

11<sup>th</sup> November 2014

Dear Councillor

**CABINET**

You are requested to attend a **Special Cabinet** meeting to be held at **The Council Chamber, County Hall, Rhadyr, Usk, NP15 1GA on Wednesday, 19<sup>th</sup> November 2014, at 2.00 p.m.**

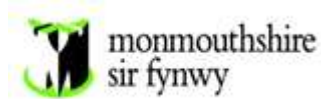
**AGENDA**

1. Apologies for Absence
2. Declarations of Interest
3. Consideration of reports from Select Committees (none):
4. To consider the following reports (copies attached):
  - (i) **MONMOUTHSHIRE LOCAL DEVELOPMENT PLAN: COMMUNITY INFRASTRUCTURE LEVY**  
Division/Wards Affected: All  
Purpose: The purpose of this report is to advise Cabinet of progress made on preparatory work for a Community Infrastructure Levy (CIL) and to seek endorsement of a Preliminary Draft Charging Schedule (PDCS), with a view to issuing for consultation purposes and to recommend to Council accordingly.  
Author: Martin Davies, Development Plans Manager  
Contact Details: [martindavies@monmouthshire.gov.uk](mailto:martindavies@monmouthshire.gov.uk)
  - (ii) **REVIEW OF ADDITIONAL LEARNING NEEDS STRATEGY AND POLICY**  
Division/Wards Affected: ALL  
Purpose: To provide members with the updated Additional Learning Needs Strategy and Policy for pupils with Additional Learning Needs across Monmouthshire and to seek approval to implement the updated Additional Learning Needs Strategy and Policy  
Author: Stephanie Hawkins, Principal Officer ALN  
Contact Details: [stephaniehawkins@monmouthshire.gov.uk](mailto:stephaniehawkins@monmouthshire.gov.uk)

Yours sincerely,  
**Paul Matthews**  
Chief Executive

**CABINET PORTFOLIOS 2014**

<b>County Councillor</b>	<b>Area of Responsibility</b>	<b>Partnership and External Working</b>	<b>Ward</b>
P.A. Fox (Leader)	<b>Organisational Development</b> Whole Council Performance, Whole Council Strategy Development, Corporate Services, Democracy.	WLGA Council WLGA Coordinating Board Local Service Board	Portskewett
R.J.W. Greenland (Deputy Leader)	<b>Innovation, Enterprise &amp; Leisure</b> Innovation Agenda, Economic Development, Tourism, Social Enterprise, Leisure, Libraries & Culture, Information Technology, Information Systems.	WLGA Council Capital Region Tourism	Devauden
P.A.D. Hobson (Deputy Leader)	<b>Community Development</b> Community Planning/Total Place, Equalities, Area Working, Citizen Engagement, Public Relations, Sustainability, Parks & Open Spaces, Community Safety.	Community Safety Partnership Equalities and Diversity Group	Larkfield
E.J. Hacket Pain	<b>Schools and Learning</b> School Improvement, Pre-School Learning, Additional Learning Needs, Children's Disabilities, Families First, Youth Service, Adult Education.	Joint Education Group (EAS) WJEC	Wyesham
G. Howard	<b>Environment, Public Services &amp; Housing</b> Development Control, Building Control, Housing Service, Trading Standards, Public Protection, Environment & Countryside.	SEWTA SEWSPG	Llanelly Hill
G. Burrows	<b>Social Care &amp; Health</b> Adult Social Services including Integrated services, Learning disabilities, Mental Health. Children's Services including Safeguarding, Looked after Children, Youth Offending, Health and Wellbeing.	Gwent Frailty Board Older Persons Strategy Partnership Group	Mitchel Troy
P. Murphy	<b>Resources</b> Accountancy, Internal Audit, Estates & Property Services, Procurement, Human Resources & Training, Health & Safety.	Prosiect Gwrydd Wales Purchasing Consortium	Caerwent
S.B. Jones	<b>County Operations</b> Highways, Transport, Traffic & Network Management, Waste & Recycling, Engineering, Landscapes, Flood Risk.	SEWTA Prosiect Gwrydd	Goytre Fawr



## Sustainable and Resilient Communities

### Outcomes we are working towards

#### **Nobody Is Left Behind**

- Older people are able to live their good life
- People have access to appropriate and affordable housing
- People have good access and mobility

#### **People Are Confident, Capable and Involved**

- People's lives are not affected by alcohol and drug misuse
- Families are supported
- People feel safe

#### **Our County Thrives**

- Business and enterprise
- People have access to practical and flexible learning
- People protect and enhance the environment

### Our priorities

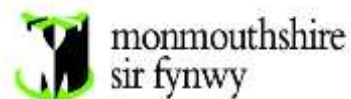
- Schools
- Protection of vulnerable people
- Supporting Business and Job Creation

### Our Values

- **Openness:** we aspire to be open and honest to develop trusting relationships.
- **Fairness:** we aspire to provide fair choice, opportunities and experiences and become an organisation built on mutual respect.
- **Flexibility:** we aspire to be flexible in our thinking and action to become an effective and efficient organisation.
- **Teamwork:** we aspire to work together to share our successes and failures by building on our strengths and supporting one another to achieve our goals.







**SUBJECT: MONMOUTHSHIRE LOCAL DEVELOPMENT PLAN: COMMUNITY INFRASTRUCTURE LEVY**  
**MEETING: SPECIAL CABINET**  
**DATE: 19 NOVEMBER 2014**  
**DIVISION/WARDS AFFECTED: ALL**

**1. PURPOSE:**

- 1.1 The purpose of this report is to advise Cabinet of progress made on preparatory work for a Community Infrastructure Levy (CIL) and to seek endorsement of a Preliminary Draft Charging Schedule (PDCS), with a view to issuing for consultation purposes and to recommend to Council accordingly.

**2. RECOMMENDATIONS:**

- 2.1 Cabinet note the contents of this report on the preparatory work being undertaken on CIL and endorse the PDCS, with a view to issuing for consultation purposes and to recommend to Council accordingly.

**3. KEY ISSUES:**

3.1 The Community Infrastructure Levy (CIL).

CIL is a new levy that local authorities (LA) in England and Wales can choose to charge on new developments in their area. The money can be used to support development by funding infrastructure that the local community needs. It applies to most new buildings and charges are based on the size and type of the new development. The CIL regulations came into force on 6 April 2010. However, liability to pay CIL for a development will not arise until the LA has implemented a charging schedule (which has to be based on an up-to-date development plan, i.e. a Local Development Plan (LDP), and is subject to consultation). A guidance note describing how CIL operates is attached as **Appendix A**.

- 3.2 It was resolved at a meeting of Full Council on 27 June 2013 to commence preparatory work for CIL with a view to adopting a CIL charge as soon as is practicable following adoption of the Monmouthshire LDP. Subsequently, the LDP was adopted on 27 February 2014.

- 3.3 A PDCS (attached as **Appendix B**) has been prepared for consultation purposes and it is intended to report this to Council on 18 December 2014. The Charging Schedule has to undergo two rounds of public consultation and a likely Examination in Public. The current timetable (if Council agrees to the implementation of CIL) envisages adoption of CIL in July 2015, although some aspects of the process, such as the appointment of an inspector for the public examination, are not in the Council's control.

- 3.4 There are two elements to the production of a CIL charging schedule – a viability assessment and an infrastructure assessment. A study has been undertaken (attached as **Appendix C**) to establish the levels of CIL that are feasible because a CIL charge should not affect scheme viability and prevent development coming forward in an area. CIL is paid as so much per square metre. In Monmouthshire CIL will mainly be applied to residential development, as out-of-town retail schemes are the only non-residential developments on which it is feasible to charge. The proposed charges will vary by area/type of development and are set out in detail in the PDCS. As an illustration, on a ‘typical’ three bedroom semi-detached house the proposed charges would be £4,800 on strategic sites and small sites in Severnside and £8,800 on most other sites in Monmouthshire.
- 3.5 LAs are required to undertake an infrastructure assessment to identify the need for and cost of infrastructure to support the level of development set out in the LDP. As part of this process a Draft Infrastructure Plan was prepared to support the LDP at Examination and was reported to Council at its meeting on 27 June 2013. CIL will replace a substantial element of the funding currently received from Section 106 Agreements, although Section 106 funding will still be required for infrastructure necessary to ensure that a development comes forward (e.g. access improvements), on-site provision of play facilities and affordable housing. One advantage of CIL is that, unlike Section 106, it does not have to be spent directly on matters necessary to implement a specific planning permission but can also be used on a more strategic basis to provide infrastructure in a wider area. The items on which the Council intends to spend CIL funding on would need to be specified in a ‘Regulation 123 list’. This can be varied over time according to Council priorities and would be based on an Infrastructure Plan that sets out the items that are considered necessary to implement the LDP (other than those that are specific to a particular site). These can include more general ‘place-making’ schemes that support the growth proposed in the LDP. At present, it is being suggested that the Reg.123 list (as set out in the PDCS) includes sustainable transport improvements, upgrade/provision of broadband connectivity, town centre improvements, education, strategic sports/adult recreation facilities and strategic green infrastructure, but this is for the Council to establish according to its priorities. At examination the charging authority should set out a draft list of projects or types of infrastructure that are to be funded in part in whole or in part by the levy. Any amendments to this list after examination will need to be consulted upon. Provided there is agreement on the broad categories of infrastructure to be supported by CIL prior to examination then it should be possible to refine a list of specific projects within these categories as part of an infrastructure planning process that includes, for example, links with Whole Place Plans, Town Teams etc. to determine what matters to communities in terms of infrastructure provision. In this respect, further reports will be made to Members in order to establish the procedures for allocating CIL monies and determining priorities for spending.
- 3.6 Landowners become liable for CIL when planning permission is granted and it is payable (not necessarily by the landowner as the liability can be transferred) when a development commences, although it is possible for payments to be made on an instalment basis. Planning permissions granted before CIL becomes operational, therefore, will not be liable to the charge but will still be subject to Section 106 requirements. However, the overall potential funding stream is slightly less under Section 106s because CIL brings all residential development, down to a single dwelling (although self-builders are excluded), into the charging regime. In addition, after 1 April 2015 no more than five Section 106 agreements can be used to fund a single piece of infrastructure.

3.7 'Meaningful amount' for local communities.

The Localism Act 2011 introduced a power to require local authorities in England and Wales to pass a 'meaningful' proportion of the CIL receipts to neighbourhoods. Contained within the 2011 Act was a definition of neighbourhoods, which applies to England only. In Wales the Welsh Government issued a letter on 8 April 2013 stating that for the purposes of receiving a proportion of CIL receipts, the equivalent definition is a Community Council. In terms of defining a 'meaningful' amount the letter states that 15% of CIL revenues 'should be passed to Community Councils'. The letter goes on to state that 'where the community council does not have the capacity to identify, spend and account for the receipt of such funds, the charging authority [the County Council] will retain the funds but will be required through statutory guidance to engage with community councils where development has taken place to agree how best to spend the funding'. The relevant regulation states 'In Wales, where all or part of a chargeable development is within the area of a community council, then ... the charging authority must pass 15 per cent of the relevant CIL receipts to that community council'. The part of the levy that is passed to a community council must be spent to 'support the development of the area'. Guidance on this matter recommends that once the levy is in place town and community councils 'should work closely with their neighbouring councils and the charging authority to agree on infrastructure spending priorities'. The guidance also indicates that if the town or community council 'shares the priorities of the charging authority, they may agree that the charging authority should retain the neighbourhood funding to spend on that infrastructure', also suggesting that this infrastructure (e.g. a school) may not necessarily be in the town or community council area but will support the development of the area.

**4. REASONS:**

4.1 It is necessary for the Council to establish its position with regard to implementation of CIL to ensure that the potential for meeting infrastructure needs of communities though the implementation of the CIL Regulations is fully explored.

**5. RESOURCE IMPLICATIONS:**

Officer time and costs associated with developing CIL. These will be carried out by existing staff and within the existing budget, except for the likelihood that consultants will also be required as the CIL implementation process raises complex legal and technical issues (which are likely to be subject to a formal public examination) that requires specialised assistance from experts in this field. It is envisaged that these additional costs will be met from the existing Development Plans Professional and Technical Fees budget line. New funding streams will arise from CIL if it is introduced as it will replace and supplement Section 106 funding in a number of areas.

**6. SUSTAINABLE DEVELOPMENT AND EQUALITY IMPLICATIONS:**

6.1 Sustainable Development

The adoption of CIL will be a means of supporting and delivering the LDP. An integrated equality and sustainability impact assessment was carried out in relation to the LDP as a whole. Under the Planning Act (2004), the LDP was required, in any event, to be subject to a Sustainability Appraisal (SA). The role of the SA was to assess the extent to which the emerging planning policies would help to achieve the wider environmental, economic and social objectives of the LDP. The LPA also produced a Strategic Environmental Assessment (SEA) in accordance with the European Strategic Environment Assessment Directive 2001/42/EC; requiring the 'environmental assessment' of certain

plans and programmes prepared by local authorities, including LDP's. All stages of the LDP were subject to a SA/SEA, therefore, and the findings of the SA/SEA were used to inform the development of the LDP policies and site allocations in order to ensure that the LDP would be promoting sustainable development. CIL is supporting these existing LDP policies, which were prepared within a framework promoting sustainable development.

6.2 Equality

6.2.1 The LDP was also subjected to an Equality Challenge process and due consideration given to the issues raised. As with the sustainable development implications considered above, CIL is supporting these existing LDP policies, which were prepared within this framework.

**7. CONSULTEES**

- Head of Planning
- Section 106 Working Party
- Economy and Development Select (16 October 2014)
- Cabinet
- SLT
- Planning Committee (4 November 2014)

Consultation Responses

The minutes of the Economy and Development Select meeting on 16 October 2014 were not available at the time of the preparation of this report. Two main points of concern, however, appeared to be the lack of clarity at this stage on the processes that would be followed in allocating CIL monies and determining priorities for spending and on the way in which the 15% funding for community councils would be dealt with. In order to address these points, additional sentences have been added to the end of paragraph 3.5 and an additional paragraph 3.7 added entitled 'Meaningful amount' for local communities'.

**8. BACKGROUND PAPERS:**

- Monmouthshire Adopted LDP (February 2014)
- Monmouthshire County Council Draft Infrastructure Plan (March 2013)

**8. AUTHOR & 10. CONTACT DETAILS:**

Martin Davies (Development Plans Manager).

**Tel:** 01633 644826.

**E Mail:** [martindavies@monmouthshire.gov.uk](mailto:martindavies@monmouthshire.gov.uk)

## The “Equality Initial Challenge”

Name: Martin Davies Service area: Development Plans Date completed: 16/10/2014		Please give a <b>brief description</b> of what you are aiming to do.  The Local Development Plan (LDP), which was adopted on 27 February 2014, sets out the Council’s vision and objectives for the development and use of land in Monmouthshire, together with the policies and proposals to implement them over the ten year period to 2021. Community Infrastructure Levy (CIL) is a levy that is charged on new developments, to be used to support the funding of infrastructure that the community needs. The adoption of CIL, therefore, is a means of delivering the LDP.	
Protected characteristic	Potential <b>Negative</b> impact  Please give details (see below)	Potential <b>Neutral</b> impact  Please give details	Potential <b>Positive</b> Impact  Please give details (see below)
Age			X
Disability			X
Marriage + Civil Partnership			X
Pregnancy and maternity			X
Race			X
Religion or Belief			X
Sex (was Gender)			X
Sexual Orientation			X
Transgender			X

Welsh Language		X	
<p><b>Potential Positive Impact:</b> The LDP should bring positive benefits to all members of Monmouthshire’s population through policies that seek to achieve the five main aims of the Welsh Spatial Plan, namely Building Sustainable Communities, Promoting a Sustainable Economy, Valuing our Environment, Achieving Sustainable Accessibility and Respecting Our Environment. All the policies of the plan have been subject to a Sustainability Appraisal that measures their performance against sustainability objectives, including such matters as providing equitable access to jobs, services and facilities, allowing all people to meet their housing needs, protecting people from health risk and providing opportunities for healthy lifestyles, supporting all members of the community and promoting community cohesion. The adoption of CIL is a means of supporting and delivering the LDP. There are a number of exemptions to the CIL charge, including, for example, that it does not apply to affordable housing, development used for charitable purposes, self-build dwellings and residential annexes/extensions, so national legislation itself includes provision for measures that avoid a number of potential adverse impacts on groups with protected characteristics.</p>			
<p><b>Potential Negative Impact:</b> Decisions on how to prioritise the spending of CIL receipts could potentially have implications for groups with protected characteristics. The present stage of the process, however, does not seek to establish such priorities but is the first step in establishing a CIL charging schedule. Spending decisions will need to be subject to separate EQIAs.</p>			

Please give details about any potential <b>negative impacts</b> .	How do you propose to <b>MITIGATE</b> these <b>negative impacts</b>
➤	➤
➤	➤

**Signed**     Martin Davies     **Designation** Development Plans Manager     **Dated** 16/10/2014

## EQUALITY IMPACT ASSESSMENT FORM

<b>What are you impact assessing</b>	<b>Service area</b>
Community Infrastructure Levy	Development Plans
<b>Policy author / service lead</b>	<b>Name of assessor and date</b>
Development Plans Manager	Martin Davies 16/10/2014

### 1. What are you proposing to do?

Issue a Preliminary Draft Charging Schedule (PDCS) for consultation purposes as a first stage in implementing a CIL charge that will help deliver the LDP by providing a means of funding infrastructure to support the level of development set out in the LDP.

2. Are your proposals going to affect any people or groups of people with protected characteristics in a **negative** way? If **YES** please tick appropriate boxes below.

Age		Race	
Disability		Religion or Belief	
Gender reassignment		Sex	
Marriage or civil partnership		Sexual Orientation	
Pregnancy and maternity		Welsh Language	

3. Please give details of the negative impact

4. Did you take any actions to mitigate your proposal? Please give details below including any consultation or engagement.

Details of the LDP Consultation Process are set out in the Monmouthshire Local Development Plan Consultation Report October 2012. The web link to this is: <http://www.planningpolicy.monmouthshire.gov.uk/wp-content/uploads/2013/01/Intro-to-RoC-Oct2012.pdf>

The PDCS will be subject to a public consultation prior to adoption, targeted to those who are considered to have a specific interest in the topic but that will also include all town and community councils, notices in the press. Individuals and organisations currently on the LDP consultation data base will be given the opportunity to request to be notified of the CIL process should they wish.



5. Please list the data that has been used to develop this proposal? eg Household survey data, Welsh Govt data, ONS data, MCC service user data, Staff personnel data etc..

An extensive evidence base was established to support the LDP, including a Draft Infrastructure Report. This can be viewed at:

[http://www.planningpolicy.monmouthshire.gov.uk/?page\\_id=5373](http://www.planningpolicy.monmouthshire.gov.uk/?page_id=5373)

The plan has been subject to a Sustainability Appraisal/Strategic Environmental Assessment at every main stage.

**Signed**...Martin Davies...**Designation** Development Plans Manager.....**Dated**...16/10/2014.....

## The “Sustainability Challenge”

<p><b>Name of the Officer</b> completing “the Sustainability challenge”</p> <p>Martin Davies</p>	<p>Please give a <b>brief description</b> of the <b>aims</b> proposed policy or service reconfiguration</p> <p>The Local Development Plan (LDP), which was adopted on 27 February 2014, sets out the Council’s vision and objectives for the development and use of land in Monmouthshire, together with the policies and proposals to implement them over the ten year period to 2021. Community Infrastructure Levy (CIL) is a levy that is charged on new developments, to be used to support the funding of infrastructure that the community needs. The adoption of CIL, therefore, is a means of delivering the LDP. A fundamental aspect of the LDP process is that it promotes sustainable development through its vision, objectives and policies, seeking to balance social, economic and environmental aspects of sustainable development. *</p>		
<p><b>Name</b> of the Division or service area</p> <p>Development Plans</p>	<p><b>Date</b> “Challenge” form completed</p> <p>16/10/2014</p>		
<p>Aspect of sustainability affected</p>	<p><b>Negative impact</b></p> <p><b>Please give details</b></p>	<p>Neutral impact</p> <p><b>Please give details</b></p>	<p><b>Positive Impact</b></p> <p><b>Please give details</b></p>
<b>PEOPLE</b>			
Ensure that more people have access to healthy food			X
Improve housing quality and			X

provision			
Reduce ill health and improve healthcare provision			X
Promote independence		X	
Encourage community participation/action and voluntary work		X	
Targets socially excluded		X	
Help reduce crime and fear of crime		X	
Improve access to education and training		X	
Have a positive impact on people and places in other countries		X	
<b>PLANET</b>			
Reduce, reuse and recycle waste and water			X
Reduce carbon dioxide emissions			X
Prevent or reduce pollution of the air, land and water			X

Protect or enhance wildlife habitats (e.g. trees, hedgerows, open spaces)			X
Protect or enhance visual appearance of environment			X
<b>PROFIT</b>			
Protect local shops and services		X	
Link local production with local consumption		X	
Improve environmental awareness of local businesses		X	
Increase employment for local people			X
Preserve and enhance local identity and culture			X
Consider ethical purchasing issues, such as Fairtrade, sustainable timber (FSC logo) etc		X	
Increase and improve access to leisure, recreation or cultural facilities			X

\* Please note that the Monmouthshire Local Development Plan 2011-2021 Adoption Statement (Including SA/SEA Statement) February 2014

sets out how environmental considerations have been integrated into the plan; how the Environmental Report (SA/SEA) has been taken into account; and how opinions expressed in relation to the consultations on the plan and Environmental Report have been taken into account. This can be viewed at <http://www.planningpolicy.monmouthshire.gov.uk/wp-content/uploads/2013/01/Adoption-Statement.pdf>

Full details are given in the SA/SEA Report itself. This can be viewed at [http://www.planningpolicy.monmouthshire.gov.uk/?page\\_id=8046](http://www.planningpolicy.monmouthshire.gov.uk/?page_id=8046)

What are the potential negative Impacts	Ideas as to how we can look to <b>MITIGATE</b> the <b>negative impacts</b> (include any reasonable adjustments)
➤ These are set out in detail in the LDP Sustainability Appraisal / Strategic Environmental Assessment Report	➤ These are set out in detail in the LDP Sustainability Appraisal / Strategic Environmental Assessment Report

## The next steps

- If you have assessed the proposal/s as having a **positive impact please give full details** below

This is set out in detail in the LDP Sustainability Appraisal / Strategic Environmental Assessment Report

- If you have assessed the proposal/s as having a **Negative Impact** could you please provide us with details of what you propose to do to mitigate the negative impact:

This is set out in detail in the LDP Sustainability Appraisal / Strategic Environmental Assessment Report

**Signed** Martin Davies, Development Plans Manager      **Dated 16/10/2014**



**Monmouthshire County Council**

**Community Infrastructure Levy (CIL)**

**Guidance Note**

**DRAFT**

**Development Plans Service**

**September 2014**

# Community Infrastructure Levy (CIL) Guidance Note

## 1 INTRODUCTION

- 1.1 The purpose of this document is to provide an overview of the Community Infrastructure Levy (CIL) – a planning charge that came into force on 6 April 2010 through the Community Infrastructure Levy Regulations 2010 (as amended). CIL is not a devolved issue to Wales and responsibility for the introduction and development of the CIL process rests with the UK Government. This document sets out the key features of the levy, its purpose and how it will function in practice. In addition to this guidance note, the Council has prepared a Preliminary Draft Charging Schedule which sets out the proposed CIL for Monmouthshire.

