

# Proposal to change the age range from 4-11 to 3-11 at Ysgol Y Ddwylan

## Objection Report



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## **1. EXECUTIVE SUMMARY**

A statutory consultation was conducted regarding the proposal to change the age range of Ysgol y Ddwylan from 4-11 to 3-11 under section 2.3 of the School Organisation Code from the 4th of September 2025 to the 16<sup>th</sup> of October 2025. Following consideration and publication of the consultation report in line with Section 3 of the Code on 26<sup>th</sup> of January 2026, the County Council's Cabinet members decided to progress the proposal and approve the publication of a statutory notice under Chapter 4 of the Code.

Overall, the response rate during the objection period was very low and balance of sentiment was opposed to the proposal. During the objection period, stakeholders raised concerns about the potential impact of the proposal on local childcare providers, employment, and the wider economy. Objectors questioned the suitability of placing three-year-olds in a school environment, highlighting issues such as early ALN identification, class sizes, capacity, and the continuity of wraparound care.

Further concerns related to the consultation process and the financial feasibility of the proposal with some questioning whether the information provided was sufficient and sustainable. Respondents also emphasised the need for a qualified Early Years teacher to ensure high-quality provision for younger learners.

## **2. BACKGROUND**

This report presents the feedback gathered during the objection period, held from the 10<sup>th</sup> of February 2026 to the 10<sup>th</sup> of March 2026 and undertaken in response to proposals to amend the age range at Ysgol Y Ddwylan Primary School from 4–11 to 3–11, incorporating provision for part-time nursery education.

The report sets out the publication of the Statutory Notice and objection period process, summarises the objections received and provides an analysis of the key issues and comments raised by stakeholders.

## **3. THE OBJECTION PERIOD**

The objection period process followed Welsh Government guidelines, in compliance with the Schools Standards and Organisation (Wales) Act 2013 and in line with the

School Organisation Code 2018 (Section 4). The objection period gave anyone wishing to make objections to the proposal the opportunity to do so.

The Statutory Notice was published lawfully for a period of 28 days(including 15 school days) on the 10<sup>th</sup> of February 2026. The document contained all required information and was distributed electronically to prescribed consultees and published on Carmarthenshire County Council’s website. Hard copies of the document were available upon request and secured on the perimeter fence and gates of the school. The notice outlined the proposal being considered and the details of how objections could be made. The objection period closed on the 10<sup>th</sup> of March 2026.

#### 4. ANALYSIS OF RESPONSES

The responses received in between the 10<sup>th</sup> of February and the 10<sup>th</sup> of March 2026 are outlined below:

Online Survey	E-mail	Letter	Total
0	3	0	3

Two of the emails received were from the same sender. The responses received predominantly raised objections / concerns. No statements in support of the proposals were received. The Local Authority received no late representations.

#### 5. OBJECTIONS RECEIVED

This section will summarise the submissions received in objection to the proposal, highlighting the themes that have emerged and the Local Authority’s responses. No responses were received in support of the proposal.

##### **Thematic Analysis of Feedback**

From the responses received during the objection period, the following themes emerged:

1. **Impact on local childcare providers** - risk to viability and numbers.
2. **Employment/economic effects** - assertions of redundancies and wider economic harm.

3. **Suitability of age 3** - concern that “3 years of age is too young for school life.
4. **ALN early identification/capacity** - fear that needs will be “missed” in a school.
5. **Class sizes/ratios/capacity** - risk of “high volume classrooms”.
6. **Wraparound care and hours** - concern that parents need 8am–6pm and provision may be undermined.
7. **Consultation process/fairness** - perception that it is a done deal/ tick box exercise.
8. **Feasibility/economic impacts study** - requests for a formal economic/feasibility assessment.
9. **Requirement for an Early Years qualified teacher** - suggestion as a mitigation.

