



Education

REGULATED ALTERATION TO MILFORD HAVEN COMMUNITY PRIMARY SCHOOL

Introduction of Learning Resource Centre (LRC) for pupils with Complex Learning Needs and Autistic Spectrum Condition (ASC) within Milford Haven Community Primary School

CONSULTATION DOCUMENT

2026

Mae'r ddogfen hon hefyd ar gael yn Gymraeg / This document is also available in Welsh.

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Foreword

Pembrokeshire County Council is responsible for promoting high educational standards and for delivering efficient primary and secondary education. Having the right schools of the right type in the right places and ensuring that they are fit for our 21st century learners is a challenge facing us, and all councils across Wales.

Meeting this challenge involves reviewing the number and types of school the Council has in its area and assessing whether or not best use is being made of its resources and facilities.

The Council reviews its provision on the basis of:

- Quality and future sustainability of educational provision
- Sufficiency and accessibility of school places
- The condition, suitability and standard of school buildings
- Value for money

This consultation document sets out the proposal to establish a 24-place primary phase Learning Resource Centre (LRC) at Milford Haven Community Primary School. This proposal forms part of the Sustainable Communities for Learning development programme in Milford Haven and seeks to provide specialist provision for pupils with complex additional learning needs, including Autistic Spectrum Condition (ASC).

I look forward to receiving your views.

Steven Richards-Downes
Director of Education

1. Introduction

Pembrokeshire County Council has a statutory duty to secure sufficient and suitable school places in its area and to determine whether it is making the best use of the resources and facilities to deliver the opportunities that children deserve.

At its meeting on 14 May 2026, Pembrokeshire County Council considered evidence which outlined the need to expand our provision for learners with complex needs. The decision of Council was as follows:

That the Director of Education be authorised to commence the school organisation process to establish a 24-place Learning Resource Centre at Milford Haven Community Primary School as part of the Sustainable Communities for Learning development programme in Milford Haven.

Such a proposal constitutes a regulated alteration within the context of the School Standards and Organisation (Wales) Act 2013. Consequently, this document fulfils part of the County Council's responsibility under the Act to consult with appropriate stakeholders and to explain the Council's proposal to introduce a Learning Resource Centre to Milford Haven Community Primary School in order to accommodate learners with complex additional learning needs and ASC. This document offers an opportunity for consultees to put forward any comments, observations or alternative proposals they wish to be considered, as well as explaining why other options considered are not the preferred option.

Consultation on this proposal will comply with the requirements of the School Organisation Code. Consequently, the main purpose of this document is to provide information and to gather the views of identified stakeholders. For further information on the statutory process, see section 7 of this report.

2. Consultation

2.1 Who will we consult with?

The Governing Bodies, Parents/Carers/Guardians and Staff of:	
• Milford Haven School • Milford Haven CP School • St Francis Catholic Primary School • Gelliswick VC School • Coastlands CP School • Johnston CP School • Neyland CP School	• Fenton CP School • Waldo Williams CP School • Monkton CP School • Pembroke Dock CP School • Tenby VC School • Ysgol Penrhyn Dewi • Ysgol Glannau Gwaun • Portfield School
• Paul Davies MS – Ceredigion/Penfro • Claire Archibald MS – Ceredigion/Penfro • Kerry Fergusson MS – Ceredigion/Penfro • Rt.Hon. Elin Jones MS – Ceredigion/Penfro • Paul Marr – MS - Ceredigion/Penfro • Anna Nicholl – MS - Ceredigion/Penfro • Henry Tufnell – MP – Mid & South Wales	• Cllr. Rhys Sinnett • Cllr. Terry Davies • Cllr. Vivien Stoddart • Cllr Scott Thorley • Cllr. Guy Woodham • Cllr. Paul Miller • Cllr. Aled Thomas • Cllr. Simon Hancock • Cllr. C George
• NEU • NASUWT • UCAC • UNITE • NAHT • ASCL • UNISON • GMB	The following Town or Community Councils: Milford Haven, Dale, Marloes & St Brides, St Ishmaels, Walwyns Castle, Herbrandston, Tiers Cross, Llanstadwell, Johnston, Neyland, Rosemarket, The Havens
Church in Wales and Roman Catholic Dioceses Authority: • St Davids • The United Archdiocese of Cardiff-Menevia	• Hywel Dda Health Board • Hywel Dda DECLO (Designated Education Clinical Lead Officer) • SNAP Cymru • National Autistic Society • Mencap
The Welsh Ministers	Estyn
Partneriaeth – Regional Education Consortium	Welsh Language Commissioner Mentrau Iaith
Dyfed Powys Police and Crime Commissioner	

• Carmarthenshire County Council • Ceredigion County Council	Pembrokeshire People First
Playgroups: • Happy Days • Little Acorns • Rainbow Reef • Coastlands CP School Club • The Meads Flying Start Centre	Childminders: • SC – Milford Haven • GM – Hubberston

2.2 Consultation with children and young people

The children and young people attending all the schools identified above will be able to participate in the consultation process through their School Councils. The information provided to children and young people will be presented in a way that is relevant to their age and level of likely understanding and be in accordance with the National Standards for Children and Young People's Participation. The information gathered from the consultation with pupils will form part of the Consultation Report which will subsequently be considered by Council.

2.3 When does the consultation period start and end?

THE CONSULTATION PERIOD FOR THIS PROPOSAL WILL COMMENCE ON 22nd SEPTEMBER 2026 AND ENDS ON NOVEMBER 3rd 2026

During this period, you can express your views by writing to the Director of Education by using any of the following methods:

Letter to:	Mr Steven Richards-Downes Director of Education County Hall Haverfordwest SA61 1TP
Response Form:	See the form at the back of this document
Online:	www.pembrokeshire.gov.uk/haveyoursay

You can submit your views in favour of, or against the proposal. Responses received during the consultation period will not be treated as statutory objections. If you wish to object, you will need to do so in writing during the statutory objection period outlined in Section 7.

PLEASE NOTE THAT ALL CORRESPONDENCE SHOULD BE RECEIVED BY NO LATER THAN 5PM ON NOVEMBER 3rd 2026

2.4 What will happen after the consultation process?

At the end of the consultation period the feedback will be collated and summarised in a Consultation Report and subsequently presented to the County Council. This report will be

available to be viewed on the Council website and hard copies obtainable on request from the address detailed below. Council will consider the report and decide whether it wishes to proceed with the proposal or not.

If Council decides not to proceed, that will be the end of this proposal. However, if Council decides to proceed, a Statutory Notice will be published. The Statutory Notice will be published on the Council's website and posted in the named school/s to which this consultation relates, and other conspicuous places within the community. Copies of the notice will be made available to the relevant school/s to distribute to pupils, parents/carers and members of staff.

In accordance with The School Standards and Organisation (Wales) Act 2013, anyone wishing to make objections to the proposal will have the opportunity to do so. To be considered as statutory objections, objections will need to be made in writing or by email and sent to the Council within 28 days of the date on which the statutory notice was published.

If objections are received, these will be summarised into an Objection Report, which will be published on the Council's website with parents/carers/guardians and staff members of the relevant schools advised of its availability. All consultees listed earlier in this section will receive hard copies of the report or be emailed a link to the relevant location on the website.

The Objection Report will subsequently be considered by Council before determining whether the proposal should proceed or not. When a decision is made, it will be published on the Council's website and all consultees informed.

2.5 Your questions

The content of this Consultation Document is likely to provide answers to the most common questions that will arise regarding the proposal. However, should you have any further questions, please contact Mike Cavanagh on the following email address:

EducationConsultations@pembrokeshire.gov.uk

3. The Status Quo – Background

3.1 Milford Haven Community Primary School

Milford Haven Community Primary School is an English medium 3-11 mixed primary school maintained by Pembrokeshire County Council. The school serves the town of Milford Haven and the predominantly rural and coastal area to the east of Milford Haven. It is located in the Milford Haven Central ward. See map below.

The three-year average indicates that 31.2% of pupils are eligible for free school meals and most come from a White, British background. Around 2.8% of pupils speak English as an additional language. 5.92% of pupils are recorded as having some form of Additional Learning Need as per data taken from PLASC 2026.

Milford Haven Community primary receives its pupils predominantly from its catchment area; in 2026 this amounted to 88%, with the remaining pupils coming from neighbouring areas, i.e. in accordance with parental preference.

3.2 Details of the school which is the subject of the proposal

As part of the Sustainable Communities for Learning development programme in Milford Haven, the proposal includes the provision of a Learning Resource Centre within the new primary school development, proposed for 2030. The capacity figures outlined below are therefore based on the primary provision at the new site. Due to projected pupil forecasts, the proposed capacity is lower than the school's current capacity of 643 pupils.