### **What is the Community Infrastructure Levy (CIL)?**

- 1.2 The Community Infrastructure Levy is a new charge which local authorities in England and Wales can charge on most types of development in their area. It applies to most new buildings with 100 square metres or more of gross internal floorspace and to new dwellings of any size. The CIL Regulations 2010 (as amended) allow charging authorities to set differential rates by the type, size and location of development. The revenue generated from CIL is used to fund infrastructure that is required to support future development in an authority's area. CIL cannot be expected to pay for all of the infrastructure required but it is expected to make a significant contribution. Once introduced the CIL is mandatory and will be charged against all new development that meets the qualifying criteria (see 1.4 below).

### **Why seek to introduce CIL?**

- 1.3 It is anticipated the levy will offer a number of benefits which include:
- Delivering funding for local authorities to provide a range of physical, social and green infrastructure that supports growth and benefits local communities.
  - Providing developers with more certainty 'up front' in respect of development costs to which they will be expected to contribute, which in turn should encourage greater confidence.
  - Ensuring greater transparency in terms of how development contributes to local communities. The levy is beneficial to local communities as communities are able to receive a proportion of the CIL revenue generated in their area to fund local infrastructure.

### **What Types of Development will be charged CIL?**

- 1.4 The following development types are eligible to be charged CIL:
- All new build residential dwellings.
  - New non-residential buildings with a gross internal floorspace of over 100 square metres.
  - New build extensions to existing buildings over 100 square metres.

- 1.5 The levy will apply to all such development regardless of the type of planning consent used to grant permission. CIL will be charged in pounds per square metre on the net additional increase in floorspace.

### **Is any Development Exempt from Paying CIL?**

- 1.6 The CIL Regulations 2010 (as amended) provide for certain types of development to be exempt or eligible for relief from CIL, as set out below.

#### **Development Exempt from CIL:**

- Development with gross internal area of less than 100 sq. m (unless a house).
- Dwellings, residential annexes and residential extensions which are built by 'self-builders'.
- Vacant buildings brought back into the same use.
- Structures which are not buildings (e.g. wind turbines).
- Buildings into which people do not normally go.
- Buildings into which people only go intermittently for the purpose of inspecting or maintaining fixed plant or machinery.

#### **Development Entitled to Mandatory Relief from CIL:**

- Development used for charitable purposes i.e. development by registered charities for the delivery of their charitable purposes, as set out in the CIL Regulations 2010 (as amended).
- Social Housing i.e. those parts of a development which are to be used as social housing, as set out in the CIL Regulations (as amended).

- 1.7 The regulations allow authorities to offer CIL relief in exceptional circumstances where the specific scheme cannot afford to pay the levy, although there are conditions associated with this. The majority of development will not be eligible for exceptional circumstances relief and the fact that a development might be unviable at the time a planning application is submitted is unlikely to constitute an 'exceptional circumstance' in relation to the regulations.
- 1.8 The Council's position on CIL relief and exceptional circumstances in Monmouthshire will be further detailed as the CIL is taken forward.

## **2 CIL RATES**

### **Setting the CIL Rate**

- 2.1 In order to charge CIL, charging authorities (i.e. local authorities in Wales) are required to produce a charging schedule that sets out the rates to be applied to their area which must be based on sound viability evidence. Authorities are able to charge different rates depending on the type, scale and location of development providing this can be justified by an assessment of impact on development viability. Importantly, different rates can only be set on the basis of economic viability – not to support other objectives.
- 2.2 The CIL Regulations 2010 (as amended) require charging authorities to strike an appropriate balance between the desirability of funding infrastructure from



the levy and the potential impact of the levy on the economic viability of development across the area. It is important that CIL rates are not set at the upper limit of viability in order to deal with fluctuations in economic cycles. Charging authorities should be able to demonstrate how their proposed CIL rate will contribute towards the implementation of their local development plans and support development across their area.

### **What will the CIL Rates be in Monmouthshire?**

- 2.3 The Council's Preliminary Draft Charging Schedule sets out the proposed CIL charges for Monmouthshire. This has been informed by a comprehensive viability assessment which provides detailed evidence on development viability across a range of sites and uses in the County<sup>1</sup>. On the basis of this evidence and in accordance with the regulations, the Council has sought to set its CIL rates within the levels of what could be charged by allowing a 30% buffer in order to ensure that the rates do not put the overall viability of development at risk.

## **3 COLLECTING CIL**

### **How will CIL be Collected?**

- 3.1 CIL will be collected by the 'collecting authority' (i.e. local authorities in Wales). The collecting authority calculates individual payments and is responsible for ensuring that payment is made.

### **How will CIL be calculated?**

- 3.2 The rate will be based on the area of development liable and the level of charge identified for the use proposed in the location of the development. The chargeable rate will be index linked.
- 3.3 The chargeable amount will be calculated at the time planning permission first permits the chargeable development in accordance with the formula set out below:

$$\frac{R \times A \times Ip}{Ic}$$

R = the CIL rate set out in tables 1 and 2  
A = the deemed net area chargeable at rate R  
Ip = the index<sup>2</sup> figure for the year in which  
planning permission was granted  
Ic = the index figure for the year in which the  
charging schedule took effect

<sup>1</sup> MCC CIL Viability Assessment – Viability Evidence for Development of a CIL Charging Schedule (Three Dragons with Peter Brett Associates, July 2014)

<sup>2</sup> The index is the national All-in Tender Price Index of construction costs published by the Building Cost Information Service of the RICS and the figure is for 1<sup>st</sup> November of the preceding year

- 3.4 CIL will be charged on the net additional gross internal floor area of a development. Where buildings are demolished, the total demolished floorspace will be off-set against the floorspace of the new buildings, providing the buildings were in lawful use for a continuous period of 6 months within the past three years<sup>3</sup>. Where the chargeable amount is less than £50 it is deemed to be zero.
- 3.5 In instances where there is more than one use class in a development, the chargeable development in each use class is calculated separately and then added together to provide the total chargeable amount.
- 3.6 Where an outline planning permission allows development to be implemented in phases, each phase of the development is a separate chargeable development. In the case of outline planning applications where the floorspace is not specified the amount will be calculated at the submission of reserved matters.

#### **Who will be Liable for Paying CIL?**

- 3.7 The responsibility to pay CIL runs with the ownership of the land (although anyone involved in a development may assume the liability for CIL) and is transferred when ownership is transferred. The person liable for CIL must submit a commencement notice to the authority prior to commencement of development. The authority will then serve a demand notice on the liable party in respect of the chargeable development.
- 3.8 Where a development has a party who has assumed liability, the development will be entitled to a payment window and possibly payment through instalments provided other CIL procedures are followed. Where no-one assumes liability to pay CIL, the liability will automatically default to the landowner and payment becomes due as soon as development commences.

#### **When will CIL be Paid?**

- 3.9 CIL payments are due from the date that a chargeable development is commenced. When planning permission is granted the authority will issue a liability notice which sets out the amount that will be due for payment, the payment procedure and the possible consequences of failure to comply with the requirements.
- 3.10 Where planning permission is granted retrospectively for development that has already been carried out, the commencement date for the purposes of CIL will be day on which planning permission is granted.
- 3.11 Payments can be made in instalments subject to the authority publishing an instalments policy. The Council's position on operating an instalment policy in Monmouthshire will be further detailed as the CIL is taken forward.

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<sup>3</sup> Regulation 40 (as amended by the 2014 Regulations) provides detail on how this should be taken into account

## **Can CIL be Paid ‘in kind’?**

- 3.12 The CIL Regulations 2010 (as amended) recognise that there may be circumstances where the authority and person liable for CIL may wish land and /or infrastructure to be provided instead of money to satisfy a charge. Accordingly, subject to relevant conditions an authority may enter into an agreement to receive land / infrastructure as payment.

## **4 SPENDING CIL**

### **What can CIL money be spent on?**

- 4.1 CIL is intended to fund the provision of new infrastructure and should not be used to remedy pre-existing deficiencies in infrastructure provision unless those deficiencies will be made more severe by the new development. It can also be used to increase the capacity of existing infrastructure or to repair failing infrastructure if that is necessary to support development.
- 4.2 The levy can be used to fund a wide range of infrastructure including:
- Transport
  - Education
  - Flood defences
  - Parks and green spaces
  - Cultural and sports facilities
- It is for the authority to determine what infrastructure will be funded through CIL and to prioritise infrastructure delivery. Of note, CIL cannot be used to fund affordable housing – this will continue to be provided through planning obligations.
- 4.3 The Government wish to ensure that communities that experience new development directly share the benefits. The regulations therefore require authorities to allocate 15% of CIL receipts to spend on infrastructure priorities that should be agreed with the local community in areas where development is taking place i.e. passed to community councils in Wales. In areas without community councils the authority will retain CIL receipts but must engage with the communities where development has taken place and agree with them how best to spend the levy.
- 4.4 Authorities are able to spend CIL on infrastructure projects outside of their area and may also pool contributions to provide infrastructure that would facilitate development in their areas.

### **Regulation 123 List**

- 4.5 Regulation 123 of the Community Infrastructure Levy provides for authorities to publish a list of infrastructure that will be eligible to be funded, wholly or partly, by CIL – i.e. the Regulation 123 List. The infrastructure included in the list should draw heavily from the infrastructure requirements set out in local

development plans and can include generic and/or more project specific types of infrastructure.

- 4.6 CIL Regulation 123 restricts the use of planning obligations (S106 agreements) for infrastructure that will be funded in whole or part by CIL in order to ensure that there is no double charging towards the same item of infrastructure. This means that a S106 contribution cannot be made towards an infrastructure item included in a Regulation 123 list. This will make certain that individual developments cannot be charged for the same infrastructure items through both planning obligations and CIL.
- 4.7 Regulation 123 Lists should also set out those known site-specific matters where S106 contributions are likely to be the funding mechanism in order to provide transparency on what authorities intend to fund through CIL and those matters where S106 contributions will continue to be sought.

## 5 CIL AND PLANNING OBLIGATIONS

### What is the relationship between CIL and Planning Obligations?

- 5.1 CIL will be used as the mechanism for pooling contributions from a variety of new developments to fund the provision of new infrastructure to support development in an area. CIL offers greater flexibility than planning obligations in terms of how the levy can be used. CIL can be used to fund a wide range of infrastructure that supports the development of the area with no requirement for there to be a direct geographical or functional relationship between the development site and where infrastructure is provided. The levy secured in one part of an authority's area can be used to support delivery of infrastructure in another.
- 5.2 In order to ensure that planning obligations and CIL are able to operate in a complementary way the CIL Regulations scale-back the way planning obligations operate. Limitations are placed on the use of planning obligations in three respects:
- Putting the policy tests on the use of planning obligations (set out in Wales in Circular 13/97, Planning Obligations) on a statutory basis for developments which are capable of being charged CIL;
  - Ensuring the local use of CIL and planning obligations do not overlap;
  - Limiting pooled contributions from planning obligations towards infrastructure which may be funded by CIL. This means that contributions may be pooled from up to five separate planning obligations for a specific item of infrastructure (e.g. a local school) that is not included on the charging authority's infrastructure.
- 5.3 The CIL Regulations have made the policy tests on the use of planning obligations statutory – this is intended to clarify the purpose of planning obligations in light of CIL. From 6 April 2010 CIL Regulation 122 has made it unlawful for a planning obligation to be taken into account when determining a planning application for a development that is capable of being charged the

levy, whether there is a levy in place or not, if the obligation does not meet all of the following tests:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development.

5.4 Furthermore, after April 6 2015, or upon implementation of a CIL Charging Schedule (whichever is the earliest), all infrastructure not included in a Regulation 123 List cannot be funded through CIL contributions and may only be funded through S106 agreements which will be subject to rigorous application of the three statutory tests (as noted above).

5.5 Accordingly, planning obligations will continue to be secured albeit in a more restricted way. They will continue to play a role in the following areas:

- Affordable housing.
- Site-specific mitigation (on-site infrastructure is often required to make the development of a site acceptable e.g. access roads, play space provision).
- Restricting the use of land / buildings (e.g. clauses relating to tourism related occupancy).

5.6 It will not be possible to charge twice for the same item of infrastructure through both planning obligations and CIL. As detailed above, Regulation 123 lists set out what infrastructure will be eligible to be funded through CIL. Infrastructure included in these lists will no longer be eligible to be funded through planning obligations. This will ensure that the combined impact of contribution requests does not threaten the viability of sites / scale of development set out in local development plans.

## 6 STAGES IN THE PREPARATION OF CIL

6.1 The preparation of the CIL involves a number of stages as set out below:

- **Development of Evidence Base** – this will inform the subsequent stages of the CIL process and should include the following:
  - Identifying the range and scale of infrastructure that is required to deliver the development set out in the local development plan;
  - Establishing that there is a funding gap between the cost of, and the money available to deliver this infrastructure;
  - Establishing the type, scale and location of development and the rate at which CIL can be set in order to fund the necessary infrastructure without compromising the viability of development across the area.
- **Preliminary Draft Charging Schedule** – authorities are required to prepare and consult on this document which, based on the viability evidence, sets out the proposed CIL rates by the type, scale and location of development in an area.

- **Draft Charging Schedule** – following consideration of the comments made on the preliminary draft, authorities are required to publish and consult on the Draft Charging Schedule and amend as appropriate.
- **Examination** – authorities are then required to submit the Draft Charging Schedule together with the evidence base and representations received for independent examination. The examiner will consider whether the charging schedule meets the requirements of the CIL Regulations and Planning Act, is supported by appropriate evidence and whether the rates would threaten economic viability across the area as a whole.
- **Adoption and Implementation** – the examiner will issue a report to the authority and, subject to this, the charging schedule can be adopted and the CIL implemented.

## 7 MONITORING

### How will CIL be Monitored?

7.1 The rates at which CIL is charged must be monitored as changes in market conditions and construction costs can impact on development viability. Authorities are required to publish an annual report on CIL for the previous financial year (by 31 December each year) which sets out:

- How much CIL monies have been collected;
- How much of that money has been spent;
- Information on how CIL monies have been spent (including specific infrastructure projects and how much has been used to cover administrative costs); and
- The amount of CIL retained at the end of the reporting period.

The Council intend to formally review the Charging Schedule within 5 years of adoption. If, however, economic or development delivery conditions change significantly in the intervening period an earlier review may be necessary. The Regulation 123 List can be reviewed separately from the Charging Schedule. Accordingly, the Council will seek to review the Regulation 123 list on a regular basis as part of monitoring CIL. Any such review would be subject to appropriate consultation in accordance with the CIL Regulations (as amended).



monmouthshire  
sir fynwy

**Monmouthshire County Council**

**Community Infrastructure Levy  
Preliminary Draft Charging Schedule and  
Draft Regulation 123 List**

**DRAFT**

**Development Plans Service**

**September 2014**

# Preliminary Draft Charging Schedule

## 1 Introduction

- 1.1 The purpose of this document is to set out Monmouthshire County Council's Preliminary Draft Charging Schedule for the Community Infrastructure Levy (CIL) in its area. The finance generated from the CIL will be used to secure infrastructure required to support development in accordance with the Monmouthshire Local Development Plan. This charging schedule has been prepared in accordance with the requirements of the Community Infrastructure Levy Regulations 2010 (as amended).

## 2 Community Infrastructure Levy Rates

- 2.1 Monmouthshire County Council is the charging and collecting authority for the purposes of charging and collecting the Monmouthshire Community Infrastructure Levy respectively. The CIL charge will not apply to that part of Monmouthshire that lies within the Brecon Beacons National Park. The responsibility for setting and collecting the levy in this area will rest with the National Park Authority.
- 2.2 Reflecting the findings of the CIL viability study<sup>1</sup>, the Council intends to charge CIL at the rates, expressed as pounds per square metre, as set out in tables 1 and 2 below.

### **Residential Development Rates**

- 2.3 The CIL rate for residential development will be charged at different rates across the County. Maps showing the location and boundaries of the areas in which differential rates will be charged are attached at Appendix 1 (maps 1-5).

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<sup>1</sup> MCC CIL Viability Assessment – Viability Evidence for Development of a CIL Charging Schedule (Three Dragons with Peter Brett Associates, July 2014)



**Table 1: Residential Development CIL Rates**

Category	Geographical Area	CIL rate per square metre
(1)	Strategic LDP Sites* <ul style="list-style-type: none"> <li>• Deri Farm, Abergavenny (SAH1)</li> <li>• Crick Road, Portskewett (SAH2)</li> <li>• Fairfield Mabey, Chepstow (SAH3)</li> <li>• Wonastow Road, Monmouth (SAH4)</li> <li>• Rockfield Road, Undy (SAH5)</li> <li>• Vinegar Hill, Undy (SAH6)</li> </ul>	£60
(2)	Non-strategic sites in the Main Towns of Abergavenny, Chepstow and Monmouth and the Rural Rest of Monmouthshire** except for Category (5) sites.	£110
(3)	Non-strategic sites in Severnside settlements***	£60
(4)	Sudbrook Paper Mill Strategic Site (SAH7)	£0
(5)	Sites in Main and Minor Villages, including those identified in Policy SAH11, that are required to provide above 35% affordable housing	£0
(6)	Retirement Housing	£0

\*This excludes the strategic site in Category (4): Sudbrook Paper Mill (SAH7)

\*\*The 'Rural Rest of Monmouthshire' includes the Rural Secondary Settlements and the Main and Minor Villages identified in LDP Policy S1, together with all open countryside ('open countryside' being the area outside the named settlements in LDP Policy S1').

\*\*\*Severnside Settlements are identified in LDP Policy S1 as Caerwent, Caldicot, Magor, Portskewett, Rogiet, Sudbrook and Undy

## Commercial Development Rates

- 2.4 The CIL rate for A1 retail out-of-centre uses will be charged at a single rate across the County as set out in Table 2. A zero CIL charge will apply to all other non-residential uses across Monmouthshire. Maps showing the County's Central Shopping Areas where a zero CIL charge will apply are attached at Appendix 1 (maps 6-12) - in areas outside the Central Shopping Areas a CIL rate of £200 per square metre will apply to out-of-centre retail uses.

**Table 2: Commercial Development CIL Rates**

Type of Development	CIL rate per square metre
A1 Out-of-Centre Retail	£200

## 3 Spending CIL

- 3.1 In accordance with the CIL Regulations, the Council must apply CIL receipts to funding infrastructure to support the development of its area.
- 3.2 As part of the Local Development Plan process the Council considered the infrastructure requirements of the County which are set out in the Draft Infrastructure Plan. The document sets out the infrastructure necessary to deliver the LDP strategic sites, to be funded through S106 agreements, together with an initial list of potential 'place-making' and other infrastructure projects by settlement, to be funded through CIL. Information is provided in respect of the cost of infrastructure, funding sources and responsibility for delivery, where known. CIL is intended to fill the gaps between existing sources of funding (to the extent that they are known) and the costs of providing infrastructure.
- 3.3 The Council's draft Regulation 123 List provided at Appendix 2 has been prepared in support of the Preliminary Draft Charging Schedule and sets out the categories of infrastructure that will be eligible to be funded through CIL. The infrastructure listed cannot then be funded through planning obligations.
- 3.4 It is improbable that CIL could ever raise sufficient levels of funding to provide all of the infrastructure items that the Council would wish to see delivered. Consequently, the inclusion of an infrastructure item on the Regulation 123 List will not constitute a commitment by the Council to fund that infrastructure through CIL. Decisions on what infrastructure will be delivered through CIL rests with the Council and will be influenced by its priorities and the amount of CIL funding available. Following adoption of the CIL, the Council will seek to review the list on a regular basis as part of the monitoring of the levy.

## 4 Next Steps in the CIL Process

- 4.1 The anticipated timetable for delivering the Monmouthshire Community Infrastructure Levy is set out in Table 3 below.