## 6. SUMMARY OF OBJECTIONS RECEIVED AND LOCAL AUTHORITY RESPONSES

The following table notes the themes of the objections received. The Local Authority has conscientiously considered all objections received in accordance with Section 5.1 of the School Organisation Code 2018 and provides responses to those themes raised. Each theme’s count reflects the number of distinct responses that mention it:

<b>Thematic Heading:</b> Impact on local childcare providers.	<b>Count of Responses</b>	2
<p><b>Summary of Responses:</b></p> <p>Concern the proposal will damage local Early Years settings, reduce numbers for community and independent providers and threaten sustainability of those settings.</p>		
<p><b>Local Authority Response</b></p> <p>The School Organisation Code 2018 requires Local Authorities to consider the effect of proposals on other institutions, including private and third sector providers when adding nursery provision.</p>		

The Local Authority acknowledges there is risk that the proposal may reduce demand for places at private nurseries, childminders and Cylchoedd Meithrin. This risk was documented in the consultation document and considered as part of the statutory process. It is not the intention of the proposal to undermine or disadvantage any individual childcare setting. Rather, the aim is to complement existing provision by offering an alternative part-time Early Years education option for families, in line with the Authority's duty to ensure equitable access to funded education across the county.

The Local Authority notes that the proposed eleven places for Early Years education is non-statutory and part time only (10 hours per week). Parents may continue to choose private or voluntary settings for funded places or wraparound care. This supports the continued viability of local childcare settings and reflects the mixed market approach underpinning Early Years provision in Wales.

There are no non-maintained settings such as day nurseries or Cylchoedd Meithrin providing non-statutory approved education provision in the Newcastle Emlyn locality therefore the school-based model represents the most viable way of meeting this unmet need as such, this proposal aims to address the gap in provision and improve choices for families in the area who have to travel to access Early Years education provision elsewhere.

Importantly, the introduction of part-time education does not replace or replicate the services offered by local childcare providers. Local families will continue to require full-day or flexible wraparound childcare, which community and independent settings are best placed to provide. There remains a strong role for these providers to work alongside the school for example, through offering extended hours, childcare sessions before and after school provision, and supporting pick-up and drop-off arrangements where appropriate. Some of the local childcare providers already offer these types of services.

Similar models are already well established in other parts of Carmarthenshire and across Wales, where schools and local childcare settings operate side by side without detriment to the sustainability of providers. It is possible that the proposed school-based early education offer will strengthen local provision by increasing parental choice and generating opportunities for closer partnership working.

Birth-rate data for the Ysgol Y Ddwylan catchment area demonstrates a consistent pattern of 10–16 births per year, indicating a stable level of future demand for Early Years provision.

While the proposal aims to address a clearly identified gap, it is also acknowledged that introducing school-based Early Years provision may lead to a reduction in demand for places at local private nurseries and childminders, who currently provide childcare but not the educational element. Modest reductions in uptake may have implications for their financial sustainability and the wider childcare market. Admissions to the new provision may also include applications from outside the catchment, potentially influencing local patterns of take-up. Overall, although the proposal would address an inequity in access to Early Years education, it may also shift the distribution of children between settings, with potential consequences for the resilience of local childcare provision.

<b>Thematic Heading:</b> Employment/economic effects.	<b>Count of Responses</b>	1
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**Summary of Responses:**

Potential risk of staff redundancies at local childcare providers, reduced hours, knock on effects for families and the taxpayer.

Several concerns were raised about the potential impact of the proposal on the sustainability of childcare provision within the local area. In particular, one respondent highlighted that local childcare settings collectively provide places for a significant number of pre-school children, including many who are aged three or approaching their third birthday.

Respondents expressed concern that introducing part-time Early Years education for three-year-olds within the school could lead to a notable shift in demand with a proportion of families choosing school-based provision instead of existing childcare options. They indicated that such a change could significantly reduce the number of children accessing local childcare services, leading to financial challenges for providers.

Respondents also noted that some settings in the area are registered to deliver the Welsh Government’s Childcare Offer. Concerns were raised that if fewer three-year-olds remain in childcare settings, providers may see a reduction in funded places and associated support linked to the Offer.