School	Category	Language Category	Age Range	Anticipated School Capacity	Nursery Capacity	Flying Start Capacity
Milford Haven Community Primary School Steynton Road SA73 1AE	Community	English Medium	3-11	525	75	40

The age profile of pupils currently on roll and the figures recorded for the previous four annual school censuses are as follows:

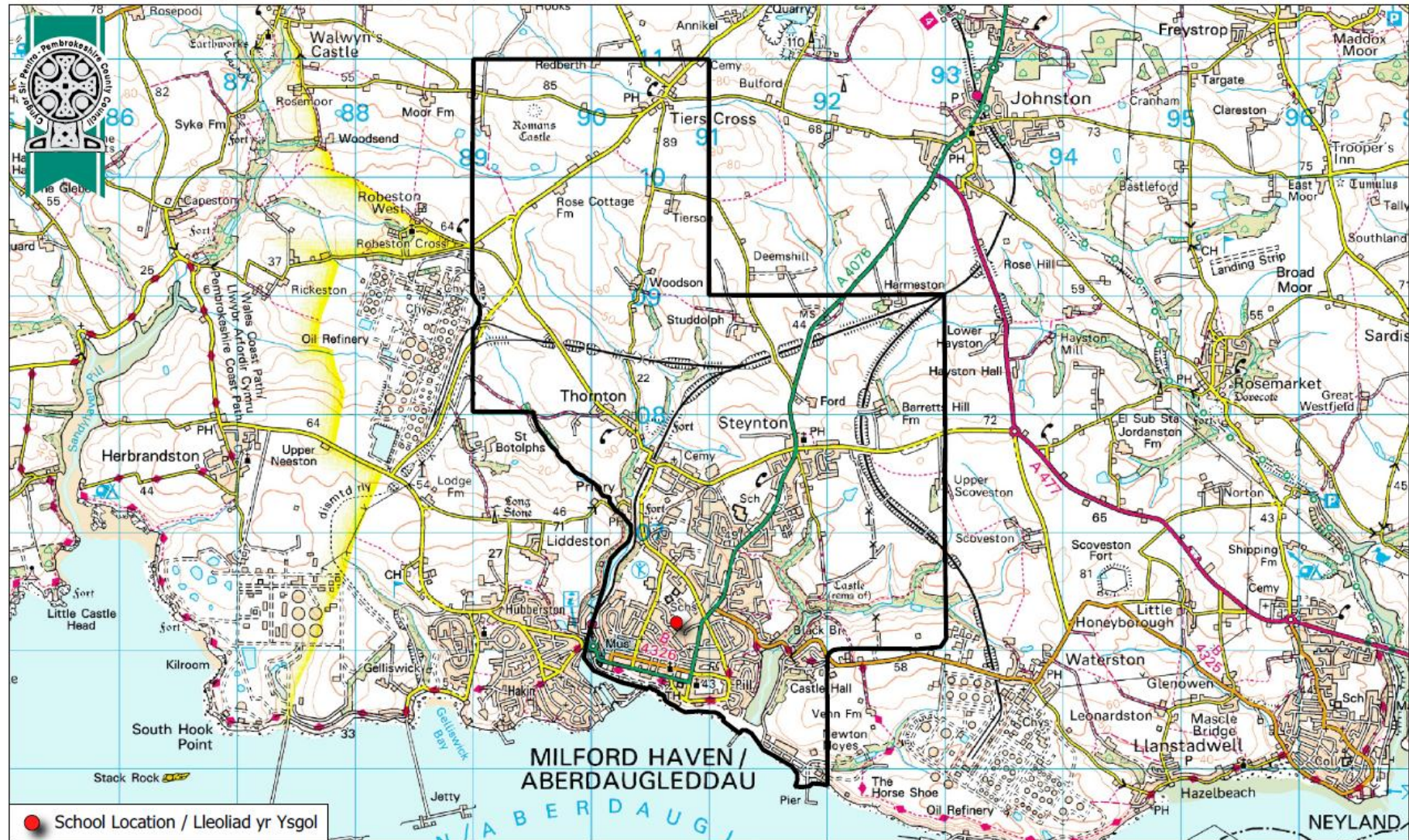
	Year Groups								Total On Roll
	Nurs.	R	1	2	3	4	5	6	
Jan 2026	70	44	55	65	49	60	70	74	487
Jan 2025	73	61	65	52	62	73	73	65	524
Jan 2024	75	67	54	68	75	78	66	75	558
Jan 2023	86	58	70	74	79	68	74	110	619
Jan 2022	80	70	75	83	66	76	110	93	653

SCHOOL CATCHMENT AREA PLAN / CYNLLUN TALGYLCH YSGOL

(Reviewed May 2021 / Adolygwyd Mai 2021)

School Name / Enw'r Ysgol: Milford Haven Community Primary School

School Number / Rhyf yr Ysgol: 2396



3.3 School Capacity

Capacity is measured using the “Measuring the Capacity of Schools in Wales” formula; this excludes nursery accommodation and part time pupils. School capacities are reviewed annually and may change when a school changes the way it uses its accommodation and when building alterations take place. The current forecast in relation to pupil population compared to school capacity is shown below.

3.4 Pupil Forecasts

An exercise to forecast future pupil numbers is undertaken annually. In the case of primary schools, forecasts are constructed as follows:

- i. New Reception Year is based on an officer assessment of the following:
 - The school’s Admission number; or
 - Data held by the Admissions Officer in relation to applications received; or
 - The school’s own assessment of pupils due to commence in Reception, i.e. based on local intelligence; or
 - The average number of pupils in the Reception year group over the previous five years.
- ii. All older year groups rolled forward, including the removal of the previous year’s Year 6 cohort.

Pupil Forecasts 2026 - 2033

	Actual	Forecast					Capacity
	2026	2027	2028	2029	2030	2031	2025/26
Milford Haven CP School	417	401	387	382	388	377	643*

Occupancy 2026 - 2033

	Actual	Forecast				
	2026	2027	2028	2029	2030	2031
Milford Haven CP School	64.9%	62%	60%	59%	73%**	71%**

*2025/26 capacity is based on the current capacity of Milford Haven CP School

** 2030 occupancy figures are based on Milford Haven Community Primary School operating from the new site, with a capacity of 525 places.

3.5 Buildings / Accommodation

Milford Haven Community Primary School is currently accommodated across two sites. The infant provision is located in a building constructed in 1952, while the junior provision occupies a building dating from 1935. Although both sites have undergone some refurbishment, the infant building is currently assessed as Condition B and the junior building as Condition C.

The school forms part of the wider Sustainable Communities for Learning (SCfL) development programme in Milford Haven. As part of this programme, it is proposed that the Learning Resource Centre (LRC) will be located within the new Milford Haven Community Primary School, comprising a purpose-built facility designed to meet current building standards and regulations.

3.6 Schools which may be affected by this proposal

It is considered that a number of schools in the area may be affected by this proposal.

More information on these schools is at **Appendix 1**.

School	Address
Milford Haven CP School	Priory Road, Milford Haven, SA73 2EE (Infant site) Prioryville, Milford Haven, SA73 2LQ (Junior site)
St Francis Catholic Primary School	Priory Road, Milford Haven, SA73 2EE
Gelliswick VC School	Gelliswick Road, Hakin, Milford Haven, SA73 3RS
Coastlands CP School	St Ishmael's, Haverfordwest, SA62 3SZ
Johnston CP School	Langford Road, Johnston, SA62 3PY
Neyland CP School	John Street, Neyland, SA73 1TH
Portfield School	Portfield, Haverfordwest, SA61 1BS
Milford Haven School	Steynton Road, Milford Haven, SA73 1AE

We have also considered the other primary school LRC's within the area, which may be affected by this proposal.

LRC	Address
Fenton CP School	Portfield Road, Haverfordwest, SA61 1BZ
Waldo Williams CP School	Scarrowscant Lane, Haverfordwest, SA61 1BS
Monkton CP School	65 Monkton, Pembroke, SA71 4LS
Pembroke Dock CP School	Bush Street, Pembroke Dock, SA72 6LQ
Tenby VC School	Heywood Lane, Tenby, SA70 8DD
Ysgol Penrhyn Dewi	St Davids, SA62 6QH
Ysgol Gynradd Glannau Gwaun	Clive Road, Fishguard, SA65 9DB

3.7 Strengths and Weaknesses of the proposed situation

School	Strengths	Weaknesses
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Milford Haven Community School	• The view of the Local Authority is that the school has developed good practice in meeting the needs of Learners with Additional Learning Needs (ALN), with strong pastoral support structures. The school has the appropriate leadership capacity to maintain an effective LRC. • Milford Haven Community Primary School are working towards achieving a TIS (Trauma Informed School) Diploma, whereby all staff have either completed or are working towards completion of specialist training to support learners who have experiences ACEs (Adverse Childhood Experiences). This is testament to the proactive approach taken by the school to be inclusive of all young people regardless of the barriers to learning that they may experience. • Taken from ESTYN inspection report 2022; <i>Staff at the school have created an inclusive, nurturing environment where pupils feel safe and cared for. They support the well-being of pupils well and engage effectively with their families. Teachers and teaching assistants deliver a good range of interventions to support pupils' emotional health and this is having a positive impact on pupils' well-being.</i>	• The school's last full inspection was in November 2022. While there were positive aspects in the report, the overall judgement was that the school required statutory follow-up and was therefore placed in the special measures category. However, in 2024 Estyn carried out a follow-up inspection, which found that the school had made sufficient progress against the recommendations. As a result, the school was removed from the list of those requiring special measures.
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	• The new school is being designed to meet both current and projected community needs. As part of this, the LRC will be delivered as a purpose-built facility, providing accommodation that meets modern educational and accessibility standards. • The wider Milford Haven redevelopment also includes a secondary school LRC on the same site. This co-location will support smoother transition for pupils who continue to require specialist provision, particularly those who benefit from consistent environments and reduced change.	
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4. Current School Standards

In relation to the school which is the subject of this proposal, Estyn judgements and the standards being achieved are as follows:

Milford Haven Community Primary School is judged to have made sufficient progress in relation to the recommendations following the most recent core inspection. As a result, His Majesty's Chief Inspector of Education and Training in Wales has removed the school from the list of schools requiring special measures. (May 2024)

4.1 Estyn Inspection

The school's last full inspection took place in November 2022, at which time it was judged to require the most intensive level of statutory follow-up and was consequently placed in special measures. A follow-up inspection by Estyn in 2024 found that the school had made sufficient progress against the recommendations. As a result, it was removed from the list of schools requiring special measures.