**Table 3: Anticipated CIL Delivery Timetable**

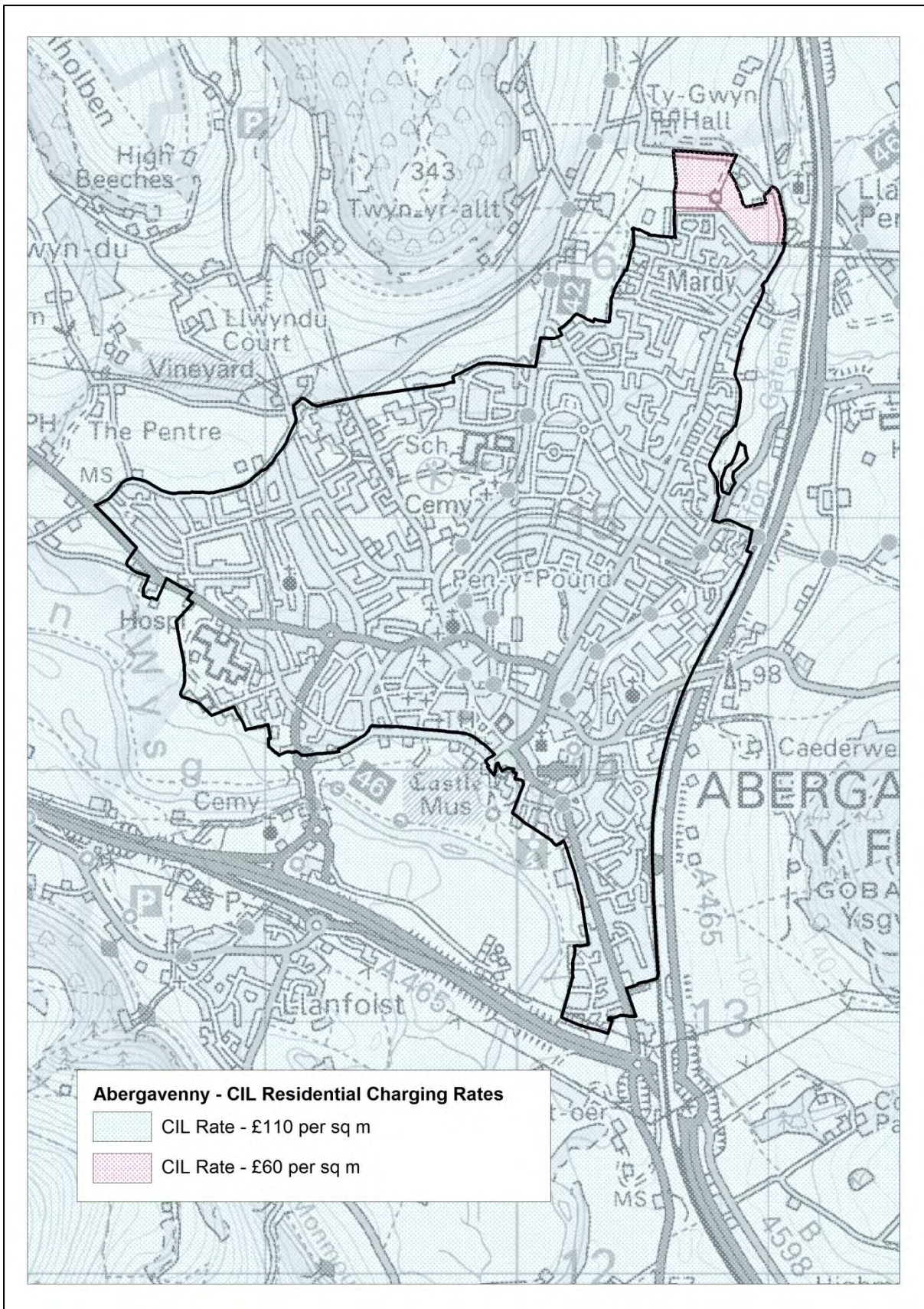
Stage	Timescale
Consultation on the Preliminary Draft Charging Schedule	December 2014
Prepare Draft Charging Schedule	January 2015
Consultation on Draft Charging Schedule	February 2015
Submission for Examination	March 2015
Examination	April/May 2015
Examiner's Report	June 2015
Implementation of CIL	July 2015
Annual Monitoring Report	October 2016