Finally, the respondents highlighted potential for significant implications for staffing in private settings. A reduction in child numbers could affect the level of work available within childcare settings, possibly resulting in reduced staff hours or, in the worst cases, redundancies if providers are unable to sustain their current workforce.

## **Local Authority Response**

The Local Authority recognises the concerns raised regarding the potential impact of the proposal on staffing levels, business sustainability and working hours within local childcare settings. These concerns are understood and the Authority does not underestimate the importance of sustaining a stable, skilled and financially viable childcare workforce within the community.

It is important to emphasise that the proposal is for a small-scale, non-statutory offer of eleven part-time Early Years education places totalling 10 hours per week where participation is entirely voluntary for families. The offer does not constitute full-day childcare and does not replicate the flexibility, extended hours or wraparound provision that private nurseries and Cylchoedd Meithrin provide. As take-up cannot be predetermined and the geographical origin of any applicants is unknown at present, it is not possible to reliably quantify any changes in demand for childcare places. Any estimate of the impact on staffing, hours or business sustainability would therefore be speculative and unlikely to produce meaningful or evidence-based conclusions.

The intention of the proposal is not to displace or diminish existing childcare provision. Local childcare settings, including the on-site Cylch Meithrin and private nurseries, provide essential services that the school cannot replicate, such as full-day care, flexible hours, wraparound provision and support for working families. Many parents will continue to require these services regardless of the availability of a part-time education offer and the proposal is designed to complement rather than compete with the local childcare market by widening the choices available to families.

Evidence from other parts of Carmarthenshire and Wales demonstrates that school-based early years education and private childcare settings commonly operate successfully alongside each other. Models are well established across the county, with schools and childcare providers maintaining strong working relationships and continued demand for wraparound care.

The Local Authority also recognises the concerns raised about the potential impact on staffing within private early years settings. While these concerns are acknowledged, the limited scale of the proposal with eleven part-time places means that any shift in parental preference is unlikely to remove the continued need for full-day or flexible childcare, upon which many working families rely. The Authority values the important role played by private nurseries in providing

employment, supporting families, delivering high-quality early years experiences, and does not expect the proposal to undermine this role.

The Authority remains committed to working constructively with local childcare providers, including nurseries and the Cylch Meithrin to support complementary arrangements such as wraparound care, transitions between settings and alignment of provision where appropriate. These collaborative models can help sustain local childcare markets while enabling parents to benefit from both funded early education and flexible childcare options.

Overall, the aim of the proposal is to ensure that families continue to have access to a diverse, sustainable and high-quality mix of childcare and early education without adverse consequences for local businesses, staff or the wider community. The Authority will monitor the potential impact on childcare providers as part of its ongoing statutory responsibilities should the proposals be implemented.

<b>Thematic Heading:</b> Suitability of age three	<b>Count of Responses</b>	1
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**Summary of Responses:**

Age three seen as too young for school life, worry about large classrooms and readiness of pupils of such a young age.

**Local Authority Response**

The Authority confirms that, should the proposal be implemented, a developmentally appropriate curriculum will be delivered in line with national expectations for pupils aged three. Early Years education is designed specifically around the needs of younger learners, with an emphasis on play, exploration and social development rather than formal schooling.

It is also important to highlight that Early Years education is not equivalent to full-time statutory schooling. Attendance for three-year-olds is voluntary and parents or guardians remain free to decide whether they feel their child is ready to attend. Children aged three are entitled to 10 hours per week of part-time education and families may choose to access this gradually based on their child's needs.

Across the county, there are several successful 3–11 school models already operating where nursery-aged children develop, thrive and are provided with rich opportunities to learn in a nurturing, age-appropriate environment. These schools demonstrate that integrating Early Years

provision within a primary school structure can offer continuity, stability and high-quality support for children from the very start of their educational journey.

Ysgol Y Ddwylan has dedicated Foundation Phase classrooms designed specifically for nursery-aged pupils with suitable capacity and facilities for Early Years provision. Staffing will be organised within the school's complement, using qualified practitioners and in line with national workforce standards, to ensure a high-quality, developmentally appropriate experience for all Early Years learners.