A summary of the follow-up inspection report is provided below. Full copies of both inspection reports are linked in the appendices. Consultees may also access the reports via the Estyn website at <https://estyn.gov.wales/education-providers/milford-haven-community-primary/>

Summary

During the inspection in 2022, Milford Haven Community Primary School, were given the following recommendations:

R1 Establish an effective leadership and governance structure

R2 Improve the quality of teaching and assessment to challenge all pupils consistently

R3 Improve pupils' reading and writing skills

R4 Improve pupils' numeracy and ICT skills

R5 Establish effective self-evaluation, school improvement and professional learning processes

R6 Develop a curriculum that engages pupils and develops their knowledge, skills and understanding systematically and progressively

Following the 2024 Estyn monitoring visit, it identified that the school had made sufficient progress against all recommendations. Overall, the report evidenced clear improvements in leadership, teaching, curriculum development and pupil outcomes, although some areas still require further embedding to secure sustained progress.

Significant progress has been made in strengthening leadership and governance. The headteacher provides effective and thoughtful leadership and has a clear vision for the school's future. Leadership responsibilities are now more effectively distributed, with senior leaders and governors demonstrating an improved understanding of their roles and contributing more effectively to school improvement. Governance is now stronger and

provides more strategic support to the school, although the school continues to face ongoing financial challenges, including a budget deficit.

Many teachers have made strong progress in developing their teaching skills. Staff benefit from a comprehensive programme of professional learning and regular feedback from leaders. This has enabled staff to address areas for improvement in their teaching and helped to improve the consistency of teaching across the school. The school's approach to assessment is now more consistent and purposeful. Many teachers use feedback within lessons to support pupils to understand their misconceptions and to move their learning forward. However, currently there is too much emphasis on standardised assessment data.

The school has implemented effective improvements to the provision for the teaching of reading. Overall, many pupils are making good progress in developing their reading skills. The school has developed a comprehensive plan for the teaching of writing also, with all teachers planning for the development of pupils' writing skills progressively and understanding which elements of writing to introduce, and when. There is a consistent approach to the teaching of writing, with teachers working closely together to plan discrete skills-based lessons and opportunities to consolidate those skills in wider, cross curricular activities.

The school has developed a well-structured plan for the teaching of mathematical skills. Across the school, teachers and support staff engage enthusiastically with pupils. They monitor progress effectively and are responsive to the needs of individuals, for example by providing additional feedback and guidance when necessary. Most staff model mathematical language well. They set clear objectives for learning and provide relevant success criteria for pupils to assess their own progress. However, there are a few cases, where provision in mathematics is less effective.

The school has ensured that the planning for developing pupils' information and communication technology (ICT) skills is clear and builds progressively on pupils' prior knowledge and understanding. This means that all teachers know the expectations for pupils in their year groups and understand how to introduce the skills in discrete sessions. However, there is still not a consistent approach to the teaching of ICT skills across the whole school.

Leaders have set in place a broad and detailed timetable of monitoring to help them evaluate the school's strengths and areas for improvement. This includes regular and purposeful activities, such as evaluating the quality of teaching and talking to pupils about their learning and progress. Leaders use the outcomes of self-evaluation thoughtfully to plan for the future, and leaders link professional learning with the school's improvement priorities carefully. Overall, professional learning has a beneficial impact on improving teaching and learning. However, leaders have yet to ensure that all teachers, such as those who do not work full-time, benefit equally well from the professional learning that takes place on a Friday afternoon.

Since the core inspection, leaders have developed a clear vision for the school's curriculum. This is understood and shared by nearly all staff who are committed to delivering the vision in practice. The curriculum is structured around overarching topics that provide consistency in pupils' experiences. Leaders have provided useful and comprehensive direction to support teachers' planning for the development of pupils' skills, staff have benefited from appropriate professional learning opportunities to strengthen their understanding of effective teaching methods and strategies to develop pupils' skills. Teachers plan suitable opportunities for pupils to revisit and apply their learning through their topic work and in focused activities as

part of the regular ‘amser sgiliau’. Leaders have introduced more systematic arrangements to plan and monitor provision across the full range of areas of learning and experience. The school’s curriculum gives a clear and consistent focus to developing pupils’ emotional, mental and physical well-being. This impacts positively on most pupils’ engagement, behaviour and readiness to learn.

Overall, the structure and guidance provided by leaders and the professional learning undertaken by staff have developed a curriculum that is starting to deliver stronger outcomes for pupils. This is most notable in the development of pupils’ literacy skills. The quality of provision for the development of pupils’ digital skills is improving more gradually.

4.2 School Improvement Advisors Report

Teaching and learning
The establishment of a LRC within the school is not expected to have a detrimental impact on the quality of teaching and learning within the existing provision. In recent years, the school has successfully focused on improving the quality, consistency and progression of learning across and between year groups. These developments have been informed by evidence-based practice and are underpinned by inclusive and responsive approaches to meeting learners' needs. As a result, the school's culture of learning and established teaching practices provide a strong foundation for the successful implementation of an LRC. The core principles that currently underpin effective teaching and learning across the school can be adapted appropriately to meet the needs of pupils accessing specialist provision. The introduction of an LRC is likely to create greater continuity in learning experiences for younger pupils who attend mainstream classes before becoming eligible for specialist provision. It also has the potential to increase opportunities for meaningful interaction and collaboration between pupils in the LRC and those in mainstream classes, where appropriate. Such opportunities could enrich learning experiences for all pupils and further strengthen the development of the four purposes through carefully planned inclusive practice and shared learning experiences.
Well-being, care, support and guidance

The proposal is likely to have a positive impact on the well-being of pupils who are eligible for an LRC place by enabling them to access specialist provision within their local community rather than travelling to schools outside the area. Attending a local school can help strengthen pupils' sense of belonging, identity and connection with their community, while reducing the disruption associated with travelling longer distances.

The proposal may also have a positive impact on families. In some cases, siblings currently attend schools outside their local community to support family arrangements linked to the placement of a child with additional learning needs. Providing specialist provision locally could enable more families to access education within their community, strengthening family engagement with the school and local support networks.

The school already works effectively with a range of external agencies and services to support children and families facing a variety of challenges. Locating specialist provision within the community is likely to improve access to coordinated support and may strengthen engagement between families, the school and partner agencies.

Leading and improving

School leaders have extensive experience in identifying and responding to a wide range of learners' needs. Over recent years, they have developed increasingly inclusive approaches to provision, including adapting classroom practice, establishing additional nurture support and working collaboratively with a broad network of services to support children and families.

These approaches have enabled a large number of pupils with diverse needs to remain successfully included within their local mainstream school while accessing learning experiences that support their progress and well-being. The addition of an LRC would build on this established practice and enhance the school's capacity to provide a more comprehensive continuum of support for learners within its community.

Overall, the proposal has the potential to build on the school's strengths and inclusive ethos, and further support its commitment that "every child matters and every moment counts" by expanding opportunities for pupils with even greater needs to access specialist provision within their local community.

4.3 Performance (Source: My Local School)

Summary of information & Attainment	School (2025)	Local Authority (LA) (2025)	Wales (2025)
Free School Meals	31.2%	17.9%	21.7%
Attendance (Primary)	87.7%	92.4%	92.7%
% Pupils where English is an Additional Language (EAL)	2.8%	2.8%	7.4%
% Pupils in the school recorded as having an ethnic background as anything other than “White-British”	4.9%	9.2%	16%
% Pupils at School Action When a teacher identifies that a pupil has ALN they provide interventions that are additional to or different from those provided as part of the school's usual curriculum.	*	4.6%	1.3%
% Pupils at School Action + When a teacher is provided with advice or support from outside specialists, so that alternative interventions additional or different to those provided for the pupil through School Action can be put in place.	1.8%	3.1%	1%
% Statemented pupils A child has ALN if s/he has learning difficulties which requires special educational provision to be made for him or her. A learning difficulty means that the child has significantly greater difficulty in learning than most children of the same age or that the child has a disability that needs different facilities from those that the school generally provides for children.	*	0.1%	0.4%
School IDP	1.3%	2.3%	7.4%
Local Authority IDP	2.3%	3.4%	1.4%

* The data is unavailable via My Local Schools.

5. The Proposal

5.1 The Proposal and its impact

The Council's proposal is as follows:

That the Director of Education be authorised to commence the school organisation process to establish a 24-place Learning Resource Centre at Milford Haven Community Primary School as part of the Sustainable Communities for Learning development programme in Milford Haven.

5.1.1 The Case for Change – why is this change being proposed?

A Learning Resource Centre (LRC) is a classroom-based provision within a mainstream school for pupils with complex needs. A LRC provides pupils with a broad and balanced curriculum that is highly differentiated, to support them in achieving their full potential and at the same time offering pupils the opportunity to be part of mainstream activities and lessons to socialise with their peers whilst their individual needs are supported and met. Generally, LRCs are strategically located to minimise travelling time for pupils.