## APPENDIX ONE

### CIL CHARGING ZONE MAPS

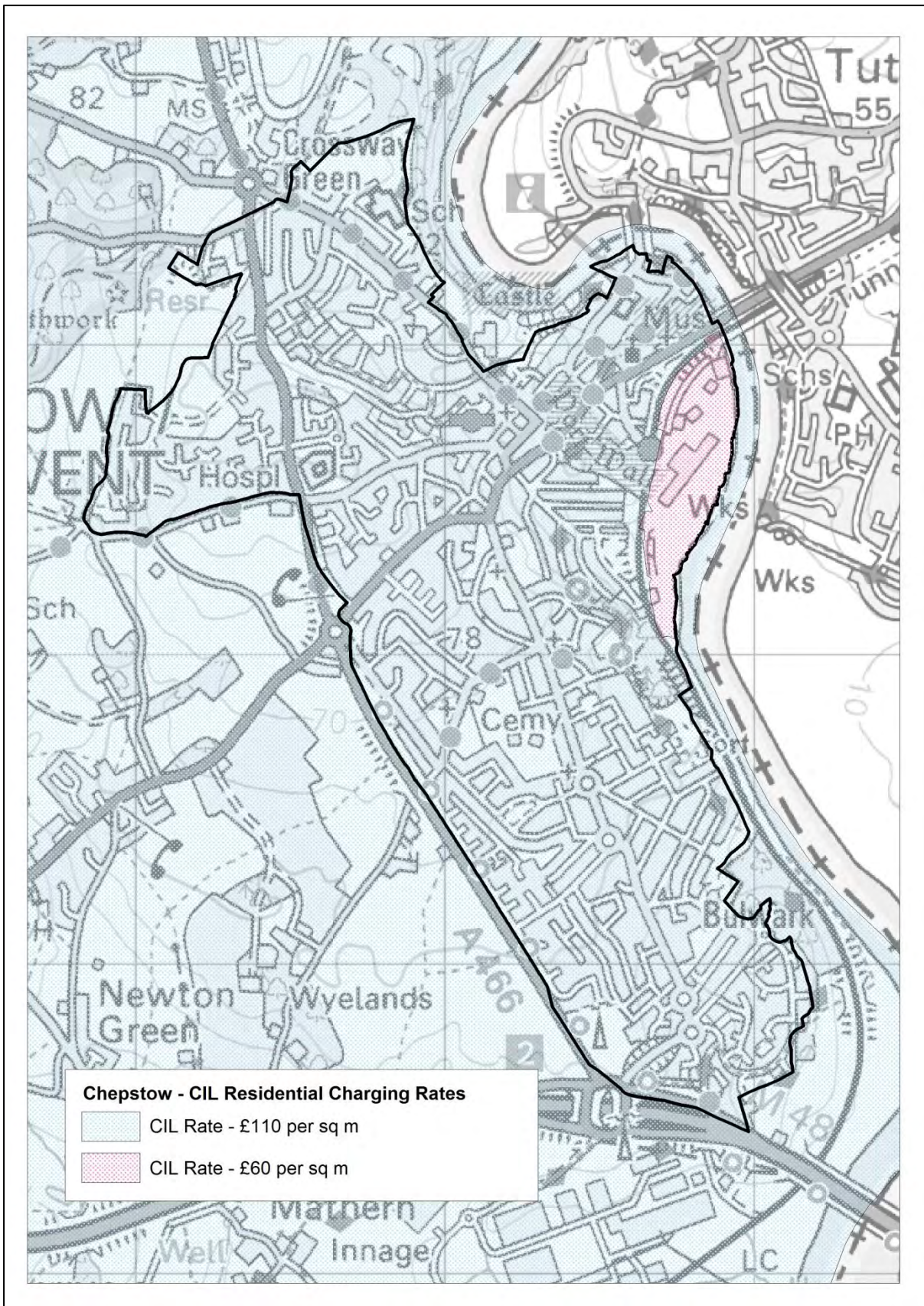


**Map 1: Abergavenny Residential Development CIL Rates**



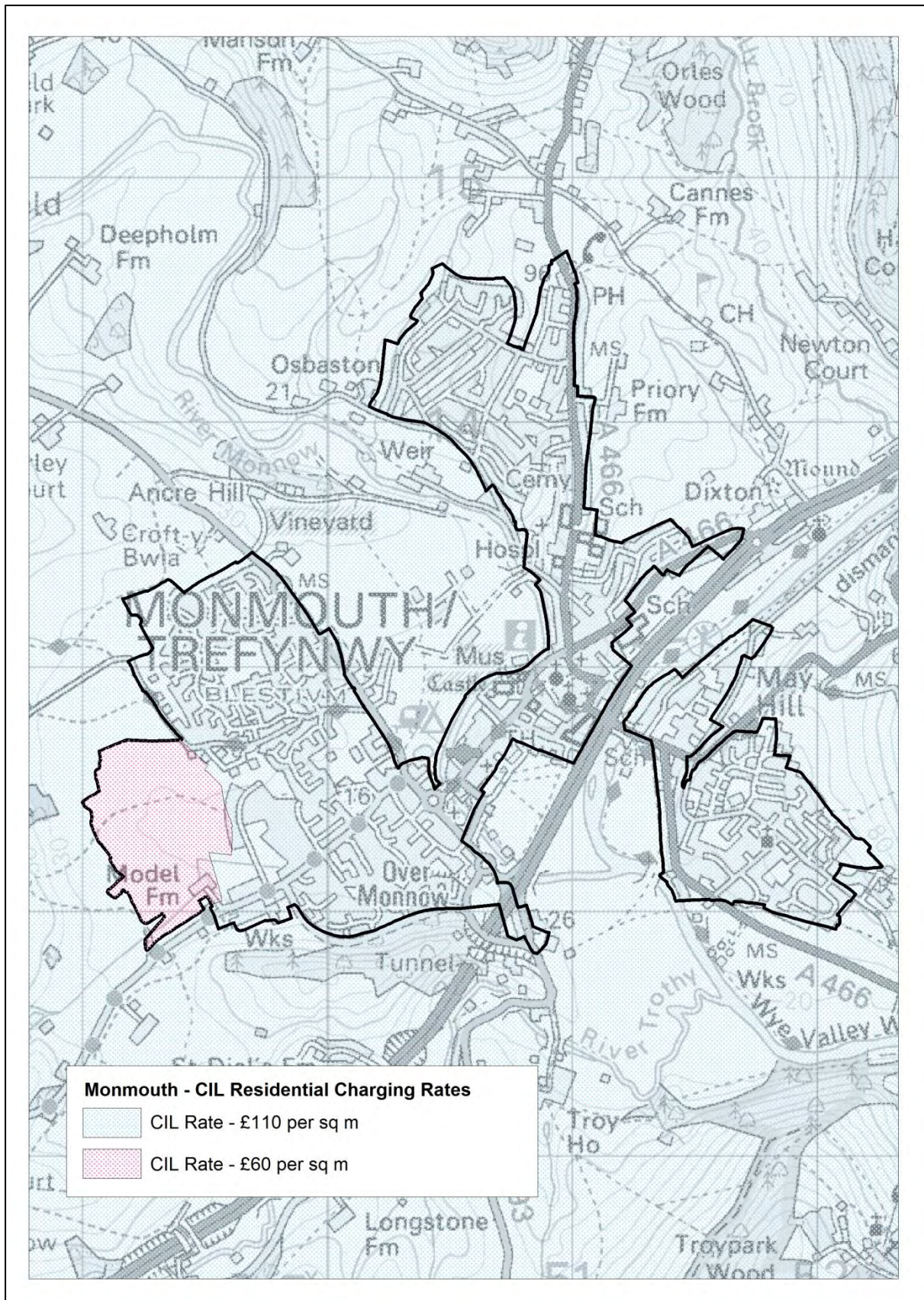


Map 2: Chepstow Residential Development CIL Rates



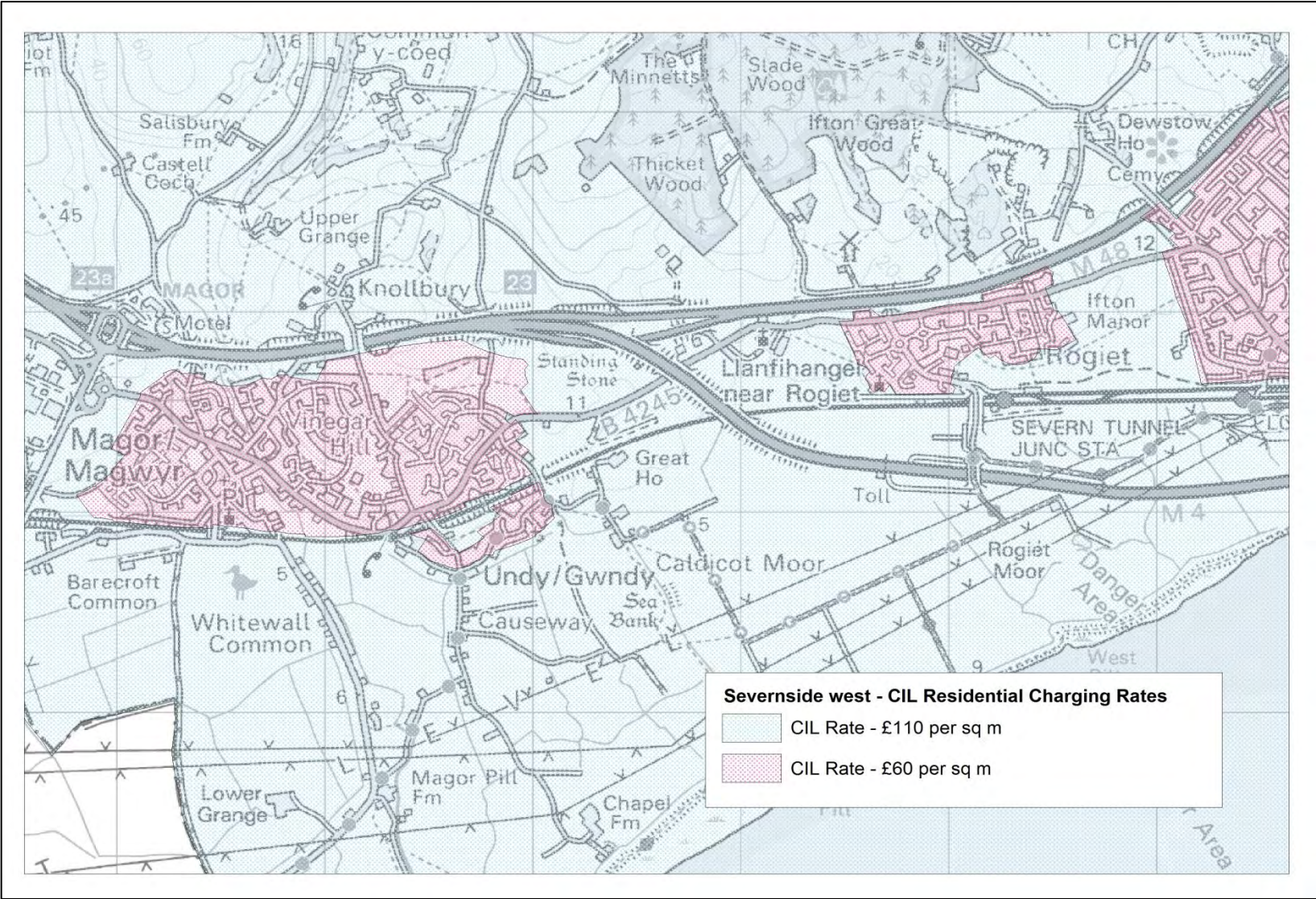


**Map 3: Monmouth Residential Development CIL Rates**



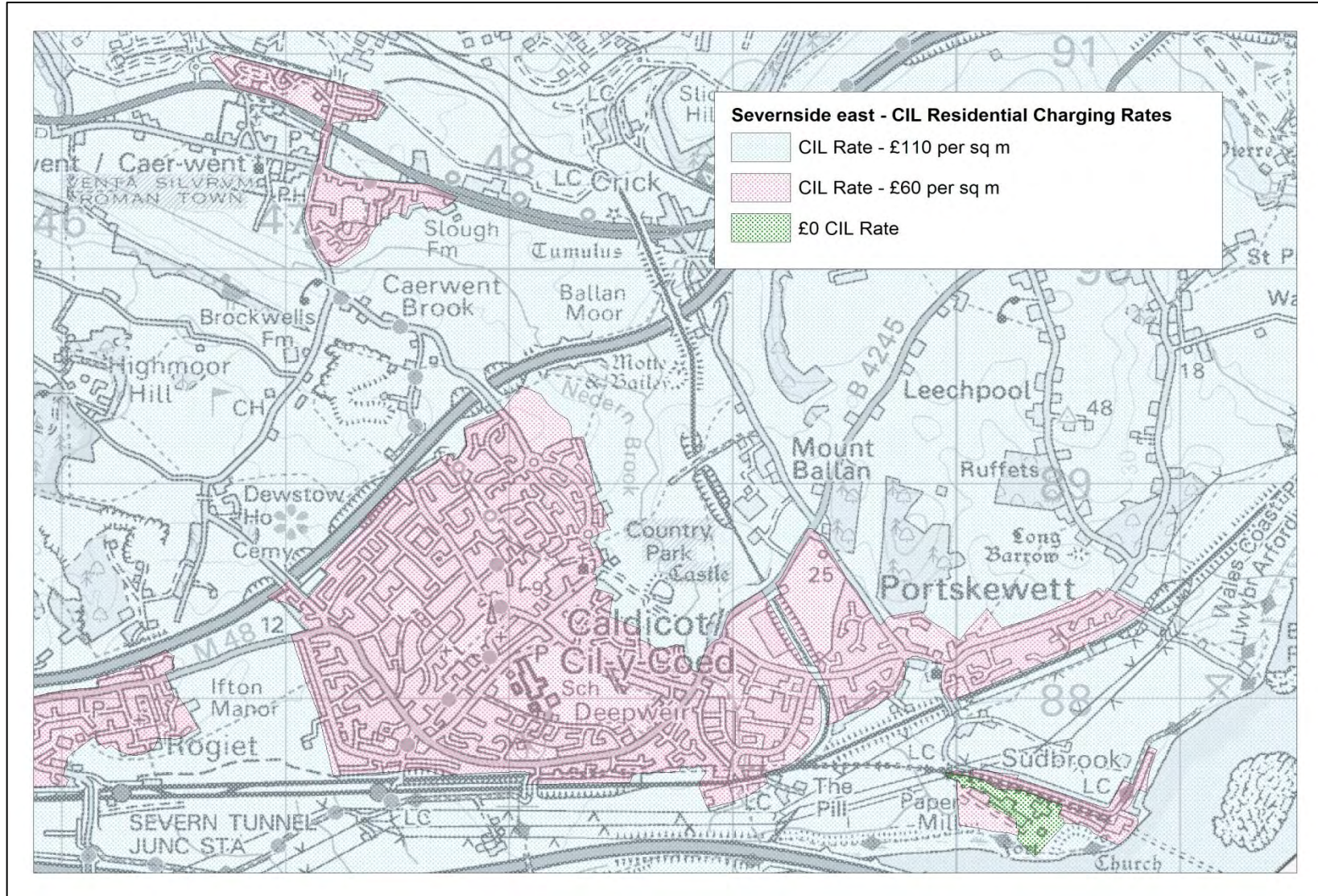


Map 4: Severnside West Residential Development CIL Rates





**Map 5: Severnside East Residential Development CIL Rates**





**Map 6: Abergavenny Commercial Development CIL Rates**



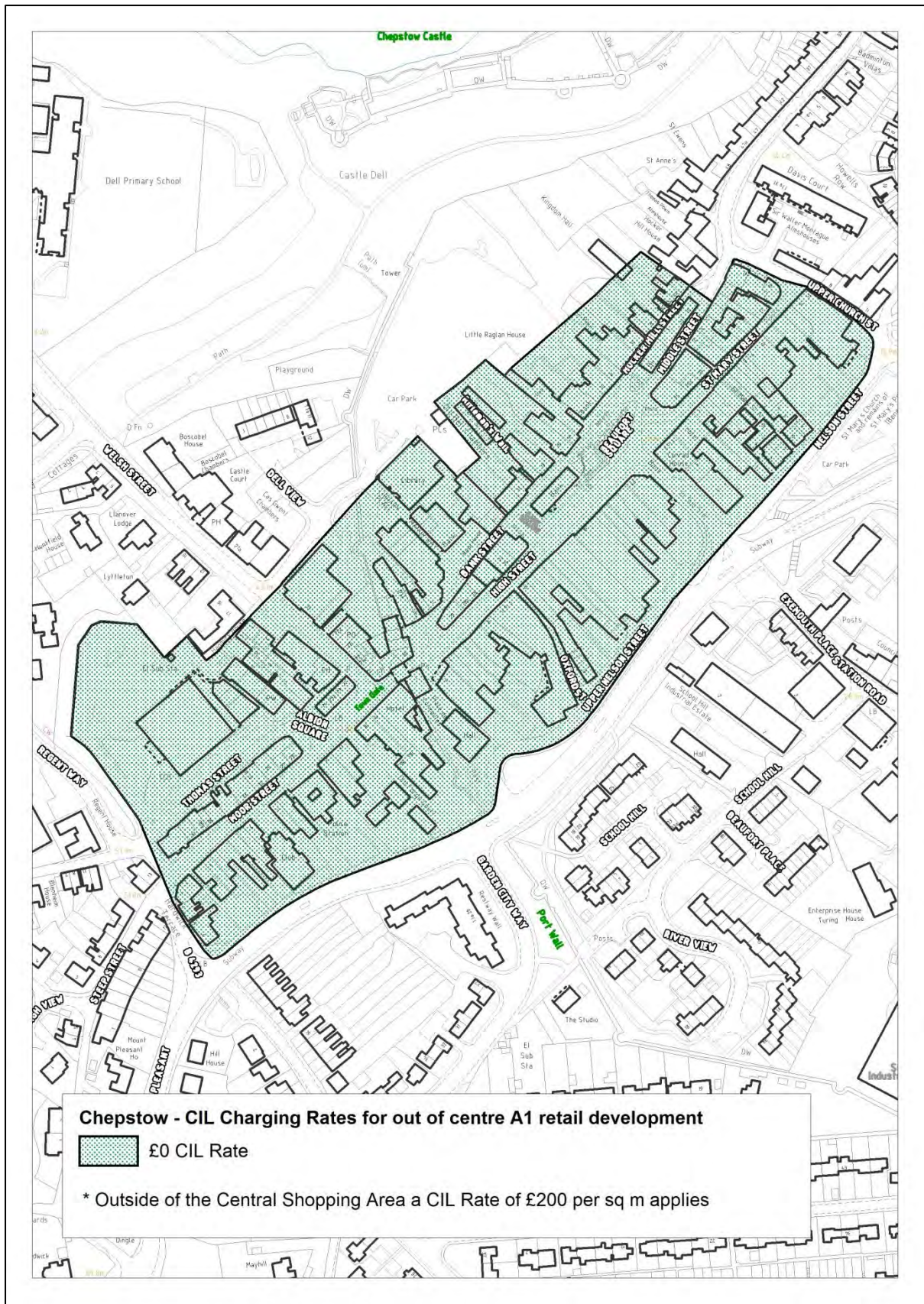


## Map 7: Caldicot Commercial Development CIL Rates



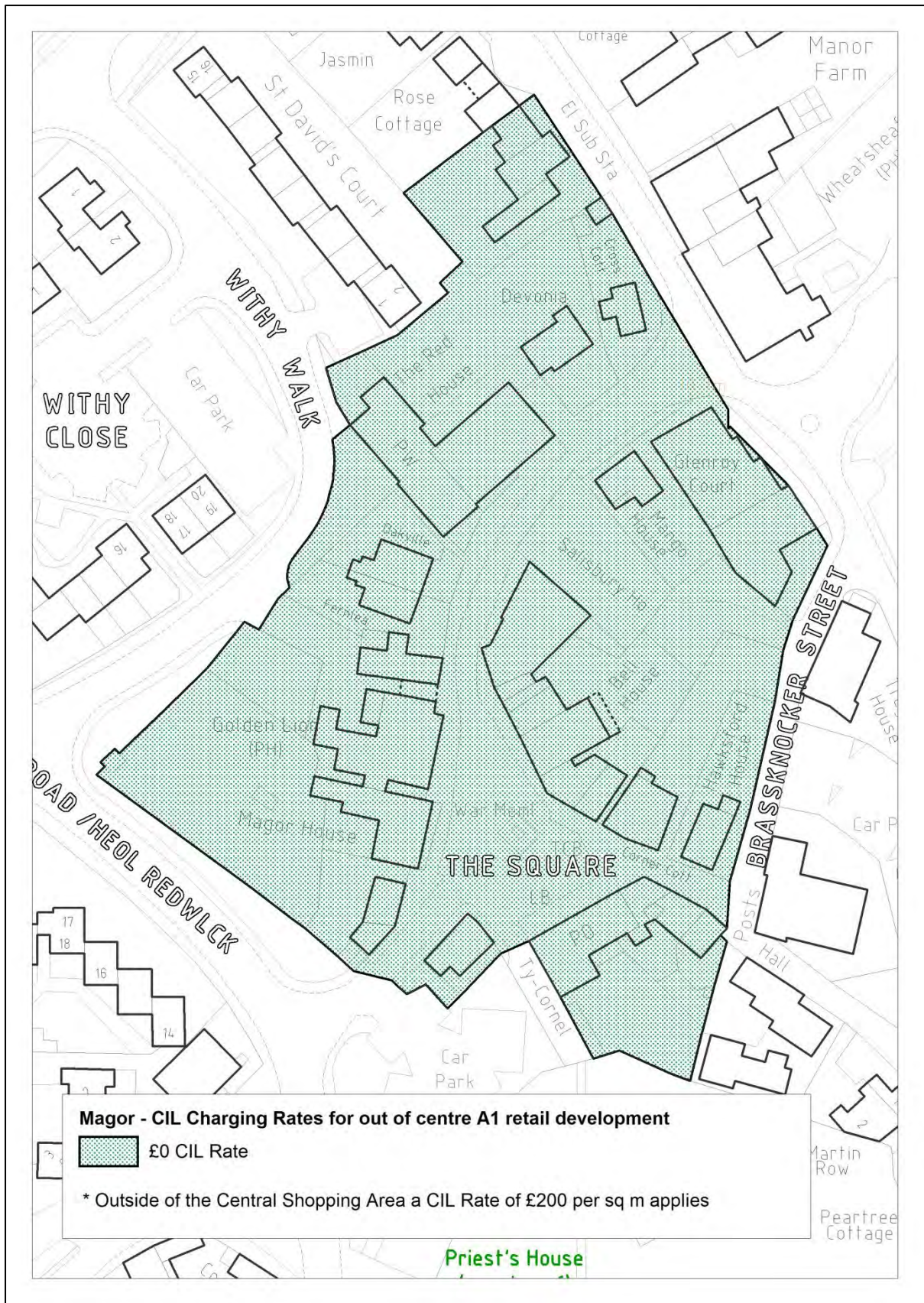


**Map 8: Chepstow Commercial Development CIL Rates**



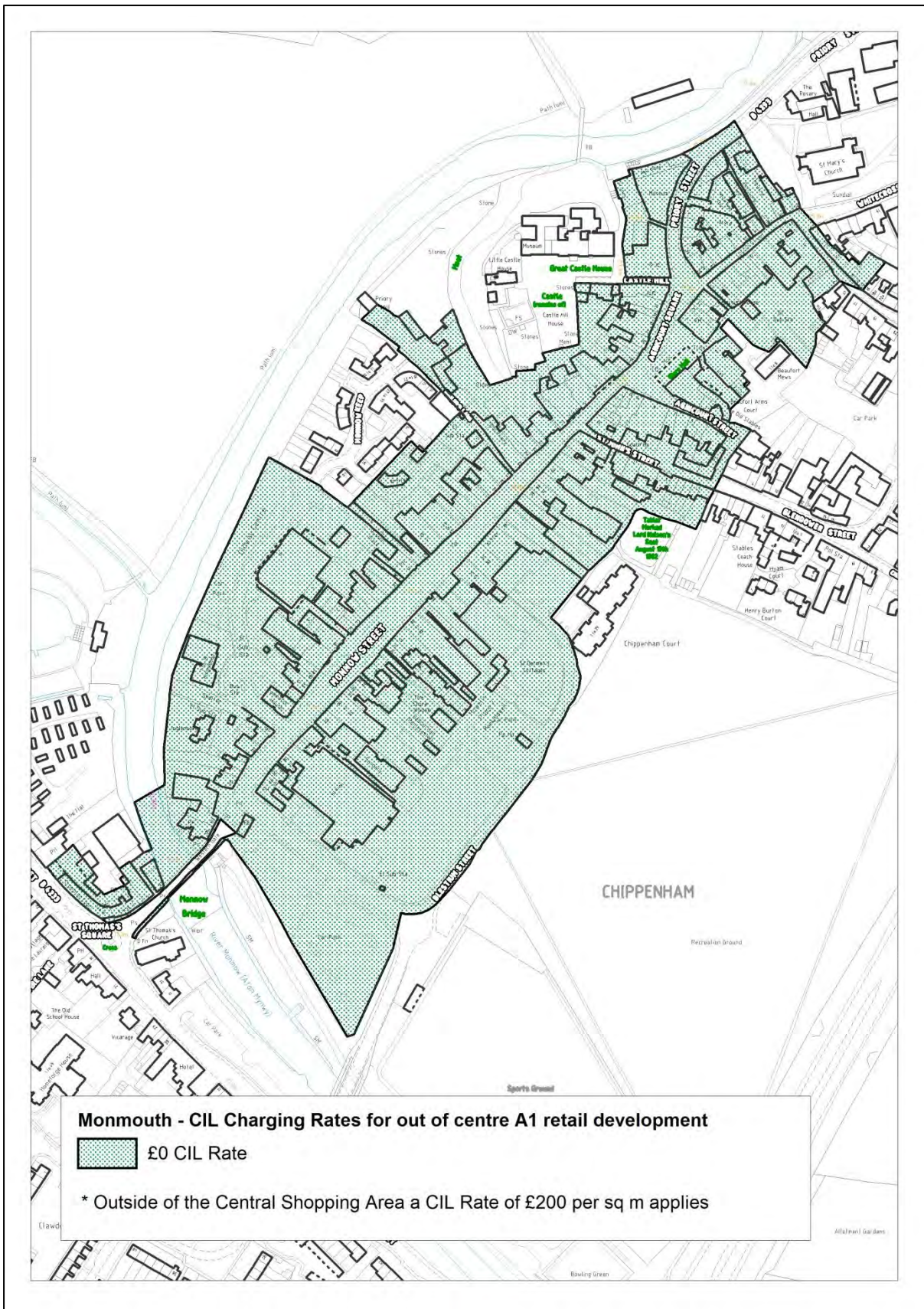


**Map 9: Magor Commercial Development CIL Rates**



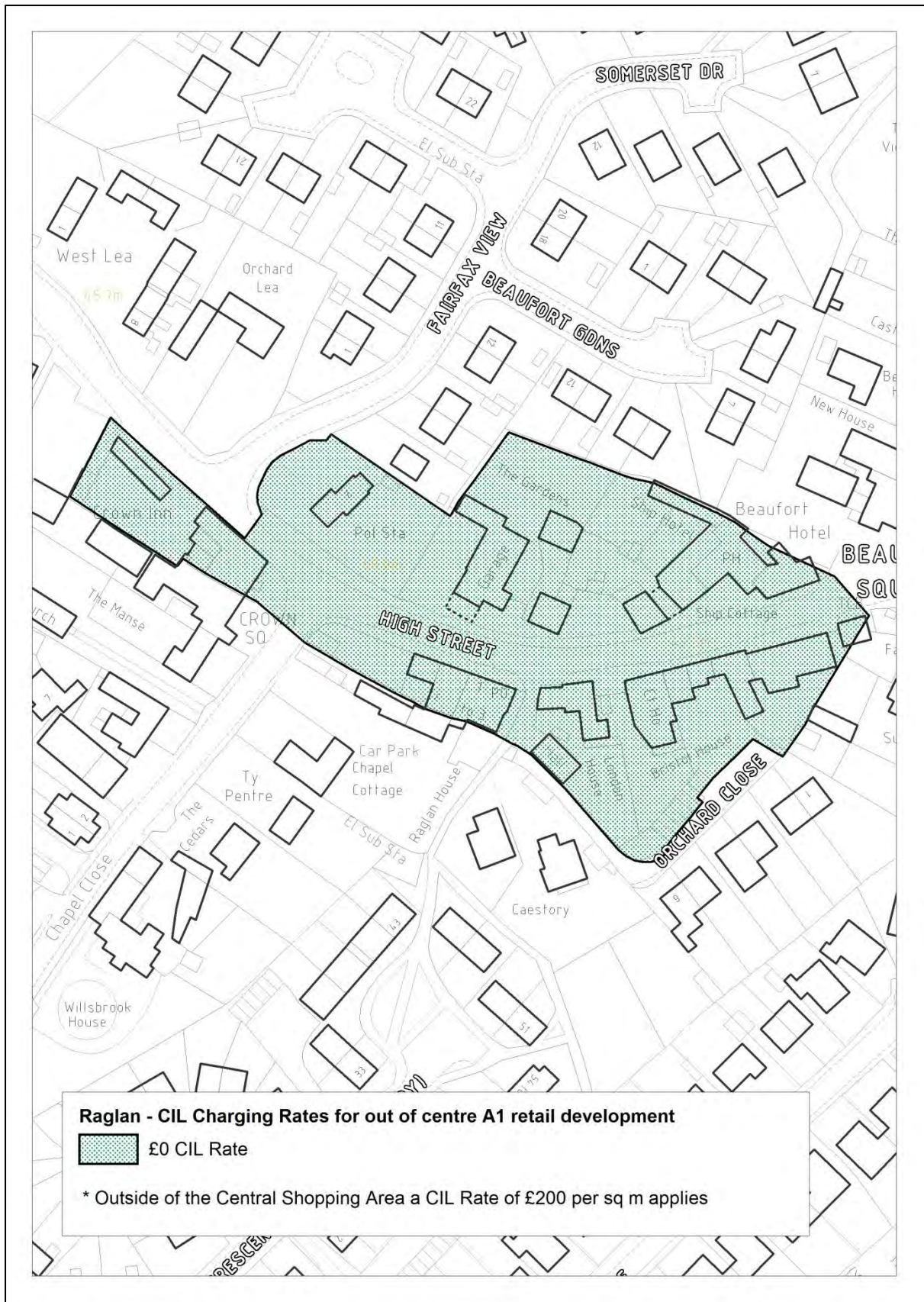


# Map 10: Monmouth Commercial Development CIL Rates



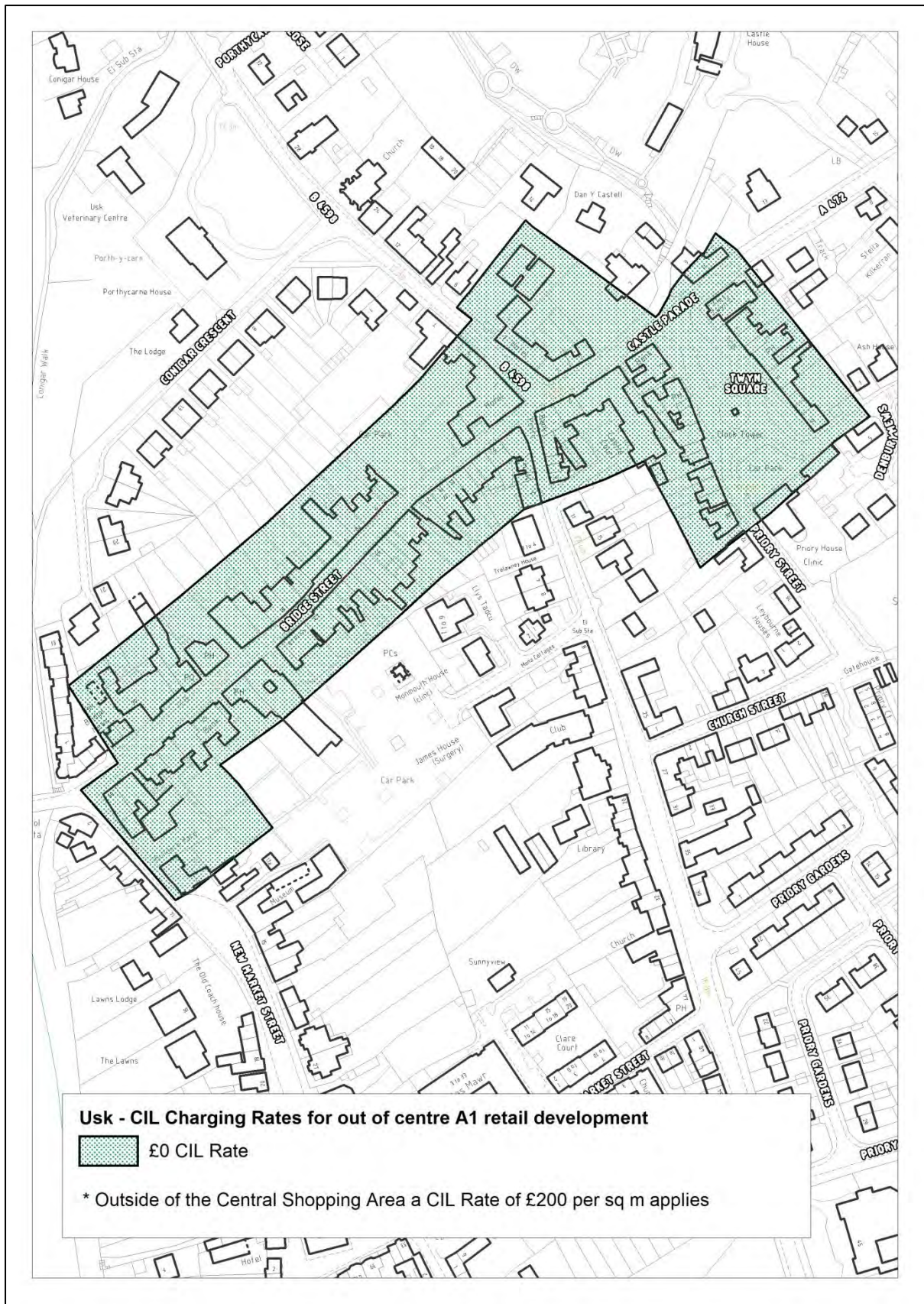


**Map 11: Raglan Commercial Development CIL Rates**





**Map 12: Usk Commercial Development CIL Rates**





## APPENDIX TWO

### Draft Regulation 123 List

The categories of infrastructure listed below will be eligible to be funded, wholly or in part, through CIL.

<b>Physical Infrastructure</b>
Including:
<ul style="list-style-type: none"><li>• Sustainable transport improvements</li></ul>
<ul style="list-style-type: none"><li>• Upgrade/provision of broadband connectivity</li></ul>
<ul style="list-style-type: none"><li>• Town centre improvements</li></ul>
<b>Social Infrastructure</b>
Including:
<ul style="list-style-type: none"><li>• Education</li></ul>
<ul style="list-style-type: none"><li>• Strategic sports /adult recreation facilities</li></ul>
<b>Strategic Green Infrastructure</b>
Schemes to be identified

### Exclusions from the Draft Regulation 123 List

The following types of infrastructure do not appear on the Draft Regulation 123 List and will be funded through S106 contributions where they meet the statutory tests set out in CIL Regulation 122:

- Infrastructure associated with the LDP Strategic Sites identified in the Council's Draft Infrastructure Plan.
- Affordable housing.
- On-site play space provision.

## APPENDIX THREE

### MCC CIL Evidence Base

The following documents support the Preliminary Draft Charging Schedule and the Draft Regulation 123 List. The documents are available to view on the Council's website and at Planning Reception, County Hall, Rhadyr, Usk NP15 1GA.

- **Monmouthshire Local Development Plan 2011-2021**  
This is the adopted development plan for Monmouthshire (excluding that part of the County within the Brecon Beacons National Park) which sets out the development framework for the County until 2021.
- **Monmouthshire County Council CIL Viability Assessment – Viability Evidence for Development of a Community Infrastructure Levy Charging Schedule (Three Dragons with Peter Brett Associates, July 2014)**  
This is a comprehensive viability assessment which has provided the Council with evidence to inform the Preliminary Draft Charging Schedule.
- **Monmouthshire Draft Infrastructure Plan (March 2013)**  
This sets out the requirements, phasing and costs and funding of infrastructure necessary to support the delivery of the LDP. It lists the infrastructure necessary for delivering the LDP strategic sites (annex 1) together with potential 'place-making' and other infrastructure projects by settlement (annex 2). The list in Annex 2 will be added to and revised as necessary as the Council establishes its priorities in light of available resources.

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**MONMOUTHSHIRE  
COUNTY COUNCIL – CIL  
VIABILITY ASSESSMENT**

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**Viability evidence for  
development of a  
Community  
Infrastructure Levy  
Charging Schedule**

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Three Dragons with Peter  
Brett Associates  
July 2014

**Final Report**



This report is not a formal land valuation or scheme appraisal and should not be relied upon as such. The report has been prepared using the Three Dragons residential toolkit and the Peter Brett non-residential model and is based on local authority level data supplied by Monmouthshire County Council, consultations and quoted published data sources. The models used provide a review of the development economics of illustrative schemes and the results depend on the data inputs provided. This analysis should not be used for individual scheme appraisal. No responsibility whatsoever is accepted to any third party who may seek to rely on the content of the report unless previously agreed.

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2. Testing Assumptions
3. Case study profiles
4. Development Industry Workshops 18th March – notes
5. 1 ha Notional Sites Results
6. Case Study Results
7. Non-residential Testing Assumptions and Results

## EXECUTIVE SUMMARY

1. The Monmouthshire County Council Viability Assessment provides the Council with evidence to assist it in drawing up a Community Infrastructure Levy (CIL) charging schedule. The evidence has been prepared in consultation with the development industry and has followed the relevant regulations and guidance. Evidence has been prepared to inform the CIL charging schedule for both residential and non-residential uses.
2. The recently adopted Monmouthshire Local Development Plan includes affordable housing viability testing as part of its evidence base. This has been reviewed in this new viability work, with testing to determine which assumptions remain current and which required updating.

### **Residential uses**

3. Residential development has been tested through notional 1 ha tiles and through case studies representative of the development planned to take place in Monmouthshire. The notional 1 ha tiles are used to test development on a common basis, which allows the effects of different market areas and different densities to become apparent. The case studies include the seven strategic sites identified in the Local Development Plan as well as other sites, including those planned to provide high proportions of affordable housing.
4. Including a 30% 'buffer', the potential residential development CIL rates that the Council may like to consider are:
  - Strategic Sites except SAH7 Sudbrook Paper Mill - £60/sq m
  - Small sites in Severnside - £60/sq m
  - Small sites in main towns, villages and rural rest of Monmouthshire £110/sq m
  - SAH7 Sudbrook Paper Mill - £0/sq m
  - Village schemes with above 35% affordable housing - £0/sq m
  - Retirement housing - £0/sq m
5. On a 'typical' three bedroom semi-detached market house the proposed charges would be £4,800 on strategic sites and on small sites in Severnside, and £8,800 on small sites in main towns, villages and rural rest of Monmouthshire. This would be in addition to the typical £1,000/dwelling residual s106 and any of the obligations affecting development on the strategic sites. This compares to the current typical s106 payments of £6,000-£7,000 per dwelling.

### **Non-residential uses**

6. The viability testing for non-residential uses included a range of developments representative of the types of development likely to come forward under the Local Development Plan as follows:
  - Retail
  - Offices
  - Industrial

- Warehouse
  - Hotels
  - Care homes
7. Using the same residual value analysis as the residential development, these non-residential uses were tested. The results show that there is scope to charge a **theoretical maximum** of £604/sq m for supermarkets, £331/sq m for retail warehouse, £68/sq m for town centre convenience retail units and £101/sq m for local store - out of centre (convenience) units. It is advised that at whatever the authority chooses as an appropriate charge that a buffer is included, so as not to set the charge at the ceiling of viability as advised in the guidance. Compared to residential development there will be fewer examples of non-residential development and it is likely that there will be wide variations in costs and values. Therefore a larger buffer is required than the 25%-30% considered for residential – a buffer of 40% is recommended. It is suggested that the Council considers a CIL rate of £200 per sq m for out of centre retail development.
8. It is suggested that a zero charge applies to all the other forms of non-residential development. All other tested uses show negative values, although, it is important to note that this does not mean that these uses will never come forward in Monmouthshire. Bespoke schemes with identified end users and land owners willing to sell at lower prices will enable development to come forward in the future.

## 1 INTRODUCTION

1.1 Three Dragons and Peter Brett Associates were commissioned by Monmouthshire County Council in 2014 to produce this CIL Viability Assessment. This document should be read in conjunction with the Council's forthcoming Infrastructure Plan and regulation 123 list, which will specify the funding gap that CIL will go towards and the type of infrastructure to be funded by CIL. The forthcoming planning obligations SPG will provide further detail on the residual s106/278 requirements.

### **Purpose of the Economic Viability Assessment**

1.2 The viability evidence provided in this report is to assist Monmouthshire County Council in determining a proposed Community Infrastructure Levy (CIL) charging schedule for residential and non-residential uses.

1.3 The viability testing for this report has been designed to assess:

- The amount of CIL that residential and non-residential development can afford.
- Whether there are differences in viability across the county, sufficient to justify different CIL rates.

1.4 The current viability assessment builds on a suite of earlier viability studies. There was an Affordable Housing/Strategic Viability Study in 2010, with additional analysis of the then identified strategic sites in 2011 and a further update in 2012. These formed part of the evidence base in setting the housing policies in the Local Development Plan and have been through the examination process.

### **The Community Infrastructure Levy (CIL)**

1.5 The CIL regulations allow charging authorities to set different rates set out in £s per sq metre (or £/sq m) of net additional floorspace for different uses and for different zones – provided these can be clearly identified geographically<sup>1</sup>. CIL is set out as £s / sq m for developments of 1 dwelling or more, or over 100 sq m additional non-residential floorspace. Exemptions include affordable housing and charities.