Furthermore, the school environment is able to support small-group learning, outdoor play and carefully planned interactions which are all essential elements in supporting the wellbeing and progression of three-year-old children. The Authority is committed to ensuring that any transition into school-based nursery provision prioritises children's emotional security, developmental needs and readiness.

<b>Thematic Heading:</b> ALN early identification/capacity	<b>Count of Responses</b>	1
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#### **Summary of Responses:**

Responses suggested private nursery settings identify ALN early and expressed fear that schools are too stretched and children may be missed.

#### **Local Authority Response**

The Local Authority is confident that Ysgol Y Ddwylan has the staffing, expertise and systems in place to ensure that any Additional Learning Needs (ALN) are identified at the earliest possible stage.

Estyn's findings for the school referenced in their report from 2022 indicate robust ALN processes and inclusive practice across the school. Estyn stated "*Staff have a sound awareness of pupils' needs and, as a result, support arrangements are devised at an early stage to meet their individual needs. The school's arrangements for assessing and tracking pupils' progress are sound. Members of staff are knowledgeable and deliver a purposeful range of effective support programmes for pupils to address their emotional wellbeing and improve their self-respect. As a result, pupils receive comprehensive support that helps them to make sound progress in their skills.*

*Provision for pupils with additional learning needs (ALN) is a highly robust feature. All pupils with ALN have an individual education plan, which includes specific targets that staff review with their*

*parents regularly. Daily information conversations between support staff and teachers enable them to monitor the progress of these pupils effectively and adapt provision in a timely manner to meet any new targets they may have. Robust links with a range of external agencies, such as the speech and language service and counselling service, provide specialist and beneficial support for pupils who need it.”*

The introduction of part-time Early Years education at the school will therefore not diminish early identification, instead, it is expected to strengthen it by integrating education, childcare and multi-agency support within one setting.

<b>Thematic Heading:</b> Class sizes/ratios/capacity	<b>Count of Responses</b>	1
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**Summary of Responses:**  
Concern about high volume classrooms and limited attention compared to nursery settings.

**Local Authority Response**

The Local Authority acknowledges the concern that younger children may receive less individual attention in a school environment than in a nursery setting. Ensuring high-quality Early Years provision with appropriate levels of support is a priority for both the Local Authority and Ysgol Y Ddwylan.

Should the proposal to change the age range of Ysgol Y Ddwylan from 4–11 to 3–11 be approved, the school would reorganise its class structure to accommodate nursery pupils appropriately. This would create a School Capacity of 314, a Nursery Capacity of 43, and a Total Capacity of 357, with an Admission Number of 44. According to PLASC 2026 data, the school currently has two full-time nursery pupils. Under the proposal, eleven part-time nursery places would be offered.

Nursery provision in the school will be staffed and organised differently from older year groups. Dedicated and experienced staff will work with small groups of children using an age-appropriate, play-based approach aligned with the Curriculum for Wales. The school is required to comply with national guidance and ratios for Early Years education, ensuring that young children receive appropriate support and supervision.

In addition, the learning environments at Ysgol Y Ddwylan would offer structured routines, continuous provision and developmental observations comparable in quality to nursery settings.

Experienced staff at the school will monitor each child's progress closely to identify any emerging needs at an early stage.

The introduction of part-time education places is therefore not expected to create "high-volume" classrooms or reduce the level of individual attention. Ysgol Y Ddwylan would adapt its staffing and class organisation to ensure that Early Years pupils are taught within a nurturing, well-supported environment that meets statutory requirements and maintains high standards of care and learning.

**Thematic Heading:** Wraparound care and hours

**Count of Responses**

1

**Summary of Responses:**

Parents need full day care, fear the school model undermines wraparound/after school provision including viability and staffing at local private settings.