There are currently 10 primary and 5 Secondary LRCs across Pembrokeshire.

Primary LRCs in Pembrokeshire are already located at the following schools:

1. Ysgol Glannau Gwaun
2. Waldo Williams
3. Fenton
4. Gelliswick
5. Monkton
6. Tenby
7. Johnston
8. Pembroke Dock
9. Neyland
10. Ysgol Penrhyn Dewi

There are 208 places available across the county in the primary phase, with 198 currently occupied (as of 14/04/2026). 2 primary phase LRCs are at full capacity, with 3 settings being oversubscribed.

During a review of the provision for ALN in the primary sector for the Milford Haven catchment area, it identified clear evidence of significant and increasing ALN demand within the catchment, supporting the case for incorporating a primary LRC within the new English-medium school. Milford Haven Community Primary School is already delivering three Nurture Groups, two in the Foundation Phase and one in Key Stage 2. These operate as small, highly staffed classes with individualised curriculums comparable to an LRC provision.

Within the wider Milford Haven catchment area, primary LRC provision at Johnston and Gelliswick are operating at capacity. While Neyland Primary LRC currently has available capacity (approximately 25%), pupils from Milford Haven Community Primary School accessing these spaces would require transport. Consideration has been given to the associated financial and wellbeing impacts of these arrangements, which increase journey times and create additional transition challenges for ALN learners, who often experience heightened difficulty with change. Establishing dedicated ALN provision within the proposed new English-medium primary school will mitigate these issues by reducing reliance on out of catchment placements, minimising unnecessary pupil movement and ensuring sufficient local capacity to meet both current and future need.

The School Organisation Code (2026) also requires consideration to be given to whether proposals will improve the standard of accommodation for pupils with additional learning needs, including accessibility. Within the Strategic Outline Case for the redevelopment of the Milford Haven schools, provision has already been made for a purpose built 36-place LRC within the new secondary school, replacing the existing provision at the Pembrokeshire Learning Centre (PLC) as part of the rolling programme. Establishing a 24-place LRC within the proposed primary school on the same site would further enhance local specialist provision and would deliver improved standards of accommodation for pupils with ALN through dedicated, purpose-built facilities designed in accordance with the Welsh Government's latest area guidelines.

Milford Haven Community Primary School represents an optimal location for the establishment of a new LRC. The school is the largest feeder to Milford Haven Secondary School and the co-location of primary and secondary provision on a single site creates a clear and coherent pathway for learners with additional learning needs. Existing LRC provision within the Milford Haven cluster is under significant pressure, with secondary provision at the Pembrokeshire Learning Centre (PLC) oversubscribed and primary LRCs operating at or near capacity. In addition, the LRC at Neyland Community Primary School has been fully open and operational since January 2025. With occupancy already at 75%, this demonstrates clear demand for LRC places within the local area.

Establishing a primary LRC at Milford Haven Community Primary School would address this pressure by providing local capacity and enabling a more natural and supported transition from primary to secondary specialist provision. The alignment of LRC provision across both

phases on the same site would create operational synergies, continuity of support, and improved outcomes for pupils, reinforcing the case for Milford Haven as a strategically appropriate location.

5.1.2 Advantages and Disadvantages of the Proposal

Introduction of Learning Resource Centre	
Advantages	Disadvantages
The proposal would address the identified need to expand provision for learners with complex ALN, with the school's location being well placed within the county to meet this demand.	The introduction of this provision requires compliance with the statutory school organisation process; this can be lengthy and requires full Council approval before it can be implemented.
The specialist provision within an LRC, alongside the skills and expertise of staff, is likely to have a positive impact on the wider school, supporting inclusive practice and improving outcomes for learners.	Places additional demands on the school's financial resources and leadership capacity to oversee and sustain the provision.
The co-location of a secondary LRC on the same site would support effective transition pathways, whether back into mainstream provision or into a secondary LRC setting.	
Reduces pressure on existing LRCs, enabling provision to remain close to optimum capacity levels and maintain smaller, more supportive learning environments, thereby maximising their effectiveness in meeting pupils' needs.	
Improves pupil wellbeing and engagement, particularly for those who may struggle in larger class environments.	

5.1.3 What are "Additional Learning Needs"?

The proposal will make provision for learners with additional learning needs as defined by The Additional Learning Needs Code for Wales 2021 Chapter 2 of the Code defines ALN as follows:

2 Additional learning needs

- (1) A person has additional learning needs if he or she has a learning difficulty or disability (whether the learning difficulty or disability arises from a medical condition or otherwise) which calls for additional learning provision.
- (2) A child of compulsory school age or person over that age has a learning difficulty or disability if he or she
- (a) has a significantly greater difficulty in learning than the majority of others of the same age, or
- (b) has a disability for the purposes of the Equality Act 2010 which prevents or hinders him or her from making use of facilities for education or training of a kind generally provided for others of the same age in mainstream maintained schools or mainstream institutions in the further education sector.

Section 3 of the Act defines the term 'additional learning provision' (ALP) as follows:

3 Additional learning provision

- (1) "Additional learning provision" for a person aged three or over means educational or training provision that is additional to, or different from, that made generally for others of the same age in
- (a) mainstream maintained schools in Wales,
- (b) mainstream institutions in the further education sector in Wales, or
- (c) places in Wales at which nursery education is provided.

A child is not to be taken as having a learning difficulty solely because the language (or form or the language) in which s/he is, or will be, taught is different from a language (or form of a language) which has at any time been spoken in his/her home.

This replaces the Special Educational Needs Code of Practice for Wales. A phased approach was taken to introducing the ALN system, which was implemented from September 2021. During the implementation period, the ALN system operated in parallel to the special educational needs system, which was gradually phased out. The implementation process was completed in August 2025, with the ALN system now fully established across Wales.

The provision supports the new ALN Code as it places a duty on Local authorities to support learners with additional learning needs (ALN) from 0 to 25, ensuring they can access suitable education and/or training, including compulsory education and specialist post-16 education or training where necessary.

The Learning Resource Class will provide Additional Learning Provision (ALP) supporting the characteristics of pupils who will have a range of Complex Learning Needs and/or Autistic Spectrum Condition.

5.1.4 The Impact on ALN provision

The Learning Resource Centre will have its bespoke unit within the school, but with the ability to be fully integrated with the mainstream provision at Milford Haven Community Primary School, providing an appropriate environment in which pupils can develop and thrive among their peers and have increased access to the mainstream curriculum, where appropriate. The overall aim of the LRC provision is to provide a continuum of provision and generate and maximise opportunities for inclusion within the mainstream environment; while meeting the individual learning, emotional and social needs of children and young people identified with particular complex needs. This will be achieved by:

- Individual and group support provided by specialist staff within the LRC;

- Supported opportunities to access the range of mainstream experiences;
- Opportunities to extend self-confidence and self-esteem;
- Opportunities to develop independence skills;
- Opportunities to improve social communication and social interaction skills and needs associated with an autistic spectrum condition;
- Access to appropriate specialist services from other agencies;
- Ensuring that all school staff have an understanding of, and skills relating to, the learning requirements of children with ALN, primarily through a programme of continuous professional development and, where appropriate, opportunities for accreditation with nationally recognised qualifications;
- Where possible, in conjunction with other specialist staff/teams, the LRC will provide consultancy, outreach support and a resource base for staff and parents.

The proposal will aim to provide learners with a broad, balanced and relevant curriculum, whilst also having their exceptional needs met in as inclusive a way as possible.

5.1.5 How the proposal will contribute more generally to enhancing the quality of education and support for children with Additional Learning Needs

The LRC will provide Learners with a small class environment with a high adult to pupil ratio that provides a more flexible and responsive provision to meet their needs. The LRC will provide learners with opportunities for integration into mainstream classes as and when possible. The quality of education in the LRC will be enhanced due to the expertise of the specialist staff working within the provision, which should improve outcomes for learners through differentiation / modification of the curriculum.

5.2 Key School Information

Location	Milford Haven Community Primary School, Priory Road, Milford Haven, SA73 2EE
Category	Community School
Admissions Arrangements	Pembrokeshire County Council will continue to be the admissions authority for the school and therefore its admissions policy and oversubscription criteria will apply. The school will continue to admit pupils of both sexes and there will be no provision for selection by either aptitude or ability. In relation to the LRC, clear admission criteria will be agreed with the school in order to determine the appropriateness of the provision.
Age Range	3-11
Capacity / Admission Number	The current capacity and Admission Number of the school are as follows: Capacity = 643 Admission Number = 91

	However, within the proposed redevelopment, they would be as follows – Capacity = 525 Admission Number = 75
Number of Nursery Places	Current: 75 Proposed: 75
Language Category	Category 1 - English Medium
Proposed accommodation	It is proposed that a designated area within the new school building will be purpose-designed and equipped to a standard comparable with other LRC provision in the county. The proposed accommodation will comprise a secure suite of rooms located in a quieter area of the school, with access to three classrooms, toilets, breakout spaces and an enclosed outdoor area. The LRC will be fully integrated within the main school building to enable appropriate access to mainstream inclusion opportunities as required. The accommodation will be located at ground level, allowing for ease of drop-off and pick-up by school transport and direct access to outdoor space. As the provision will be incorporated into the new build design, it will be delivered without disruption to the day-to-day running of the school and will fully meet the needs of the LRC from the outset.
ALN Provision	See Para. 5.1.4 and 5.1.5
School Transport	Transport arrangements will be in accordance with the law and Council's policy. In relation to pupils with Additional Learning Needs, the Council will provide transport in accordance with the following criteria: • The pupil, because of his or her disability, is incapable of using the usual school transport provided for pupils of compulsory school age receiving primary education living more than two miles from the catchment primary school and is unable to make use of any alternative means of transport such as a family car or Motability vehicle. • The pupil, because of his or her disability, is incapable of using the usual school transport provided for pupils of compulsory school age receiving secondary education living more than three miles from the catchment secondary school and is unable to make use of any alternative means of transport such as a family car or Motability vehicle.

