash area. The Cabinet Secretary notes that there are already learners from the Mountain Ash area attending Aberdare Community School and is an option already available to them, where capacity allows.

37. The Cabinet Secretary notes that the local authority provided additional information in its consultation report to address this issue, and that the local authority appears to have considered these additional matters before coming to a final decision.

Must ensure that the proposal has been published in accordance with the Code and that the notice contains all the required information

38. The Cabinet Secretary notes that the statutory notice was published on 4 March 2025 and ran to 3 April 2025 for 31 days. In accordance with the Code and the 2013 Act, the statutory notice must be published on a school day and must include 15 school days, in addition to the day on which it is published. The length of the objection period is for 28 days. To be considered as statutory objections, objections must be made in writing or by email and sent to the local authority before the end of 28 days beginning with the day on which the notice was published. She notes that the two objections were received within the statutory 28-day period.

39. The Cabinet Secretary notes that dates set out in the 2013 Act and the Code should be adhered to in order to ensure that the timescale is clear, that objections are received within that timescale and are considered as statutory objections. Please bear this in mind for future proposals.

40. Other than the objection period being too long, the Cabinet Secretary is satisfied that the notice contained all the required information, for this type of proposal and that objections received were taken into account.

Must consider the consultation document and consultation report

41. The consultation process should include sufficient reasons and information for the proposal to enable intelligent consideration and a reasoned response. Proposals involving the transfer of learners to alternative provision should demonstrate that the alternative would deliver outcomes and offer provision at least equivalent to that which is currently available to those learners (including learners with ALN).

42. The Cabinet Secretary notes that responses from the consultation raised several concerns, including the potential negative impact on pupil achievement, staffing levels, future intakes, and the well-being of learners, particularly those with ALN. Respondents expressed concerns about increased travel costs, uniform expenses and the loss of established relationships with staff. Some feared the proposal could discourage learners

from post-16 education, especially for learners from deprived areas. However, benefits such as broader subject choices, reduced travel between sites and improved financial viability for both schools were also noted. Estyn supported the proposal, citing potential improvements in post-16 provision.

43. The Cabinet Secretary is satisfied that the consultation document contained the relevant information for consultees to make an informed view. Though 87% of consultees were not supportive of the proposal during the consultation stage, two statutory objections were received. The Cabinet Secretary is satisfied with the comments raised in the consultation report and the local authority's responses. She notes the support that will be available to learners during the transition to new sixth form provision and financial support available.
44. The Cabinet Secretary notes that both school's councils were consulted on the proposals and had the local authority had meetings with each school council. They shared similar concerns as described throughout this letter. She notes that the school council at Aberdare Community School, shared their concerns for learners at Mountain Ash Comprehensive School and were discussing ways in how they can offer their support to help them settle into a new learning environment.
45. The Cabinet Secretary is satisfied that the local authority in its consultation and consultation report has demonstrated that Aberdare Community School would deliver outcomes and offer provision at least equivalent to that which is currently available to those learners who attend Mountain Ash Comprehensive School.

Consider the objections and the objection report and any responses to the notice supporting the proposals

46. The Cabinet Secretary notes that there were only two objections made during the statutory objection period. She notes that the objections were similar to those within the consultation report.
47. The Cabinet Secretary notes that there were concerns for impact on students of moving from a familiar, supported school to a new setting and that students may feel less motivated to move to post-16 provision. She notes concerns regarding the travel and accessibility arrangements and that could also be a barrier to post-16 provision with the loss of sixth form in their area. There were also concerns regarding the capacity at Aberdare Community School and whether they could manage a larger sixth form and larger sixth form classes. She notes concerns that the proposal might limit subject choice or reduce flexibility in choice.
48. The Cabinet Secretary is satisfied that the local authority has addressed the concerns raised in the statutory objections. She is satisfied that the local authority has demonstrated that the proposal aims to provide a robust post-16 education in Aberdare Community School, that is more financially viable, with enhanced support for transitioning learners and a broader curriculum offer. She is satisfied that there is suitable capacity for additional sixth form learners at Aberdare Community School.

Determination

49. The Cabinet Secretary has determined to approve the proposal without modification on the basis that it is likely to at least maintain the current standards of educational provision in the area and is likely to have a positive impact on learners. The proposal will also contribute to the effective funding of education and ensure that learners have access to an appropriate range of relevant courses and qualifications and high-quality

employer informed vocational learning routes targeted at pupils of all abilities.

50. The Cabinet Secretary is satisfied that the proposal will contribute to an appropriate use of funding and resources.

51. The local authority should notify the Welsh Ministers by e-mail when the proposal is implemented. E-mails should be sent to SGOA@gov.wales.

I am sending a copy of this letter to the Chief Executive of Rhondda Cynon Taf County Borough Council.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Emyr Harries', with a stylized flourish at the end.

Emyr Harries
Deputy Director Education Infrastructure, Finance & Governance

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