1.6 DCLG has provided Guidance for the Community Infrastructure Levy<sup>2</sup>, with a new version of this published in February 2014. This guidance is applicable in England as well as Wales and reiterates the importance of balancing the need to provide infrastructure with ensuring that development generally is not made unviable:

*“A charging authority should use an area-based approach, involving a broad test of viability across their area, as the evidence base to underpin their charge. The authority will need to be able to show why they consider that the proposed levy rate or rates set an appropriate balance*

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<sup>1</sup> Regulation 13

<sup>2</sup> Department for Communities and Local Government (DCLG), February 2014, Community Infrastructure Levy Guidance,



.....between the need to fund infrastructure and the potential implications for the economic viability of development across their area. “(para 23)

- 1.7 In setting the levy rates, the Guidance explains that charging authorities should not set the rate at the margins of viability. English guidance<sup>3</sup> has formalised the concept of a viability ‘buffer’ although it is not quantified and not yet an obligatory part of CIL in Wales.
- 1.8 The CIL Guidance explains that the regulations allow charging authorities to apply differential rates for the Levy by geographic zones, development type and scale of development, provided this is justified by the viability evidence. However, “Charging authorities that plan to set differential levy rates should seek to avoid undue complexity, and limit the permutations of different charges that they set within their area.” (para 37)
- 1.9 There will still be s106 contributions in order to make the development acceptable in planning terms. These will have to meet the three tests:
- Necessary to make the development acceptable in planning terms
  - Directly related to the development
  - Fairly and reasonably related in scale and kind to the development
- 1.10 An allowance for residual s106 contributions have been included within the viability assessments.

**Guidance on plan viability testing**

- 1.11 Guidance has also been published to assist practitioners in undertaking viability studies for policy making purposes – “Viability Testing Local Plans - Advice for planning practitioners”<sup>4</sup> (the Harman Guide) The approach to viability testing in the Viability Assessment follows the principles set out in the advice. The advice re-iterates that:
- “The approach to assessing plan viability should recognise that it can only provide high level assurance.”*
- 1.12 The Advice also comments on how viability testing should deal with potential future changes in market conditions and other costs and values and states that:
- “The most straightforward way to assess plan policies for the first five years is to work on the basis of current costs and values”. (page 26) but that:*
- “The one exception to the use of current costs and current values should be recognition of significant national regulatory changes to be implemented.....” (page 26)*
- 1.13 This viability assessment has been undertaken in compliance with the CIL regulations and guidance.

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<sup>3</sup> DCLG, 2014, Planning Practice Guidance

<sup>4</sup> The guide was published in June 2012 and is the work of the Local Housing Delivery Group, which is a cross-industry group, supported by the Local Government Association and the Home Builders Federation.

## Local Plan Policies

- 1.14 The Council adopted the Local Development Plan in 2014. This will guide the future development of Monmouthshire up to 2021. This plan was examined in 2013 and contains current information which is pertinent to this viability assessment and policies that may affect viability. These policies have been reviewed as part of this work and taken into account as part of the viability assessments.
- 1.15 The relevant policies are described in brief in this section of the report. The adjustments to the viability testing in response to the policies are set out in the testing assumptions section.
- Policy S1 sets out the spatial distribution of new housing provision. This has been used to inform the case studies used for the viability testing.
  - Policy S4 states that the affordable housing requirement is 35% for developments of 5 or more dwellings except in Severnside where 25% is required; main villages where 60% is required for 3 or more dwellings; minor villages where 75% is required for 4 dwellings and 66% is required for 3 dwellings. These requirements have been included within the testing.
  - Policy S7 describes the obligation for development to make appropriate on or offsite provision of infrastructure; and that if there are viability issues, provision of affordable housing will generally take precedence over other infrastructure obligations. The narrative following Policy S7 states that *“It is considered that the LDP strategic sites can be delivered without the need for CIL as each site has specific infrastructure requirements that can be dealt with through a standard Section 106 Legal Agreement.”* Viability testing has therefore used policy compliant affordable housing proportions and has included known site-specific infrastructure requirements as well as a more general allowance for bringing the strategic sites forward for development.
  - Policy S12 requires new development to demonstrate sustainable and efficient resource use. We have used build costs that will include current requirements.
  - Policy CRF2 Outdoor Recreation/Public Open Space/Allotments describes the standards sought by the Council: outdoor playing space of 2.4 hectares per 1,000 population and 0.4 hectares of public open space per 1,000 population; 0.25 hectares of allotment space per 1,000 population (strategic sites and 50+ dwellings only) – i.e. 3.05 ha/1,000 people for larger sites and 2.8 ha/1,000 for smaller sites. With an average household size of 2.35 in Monmouthshire, 1,000 people is equivalent to 425 households – indicating that approximately 0.7 ha of open space is required per 100 dwellings.
  - Policy SD4 states that development will include Sustainable Urban Drainage Systems (SUDS). This is part of normal development good practice.
  - Policy MV1 states that development that is likely to have a significant transport impact must have a Transport Assessment with a Transport Implementation Strategy. If there will be a significant additional traffic then highway improvements or traffic mitigation will be required.
  - Policy MV2 states that development will include appropriate sustainable transport links, including public transport, walking and cycling.

- Allocated sites – there are seven strategic sites in the County, which are planned to take approximately 2,000 dwellings out of the 3,349 planned dwellings yet to be completed. The importance of these sites to delivery of the Plan means that they will need to be specifically included within any viability modelling. They are described in detail in the following policies:
  - Policy SAH1 deals with the Deri Farm strategic site and requires that electricity pylons are removed and lines undergrounded; sustainable transport links are provided to Abergavenny centre and that there is a landscape buffer along the northern edge of the site. This is accounted for in the site specific costs and the gross to net developable land area.
  - Policy SAH2 deals with the Crick Road strategic site and requires that 1 hectare of employment land is provided and that there is pedestrian access to Portskewett and Caldicot.
  - Policy SAH3 deals with the Fairfield Mabey strategic site and requires that 3 hectares of employment land is provided (with four starter units financed by an adjacent development), that necessary offsite highway and pedestrian works are undertaken, that there will be a riverside path and that there will be a buffer strip along the River Wye.
  - Policy SAH4 deals with the Wonastow Road strategic site and requires that 6.5 hectares of employment land is provided and that necessary offsite highway works are undertaken.
  - Policy SAH5 deals with the Rockfield Farm strategic site and requires that 2 hectares of employment land is provided, that the masterplan takes account of the SINC on site, that necessary offsite highway works through Magor and Undy are undertaken and that there are contributions to community facilities.
  - Policy SAH6 deals with the Vinegar Hill strategic site and requires that necessary offsite highway works are undertaken and that there are contributions to community facilities.
  - Policy SAH7 Sudbrook Paper Mill deals with the Sudbrook strategic site. There are no specific requirements beyond the housing numbers.

1.16 In addition to these policies, the Council has advised that Rockfield Farm and Vinegar Hill are required to provide sections of the Magor-Undy bypass and this has been included as part of the assessment.

#### **Research evidence**

1.17 The research which underpins the viability assessment includes:

- An analysis of publicly available data to identify the range of values and costs needed for the viability assessment – updated to the start of 2014;
- Discussions with council officers from planning, estates and housing departments;
- Analysis of information held by the authority, including a review of historic planning permissions, land sales and information on the strategic sites for development;

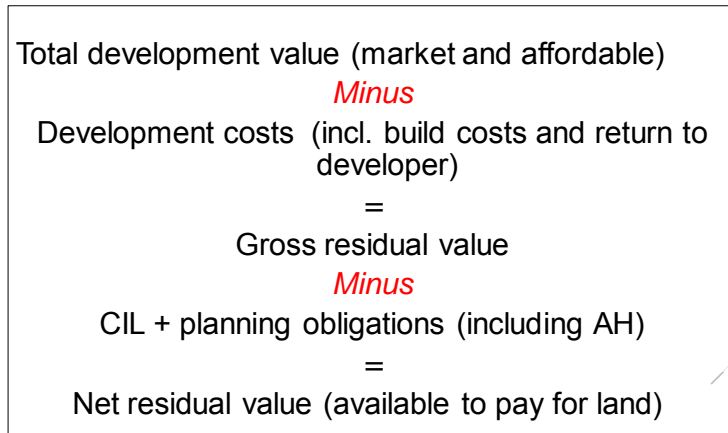
- A workshop held in March 2014 with developers, land owners, their agents and representatives from a selection of registered providers in the area. 13 organisations were invited and seven organisations were represented at the workshop, in addition to the Council. A follow on note regarding land values and house prices was then circulated to the 13 organisations originally invited, with one comment received. Annex 5 provides a note of the workshop;
- Subsequent communication via the Council with landowners, developers and their agents of the strategic sites in Monmouthshire, used to collect information about specific costs associated with the sites;
- Use of the Three Dragons Toolkit, adapted for Monmouthshire to analyse scheme viability for residential development and of the Peter Brett non-residential model for the analysis of non-residential schemes.

## 2 VIABILITY TESTING – RESIDENTIAL DEVELOPMENT

### Principles

- 2.1 The viability testing uses a residual value approach, the principles of which are set out in the figure below.

**Figure 2.1 Residual Value Approach**



- 2.2 To assess viability, the residual value generated by a scheme is compared with a benchmark value, which reflects a competitive return for a landowner. If the residual value is higher than the benchmark land value, the scheme is considered viable. This is considered through the testing of notional 1 ha tiles (used to test development on a common basis, which allows the effects of different market areas and different densities to become apparent) and through case studies representative of the development planned to take place in Monmouthshire.
- 2.3 Establishing suitable land value benchmarks is an important part of any viability testing. Welsh Government guidance<sup>5</sup> states that viability is a key factor in striking the balance between collecting revenue and not setting rates too high (para 2.2); and that viability studies should concentrate on sites where the imposition of CIL may have an impact on viability (para 2.18). It is noted that land values across an area may already result in development becoming unviable or marginal and this needs to be considered (para 2.20). Land value benchmarks used in this study take account of the benchmarks used in the Local Development Plan evidence base, existing use values, land registry transaction evidence, recent transactions and the development industry feedback.
- 2.4 The setting of benchmark land values in Monmouthshire takes account of the existing or former uses of the sites. Where the site is within an urban area or on a brownfield site outside an urban area the threshold land value uses a premium over industrial land values (as this is the likely former or alternative use) and where the site is a greenfield allocation the threshold land

<sup>5</sup> Welsh Government, 2011, Community Infrastructure Levy Preparation of a Charging Schedule,

value use a premium over agricultural land values. The benchmark land values used in this study are:

- £650,000 per gross ha for urban sites. This figure is 60% over the estimated industrial land value (a premium of 30% is normally considered a suitable incentive), has been discussed at the development industry workshop and is in line with the evidence base for the recently adopted Local Development Plan. This benchmark is also supported by the land transaction evidence although it is noted sale prices are either side of this value. This benchmark is above the comparables in lower value Caerphilly and Merthyr Tydfil<sup>6</sup> (up to £500,000/ha used in the CIL viability assessments).
- £250,000 per gross ha for strategic greenfield sites. This is 15-20 times agricultural values, which is in the higher end of the range expected to incentivise greenfield land owners. In addition we assess the impact of a slightly higher benchmark at £300,000 per hectare.

- 2.5 The benchmarks are applicable across Monmouthshire as there is no clear evidence to vary them by location and the development industry indicated that a single set of benchmarks was appropriate.
- 2.6 Further detail on the information used to set the benchmark land values can be found in Annex 1.

**Testing Assumptions**

- 2.7 The key assumptions used in the analysis of residual values for both the 1 hectare and case study sites are presented below. These have been discussed as part of the development industry workshop in March 2014, with some of the affordable housing assumptions and strategic site characteristics refined through subsequent information collection.

**Table 2-1 Development Costs**

Item	Rate	Notes
Build - Flats (1-2 storeys)	£1,080/sq m	Includes 15% for external works. BCIS with Gwent location weighting <sup>7</sup> , 5 year median
Build - Houses (2-3 storeys)	£993/sq m	Includes 15% for external works. BCIS with Gwent location weighting, 5 year median
One off development build – Houses (2-3 storeys)	£1,092/sq m	Premium over standard BCIS to reflect higher build costs for smaller developments.
One off development build – Flats (1-2 storeys)	£1,188/sq m	Premium over standard BCIS to reflect higher build costs for smaller developments.
Professional fees	10% of build costs	
Finance	6% of development costs	

<sup>6</sup> DCLG Live Table 581 states q3 2013 average house prices in Monmouthshire were £208,610 compared to £117,596 in Caerphilly and £103,066 in Merthyr Tydfil.

<sup>7</sup> Building Cost Information Service (BCIS) applies weightings to reflect varying build costs in different parts of the UK and continues to use Gwent as a defined area. The development industry workshop agreed that Gwent costs were suitable for Monmouthshire and other parts of South Wales

Item	Rate	Notes
Marketing fees	3% of market GDV	
Developer return (market)	20% of market GDV	For market housing
Contractor return (AH)	6% of build costs	For affordable housing
Stamp Duty Land Tax	Variable	Depends on land value
Agents/legal costs	2.5% of residual value	
Sprinklers	£3,075 houses, £879 flats	Source Welsh Government. Not required until Jan 2016
Base residual s106	£1,000 per dwelling	To cover play only, based on the MCC Interim Policy Guidance costs of public open space and children's' play.

- 2.8 In addition to these costs, an additional allowance has been made for development on the larger sites to reflect additional costs for site specific infrastructure (opening up costs). As discussed at the development industry workshop, this is £100,000 per hectare. This in addition to the 15% allowance for external works.
- 2.9 The costs in Table 2.1 above refer to a base residual s106 payment of £1,000 per dwelling, which will be for onsite open space and children's' play. This compares to the current typical s106 contribution of £6,000-£7,000 per dwelling, which also includes contributions for adult recreation, sustainable transport and education. While the Council has yet to formally determine its approach to the use of CIL through a regulation 123 list, the Council has advised that the current intention is for adult recreation, strategic highways and education to be funded through CIL and that the £1,000 per dwelling will be the typical post-CIL s106 requirement for each household. In addition to this base residual s106 payment, the different strategic sites have their own specific s106 requirements and the cost of these<sup>8</sup> have been included within the modelling for each of the sites.
- 2.10 In the analysis of the case studies (see chapter 4), we include additional costs for certain sites that the Council expects to be directly funded by the development through a s106 agreement.
- 2.11 Some of the other case study types have their individual costs:
- Retirement housing has a build cost of £1,163/sq m including 15% external works, as well as 6% marketing costs and £120,000 empty property costs, sales are spread over three years and 25% of the GIA is communal space.
  - One-off housing (up to three dwellings) has additional costs. This varies considerably and an uplift of 10% above general housing costs has been used.

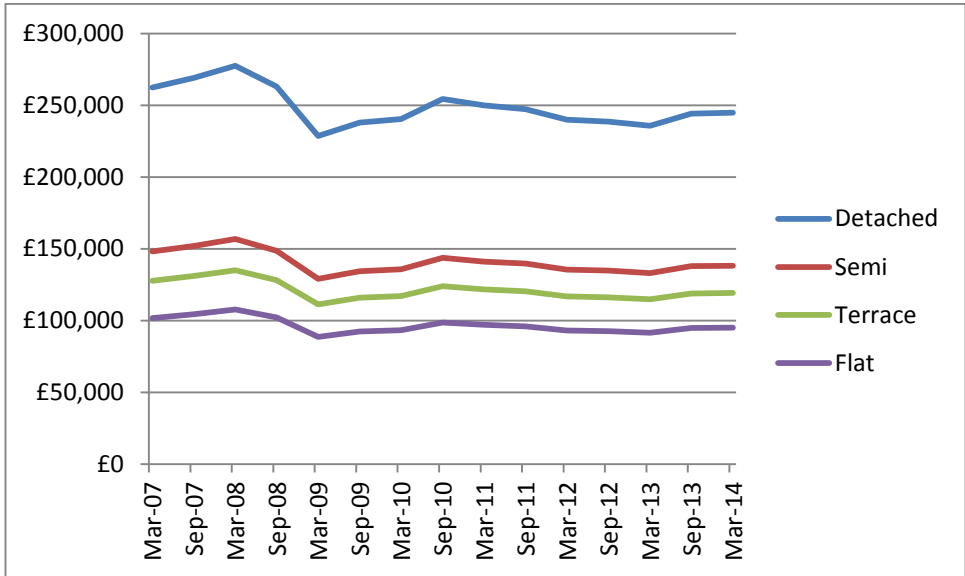
<sup>8</sup> Estimates based upon contact with developers, discussions with Council Officers and reference to the costs used in the Schedule of Infrastructure Provision for Strategic Sites appended to the Local Development Plan.

**Development Values**

**Market Housing Values**

2.12 House prices in Monmouthshire are still lower on average than they were at the peak of the market in 2007-2008, although prices have risen since 2009.

**Figure 2-2 House Prices in Monmouthshire 2007-2014**

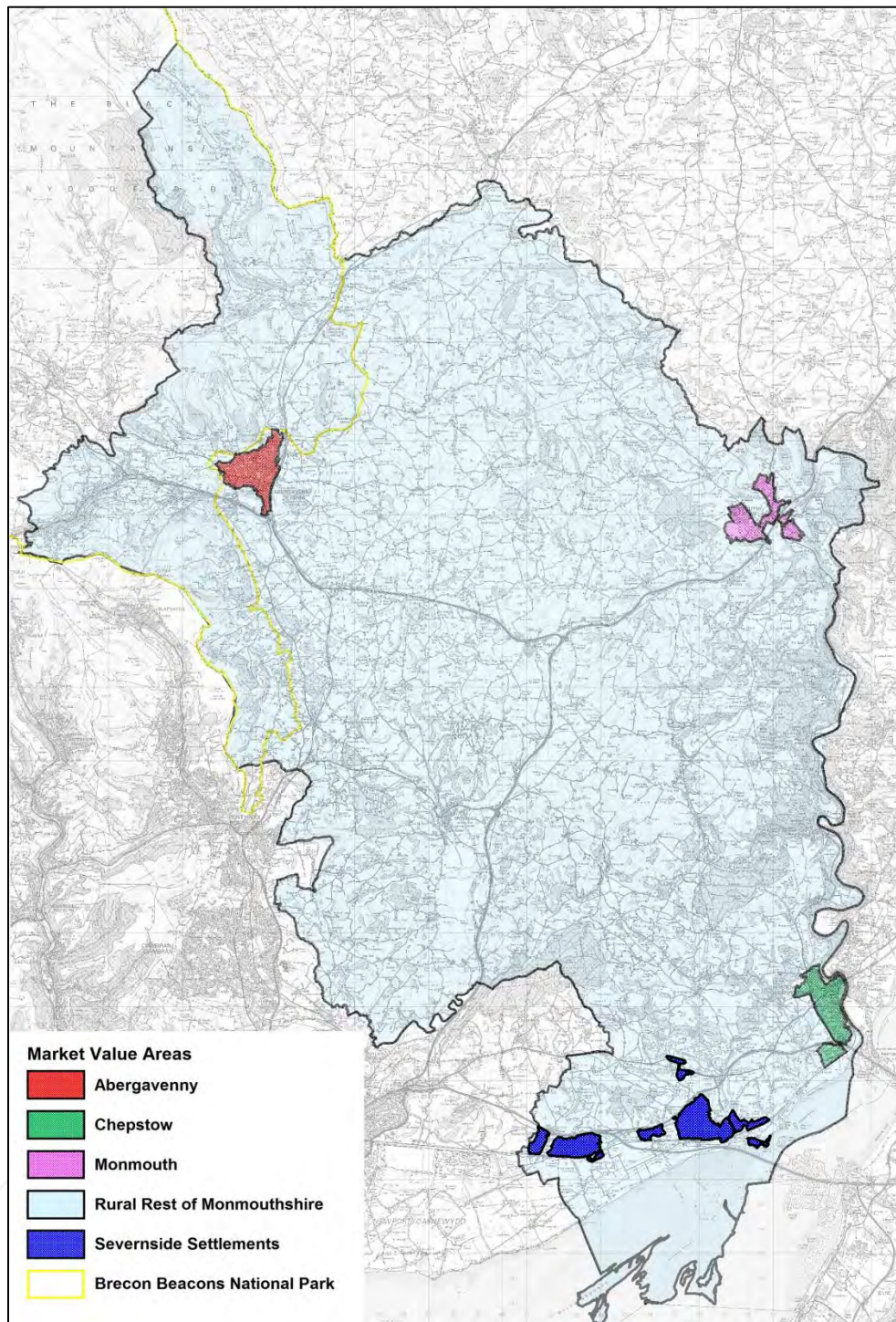


Source Land Registry Price Paid data

2.13 House prices vary within Monmouthshire and this viability study uses the value areas identified as part of the 2010 Affordable Housing Viability Study (AHVS) and accepted as being robust at the examination into the Council’s Local Development Plan. These value areas were again discussed as part of the development industry workshop held in March 2014 and the house price analysis confirms that there are value variations between these areas. In terms of the prices for new build dwellings, the rural rest of Monmouthshire has the highest values, followed by Chepstow, Abergavenny/ Monmouth and then the Severnside settlements along the M4.



**Figure 2.3 Illustrative House Price Areas in Monmouthshire**



Contains Ordnance Survey data © Crown copyright and database right 2014

Severnside settlements are identified in Local Development Plan Policy S1 – Caerwent, Caldicot, Magor, Portskewett, Rogiet, Sudbrook and Undy. The ‘Rural Rest of Monmouthshire’ includes the main and minor villages and the rural secondary settlements (identified in Local Development Plan Policy S1) and open countryside.

- 2.14 Initial house price data was discussed at the development industry workshop in March 2014 and it was suggested that the values needed to be reviewed, that some atypical schemes should be excluded and that sales values per sq m should also be considered.
- 2.15 Following the workshop further data collection and analysis was undertaken. This included:
- Land Registry data for new build dwellings from 2011 to 2013 was reviewed in order to get a spread of transactions<sup>9</sup>, and care was taken to ensure specific developments<sup>10</sup> did not unduly skew average values.
  - For a sample of dwellings<sup>11</sup>, sale price and size data was used to analyse price paid per sq m.
  - Current prices for new dwellings were reviewed; taking into account that price paid is likely to be less than the asking price.<sup>12</sup>
- 2.16 Drawing on all the above data, market values for different dwelling types were then estimated. This process started with the price paid data, which was then cross referenced against current asking prices (with discount) and values per sq m, and adjusted as appropriate for typical dwelling sizes being developed in Monmouthshire. The table below sets out the prices for different dwelling types in the Monmouthshire value areas based upon this analysis. Individual dwellings may sell above or below these averages depending on their size and specific location.