	• The pupil lives within two miles of the catchment primary school, or within three miles of the catchment secondary school, but is incapable of walking to school, and is unable to make use of any alternative means of transport, such as a family car or Motability vehicle. • The Inclusion Panel recommends that a pupil should be placed in a school which is not the catchment school and the above criteria are met. • Medical advice from the pupil's Medical Consultant must confirm the requirement. No other medical professional's advice will be accepted. Transport is not provided for additional learning needs pupils in the following circumstances: • where parents choose a non-catchment school; • to attend examinations outside the normal transport arrangements; • to attend breakfast and after school clubs; • to attend swimming lessons except if the child is a wheelchair user and cannot access swimming lessons otherwise, in which case Education Services may pay the parent to transport the child. The Authority may provide an attendant for pupils with statements of Additional Learning Needs who qualify for transport under the defined criteria. Provision of attendants will take place after consideration by relevant officers of the individual needs of the pupil or group of pupils concerned and the nature of the transport available and is at the discretion of the Director of Education.
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5.3 Governance

The LRC will form part of Milford Haven Community Primary School, and its governance will rest with the governing body of the school.

5.4 Welsh Impact Assessment

A Welsh Impact Assessment is attached in Appendix 5.

5.5 Transport Impact

The Learner Travel (Wales) Measure 2008 places a duty on the Council to assess the travel needs of learners under the age of 19. In addition to those children who qualify for free transport provision due to meeting the eligibility for distance between home and school, the Council is under a legal obligation to assess the travel needs of learners who walk to school.

In relation to the proposal included within this document, walking routes to schools are assessed to ensure that learners can reach their destination in safety. There are no changes proposed to the Council's Home to School Transport policy; the relevant information in relation to transport to pupils with special educational needs is provided in Para. 5.2.

5.6 Staff Impact

The Learning Resource Centre will require specialist staffing to support the needs of pupils attending the provision. No adverse impact on existing staffing levels is anticipated and the staff employed in the LRC will be additional to the school's current staffing complement. Any staffing changes arising from the proposal will be managed in accordance with the Council's employment policies and procedures and in consultation with recognised trade unions.

5.7 Finance

All schools are funded according to a formula which is largely pupil based and this is the funding which is delegated to school governing bodies for schools' revenue expenditure.

In relation to the proposal to establish a Learning Resource Centre at Milford Haven Community Primary School, the current funding methodology is as follows:

Provision	Funding methodology
24 Place Learning Resource Centre	• x2 Teachers at U3 • x2 HLTA • x2 LSA (Level 1) • Capitation £13,893 per place.

For 2026/27, this attracts funding of £333,432

5.8 Pupil costs

The current costs per pupil for Milford Haven Community School are as follows:

	Pupils Sept 2026/27 – Milford Haven Community School	Funding per pupil - Milford Haven Community School	Average Funding per pupil – all primary schools
	FTE	£	£
Total formula funding	467.5	5,422	5,506
Excluding SEN		4,532	4,618

Note: Based on 2026/27 Education Budget Statement (Section 52 of the School Standards and Framework Act 1998)

5.9 Revenue Savings

It is not anticipated that revenue savings will arise as a result of this proposal. Funding will be re-allocated to Milford Haven Community Primary School, in accordance with the school funding formula methodology.

5.10 Capital Investment

Funding for the LRC will form part of the wider funding model for the Milford Haven school re-development and therefore 75% is anticipated to be funded through Welsh Government via the Sustainable Communities for Learning programme and 25% from PCC.

5.11 Title of land and buildings

Milford Haven Community Primary School will be sited on the current Milford Haven Secondary school site, along with the proposed LRC. The land is fully owned by Pembrokeshire County Council and will be purpose built through the Sustainable Communities for Learning rolling programme.

5.12 Risks and Counter measures

	Risk	Counter Measure
1	Failure to obtain relevant statutory notice approvals and Education Statutory obligations by due dates.	- Ensure that all options are considered in light of the School Organisation Code 2026. - Ensure sufficient time is allocated to undertake process. - Undertake consultation with appropriate statutory consultees.
2	Key partners or stakeholders are not involved in the early planning process of the project.	– Engage and consult with stakeholders. – Ensure all parties are aware and have agreed delivery timescales. – Ensure stakeholders are identified at an early stage and are fully involved.
3	The wider redevelopment project is delayed with insufficient funding available.	– Work with Construction services to ensure the project is delivered on time and in full – Continue to undertake the business case process to secure funding from the Welsh Government, ensuring vigorous scrutiny on the documents published.

6. Alternative Options Considered

Section 5 of this document outlines the Council's proposal, i.e. the preferred option. Alternative options considered as part of developing this proposal are outlined below, all of which have been discounted.

Option	Description	Comment
1	Maintain status quo	Does nothing to address the current lack of primary provision for pupils with complex needs and ASC and does not proactively position the Authority to respond to the forecasted growth of demand for LRC places at primary level. DISCOUNT
2	Establish an LRC at another school	There are currently 10 Learning Resource Centre (LRC) provisions across Pembrokeshire that cater for Key Stage 2 and Key Stage 3 learners. Following a review of schools that do not currently host an LRC, it is considered that demand for specialist provision is particularly acute within the Milford Haven area, and that additional capacity is required to meet this need locally. Additionally, an establishment of an LRC within the existing school estate would reduce mainstream capacity and require additional capital investment to adapt current facilities. This contrasts with Milford Haven Community Primary School, where the proposed provision would benefit from a purpose-built environment. DISCOUNT
3	Increase size of another LRC	In reviewing the current capacity and geographical distribution of Learning Resource Centres, careful consideration must be given to travel requirements for pupils. LRC provision is intended to operate as a small, nurturing environment in order to deliver high-quality support for learners with additional learning needs. As such, there is a clear rationale for maintaining smaller-scale provision rather than significantly increasing the size of existing centres. In addition, expanding LRC provision within existing mainstream schools often requires the reallocation of teaching space, such as the loss of a classroom, which in turn reduces overall mainstream capacity and admission numbers, potentially impacting the availability of school places.

		DISCOUNT
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7. The Statutory Process

The statutory process followed in respect of the proposal included as part of this document will comply with the School Standards and Organisation (Wales) Act 2013 and specifically, the School Organisation Code (001/2026). The process and indicative timetable will be as follows:

Date	Process	
22nd September 2026	Consultation Document Published	
3rd November 2026	Closing date for receipt of observations on the proposal	
At least 2 weeks prior to publishing a Statutory Notice	Publication of Consultation Report - Consultation Report presented to Council Council to decide whether to approve publishing a statutory notice If approved – proceed to Statutory Notice If not approved – proposal ends.	
Within 26 weeks of the above closing date	Publish Statutory Notice (SN) If approved, the SN will be published on the County Council and any other proposer’s websites and posted in the named schools and other conspicuous places within the community. Copies of the notice will be made available to the relevant schools to distribute to pupils, parents/carers and members of staff. The SN will be published on a school day and will allow a period of 28 days for objections. 15 of these days (excluding the day of publication) must be school days.	
28 days after date of SN	Closing date for receipt of objections to proposal	
Within 28 days of the end of the Objection Period	<u>Where objections received</u> - Objection Report presented to Council <i>Council to determine proposal in light of the objections received and the content of the Objection Report</i>	<u>Where no objections received</u> <u>Council to determine proposal</u>

Within 16 weeks of the end of the Objection period	Publication of Council Decision
April 2030	If approved, implementation of proposal

All reports listed above will be published on the County Council's website with parents/carers/guardians and staff members of the relevant schools advised of their availability. All consultees listed in Section 2 of this document will be emailed a link to the relevant page on the Council website; hard copies of all documents will be made available if requested by emailing EducationConsultations@pembrokeshire.gov.uk or by calling 01437 764551

APPENDIX 1

Details of affected schools

Name of School	Category	Lang. Category	Age Range	Nursery Pupils January 2026	Total NOR Jan 2026	Condition Grade	Suitability Grade
Portfield School	Community Special	Category 1	3-19	-		A / B	A / B
Milford Haven School	Community	Category 1	11-16	-	959	C	C
Coastlands School	Community	Category 1	3-11	20	106	B	B
Gelliswick Church in Wales School	Voluntary Controlled	Category 1	3-11	72	487	B	A
Milford Haven Community Primary School	Community	Category 1	3-11	70	487	Priory Rd site	
						B	C
						Prioryville site	
						C	B
St Francis Catholic Primary School	Voluntary Aided	Category 1	3-11	27	136	C	B
Johnston Community Primary School	Community	Category 1	3-11	30	250	B	A
Neyland Community School	Community	Category 1	3-11	41	302	B	A
Fenton Community Primary School	Community	Category 1	3-11	38	315	C	B