**Local Authority Response**

The Local Authority has a duty to consider the extent to which Early Years education is integrated with childcare services. As part of the Rising 4s study, the Authority undertook an assessment to identify areas where there were shortfalls in Early Years education provision across the county. This included consultation with local childcare providers to explore whether there was interest in delivering Early Years education within their settings. No responses expressing an interest to deliver Early Years education were received from providers in the Newcastle Emlyn area and therefore the proposal to introduce provision at Ysgol Y Ddwylan has been developed.

The proposal to change the school's age range is focused on providing part-time Early Years education and is not intended to replace or reduce existing childcare options available to families. A Cylch Meithrin already operates on the school site, offering established Early Years provision for the community. There is significant potential for the school and the Cylch Meithrin to work collaboratively to deliver a complementary model, with the school providing part-time education and the Cylch Meithrin continuing to offer wraparound childcare for families who require longer or more flexible hours.

This type of arrangement is already working successfully in many schools across Wales, where education and childcare settings operate side-by-side to provide families with a seamless blend of early education and childcare.

In addition, the proposal does not prevent local childcare providers from continuing to offer pick-up and drop-off services if they are able to do so. It is quite common to have private providers support children attending part-time nursery classes in other schools by transporting them to and from settings to accommodate parents who need full-day care. These type of arrangements are already offered by some local childcare providers and would be able to continue and possibly may expand in response to parental demand.

The Local Authority notes that the proposed Early Years education in the school is non-statutory and part time only (10 hours per week). Parents may continue to choose private or voluntary settings for funded places or wraparound care. This supports the continued viability of local childcare settings and reflects the mixed market approach underpinning Early Years provision in Wales.

Overall, the proposal aims to increase choice for parents by bringing funded Early Years education onto the school site while maintaining and potentially enhancing the viability of local childcare and wraparound options. There is however a risk that the implementation of the proposal may impact local childcare providers.

<b>Thematic Heading:</b> Consultation process/fairness	<b>Count of Responses</b>	1
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**Summary of Responses:**  
 Perception that consultation and opportunity to object may be lip service rather than an exercise of due diligence on the matter.

**Local Authority Response**

The Authority recognises the concerns raised regarding the perception that the consultation process may be a formality rather than a meaningful opportunity to influence the outcome. The Authority wishes to reassure all stakeholders that this is not the case. All school organisation proposals must follow the statutory procedures set out in the School Organisation Code, which requires full, fair and transparent consultation before any decision can be made. No final decision is taken until all statutory steps have been completed, including the analysis of all feedback and the publication of a comprehensive report for elected Members to consider. This ensures that the process is robust, lawful and genuinely informed by the views of those affected by the proposal.

The initial consultation in relation to the proposal complied with Section 3 of the School Organisation Code, providing a minimum of 42 days including 20 school days and notifying all

prescribed consultees, including independent Early Years providers such as Mudiad Meithrin. A consultation report was produced and covered the feedback received on the proposal. The Consultation report was published on the County Council's website and presented to Cabinet who decided to progress and publish a Statutory Notice on the proposal. The objection period followed guidelines contained in Section 4 of the Code and lasted 28 days, the three objections received are summarised in this report along with the Local Authority responses to each theme. The Cabinet will consider the content of this report and decide to proceed with or without amendment to County Council where a decision will be made on whether to implement the proposal or not. The objection report will be published within 7 days of any determination by County Council. In addition, hard copies will be made available on request to anyone who wants to view the report.

<b>Thematic Heading:</b> Feasibility/economic study	<b>Count of Responses</b>	1
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**Summary of Responses:**

Queries whether feasibility and economic studies on impacts (business, jobs, benefits) have been carried out.

**Local Authority Response**

The School Organisation Code (S1.5) requires the Authority to assess recurrent costs, the effect on surplus places and other finance related issues. It does not require local authorities to undertake economic and feasibility studies on potential wider impacts of proposals. The Consultation Document provided PLASC projections, surplus place analysis, details of delegated 3 year old funding (£2,044 per pupil) and other required financial details meeting statutory financial assessment requirements.