**Table 2-2 House prices for Monmouthshire Value Areas**

	<b>Abergavenny</b>	<b>Chepstow</b>	<b>Monmouth</b>	<b>Severnside</b>	<b>Rural Rest of Monmouthshire</b>
1 bed flat	£115,000	£120,000	£125,000	£100,000	£115,000
2 bed flat	£130,000	£140,000	£140,000	£120,000	£130,000
2 bed terrace	£170,000	£180,000	£180,000	£140,000	£170,000
3 bed terrace	£190,000	£200,000	£190,000	£170,000	£190,000
3 bed semi	£190,000	£210,000	£190,000	£170,000	£200,000
3 bed detached	£210,000	£215,000	£195,000	£185,000	£215,000
4 bed detached	£300,000	£330,000	£290,000	£260,000	£330,000
5 bed detached	£350,000	£380,000	£320,000	£290,000	£380,000

Source Three Dragons analysis based on Land Registry Price Paid data for new build, current asking prices (with discount) and price per sq m.

- 2.17 Waterfront developments are known to create higher than average values. 2012 research<sup>13</sup> states that prime UK waterfront properties have a 56% premium over inland equivalents, with estuary locations providing 85% premium, harbour locations 78%, coastal locations 52%, river

<sup>9</sup> 386 new build transactions

<sup>10</sup> E.g. the higher value Caerwent scheme in Severnside – Caerwent being more typical of other settlements north of the M4

<sup>11</sup> 67 dwellings analysed for £/sq m. The sample was drawn from recent planning permissions to provide accurate measurement of the dwelling sizes and then cross referenced, on a property by property basis, to Land Registry data on actual sale prices.

<sup>12</sup> By about 7%

<sup>13</sup> Knight Frank, 2012, How do waterfront locations affect prices?

locations 47% and lakeside 28%. While it is unclear to what extent these prime property uplifts will apply in Monmouthshire, it is likely that there will be increased values in water front sites in locations such as Chepstow. A conservative 25% premium (just under half of the average uplift suggested in the research) has been applied to a subset (25%) of dwellings assumed to have good river views for the Fairfield Mabey case study site, which is on the banks of the River Wye in Chepstow. The Sudbrook Paper Mill case study site is also waterfront, but its location at the foot of the second Severn Crossing makes it a less likely candidate for this kind of uplift.

2.18 Small scale “one-off” developments (up to three dwellings) are also known to support higher values, related to the bespoke nature of this scale of development. While some one-off developments with special design and space standards will produce very high values, this viability assessment has sought to model dwellings that are similar to the types of dwellings that may also be built as part of larger developments. Based on experience, it has been assumed that these dwellings will command a 10% premium over their estate counterparts.

### **Affordable Housing**

2.19 Policy S4 of the Local Development Plan sets out the requirement for affordable housing to be provided. The policy provides targets for affordable housing for the main settlements and for villages. The following extract shows the policy for the main settlements.

- *In Main Towns and Rural Secondary Settlements as identified in Policy S1 development sites with a capacity for 5 or more dwellings will make provision (subject to appropriate viability assessment) for 35% of the total number of dwellings on the site to be affordable.*
- *In the Severnside settlements identified in Policy S1 development sites with a capacity for 5 or more dwellings will make provision (subject to appropriate viability assessment) for 25% of the total number of dwellings on the site to be affordable.*

Source Policy S4 Local Development Plan

2.20 These affordable housing targets are used for testing the notional 1 ha tile (in chapter 3) and testing a range of case study sites (in chapter 4). There are further policies for provision of affordable housing in the Main and Minor Villages which we deal with in detail through a selection of case studies in chapter 4.

2.21 The affordable housing modelled, is a combination of social rented (50%), intermediate rent (25%) and Homebuy (25%; at 50% average share size, with no rent on the unbought share).

2.22 The values for affordable rented housing are estimated using capitalised net rent<sup>14</sup> without grant and assume £1,500 for management/maintenance/repairs/voids etc.

**Table 2-3 Weekly Affordable Housing Rents**

<b>Dwelling Type</b>	<b>Weekly Social Rent</b>	<b>Weekly Intermediate Rent</b>
1 bed flat	£78	£90
2 bed flat	£85	£110
2 bed house	£85	£115

<sup>14</sup> Capitalisation rate of 6%

<b>Dwelling Type</b>	<b>Weekly Social Rent</b>	<b>Weekly Intermediate Rent</b>
3 bed house	£89	£135
4 bed house	£92	£160

Source Monmouthshire County Council. Rents are net of service charges.

### **Types of testing**

2.23 Two types of testing have been undertaken for the assessment:

- A notional 1 hectare site (at a range of densities from 30dph to 50dph); tested in the different value areas in Monmouthshire. This is used to explore the differences in viability between different locations and different densities of development, on a common basis.
- A series of 19 case studies ranging in size from 3 to 450 dwellings.

2.24 Results from the Notional 1 ha tile are reported in chapter 3 and results for the case studies, in chapter 4

### 3 VIABILITY TESTING – NOTIONAL 1 HA TILE

#### Introduction

- 3.1 This section of the report sets out the viability assessments for the 1 ha notional tiles, which are used to explore the underlying viability trends across the county.
- 3.2 The residual value of the notional 1 ha site is calculated using the Three Dragons Toolkit and then compared with the benchmark land value for the area, to estimate the surplus residual value potentially available for CIL.
- 3.3 We model the 1 ha tile in each of the value areas i.e. Severnside, Monmouth, Chepstow, Abergavenny and rural rest of Monmouthshire. The tile is tested for three different densities of development, as agreed with the Council and discussed at the industry development workshop. The three densities are 30 dwellings per hectare (dph), 40 dph and 50 dph. The dwelling mixes for the market housing reflect feedback from the development industry workshop and an analysis of development profiles from a sample of recent planning permissions provided by the Council.
- 3.4 For the affordable housing, the Council advised on the type of dwelling for the different affordable tenures, based on the results of their latest Local Housing Market Assessment<sup>15</sup>. These do not vary with scheme density. In practice the mix may vary depending on local circumstances.

**Table 3.1a Dwelling mixes for the market units – at different development densities**

	30 dph	40 dph	50 dph
	%s	%s	%s
1 bed flat			
2 bed flat		5%	10%
2 bed terrace		10%	15%
3 bed terrace	10%	25%	40%
3 bed semi	15%	35%	15%
3 bed detached	5%	5%	
4 bed detached	60%	20%	20%
5 bed detached	10%		

<sup>15</sup> Newport, Torfaen and Monmouthshire Local Housing Market Assessment 2006 – Update 2010 Local Authority Report for Monmouthshire June 2010

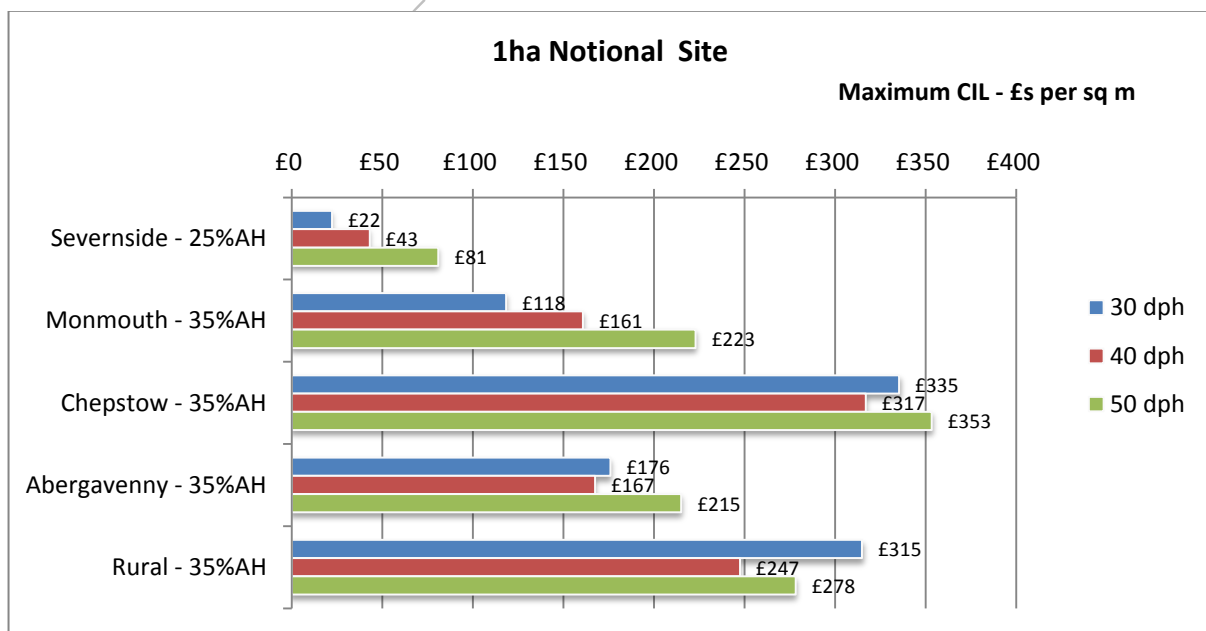
**Table 3.1b Dwelling mixes for the affordable housing – as %ages of total Affordable units – same for all densities**

	Social Rent	Intermediate Rent	Homebuy	Total
1 bed flat	20%			<b>20%</b>
2 bed flat	10%	10%		<b>20%</b>
2 bed terrace	2.5%	15%	12.5%	<b>30%</b>
3 bed terrace	7.5%		12.5%	<b>20%</b>
4 bed terrace	10%			<b>10%</b>
<b>Total</b>	<b>50%</b>	<b>25%</b>	<b>25%</b>	<b>100%</b>

**Results for the notional 1 hectare tile**

- 3.5 We tested at affordable housing policy percentages i.e. 35% in all value areas except Severnside, which was tested at 25% affordable housing. All testing was undertaken with a residual s106 requirement of £1,000 per dwelling, and allowed for the provision of sprinklers - £879/flat and £3,075 per house.
- 3.6 To arrive at the maximum potential CIL we:
- Identify the residual value of the scheme being tested;
  - Deduct the land value benchmark to identify the ‘surplus’ value available for CIL;
  - Divide the surplus by the area of the market dwellings (in £s per sq m)
- 3.7 Results for each value area are shown in chart 3.1 below, which assumes the standard urban sites land value benchmark of £650,000 per hectare (detailed results are shown in Annex 6).

**Chart 3-1: Maximum potential CIL for the 1 ha tile at 30 dph, 40 dph and 50 dph**



3.8 Commentary:

- Residual values vary with the value area and density of development and hence there is considerable variation in the potential for CIL.
- Chepstow and the rural rest of Monmouthshire value area show similar profiles with a CIL in excess of £300 per sq m potentially available for at least one development density.
- The potential for CIL is lower in the Monmouth and Abergavenny value area but even here, there is at least one development density that shows a potential CIL of over £200 per sq m with no potential CIL for any development density of below £100 per sq m.
- Severnside value area (which already has a lower affordable housing requirement – at 25%) shows a much reduced potential for CIL. At most, this is £80 per sq m but falls to £22 per sq m with the 30 dph development mix.

## 4 RESIDENTIAL VIABILITY TESTING – CASE STUDY SITES

### Introduction

4.1 The Council has identified 21 case studies, varying in size from 3 to 450 dwellings, which reflect typical sites likely to be brought forward in Monmouthshire over the plan period. The selection of sites draws on the policies set out in the LDP and we emphasise the importance of case studies that illustrate sites making up a high proportion of the future housing supply. The following is an extract from the LDP which highlights:

- The significant contribution from new site allocations (about 73% of total dwellings excluding those built or with planning permission at 1 April 2013).
- That windfall sites will make a larger contribution in the main towns of Abergavenny, Chepstow and Monmouth than in the Severnside settlements but in neither are they to be the main source of future supply.
- Windfall sites are relatively important in the rural rest of Monmouthshire, particularly small windfall sites of less than 10 dwellings (windfalls account for 59% of total dwellings in Rural Secondary Settlements and other rural areas excluding those built or with planning permission at 1 April 2013).



**Table 4-1 Extract from Monmouthshire County Council Local Development Plan**

<b>Policy S2 – Housing Provision</b>						
<b>Provision will be made to meet a requirement for 4,500 residential units in the plan period 2011-2021. This need will be met by identifying opportunities for around 4,950 dwellings to enable a 10% flexibility allowance as follows:</b>						
Settlements	a) Committed 1/4/2013	b) Completions 2011 - 2013	c) Large Site Windfall	d) Small Site Windfall	e) New Site Allocations	Total
Abergavenny	97	19	65	75	310	566
Chepstow	220	29	30	46	350	675
Monmouth	197	86	11	46	485	825
<b>MAIN TOWNS</b>	<b>514</b>	<b>134</b>	<b>106</b>	<b>167</b>	<b>1145</b>	<b>2066</b>
Caldicot	67	119	0	24	0	210
Portskewett	8	19	0	12	285	324
Magor/Undy	53	61	0	22	495	631
Caerwent	54	79	0	19	0	152
Rogiet	8	15	25	5	0	53
Sudbrook	3	4	46	1	190	244
<b>SEVERNSIDE SETTLEMENTS</b>	<b>193</b>	<b>297</b>	<b>71</b>	<b>83</b>	<b>970</b>	<b>1614</b>
Usk	5	11	0	17	20	53
Raglan	11	3	0	16	45	75
Penperlleni	8	1	45	3	65	122
Llanfoist	63	77	102	3	0	245
<b>RURAL SECONDARY SETTLEMENTS</b>	<b>87</b>	<b>92</b>	<b>147</b>	<b>39</b>	<b>130</b>	<b>495</b>
<b>RURAL</b>	<b>218</b>	<b>73</b>	<b>14</b>	<b>277</b>	<b>200</b>	<b>782</b>
<b>TOTAL</b>	<b>1012</b>	<b>596</b>	<b>338</b>	<b>566</b>	<b>2445</b>	<b>4,957</b>

4.2 We have divided the case studies into two groups – larger (allocated) strategic sites and small case studies and report on them separately below while Annexes 2 and 3 provide details of the assumptions used for the testing.

**Larger strategic sites (Case Studies 1 to 7)**

4.3 The larger strategic case studies mirror the strategic sites allocated in the LDP. They are:

- i. SAH1 Deri Farm Abergavenny
- ii. SAH2 Crick Road Portskewett
- iii. SAH3 Fairfield Mabey Chepstow
- iv. SAH4 Wonastow Road Monmouth
- v. SAH5 Rockfield Farm Undy

- vi. SAH6 Vinegar Hill Undy
- vii. SAH7 Paper Mill Sudbrook

4.4 In modelling larger schemes, there are a number of additional factors that have to be taken into account (and are referred to in the Advice for Planning Practitioners):

- The Advice for Planning Practitioners indicates that large scale schemes incur additional development costs that do not apply to smaller sites. We have already included a 15% uplift on build costs (identified by BCIS) for external works (local roads, pavements etc.). This approximates to just under £11,000 per dwelling or in the order of £330,000 per hectare for a 30 dph scheme. We make a further allowance to cover items such as ground remodeling and bringing utilities to the site. We have made a standard allowance for these costs but recognise the figure used is an estimate and actual costs will vary from site to site. The additional costs are at £100,000 per net hectare. At a density of 30 dph this is about £3,300 per dwelling, which added to the £11,000 above takes the total cost per dwelling to over £14,000.
- In other studies we have undertaken with strategic sites of 1,000 dwellings or more, we use a higher cost but for strategic sites of this scale and location (in relation to existing services), we consider the figure of £100,000 to be adequate. Two of the strategic sites (at SAH3 Fairfield Mabey and the SAH7 Paper Mill Sudbrook) are brownfield sites. In these cases the £100,000 per hectare is for site clearance etc. rather than bringing in new services etc.
- The developable area will sometimes be less than the gross area of the allocated site. The percentages used have been discussed with the Council and reflect site characteristics and how requirements for open space will be met. For Rockfield Farm and Vinegar Hill an allowance has been made on the advice of the Council for the land take for a Magor-Undy bypass.
- Completion of the schemes will take a number of years and this is reflected in the modeling process. Residual values have been calculated using the discounted cash flow facility within the Three Dragons Toolkit, using an appropriate discount rate.

4.5 Each strategic site has a series of requirements set out in the LDP which are to be funded through site-specific s106 agreements (and not through CIL). Some sites also have known development issues (e.g. undergrounding power lines) that need to be taken into account in the viability assessment even if they are not subject to s106 agreements.

4.6 To obtain the best estimates for all these requirements we have consulted the Council who, in turn, wrote to all the scheme promoters following the development industry workshop. Where we have not been provided with up to date information, we have used information from the previous report that assessed the strategic sites (Affordable Housing/Strategic Viability Study – 2011 update) and our own information sources. Costs include items such as transport, community facilities, moving power cables, specific greenspace requirements etc. It is not possible to itemise costs as some information has been provided on a confidential basis. In all cases, the costs shown are best estimates and will be subject to change when schemes are

further advanced in design and planning terms. This is important when considering the use of a buffer in setting the CIL rate.

- 4.7 Some of the LDP requirements may be funded outside any s106 agreements (such as CIL or other funding) and the Council has advised on alternative scenarios for three of the strategic sites:
- SAH3 Fairfield Mabey has been tested without and with the £1.7m cost of High Beech roundabout improvements, in addition to the other LDP requirements. These are *alt 1* and *alt 2* respectively.
  - SAH5 Rockfield Farm and the adjacent SAH6 Vinegar Hill have been tested with different Magor bypass scenarios in addition to the other LDP requirements:
    - Non-frontage distributor road – c.£1.3m for Rockfield Farm and c.£1.5m for Vinegar Hill. This is *alt 1* for both of these sites.
    - By-pass standard road – c.£1.6m for Rock Field Farm and c.£1.9m for Vinegar Hill. This is *alt 2* for both of these sites.
    - Route safeguarded – adjustment to gross to net only and no direct cost for road construction. This is *alt 3* for both of these sites.
- 4.8 The following table summarises the key information we have used for the larger case studies, all the other assumptions are as for the notional 1 hectare scheme.

**Table 4 – 2 Large Strategic Case Studies Characteristics**

Case Study	Scheme	MVA	Dwgs	Net ha	Net to gross (%)	Additional Development Costs	Development Rate; Dev Period
<b>STRATEGIC SITES</b>							
1	SAH1 Deri Farm Abergavenny	Abergavenny	250	7.70	89%	4,250,000	20pa yr 1 then 40 pa; 7 yrs
2	SAH2 Crick Road Portskewett	Severnside	285	7.70	77%	120,000	55pa; 6 yrs
3.1	SAH3 Fairfield Mabey, Chepstow (alt 1)	Chepstow	350	9.50	73%	3,600,000	40pa yr 1 then 80 pa; 5 yrs
3.2	SAH3 Fairfield Mabey, Chepstow (alt 2)	Chepstow	350	9.50	73%	5,290,000	40pa yr 1 then 80 pa; 5 yrs
4	SAH4 Wonastow Rd Monmouth	Monmouth	450	16.46	84%	420,000	62pa yr 1 then 100 pa; 5 yrs
5.1	SAH5 Rockfield Farm Undy (Alt 1)	Severnside	270	7.45	83%	1,700,000	55pa; 5 yrs
5.2	SAH5 Rockfield Farm Undy (Alt 2)	Severnside	270	7.45	83%	1,970,000	55pa; 5 yrs
5.3	SAH5 Rockfield Farm Undy (Alt 3)	Severnside	270	7.45	83%	400,000	55pa; 5 yrs
6.1	SAH6 Vinegar Hill Undy (Alt 1)	Severnside	225	6.91	88%	2,000,000	50pa; 5 yrs
6.2	SAH6 Vinegar Hill Undy (Alt 2)	Severnside	225	6.91	88%	2,320,000	50pa; 5 yrs
6.3	SAH6 Vinegar Hill Undy (Alt 3)	Severnside	225	6.91	88%	450,000	50pa; 5 yrs
7	SAH7 Paper Mill Sudbrook (Alt 1)	Severnside	190	6.60	100%	38,000	50pa; 4 yrs

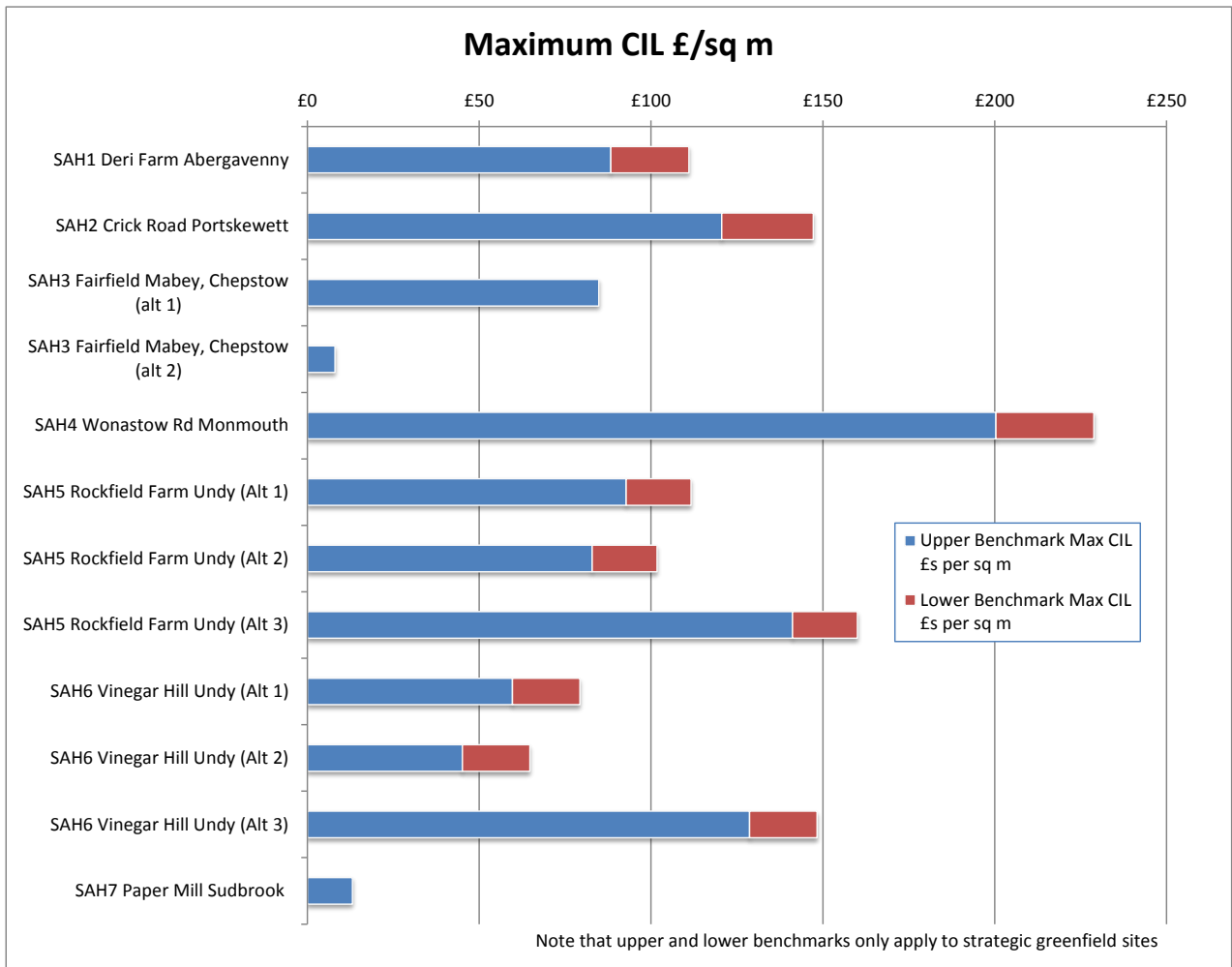
4.9 The testing results for the large strategic case studies are summarised below. The results show the maximum potential CIL with the upper and lower benchmark land values for strategic greenfield land, while the brownfield sites have a single standard benchmark land value. In all cases the modelling has taken into account a residual s106 allowance of £1,000 per dwelling and an allowance for sprinklers of £879 per flat and £3,075 per house.