Pembroke Dock Community School	Community	Category 1	3-11	73	606	B	A
Monkton Priory Community Primary School	Community	Category 1	3-11	31	196	C	B
Tenby CiW VC Primary School	Voluntary Controlled	Category 1	3-11	26	225	C	A
Waldo Williams Primary School	Community	Category 1	3-11	29	208	A	B
Ysgol Glannau Gwaun	Community	Category 1 & 3	3-11	24	260	B	A
Ysgol Penrhyn Dewi	Voluntary Aided	Category 1	3-16	23	196	Aidan Campus	
						C	C
						Non Campus	
						B	B

Note:

- Pupil numbers are as at January PLASC 2026 and include LRC pupils
- In relation to Condition and Suitability grades. For Portfield School, A/B refers to Lower School / Upper School
 - A = Good
 - B = Satisfactory (condition) / Reasonable (suitability)
 - C = Poor

School	Capacity	LRC Capacity	Admission Number	Actual Number on roll (Net of Part Time and LRC Pupils)					Pupil Forecasts (Net of Part Time and LRC Pupils)				
	2026		2025/26	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031
Portfield School	-	-	-						*	*	*	*	*

Milford Haven School	1262	-	252	1060	1075	1098	1045	959	943	904	843	811	820
Coastlands School	107	-	15	85	86	88	88	86	90	88	85	92	89
Gelliswick Church in Wales School	480	24	68	436	406	379	387	395	394	380	374	383	391
Milford Haven Community Primary School	643	-	96	573	533	483	451	417	401	387	382	388	377
St Francis Catholic Primary School	138	-	19	121	126	120	121	109	108	115	118	116	116
Johnston Community Primary School	210	24	30	195	198	194	196	197	190	191	191	189	193
Neyland Community School	300	24	47	259	265	263	250	247	248	245	232	228	219
Fenton Community Primary School	355	24	50	329	317	304	284	248	240	242	242	244	244

Pembroke Dock Community School	633	16	90	553	536	519	503	513	485	467	453	438	442
Monkton Priory Community Primary School	212	24	30	170	169	169	151	143	141	137	132	127	130
Tenby CiW VC Primary School	318	24	45	227	225	213	197	188	182	180	174	174	179
Waldo Williams Primary School	259	12	37	205	187	175	178	172	172	162	170	170	178
Ysgol Glannau Gwaun	269	24	33 EM:12 WM:21	222	208	195	202	209	198	188	180	177	174
Ysgol Penrhyn Dewi	209	12	27	186	181	169	166	165	149	133	120	116	115

*Forecast data for Portfield unavailable for these periods.

APPENDIX 2

ESTYN LINK: <https://estyn.gov.wales/education-providers/milford-haven-community-primary/>

APPENDIX 3

How does the proposal fit with Well-being goals for Pembrokeshire/Wales	
Prosperous	The proposal is not expected to have a significant impact on the prosperity of the area. The school would continue to operate and provide educational services within the community. As a result, businesses that benefit from school-generated footfall are expected to continue to be supported, and the overall impact on the local economy is likely to be limited.
Resilient	The proposal should increase school resilience by providing additional support to vulnerable learners.
Healthier	No immediate impact, however the improved facilities at Milford Haven CP School as part of Sustainable Communities for Learning investment would enhance the health and wellbeing of both pupils and the wider community. Enhanced sports and recreational provision may encourage greater participation and engagement, while contributing to a more attractive and accessible educational offer.
Equal	See Appendix 4
Cohesive communities	Unlikely to have a material impact.
Vibrant culture & thriving Welsh language	The school in question is English medium, and the proposal is not anticipated to have any material impact with regard to Welsh language. No impacts anticipated with regard to cultural considerations in the area.
Globally responsible	The proposal is unlikely to have a significant impact in this area. However, the primary school along with the LRC being supported through the Sustainable Communities for Learning programme, provides an opportunity to develop modern, energy-efficient facilities designed in line with Welsh Government sustainability and carbon reduction objectives. The new school building would be expected to operate more efficiently than the existing estate, potentially reducing energy consumption and carbon emissions. In addition, operating from a single school site rather than two separate sites may generate operational efficiencies, resulting in lower overall energy and utility usage. These factors could have a positive environmental impact for both the school and the wider community.

Appraising sustainability of the proposal	
Long term How the proposal balances the short term with safeguarding the ability to meet long term needs	The proposal supports the provision of Additional Learning Needs services by establishing bespoke learning provision to address a significant identified need within the area. It will help reduce capacity pressures at other LRCs while ensuring that learners with additional learning needs can access appropriate provision within their local catchment area. This will support improved outcomes for learners by providing timely, tailored support and helping to ensure that their individual needs are met effectively over the long term.
Prevention How the proposal may prevent problems occurring or getting worse	The proposal will help prevent educational, social and wellbeing needs from escalating by providing a bespoke LRC for learners with identified ALN. There is a recognised demand for this provision within the school, but currently limited capacity to meet these needs through dedicated specialist provision. Establishing the LRC will enable learners to access timely, tailored support within an appropriately staffed environment, helping to improve engagement, progress and overall outcomes. The proposal will also help reduce pressures on mainstream teaching staff by ensuring that learners with more complex needs can access the specialist support and interventions required to meet their individual needs effectively.
Integration Considering how the proposal fits with the objectives of other public bodies	The proposal follows Welsh Government statutory consultation requirements and supports the principles of the ALN system in Wales by seeking to ensure that learners can access appropriate provision and support to meet their individual needs.
Collaboration How the proposal fits with working with other organisations or other parts of the Council.	The proposal will require close collaboration between the school, the governing body, the Local Authority's Inclusion Service and other relevant support services to ensure the LRC is established and operated effectively. Ongoing partnership working will support appropriate learner admissions, the delivery of specialist provision and the monitoring of pupil outcomes. The proposal will also involve collaboration with

	secondary school leadership teams to ensure effective transition arrangements are in place, enabling learners to move smoothly into the provision and access the support they need at the appropriate time. Through this joined-up approach, the proposal will help ensure that learners receive consistent, well-coordinated support throughout their educational journey.
Involvement How people have been involved and how have we ensured that those people reflect the diversity of Pembrokeshire.	Prior to this statutory consultation, there has been engagement with the school and inclusion services. A wide stakeholder involvement is an inherent part of the statutory school organisation process in Pembrokeshire.

Equality Impact Assessment – Summer 2026

Protected Characteristics	Current Schools	Proposal	Impact
Age	Milford Haven CP School has a 3-11 age range	The proposal will continue to accommodate these age ranges.	No change
Disability	Milford Haven CP School has an equality rating of A on the infant site and B on the junior site, highlighting its set up is currently accommodating of pupils/staff with disability.	The proposal is for the LRC to be situated on the new school site as part of the Sustainable Communities for Learning (SCfL) investment, the school would be rebuilt to 21st Century School standards, providing enhanced accessibility and disability facilities, and achieving an overall suitability and equality rating of Grade A for the whole school. As well as this, due to the school not currently having an LRC, it would provide a bespoke learning environment to pupils eligible with disabilities.	Positive Change
Race	– As at the 2026 PLASC, please see ethnicity profiles below.	The proposal does not affect the	No change

Protected Characteristics	Current Schools	Proposal	Impact																																
	– There is no discrimination against race in the Admissions Policy <u>Milford Haven CP School</u> <table><tr><th>Ethnicity</th><th>%</th></tr><tr><td>White - British</td><td>90.48%</td></tr><tr><td>Other Black African</td><td>1.13%</td></tr><tr><td>Nigerian</td><td>0.68%</td></tr><tr><td>White European Other</td><td>0.68%</td></tr><tr><td>Bangladeshi</td><td>0.45%</td></tr><tr><td>Other Mixed Background</td><td>0.45%</td></tr><tr><td>White and Asian</td><td>0.45%</td></tr><tr><td>Black and any other ethnic group</td><td>0.23%</td></tr><tr><td>British Gypsy</td><td>0.23%</td></tr><tr><td>Indian</td><td>0.23%</td></tr><tr><td>Sudanese</td><td>0.23%</td></tr><tr><td>Turkish/Turkish Cypriot</td><td>0.23%</td></tr><tr><td>White and Black African</td><td>0.23%</td></tr><tr><td>White and Black Caribbean</td><td>0.23%</td></tr><tr><td>Not entered in SIMS</td><td>4.08%</td></tr></table>	Ethnicity	%	White - British	90.48%	Other Black African	1.13%	Nigerian	0.68%	White European Other	0.68%	Bangladeshi	0.45%	Other Mixed Background	0.45%	White and Asian	0.45%	Black and any other ethnic group	0.23%	British Gypsy	0.23%	Indian	0.23%	Sudanese	0.23%	Turkish/Turkish Cypriot	0.23%	White and Black African	0.23%	White and Black Caribbean	0.23%	Not entered in SIMS	4.08%	ethnicity profiling of the school and there is no change proposed to the Council’s Admissions Policy.	
Ethnicity	%																																		
White - British	90.48%																																		
Other Black African	1.13%																																		
Nigerian	0.68%																																		
White European Other	0.68%																																		
Bangladeshi	0.45%																																		
Other Mixed Background	0.45%																																		
White and Asian	0.45%																																		
Black and any other ethnic group	0.23%																																		
British Gypsy	0.23%																																		
Indian	0.23%																																		
Sudanese	0.23%																																		
Turkish/Turkish Cypriot	0.23%																																		
White and Black African	0.23%																																		
White and Black Caribbean	0.23%																																		
Not entered in SIMS	4.08%																																		
Religion & Belief	Milford Haven CP School is a non-faith based school.	The proposal is for the school to retain the same non-faith status.	No change																																
Sex	Milford Haven CP School is a mixed sex school.	No change in the proposal.	No change																																
Marriage or civil partnership	Milford Haven CP School and all other alternative schools meet with the requirements to comply with the Equality Act 2010 within their Strategic Equality Plans		No change																																
Pregnancy & maternity			No change																																
Sexual Orientation			No change																																
Gender reassignment			No change																																

WELSH LANGUAGE IMPACT ASSESSMENT – Summer 2026

This assessment has been undertaken in accordance with the guidelines outlined in Annex C of the School Organisation Code.