The Local Authority has not undertaken a formal feasibility or economic impact study relating to the potential effect of this proposal on local childcare businesses or settings however the initial consultation document did highlight specific factors to be taken into account for proposals to add or remove nursery classes as required in Section 1.9 of the Code. The potential for a negative impact effect on other institutions, including private and third sector providers if the proposals are implemented was highlighted in the consultation document. It was acknowledged that if implemented, it may result in a potential reduction in enrolment for childcare providers, as families may choose the proposed Early Years provision at Ysgol Y Ddwylan over private or voluntary settings. This could lead to a loss of income for local providers and in some cases may

place smaller rural settings at risk of closure. Reduced numbers may also result in job losses or staffing reductions within the local childcare workforce.

The proposal to offer part time Early Years education is non-statutory and participation is entirely voluntary for families. As only eleven part-time education places are proposed and as take-up cannot be predetermined, it is not possible to accurately model the source of potential pupils or the extent to which any individual childcare provider may be affected. Any such study would therefore be hypothetical and unlikely to produce meaningful or reliable conclusions.

The primary aim of the proposal is to address an identified gap in Early Years education provision in the Newcastle Emlyn area. This follows consultation with local providers as part of the Rising 4's study, during which no providers expressed interest in delivering the funded Early Years education offer themselves.

Importantly, the introduction of part-time education at the school is not designed to replace childcare services. It is likely that wraparound and full-day childcare will continue to be required by families in the local area. Local providers retain the opportunity to work alongside the school to offer complementary provision such as extended hours, childcare sessions and pick-up/drop-off options. In many parts of Carmarthenshire and across Wales, similar arrangements operate successfully without negative impact on local childcare sustainability however it must be noted that there may be negative impacts as stated above.

<b>Thematic Heading:</b> Requirement for an Early Years qualified teacher	<b>Count of Responses</b>	1
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**Summary of Responses:**

Expectations raised that the class should be led by a qualified Early Years teacher.

**Local Authority Response**

Staffing will be arranged within the school's complement and in line with national workforce standards to ensure quality of Early Years provision.

## 7. ALTERNATIVE OPTIONS

No clear alternative options were received for consideration from the three responses received during the objection period.

## **8. CONCLUSION**

The Local Authority notes the concerns raised that private nurseries and Cylch Meithrin settings in the locality may be affected as a result of the proposed changes, and these impacts must be considered as part of the decision-making process.

After taking concerns raised during the objection period it is considered that the proposal to change the age range of Ysgol Y Ddwylan would have an overall positive impact on both current and future pupils. Offering eleven nursery places in the school to pupils eligible for 10 hours of Early Years education in the community would:

- provide parents with more options for Early Years provision within the local area.
- offer a gradual and supported transition for 3-year-olds entering school, starting with half-day sessions and progressing to full school days.
- potentially attract more pupils to attend the school, reducing surplus places and making the school more sustainable in the long term.
- potentially create a continuous educational journey for children as they progress through to Ysgol Gyfun Emlyn, strengthening continuity and community integration.
- increase the number of nursery places available in Newcastle Emlyn, helping to reduce inequalities of opportunity and outcome in education.
- offer early opportunities for immersion in the Welsh language, positively impacting pupils' linguistic skills.
- support families who currently need to travel to out-of-catchment schools in order to access equivalent Early Years provision.

## **9. RECOMMENDATION**

Following consideration of the responses received during the objection period, it is recommended that permission is sought to implement the proposal to change the age range of the school from 4–11 to 3–11 without amendment. There are no related proposals that would prevent or undermine implementation. This recommendation reflects the identified benefits of the proposal, including enhanced parental choice,

improved continuity of education, increased sustainability of the school, and positive impacts on equality of opportunity and Welsh language development.

## **10. NEXT STEPS**

The Objection Report will be presented to the Cabinet who will decide whether or not to recommend to proceed with the proposals or not. The objection report will then be presented to County Council, who will determine whether or not to implement the proposal. The Objection report will be published within 7 days of any decision on Carmarthenshire County Council's website and available in hard copy on request. All required consultees will be notified of availability.