4.10 To calculate the maximum potential CIL, we take the residual value per gross hectare, deduct the upper or lower benchmark value and then divide by the market floor area per gross hectare of the scheme. The upper benchmark value will generate a lower potential CIL rate than the lower benchmark value. Where a scheme is located within an urban area, a benchmark of £650,000 per hectare is applied, whilst large greenfield sites are measured against an upper

benchmark of £300,000 and a lower benchmark of £250,000 per gross hectare to take into account the higher costs of servicing and developing the site.

4.11 Again we model sites in Severnside with a lower affordable housing requirement than elsewhere (25% compared to 35%).

**Figure 4-1 Large Strategic Case Studies –Maximum Potential CIL**



4.12 All the strategic sites produce a residual value above the benchmark land value and therefore there is potential to charge a CIL but there are significant differences between the economic viability of the sites:

- i. SAH4 Wonastow Road generates the highest potential CIL at between £200 and £229 /sq m depending on whether the upper or lower benchmark is used.
- ii. SAH2 Crick Road has a potential maximum CIL of between £121-£147/sq m and SAH1 Deri Farm has a potential maximum CIL of between £88-£111/sq m.
- iii. SAH3 Fairfield Mabey Chepstow is measured against the urban benchmark of £650,000 per gross hectare (because it has a previous use as an industrial site) and generates a potential

CIL of £85/sq m. However if this development has to fund the High Beech roundabout the maximum CIL is effectively £0/sq m.

- iv. SAH7 Sudbrook Paper Mill is also measured against the urban benchmark of £650,000 per gross hectare (again because it has a previous use as an industrial site) and generates a potential CIL of just £13 per sq m.
- v. SAH5 Rockfield Farm and SAH6 Vinegar Hill both have similar viability. If the developments are not required to provide a Magor-Undy bypass then the maximum potential CIL varies from £129/sqm to £160/sq m, depending on the site and whether the upper or lower benchmark is used. However the provision of a non-frontage road will reduce the maximum CIL to between £60/sq m to £112/sq m and a bypass standard road will further reduce the maximum CIL to between £45/sq m to £102/sq m.

**Small Case Study Sites (Case Studies 8 to 20)**

- 4.13 The smaller case studies are hypothetical schemes representative of future development in Monmouthshire (away from the strategic sites). They are based on information about sites allocated in the LDP but should also be representative of windfall developments. The small case studies vary in size from 3 to 35 dwellings.
- 4.14 The first group of small case studies are of developments that will provide the ‘normal’ policy level of affordable housing i.e. 25% in Severnside and 35% elsewhere. These case studies are set out below.

**Table 4-3 Small Case Studies**

Number	Name	Dwellings
8	Severnside	35
9	Severnside	10
10	Severnside	4
11	Severnside	3
12	Main towns	35
13	Main towns	10
14	Main towns	4
15	Main towns	3

- 4.15 For these small case studies, we assume that development occurs within one year and we follow a similar approach to that used for the other testing, with the benchmark land value deducted from the residual value to estimate the additional value available for a CIL charge.
- 4.16 Table 4-4 below sets out the key characteristics of the small case studies, all other assumptions are as for the notional 1 ha scheme including an assumption that all dwellings have to meet a residual s106 payment of £1,000 per dwelling and there is an additional cost to provide sprinklers.
- 4.17 There is an exception to this which relate to case studies 11 and 15. These are both sites with 3 dwellings and these will have higher build costs, which we allow for. At the same time, it is

considered that small sites (on a like for like basis) will generate higher selling prices. We have therefore allowed a 10% increase on market selling prices for these two case studies.

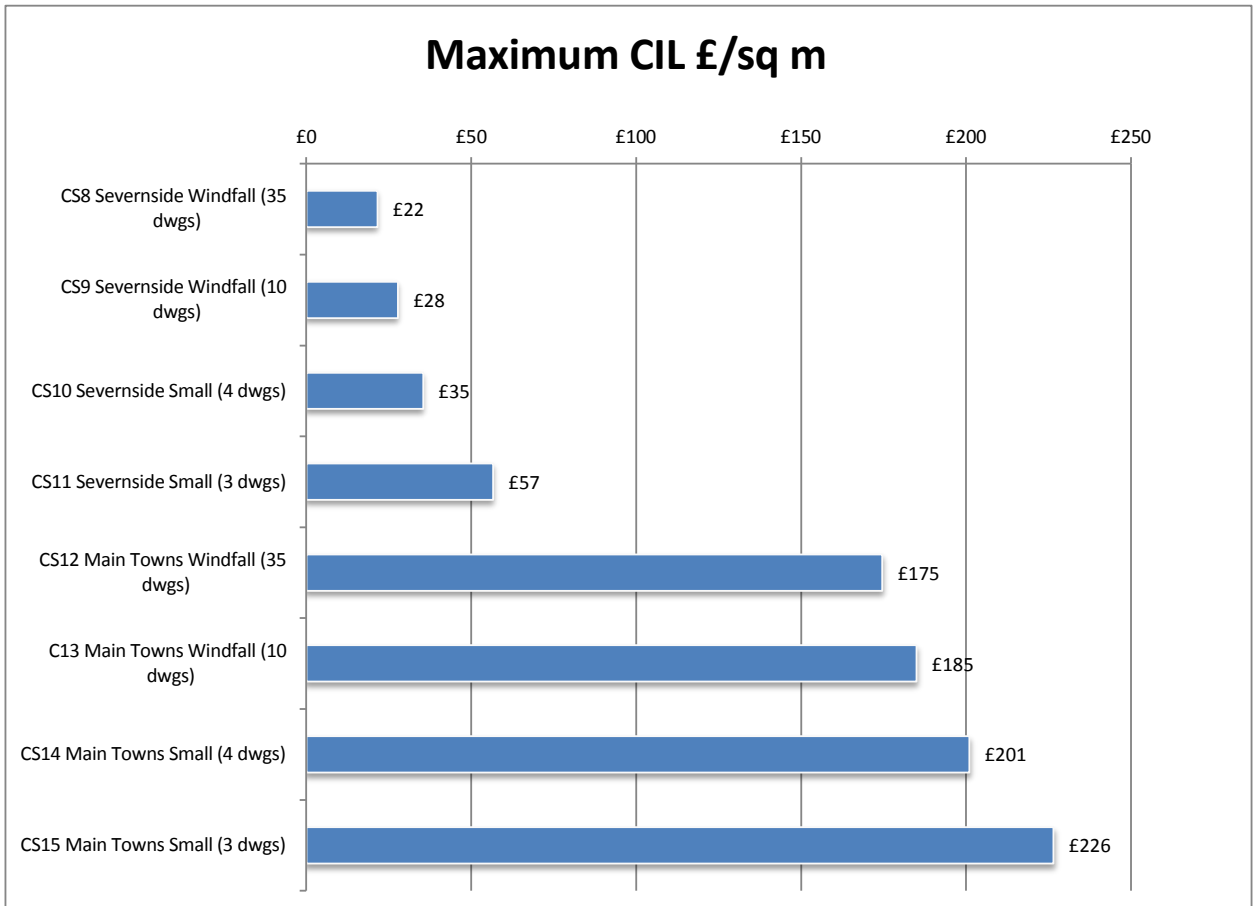
4.18 For the testing of case studies 12– 15 we use the Abergavenny value area. Abergavenny market values are similar to those of Monmouth and a little below those for Chepstow. Therefore Abergavenny is a realistic proxy for all three main towns in testing case studies 12 to 15.

**Table 4-4 Small Case Study Characteristics**

Case Study	Scheme	MVA	Dwgs	Net ha	Net to gross (%)	Development period	Market %	AH %
8	Severnside Windfall (35 dwgs)	Severnside	35	1.17	100%	1 year	75%	25%
9	Severnside Windfall (10 dwgs)	Severnside	10	0.33	100%	1 year	75%	25%
10	Severnside Small (4 dwgs)	Severnside	4	0.13	100%	1 year	75%	25%
11	Severnside Small (3 dwgs)	Severnside	3	0.10	100%	1 year	75%	25%
12	Main Towns Windfall (35 dwgs)	Abergavenny	35	1.17	100%	1 year	65%	35%
13	Main Towns Windfall (10 dwgs)	Abergavenny	10	0.33	100%	1 year	65%	35%
14	Main Towns Small (4 dwgs)	Abergavenny	4	0.13	100%	1 year	65%	35%
15	Main Towns Small (3 dwgs)	Abergavenny	3	0.10	100%	1 year	65%	35%

4.19 The results of the viability testing for the small case studies are set out in the following chart.

**Figure 4-2 Case Studies 8 - 15 Maximum Potential CIL**



- 4.20 Case studies 8 to 15 all generate residual values over the land value benchmark and therefore can potentially make some level of CIL payment.
- 4.21 Small developments in the main towns (whether allocated sites or windfalls) have sufficient surplus value to achieve a potential CIL of between £175 and £226 £s per sq m.
- 4.22 However, small sites in Severnside generate a much lower potential CIL payment. The smaller sites tested (at 3 and 4 dwellings) can potentially meet a higher CIL payment than the larger schemes at 10 and 35 dwellings. It is worth re-iterating that future land supply in Severnside does not rely on small sites, with a significant majority of supply delivered by the strategic sites.
- 4.23 The small site case studies for Severnside are based upon the dwelling mix advised by the Council and informed by the development workshop. This mix includes a variety of dwelling types. However, if a simplified mix composed of detached houses (2, 3 and 4 bedroom) is used instead then viability testing shows that higher CIL rates can be achieved, with 4 bedroom detached generally showing the best viability. In the case of CS8 it is possible to achieve a



maximum CIL of £47/sq m, CS9 can achieve £53/sq m, CS10 £60/sq m and CS11 £85/sq m<sup>16</sup>. This suggests that where viability is an issue it will be possible to amend scheme mixes to achieve better values.

### Case Studies 16 -20

- 4.24 The adopted LDP includes a policy which allows some residential development in villages but only when this achieves a high proportion of affordable housing. The relevant extract from the LDP is shown below.

**Figure 4-3 Extract from Monmouthshire County Council Local Development Plan – Policy S4**

**In the Main Villages identified in Policy S1:**

- Development sites with a capacity for 3 or more dwellings will make provision for at least 60% of the total number of dwellings on the site to be affordable.

**In the Minor Villages identified in Policy S1 where there is compliance with Policy H3:**

- Development sites with a capacity for 4 dwellings will make provision for 3 dwellings to be affordable.
- Development sites with a capacity for 3 dwellings will make provision for 2 dwellings to be affordable.

- 4.25 We have tested this policy but only in the rural rest of Monmouthshire value area. There is no specific land value benchmark that can be easily identified for these sites as they are not available for other forms of development. However, it is highly unlikely that they would be brought forward if the residual value did not at least exceed agricultural land value.
- 4.26 The following table sets out the characteristics of the sites, which includes one larger scheme at 15 dwellings but with 4 different schemes of 3 or 4 dwellings. All assumptions are as for the 1 ha tile. However, we have considered the composition of the small case studies in more detail and have taken advice from the Council on the make up of the 15 dwelling scheme. Annex 3 includes details of the composition of these case studies.

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<sup>16</sup> All of these sensitivity tests include the policy proportion of affordable housing and the same affordable housing dwelling mix

**Table 4-5 Details of Case Studies 16 to 20**

Case Study	Scheme	MVA	Dwgs	Gross ha	Net ha	Net to gross (%)	Development period	Market %	AH %
16	Main villages Small (4 dwgs)	Rural	4	0.13	0.13	100%	1 year	40%	60%
17	Main villages Small (3 dwgs)	Rural	3	0.10	0.10	100%	1 year	40%	60%
18	Main Villages (15dwgs)	Rural	15	0.50	0.50	100%	1 year	40%	60%
19	Minor Village Small (4 dwgs)	Rural	4	0.13	0.13	100%	1 year	25%	75%
20	Minor Village Small (3 dwgs)	Rural	3	0.10	0.10	100%	1 year	33%	67%

4.27 The residual value generated by the schemes are set out in the table below. This demonstrates that all the schemes generate a value well in excess of agricultural land value and in some cases, a residual value per plot of over £20,000.

**Table 4-6 Residual Value for Case Studies 16 to 20**

Case Study	Scheme	MVA	Dwgs	AH %	Scheme Residual Value	Residual value/gross ha	Residual value per plot
16	Main villages Small (4 dwgs)	Rural	4	60%	£97,000	£746,154	£24,250
17	Main villages Small (3 dwgs)	Rural	3	60%	£79,000	£790,000	£26,333
18	Main Villages (15dwgs)	Rural	15	60%	£324,000	£648,000	£21,600
19	Minor Village Small (4 dwgs)	Rural	4	75%	£25,000	£192,308	£6,250
20	Minor Village Small (3 dwgs)	Rural	3	67%	£52,000	£520,000	£17,333

4.28 Case study 19 has the lowest residual value but, even here, the residual value is around 12 to 15 times agricultural land value.

4.29 For some of the case studies in this group (case studies 16 to 20), a small CIL payment may be theoretically possible but given the variations in viability of these site types, the prudent approach would be to exempt these sites from CIL.

### **Retirement Housing**

4.30 The testing has also included a retirement housing scheme of 50 units on a 0.5ha plot, located in each of the value areas at the relevant affordable housing percentage. When tested against a threshold land value of £650,000 per gross hectare, the retirement schemes were only marginally viable in Monmouth and Chepstow, and not viable elsewhere (see Annex 6 for

details). On this basis, it is likely that retirement housing outside Monmouth and Chepstow will take place where it is able to achieve better values (or lower costs) than modelled here, or is able to take advantage of cheaper land. It remains possible that retirement schemes can make a contribution to affordable housing (most likely, but not exclusively, in Monmouth and Chepstow) but this will be on the basis of scheme-specific negotiations. However, it would be prudent to exempt all retirement housing from CIL.

### **Other Housing**

- 4.31 Care homes are considered under the non-residential viability testing later in this report.
- 4.32 The Council has advised that there is no market for student accommodation in Monmouthshire and therefore there is no purpose in testing its viability nor any evidence on which to base any testing.

### **Summary**

- 4.33 The potential CIL from the strategic sites varies, with the cost of site-specific infrastructure having more of an impact than location. Apart from the Wonastow Road site which is potentially able to support a CIL of over £200/sq m, the majority of the rest of the strategic sites are able to support a CIL of between £85/sq m to around £150/sq m. The clear exception to this is SAH7 Sudbrook Paper Mill which is viable but unable to support any meaningful CIL.
- 4.34 However if SAH3 Fairfield Mabey, SAH5 Rockfield Farm and SAH6 Vinegar Hill have to fund the maximum infrastructure costs identified then the potential CIL rate falls for these sites – to £0/sq m for SAH3 Fairfield Mabey and about £60/sq m for SAH5 Rockfield Farm and SAH6 Vinegar Hill.
- 4.35 There is an important general point about the strategic sites and that is the uncertainty about both the appropriate land value benchmark and the scale of costs the schemes will need to bear (both as s106 payments and to deal with site related development issues). This means that a generous viability buffer will be required in setting the CIL rate affecting the strategic sites.
- 4.36 Small sites in the main towns show relatively strong viability, with potential CIL rates of £175/sq m to £226/sq m. In Severnside, the small case studies generated much lower potential CIL levels (at around £20/sq m to £60/sq m). However it is possible to achieve better values on the smaller Severnside case studies (and a higher theoretical maximum CIL of about £50/sq m to £85/sq m) by changing the dwelling mix.
- 4.37 Village schemes required to provide a high percentage of affordable housing are very varied in the residual values they generate. It is very uncertain that they can generally make any CIL payments and remain viable.
- 4.38 Retirement housing produces a positive residual value in some parts of the County but is unable to support a CIL.

## 5 RESIDENTIAL VIABILITY CONCLUSIONS

### Introduction

- 5.1 The process for developing potential CIL rates is a set of structured qualitative judgements which takes account of the type of development being tested and the role of this development type in delivering the adopted Local Development Plan. The process starts with the 1 ha tiles and uses the analysis to develop an initial view. This is then tested against the findings from the case study analysis to check whether the case study analysis suggest any amendment, with particular weight given to the site types that are important to plan delivery – such as the seven strategic sites.
- 5.2 The Local Development Plan extract from Policy S2 in section 4 provides a useful context for this analysis in that it sets out the quantum and spatial pattern of the planned development:
- The larger strategic sites are important to the delivery of the plan.
  - 18% of the total planned dwellings are expected to be on windfall sites, and of these 154 are in the lower value Severnside settlements (3% of the Plan total) and the rest are in the main towns and villages. Whilst windfall sites are important, it is noted that many of them are in the higher value areas in the County.

### Synthesising the results

- 5.3 The figure below follows the process through the two stages. The CIL rates noted in the table are the **maximum theoretical rates** rather than recommended rates. We draw attention to the need for the council to set CIL rates that are not at the margin of viability and provide a buffer to allow for individual site circumstances and market change.

**Figure 5-1: Considering the maximum theoretical CIL**

Stage 1 – 1 ha tiles		
AH	Notes	Maximum CIL per sq m
25%	Severnside 1ha tiles produce positive residual values above the standard £650,000/ha threshold land value at the three densities tested. However the viability headroom to support a CIL payment is very limited, particularly at lower development densities (as shown in the 1 ha tiles – max CIL of £22/sq m in Severnside). Two of the three densities exceeded a potential CIL of £40/sq m.	£40
35%	Main towns and rural ‘rest of Monmouthshire’ produce positive residual values above the standard £650,000/ha threshold land value at the three densities tested. The viability headroom available to supports CIL payment is considerable, with almost all at least £160/sq m.	£160
<p><b>Stage 1 conclusions</b> – Development types similar to the 1 ha tiles modelled are all viable. The viability suggests that a theoretical maximum CIL rate in main towns and rural ‘rest of Monmouthshire’ might be around £160/sq m, acknowledging that the lower density development in Monmouth will not be viable at this level. The lower values in Severnside suggest that only a lower CIL can be supported for these types of site, up to say £40/sq m (acknowledging that the lower density development will not be viable). However, as noted in LDP S2, these sites will only make up a small proportion of the planned development.</p>		
□		
Stage 2 – Testing against the case studies		
AH	Notes	Maximum CIL per sq m
25%-35%	The strategic sites produce positive residual values above the appropriate threshold land values (£250,000-£300,000/ha for the five greenfield sites and £650,000/ha for the two brownfield sites) and are therefore all viable. All of the strategic sites are able to support a CIL with the exception of Sudbrook Paper Mill.	£85-£150/sq m
25%-35%	The small sites and windfalls in main towns and the rural ‘rest of Monmouthshire’ produce positive residual values above the standard £650,000/ha threshold land value and are viable, with sites are able to support a maximum theoretical CIL of between £175-£226/sq m. The small sites and windfalls in Severnside also produce positive residual values above the standard £650,000/ha threshold land value and are viable, but the viability is less strong. As a result the maximum theoretical CIL is much lower in Severnside, £20-£55/sq m unless the dwelling mix is adjusted to support £50-£85/sq m.	£175-£226/sq m in main towns and rural rest of Monmouthshire £20-£55/ £50-£85/sq m in Severnside
60% - 75%	The small sites predominantly providing affordable housing in rural ‘rest of Monmouthshire’ all produce positive residual values of between £6,250 and £26,333 per plot. It may be theoretically possible to charge a CIL on some of these sites but the variation in viability (particularly when the affordable housing component is over 60%) suggests that a £0 CIL is prudent.	£0
25%-35%	Retirement housing schemes show positive residual values in some parts of Monmouthshire. However the variability suggests that a £0 CIL is prudent.	£0
<p><b>Stage 2 conclusions</b> – Smaller site development in main towns and rural ‘rest of Monmouthshire’ demonstrates strong viability and is able to support a CIL of up to £175/sq m. A rate of around £85/sq m can be supported by the strategic sites except for Sudbrook Paper Mill which is not able to support a CIL.</p>		

- 5.4 The analysis above suggests that it is appropriate to set a CIL for residential development in Monmouthshire and that this should vary by location and type of site. In broad terms the potential maximum CIL in Monmouthshire is £85/sq m. The exceptions are:
- Sudbrook Paper Mill which has a maximum potential CIL rate of £0/sq m.
  - Windfall and small site development in the main towns, villages and rural rest of Monmouthshire, which has a maximum potential CIL of £160/sq m.
  - The theoretical maximum CIL rate for small sites in Severnside is £50-£85/sq m.
- 5.5 In order to maintain simplicity it may be worth considering the same rate for the Severnside small sites as the strategic sites across the county. While it is possible that this may render some small sites unviable in Severnside this type of development in this location is not critical to the delivery of the Local Development Plan.
- 5.6 If SAH3 Fairfield Mabey, SAH5 Rockfield Farm and SAH6 Vinegar Hill have to fund more infrastructure then the potential CIL rate falls for these sites. However there is some uncertainty about the real requirement and funding for the infrastructure concerned, and so it is difficult to recommend setting a CIL rate to accommodate this uncertainty.
- 5.7 The small village sites providing large proportions of affordable housing are not able to support a CIL.
- 5.8 Retirement housing is not able to support a CIL.
- 5.9 The guidance clearly suggests that a buffer is required so that the CIL is not set at the limits of viability. The table below illustrates the potential maximum recommended CIL with a 30% buffer.