Impact Area	+/-
Links to the targets within the Welsh in Education Strategic Plan (WESP) and any future actions that will be needed in consequence of the change to continue to comply with the plan or meet targets in the plan; The proposal is not expected to make a direct contribution to the learner growth targets set out within Pembrokeshire's WESP, particularly Outcome 6, as it seeks to retain the LRC provision through the medium of English. This reflects both the current linguistic profile of the catchment area and the linguistic needs of the pupils accessing specialist support, as the school's LRC provision must be aligned with the language category of the school. At present, as identified within the WESP, Pembrokeshire's LRCs predominantly support learners with Autism Spectrum Disorder (ASD) and speech, language and communication needs, where the number of first-language Welsh speakers is currently low. Consequently, there is no dedicated Welsh-medium primary LRC provision within the Authority, although Welsh language learning opportunities continue to be provided in accordance with statutory requirements. The Authority recognises however, the importance of promoting Welsh language opportunities wherever possible within specialist provision. Existing examples include the LRC at Ysgol Glannau Gwaun and Ysgol Bro Gwaun, where Welsh language use is encouraged within a bilingual school environment, and Y Porth at Ysgol Preseli, which operates as a satellite provision of Portfield School's Welsh-medium specialist provision. These examples demonstrate	Neutral The proposal is considered to have a neutral impact on the Welsh language. It does not directly contribute to the growth of Welsh-medium education or increase Welsh-medium ALN provision. Instead, it maintains the current position, reflecting the existing linguistic profile of the catchment area and established patterns of parental demand, while continuing to provide Welsh language learning opportunities in line with statutory requirements.

that Welsh language development can be successfully supported within specialist settings where learner profiles and local demand allow. Although the proposed provision is intended to operate through the medium of English to meet the current needs and linguistic profile of learners, the additional specialist capacity created through this proposal may provide opportunities for future review of LRC delivery models in line with the ambitions of the WESP in areas the Welsh language is further established.	
Compliance with the Welsh language Policy Making Standards and in general with the relevant Local Authority Standards Compliance Notice Around 9% of the catchment of Milford Haven Community Primary could speak Welsh in 2021, lower than the Pembrokeshire average. It is likely the proportion of Welsh speakers has reduced a little since 2011. The proposal is to add an LRC and the language category for this must be the same as for the school. This constrains our ability to apply Welsh language standards for considering how the use of Welsh might be enhanced, but equally it is clear that the use of Welsh will not be diminished. Changes to schools' Welsh language category is for the WESP. Additionally, the proposal is being assessed against the requirements of the Welsh Language Standards (No.1) Regulations 2015 with particular regard to the Policy Making Standards to ensure that opportunities to use Welsh are not diminished and that Welsh is treated no less favourably than English with regard to the proposal. To meet policy making standards the consultation considers the effects of the proposal on the Welsh language within this consultation document (Welsh language impact assessment). Views are sought on the effects the proposals will have on the Welsh language, and whether the proposal can be changed to be more positive or avoid/reduce negative effects (see question 3 of the response form). Respondents are also asked about their Welsh language skills and main language.	Neutral The proposal cannot change the Welsh language category of a school.

Effects of the proposal on the Welsh Language

(on people's opportunities to use Welsh and the need to treat the Welsh Language no less favourably than English)

Positive

- A dedicated LRC may improve educational outcomes, wellbeing, inclusion and access to specialist support for learners who require enhanced provision.
- The LRC provision may reduce the need for pupils to travel outside their local community. This could help pupils maintain connections with their Welsh-speaking peers, families and communities.
- The LRC could create opportunities for staff with Welsh language skills to develop specialist expertise in ALN provision, increasing capacity within the education system.

Negative Impacts

- The proposal does not itself increase Welsh-medium educational provision.
- As the LRC would operate through the medium of English, Welsh-speaking pupils attending the provision may experience reduced opportunities to use Welsh as their day-to-day language of learning and social interaction, though the number of first-language Welsh speakers is currently low at the school.

Neutral Impacts

- The proposal does not alter the language category of the school and does not in itself affect the status of Welsh.
- Welsh language learning opportunities continue to be provided in accordance with statutory requirements across the wider school.
- The proposal does not reduce Welsh language curricular and extra-curricular opportunities and activities across the wider school.
- Existing rights to communicate with the local authority and to receive services in Welsh remain unchanged.

Can the proposal be changed to have more positive effects or to avoid or reduce negative effects?

Potential measures could include:

• Providing and signposting opportunities for pupils to use Welsh informally through clubs, sports, cultural activities as appropriate. • Monitoring the number of Welsh-speaking learners attending the LRC and regularly assess whether measures are needed to strengthen Welsh language opportunities. • Maintain bilingual communications throughout consultation - meetings, engagement events and public communications are accessible in Welsh. • Include Welsh language considerations within governance/school improvement and monitoring arrangements. • Monitoring compliance with Welsh Language Standards throughout implementation. • Seek to recruit staff with Welsh language skills where possible and provide Welsh language awareness opportunities for staff. • Ensure parents can engage with the centre through Welsh without additional barriers. • Promote the visibility of Welsh throughout the centre and school e.g. signage.	
Local catchment areas (regardless of language provision) and issues around travel distances; Milford Haven Community Primary School shares its catchment area with St Francis RC Primary School and Ysgol Caer Elen. Within the wider proposal under the Milford Haven SCfL project, it is proposed that the catchment area will also be served by a new Welsh-medium primary school located on the current Milford Haven Junior School site. This will increase local access to Welsh-medium education and provide families with greater choice within the catchment area without the need to travel further afield. Currently, pupils from the Milford Haven catchment area who wish to access Welsh-medium education can attend Ysgol Caer Elen, with 52 pupils currently doing so (Plasc 2026). However, there is currently no LRC provision available at Ysgol Caer Elen. More broadly, there is no primary Welsh-medium LRC provision within Pembrokeshire. The nearest equivalent provision is the LRC at Ysgol Glannau Gwaun, although the specialist provision itself operates through the medium of English, while Welsh language use is encouraged within the wider school environment due to it being a dual stream school.	Neutral This proposal is not expected to alter existing catchment arrangements or significantly affect travel distances for learners seeking Welsh-medium education.

The proposal does not alter existing access to Welsh-medium specialist provision and is therefore not expected to have any significant impact on travel arrangements for learners requiring LRC support. Demand for specialist provision continues to reflect the linguistic profile of the area, where Welsh speakers account for a relatively small proportion of the population within the Milford Haven catchment area, approximately 9%*. *Welsh Language Commissioner Data Dashboard, Census 2021	
The relevant local planning authority development plan in terms of Technical Advice Note (TAN 20)177 and due regard and consideration of Areas of Linguistic Sensitivity; The area where this proposal affects is not in an area of Linguistic Sensitivity.	Neutral
Links to the relevant local authority 5-year Welsh Language Promotion Strategy; This proposal does not directly contribute to the objectives of the Local Authority's 5-Year Welsh Language Promotion Strategy.	Neutral
Links to the aims of Cymraeg 2050; This proposal does not actively contribute to the ambitions of Cymraeg 2050, as it relates to English-medium provision and does not currently include any changes to the language medium of education. However, the proposal is not considered to have a negative impact on the objectives of Cymraeg 2050, as it involves a like-for-like replacement based on existing demand.	Neutral
General links to the goals of the Well-being of Future Generations (Wales) Act 2015; The proposal's contribution to the Well-being of Future Generations (Wales) Act is outlined in Appendix 3. Overall, the proposal is considered to have a limited impact across the well-being goals. However, potential benefits have been identified in relation to creating a more resilient	Neutral

Wales and a healthier Wales, particularly through the provision of modern, sustainable educational facilities and enhanced opportunities for learners and the wider community.	
Socio-economic considerations (comparison of the ward/Lower Layer Super Output Area (LSOA) data on deprivation with the data on Welsh speakers); There is no evident correlation between levels of deprivation and the proportion of Welsh speakers within the affected area. Welsh speakers are represented across communities with similar socio-economic characteristics, and the proposal is not expected to have a disproportionate impact on Welsh speakers based on deprivation levels.	Neutral
Mitigating factors (including cross-boundary and regional issues). The proposal is not expected to have any significant cross-boundary or regional impacts on the Welsh language. Welsh-medium primary and secondary education provision is already available within the wider area, ensuring that learners continue to have access to Welsh-medium pathways throughout their education. There is currently no Welsh-medium LRC provision available within the local area. While this proposal will not address that gap, the development of the LRC is being brought forward to meet identified demand within the existing language medium of the school.	Neutral The proposal does not reduce the availability of Welsh-medium education. Consequently, no adverse cross-boundary or regional impacts on the Welsh language have been identified.
Information on the language category of the school Milford Haven CP School is a Category 1 English-medium school. Census 2021 data indicate that approximately 9% of residents aged three years and over within the Milford Haven area are able to speak Welsh. Across the wider catchment area, Welsh language ability is broadly comparable, although St Ishmaels records the highest proportion of Welsh speakers at 12.7%. Welsh language ability across the catchment remains considerably lower than the Pembrokeshire average of 17.2% recorded in the 2021 Census. These figures demonstrate that Welsh is still developing within the local community and support the continued need for English-	Neutral Welsh language ability within the wider catchment is below the Pembrokeshire average overall.

medium specialist provision through the LRC, while also highlighting opportunities to promote and strengthen the use of Welsh language skills among pupils attending the provision.	
Information on the language category of any alternative school or any other education institution that learners may attend The language category of most alternative schools in the area is also Category 1. However, parents/carers/guardians may express a preference for their child to attend Ysgol Caer Elin in Haverfordwest; which is a Category 3 Welsh medium school.	Neutral
Assessment of the likely impacts on any other school or education institution likely to be affected by the proposals, irrespective of school category or medium of provision; Of the schools identified as potentially affected by this proposal, the majority are English-medium Category 1 schools. Ysgol Glannau Gwaun and Ysgol Bro Gwaun who currently have LRC's within their schools, are the only schools that provide dual-stream provision, but the LRC's operate through the medium of English. Other primary schools within the cluster may also be affected by this proposal, as all schools apart from Coastlands have an LRC. However, as identified above, all LRCs are currently at, or near, capacity. This highlights the demand for LRC provision within the area and indicates that the proposal is unlikely to have a detrimental effect on other schools. .	Neutral The proposal is not expected to have a significant impact on other schools within the cluster. While most LRCs in the area are operating at, or near, capacity, this demonstrates an ongoing demand for specialist provision within the locality. As the proposal does not alter the medium of instruction or Welsh language provision, no impact on the Welsh language has been identified.

Information about standards in the Welsh language in the schools which are the subject of the proposal and any alternative school or other education institution learners may attend Within Milford Haven CP standards of Welsh from Nursery to Year 2 are positive and broadly in line with expectations in the curriculum. This is approached by using a structured scheme of work, created by PCC and this is implemented well. Standards in Welsh from Years 3 to 6 are below the expectations outlined within our scheme. This is due to the school's initial focus on addressing the recommendations associated with entering Special Measures, with priority given to improving literacy, numeracy and digital skills. In the past two years, standards are improving in Welsh and pupils are making good progress as a result of a new curriculum structure and staff training. However Welsh Oracy skills sit on our school improvement plan currently.	
Information about after school activities which provide additional opportunities to use Welsh in the schools which are the subject of the proposals and any alternative school or other education institution learners may attend (e.g. the Urdd, Mentrau Iaith clubs) The school participates in Urdd sports events and runs an afterschool Welsh club for pupils each term with two years groups able to attend at a time e.g. Y5/6. The school already operates in a strong cluster model where Welsh lead staff liaise together, undertaking collaborative monitoring and improvement activity to improve Welsh across our cluster.	
Information about facilities for members of the community to learn Welsh, or undertake activities through the medium of Welsh, at the schools which are the subject of the proposals if provided and where any alternative facilities could be provided	

The school does not currently have any of these facilities. However, as part of the wider Sustainable Communities for Learning Milford Haven redevelopment programme, the primary and secondary schools will be co-located on the same site in Steynton, alongside the proposed redevelopment of the current Milford Haven CP Junior School to create a Welsh-medium primary school. This will provide opportunities for shared use of facilities and greater collaboration, enabling the opportunity for Learn Pembrokeshire to deliver Welsh language classes for staff and community members who are Welsh second-language speakers. These facilities would also support enhanced cluster working, including the organisation of Eisteddfod events and Urdd sporting activities.	
Whether it might be appropriate to provide additional after school facilities at any alternative school to further secure standards in the Welsh language The proposal would not alter the current Welsh language provision available within either of the existing English-medium schools. As such, the provision of additional after-school facilities at an alternative school to further support Welsh language standards is not considered necessary as a direct consequence of this proposal.	Neutral The proposal does not change the linguistic character, curriculum offer, or Welsh language provision of the schools concerned; it is not considered that additional after-school Welsh language facilities are required to mitigate any impact arising from the proposal.
How parents' and learners' engagement with any alternative school or other education institution and any specific language enhancement it offers could be supported (e.g. how learners will be helped to participate in activities provided by the Urdd, Menterau Iaith); Milford Haven CP already operates on a no cost basis for clubs to ensure accessibility for all. The school also uses fundraising to allow learners from disadvantaged backgrounds to access trips e.g. Llangrannog for Year 4 pupils, Urdd memberships and access to transport to events the Urdd put on throughout the school year. As part of the wider Sustainable Communities for	

Learning programme, which will see the primary school and LRC located alongside the secondary school, primary learners will also benefit from access to Welsh specialist teachers within the secondary provision, helping to strengthen the quality of teaching and learning.	
Observations provided by the local authority's Welsh-medium education forum. The Fforwm Cymraeg has not provided an observation to this proposal.	Neutral

Regulated Alteration to Milford Haven Community Primary School –



Introduction of Learning Resource Centre (LRC) for pupils with Complex Learning Needs and Autistic Spectrum Condition (ASC) within Milford Haven Community Primary School

1) Please indicate which of the following reflects your views on the proposal:

	Please tick one
I do not feel strongly one way or the other	
I support the proposal	
I do not support the proposal	

2) Please provide any alternatives you have to the Council's proposal.

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3) What effects do you feel the proposal(s) would have on

- opportunities for persons to use the Welsh language
- treating the Welsh language no less favourably than the English language.

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Please consider if the proposal can be changed so as to have positive effects (or more positive effects), and to avoid or reduce negative effects, on:

- (i) people's opportunities to use Welsh?**
- (ii) the need to treat the Welsh Language no less favourably than English?**

If yes - How? If no - Why not?

About you:

4). Please tell us about you *(please tick all that apply)*

Preschool parent	☐
Staff	☐
Parent/Carer/Guardian	☐
Governor	☐
Local resident	☐
Other (please state below)	☐

5). Which school or schools are you primarily interested in, in this consultation?
(Please tick all that apply)

Milford Haven CP School	☐
Milford Haven Secondary School	☐
St Francis Catholic Primary School	☐
Gelliswick VC School	☐
Coastlands CP School	☐
Johnston CP School	☐
Neyland CP School	☐
Fenton CP School	☐
Waldo Williams CP School	☐

Monkton CP School	
Pembroke Dock CP School	
Tenby VC School	
Ysgol Penrhyn Dewi	
Ysgol Glannau Gwaun	
Portfield School	

6). Are you? *(Please tick only one)*

15 or under	
16-24	
25-34	
35-44	
45-54	
55-64	
65-74	
75 +	
I prefer not to say	

7). What gender do you identify as? *(Please tick only one)*

Male	
Female	
Non-binary	
I prefer to use another term	
I prefer not to say	

8). How would you describe your ethnic group? *(Please tick only one)*

White	
Gypsy or Irish Traveller	
Roma	
Mixed/Multiple ethnic group	
Asian	
Black/African/Caribbean	
I prefer not to say	
Other	

9). What is your religion or belief? *(Please tick only one)*

No religion	
Christian (all denominations)	

Buddhist	
Hindu	
Jewish	
Muslim	
Sikh	
I prefer not to say	
Other	

10). Do you have any physical or mental health conditions or illnesses lasting or expected to last 12 months or more? (Please tick only one)

Yes	
No	
I prefer not to say	

11). Do any of your conditions or illnesses reduce your ability to carry out day to day activities? (Please tick only one)

Yes, a lot	
Yes, a little	
Not at all	
I prefer not to say	

12). Do you look after or give any help or support to anyone because they have long-term physical or mental health conditions or illnesses, or problems related to old age? (Please tick only one)

Yes	
No	
I prefer not to say	

13). Can you understand, speak, read or write Welsh? (Please tick all that apply)

Understand spoken Welsh	
Speak Welsh	
Read Welsh	
Write Welsh	
None of the above	
I prefer not to say	

14). What is your main language? (Please tick only one)

Welsh	
English	
I prefer not to say	

Other	
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Please tick the box if you wish to be informed of the publication of the Consultation Report. ☐

You are asked to provide email and postal address details ONLY if you wish to receive a copy of the Consultation Report. Other information you are asked to provide is for the purposes of Equalities Monitoring and will be used for statistical purposes only.

Print Name..... Email

Address.....

.....

We will make any comments that you make publicly available as part of the Consultation Report, unless you ask us not to.

Please tick this box if you do not wish for your comments to be made publicly available. ☐

All information will be handled in accordance with the Data Protection Act 2018.

Please return to: Director of Education, Pembrokeshire County Council, County Hall, Haverfordwest, SA61 1TP no later than 5pm on 3rd November 2026.

Thank you for your time.