**Figure 5-2: Maximum theoretical CIL with a buffer**

Location/type	Theoretical maximum CIL/sq m	Theoretical maximum CIL/sq m with 30% buffer
Strategic Sites except SAH7 Sudbrook Paper Mill	£85	£60
Small sites in Severnside	£85	£60
Small sites in main towns, villages and rural rest of Monmouthshire	£160	£110
SAH7 Sudbrook Paper Mill	£0	£0
Village schemes with above 35% affordable housing	£0	£0
Retirement housing	£0	£0

### Summary

- 5.10 The potential CIL rates that the Council may like to consider are:
- Strategic Sites except SAH7 Sudbrook Paper Mill - £60/sq m

- Small sites in Severnside - £60/sq m
- Small sites in main towns, villages and rural rest of Monmouthshire £110/sq m
- SAH7 Sudbrook Paper Mill - £0/sq m
- Village schemes with above 35% affordable housing - £0/sq m
- Retirement housing - £0/sq m

5.11 On a 'typical' three bedroom semi-detached market house the proposed charges would be £4,800 on strategic sites and on small sites in Severnside, and £8,800 on small sites in main towns, villages and rural rest of Monmouthshire. This would be in addition to the typical £1,000/dwelling residual s106 and any of the obligations affecting development on the strategic sites. This compares to the current typical s106 payments of £6,000-£7,000 per dwelling.



## 6 NON-RESIDENTIAL TESTING ASSUMPTIONS

### Introduction

- 6.1 Based on our understanding of Monmouthshire, previous experience and the Council's future development plans we have identified some 'typical' development typologies. These have been informed by empirical examples, but are not intended to represent any actual developments.
- 6.2 Whilst many developments may share the same use class, they are not necessarily the same use in terms of Section 13 of the CIL Regulations. Therefore we have tested a range of non-residential typologies within the same use class, as per the CIL regulations.

### **Retail Uses (A1)**

- 6.3 We have developed a clear process for considering retail, where large format out of centre convenience retail continues to be one of the best-performing investment markets. The sector is characterised by strong yields and high land values. Hence it should be able to support high levels of development contributions. In contrast, high street retail is generally much weaker with less potential to contribute. If all retail is merged into one category, total receipts may be much less than they could be. On the other hand, if retail is split for CIL purposes, we need to ensure that the split is based on robust evidence.
- 6.4 We have based our A1 assumptions on five retail typologies:
- Supermarkets – Out of centre developments with a gross internal area of 1,200 sq m. These tend to have site coverage of substantially more due to car parking requirements, which we estimate at 50%.
  - Out of centre Retail Warehouse – Again, these are considered to be out of centre developments, with a gross internal area of 1,000 sq m, which we expect would to comprise of two or three large retailing units. Similar to Supermarkets there is a necessity to provide parking to reach these developments so we would expect similar site coverage.
  - Town Centre Retail (Comparison) – Smaller stand-alone units within a town centre. Typically these comprise of around 200 sq m which tends to cover the whole of the site.
  - Town Centre Retail (Convenience) – Similar to the above description for town centre comparison retailers, however, empirical evidence tends to suggest that these are on the whole marginally larger than comparison goods retailers, for instance the necessity to include bulky refrigerating devices etc.
  - Local store – Out of centre (Convenience) – This encompasses developments that are typical of local centres or standalone stores servicing residential areas. Here we are testing for developments that are 200 sq m. We also recognise that there may be a greater propensity for developments built near local centres to make provision for parking and have therefore tested for site coverage of 90%.

### **B1 Business Offices**

6.5 We have used two B1 Office typologies:

- Town Centre office – We are testing 500 sq m with building foot print site coverage of 120% (development over 2 or 3 floors).
- Out of town development of gross 2,000 sq m building foot print site coverage of 40% (development over two floors).

6.6 We believe this correlates with the Employment Land and Premises Review’s recommendations of provision for smaller businesses, particularly ones that are able to share purpose built business parks and town centre developments.

6.7 The non-office B1 uses are covered by the B2/B8 uses discussed below.

6.8 We have used two B2 general industrial typologies:

#### **B2 General Industrial**

- Out of centre industrial – we have tested for a 1,000 sq m development. We believe this is an adequate size to cover a number of smaller workshops as required by the Employment Land and Premises Review. Site coverage for industrial units tend to be around 50%.

#### **B8 Storage/Distribution**

- As per B2 General Industrial, in practice the activity will have the same types of premises and similar values as the smaller B2 typology; i.e. warehouse of gross internal area of 2,000 sq m with a similar site coverage of 50%.

### **C1 Hotels**

6.9 We have also tested for the provision of a hotel in line with the Local Development Plan’s ambitions to strengthen the local tourism industry. Consultation with relevant stakeholders suggest a 30 bedroom hotel of gross 800 sq m on two floors on an out of town site with 80% site coverage would be an appropriate potential scheme.

### **C2 Care Homes**

6.10 In addition to residential development it is appropriate in Monmouthshire to also test different types of specific accommodation for the older population. To this end we have included a test for care homes of around 1,500 sq m.

### **Other uses**

6.11 There are a range of other uses that we have considered, including community, social and Sui Generis such as theatres; hostels; scrap yards; petrol filling stations; shops selling and/or displaying motor vehicles; retail warehouse clubs; nightclubs; launderettes; taxi businesses; amusement centres; and casinos. The types of premises, value of uses and development costs for premises accommodating these types of activity will vary considerably; and this means that these uses cannot be treated in the same way as the other use classes.

6.12 Our approach to this issue has been to consider the types of premises and locations that may be used for the other and Sui Generis uses and assess whether the costs and value implications may have similarities with other uses. We have also considered the likely developments within the plan period as a guide to whether more detailed work might be useful.

- Education, health and community - We see this category as including, but not necessarily being limited to: schools, including free schools; community facilities, including community halls, community arts centres, and libraries; medical facilities; and emergency services facilities. A number of these facilities may be delivered in the area over the plan period and would potentially occupy net additional floorspace (thereby creating development which is liable for CIL).
- Theatres – very few new theatres are being developed in the UK and the exceptions – such as Chester – are in locations with large catchments, an existing foundation of extensive artistic activity and a local authority with the means and inclination to pay.
- Hostels providing no significant element of care – these are likely to be either charitable or public sector uses such as probation hostels, half-way houses, refuges, etc., or low cost visitor accommodation such as Youth Hostels. Our view is that the charitable uses are dependent upon public subsidy for development and operation, and therefore not viable in any commercial sense. Youth Hostels are operated on a social enterprise basis with small financial returns. Neither of these scenarios offers significant commercial viability.
- Scrapyards – there may be new scrapyard/recycling uses in Monmouthshire in the future, particularly if the prices of metals and other materials rise. Subject to consent these are likely to occupy the same sorts of premises as many B2 uses and therefore the viability will be covered by the assessment of the viability of B2 uses.
- Petrol filling stations – we are aware that the recent new filling stations have generally been as part of larger supermarket developments, with independent filling stations closing. It seems unlikely that there will be significant new stand-alone filling station development.
- Selling and/or displaying motor vehicles - sales of vehicles are likely to occupy the same sorts of premises and locations as many B2 uses and therefore the viability will be covered by the assessment of the viability of B2 uses.
- Retail warehouse clubs – these retail uses are likely to be in the same type of premises as the out of town A1 retail uses and covering the same purchase or rental costs. Therefore they are covered by this viability assessment.
- Nightclubs/Laundrettes/Taxi businesses/Amusement centres – these uses are likely to be in the same type of premises as A1 town centre retail uses and covering the same purchase or rental costs. Therefore they are covered by this viability assessment.

#### **Establishing gross development value (GDV)**

6.13 We use a range of information sources in setting benchmark land values and getting intelligent inputs to our residual value modelling. The regulations require Charging Authorities to use “appropriate available evidence” in setting their CIL Charge.

- 6.14 We source non-residential revenues from a range of sources, including:
- Generic websites, such as the RightMove, Zoopla and the Land Registry
  - Direct research with developers and agents operating in the area.
  - Information on land and property values has been taken from industry standard sources including the EGi, CoStar (Focus) and Property Week databases.
- 6.15 However, given the significant variety in development types, this report has also considered historic comparable evidence for new values on both a local, regional and national level.
- 6.16 The following table illustrates the values established for a variety of non-residential uses, expressed in sq m of net rentable floorspace. The table is based on our knowledge of the market and analysis of comparable transaction data. The data has then been corroborated through a discussion with local stakeholders and through the March 2014 development industry workshop.

**Table 6-1 Non-residential uses – annual rent and yields**

Use	Rent (£ Sq. m)	Yield
1: Town Centre Office	£90	8.00%
2: Business Park	£80	8.00%
3: Industrial	£50	13.00%
4: Warehouse	£35	13.00%
5: Local Store - Out of centre (Convenience)	£160	7.50%
6: Supermarket (Convenience)	£190	5.50%
7: Out of centre Retail Warehouse (Comparison)	£140	7.50%
8: Town Centre Retail (Comparison)	£165	9.00%
9: Hotel	£130	7.27%
10: Care homes	£3,700 (per bed)	7.00%
11: Town Centre Retail (Convenience)	£185	8.00%

Source: PBA research

- 6.17 In terms of care homes, there is much less comparable transactional data available specific to Monmouthshire in which to derive a square metre value. In the absence of this, Knight Frank’s research entitled “Care Homes, Trading Performance Review” offers a useful indication as to the likely rent per room. Their research indicates that rents for Care homes in Wales are in the region of £3,700 per room per annum. This is in line with comparable data from neighbouring locations.
- 6.18 Hotels are another sector where there is less comparable transactional data. Discussion with local agents advised a rental per square metre value between £120 and £140 per sq m per annum. This reflects what few transactions there have been in recent years where for example a budget hotel constructed nearby in 2008 by a national chain had a rental value of £114 per sq m per annum which is broadly in line with the values of £130 we have tested.

**Site coverage**

6.19 It is important to consider the density of development proposed. The following table summarises the assumed site coverage ratios for each development type.

**Table 6-2 Non-residential uses – site coverage ratios**

Use	Coverage
1: Town Centre Office	120%
2: Business Park	70%
3: Industrial	50%
4: Warehouse	50%
5: Local Store - Out of centre (Convenience)	90%
6: Supermarket (Convenience)	50%
7: Out of centre Retail Warehouse (Comparison)	50%
8: Town Centre Retail (Comparison)	100%
9: Hotel	80%
10: Care home	70%
11: Town Centre Retail (Convenience)	100%

Source: PBA research

**Developer profit**

6.20 The developer’s profit is the expected and reasonable level of return a private developer can expect to achieve from a development scheme. This figure is based a 20% profit margin of the total development value (GDV).

**Build costs**

6.21 Build cost inputs have been established from the RICS Build Cost Information Service (BCIS) at values set at the time of this study (current build cost values). The build costs are entered at a pound per square metre rate at the following values shown in the following table. The build costs adopted are based on the BCIS median values, indexed separately to Monmouthshire prices.

**Table 6-3 Non-residential uses – build costs**

Use	Build cost per sq m
1: Town Centre Office	£1,103
2: Business Park	£1,251
3: Industrial	£665
4: Warehouse	£440
5: Local Store - Out of centre (Convenience)	£945
6: Supermarket (Convenience)	£1,251

Use	Build cost per sq m
7: Out of centre Retail Warehouse (Comparison)	£615
8: Town Centre Retail (Comparison)	£907
9: Hotel	£993
10: Care home	£1,223
11: Town Centre Retail (Convenience)	£1,062

Sources: BCIS

6.22 In addition, an allowance of 10% of build costs is also made for external works such as car parking and landscaping.

**Professional fees, overheads**

6.23 This input incorporates all professional fees associated with the build, including: architect fees, planner fees, surveyor fees, project manager fees. The professional fees are set at a rate of 12% of build cost.

6.24 This variable has been applied to the valuation appraisal as a percentage of the total construction cost. This figure is established from discussions with both regional and national developers as well as in house knowledge and experience of industry standards.

**Development contributions other than CIL**

6.25 We have assumed for the purposes of testing that most development will still be expected to make s106/s278 etc. contributions to mitigate direct impacts of the development. These will often centre on highways improvements but could also relate to design and access. We have used a combination of looking at past agreements made with the council and utilising our knowledge of undertaking similar studies elsewhere. Clearly as these types of agreement are specific to individual developments we have had to take a pragmatic approach in our generic appraisals. We have basically assumed that higher impact and trip generating uses such as supermarkets will generally be expected to contribute the highest amounts, which are borne out when analysing past agreements. Smaller amounts have been attributed to the other uses as impact is often less significant and ability to pay( i.e. viability) often limits the level sought.

**Finance**

6.26 A finance rate has been incorporated into the viability testing to reflect the value of money and the cost of reasonable developer borrowing for the delivery of development. This is applied to the valuation appraisal as a percentage of the build cost at the rate of 6.5% of total development costs (including build costs, external works, professional fees, sales and marketing).

**Sales costs**

6.27 This variable is based on the average cost of legals and marketing for development, incorporating agent fees, 'on site' sales costs and general marketing/advertising costs. The rate of 3% of GDV is applied to the valuation appraisal as a percentage of the GDV and is established from discussions with developers and agents.

**Professional fees on land purchase**

- 6.28 This input represents the fees associated with the lands purchase and are based upon the following industry standards: Surveyor – 1%; Legals – 0.75% of residual land value.
- 6.29 A Stamp Duty Land Tax is payable by a developer when acquiring development land. This factor has been recognised and applied to the residual valuation as percentage cost against the residual land value at the standard variable rates set out by HMRC (0 – 4%).

**Land for non-residential uses**

- 6.30 After systematically removing the various costs and variables detailed above, the result is the residual land value. In order to ascertain the level of likelihood towards delivery and the level of risk associated with development viability, the resulting residual land values are measured against a benchmark value which reflects a value that a landowner would reasonably be expected to sell/release their land for development.
- 6.31 Establishing the existing use value (EUV) of land and in setting a benchmark at which a landowner is prepared to sell to enable a consideration of viability can be a complex process. There are a wide range of site specific variables which effect land sales (e.g. position of the landowner – are they requiring a quick sale or is it a long term land investment). However, for a strategic study, where the land values on future individual sites are unknown, a pragmatic approach is required.
- 6.32 Discussions with agents active in the commercial sector reveal there have been very few sales of commercial or employment land in the district over the past 5 years, largely arising from the moribund state of the commercial market caused by the recession. As a general figure, discussions with local agents indicated land values were generally in the region of £400,000 to £700,000 (per net hectare) depending largely upon location.
- 6.33 Transactional data from CoStar for Monmouthshire reveal values of an average of £375,000 per hectare. This has been predominantly used for industrial purposes in out of centre locations. Whilst this figure is a useful benchmark it should not be used as a one size fits all approach to values. In reality, land values vary considerably depending upon location and prospective use. For instance land within a town centre is likely to have a comparatively higher uplift value to more out of centre locations as there is a greater expectation on return. Similarly, as we can see from analysis of rental values, retail achieves higher returns than industrial and office sites and similarly will likely command a higher land value.
- 6.34 Taking all of this into account alongside discussion with local land values we feel the below land values are representative.

**Table 6-4 Land Values**

Use	Land Value (net hectare)
1: Town Centre Office	£800,000
2: Business Park	£500,000
3: Industrial	£400,000
4: Warehouse	£400,000



<b>Use</b>	<b>Land Value (net hectare)</b>
5: Local Store - Out of centre (Convenience)	£800,000
6: Supermarket (Convenience)	£1,000,000
7: Out of centre Retail Warehouse (Comparison)	£800,000
8: Town Centre Retail (Comparison)	£800,000
9: Hotel	£500,000
10: Care home	£500,000
11: Town Centre Retail (Convenience)	£800,000

Source: PBA research

## 7 NON-RESIDENTIAL VIABILITY ASSESSMENT

### Introduction

- 7.1 This section sets out the assessment of non-residential development viability and also summarises the effect on viability of changes in values and costs, and how this might have an impact on the level of developer contribution. The tables below summarise the detailed assessments, and represent the residual value per square metres after values and costs, including land have been calculated.
- 7.2 It is important to note that the analysis considers development that might be built for subsequent sale or rent to a commercial tenant. However there will also be development that is undertaken for specific commercial operators either as owners or pre-lets.

### B-class uses

- 7.3 In line with other areas of the country our analysis suggests that for commercial B-class development it is not currently viable to charge a CIL. Whilst there is variance for different types of B-space, essentially none of them generate sufficient value to justify a CIL charge. From our analysis, the viability of all four categories; Town centre offices, Business Parks, Industrial and Warehouses, are undermined by relatively poor rental values, particularly when compared to retail units.
- 7.4 As the economy recovers this situation may improve but for the purposes of setting a CIL we need to consider the current market. Importantly this viability assessment relates to speculative build for rent – we do expect that there will be development to accommodate specific users, and this will be based on the profitability of the occupier's core business activities rather than the market values of the development. We have tested offices, warehouses and industrial uses on a county-wide basis as there was little variance in costs or values across different locations.

**Table 7-1 B-class development**

Use	Town Centre Office	Business Park	Industrial	Warehouse
Residual value per sq m (inc. allowance for EUV + uplift)	-£734	-£983	-£680	-£470

Source: PBA research

### Retail uses

- 7.5 As discussed in the previous chapter, five retail scenarios have been tested, namely; supermarkets, out of centre retail warehouses, town centre retail (convenience), town centre retail (comparison) and local stores. It was considered that these represent the most likely scenarios to come forward over the plan period and also allowed the testing of the type of development envisaged in the Plan.

### **Supermarkets**

- 7.6 Large scale convenience retail continues to be one of the best performing sectors in the UK, although we are aware that even this sector is seeing reduced profits at the time of writing. Leases to the main supermarket operators (often with fixed uplifts) command a premium with investment institutions. Although there are some small regional variations on yields, they remain generally strong with investors focussing primarily on the strength of the operator covenant and security of income. We would therefore suggest the evidence base for large out of town convenience retail can be approached on a wider region or even national basis when justifying CIL charging. Following our appraisal on this basis in Monmouthshire we believe there is scope for a CIL charge for out of town centre convenience retail development without affecting viability.

### **Retail warehouse**

- 7.7 Although this market has been relatively flat in recent times, especially in terms of new build, there may potentially be more activity in the future. Whilst values have dropped the relatively low build costs mean that there is still value in these types of developments when there is occupier demand. Our analysis therefore suggests there is reasonable scope for justifying CIL without adversely affecting viability.

### **Town Centre Retail (Comparison) and Town Centre Retail (Convenience)**

- 7.8 Our testing indicates very little scope for charging CIL for town centre comparison and convenience retail units. There is insufficient value in town centre comparison development to set a levy. Whilst town centre convenience testing does show a positive value, it is not significant and may be considered as more marginal than out of centres retail uses.

### **Local Convenience (out of centre)**

- 7.9 Local convenience stores are another area that could form part of the charging schedule, albeit not to the same degree as supermarket and retail warehouse units. In setting a suitable charge the authority should be mindful that setting a separate charge for small scale convenience, whilst possible, requires a more substantial evidence base to support a threshold for the development type. It should also be noted that within Monmouthshire because of its rural nature, potentially a lot of new convenience floorspace will either utilise existing floorspace or be under 100 sq. m. Therefore if the authority chooses to set out a more simple levy regime with a catch all charge for out of centre retailing, which is higher than a smaller convenience store has shown as viable then it is not considered that this will put at risk the provision of smaller units for the reasons set out above and would not significantly impact delivery of the Plan.

### **Summary**

- 7.10 The appraisal summary shown in Table 7.2 is for all retail development. As discussed there is scope for charging, to various degrees, on all types except town centre stores. Our testing shows that residual values are lower for town centre comparison and convenience units than it is for out of town units such as supermarkets and retail parks. Whilst we have identified scope

for a charge, the authority may wish a to set a simple and less complex charging regime with a levy of zero for in centre development and a levy of up to £604 for out of centre development.

7.11 It should be noted that whilst out of centre development is shown as viable in respect of the generic models tested, there may be limited circumstances for specific types of retail development where a specific scheme’s viability may not be as positive. However, these will be very limited in number and are not considered as critical to delivery of the Plan as they have not been identified, therefore they have not been tested. If such a circumstance arises and a scheme is found to be unviable but otherwise is in accordance with Plan policy and objectives then, the Council, under the appropriate regulation, could choose to set out an exceptions policy to assist delivery of this and other proposals with similar circumstances.

**Table 7-2 Summary of Retail uses**

Use	Supermarket	Retail warehouse	Town Centre retail (Comparison)	Town Centre retail (Convenience)	Local store (Convenience)
Residual value per sq m (inc. allowance for EUV + uplift)	£604	£331	-£59	£68	£101

Source: PBA research

**Hotel development**

7.12 As can be seen in Table 7.3, hotel development in Monmouthshire does not realise sufficient residual value to warrant a positive levy charge.

**Table 7-3 Hotel viability**

Use	Hotels
Residual value per sq m (inc. allowance for EUV + uplift)	-£107

Source: PBA research

**Care homes**

7.13 We have tested the viability of the care sector. There has been significant private sector investment in care homes in recent years, fuelled by investment funds seeking new returns. However, there have been concerns about the occupancy rates and the ability to sustain prices, for instance, evidence provided by Knight Frank suggests income per bed for care homes in Wales is less than half of the UK average. The high level analysis suggests that care homes are unlikely to be viable enough in Monmouthshire.

**Table 7-4 Care homes viability**

Use	Care homes
Residual value per sq m (inc. allowance for EUV + uplift)	-£1,010

Source: PBA research

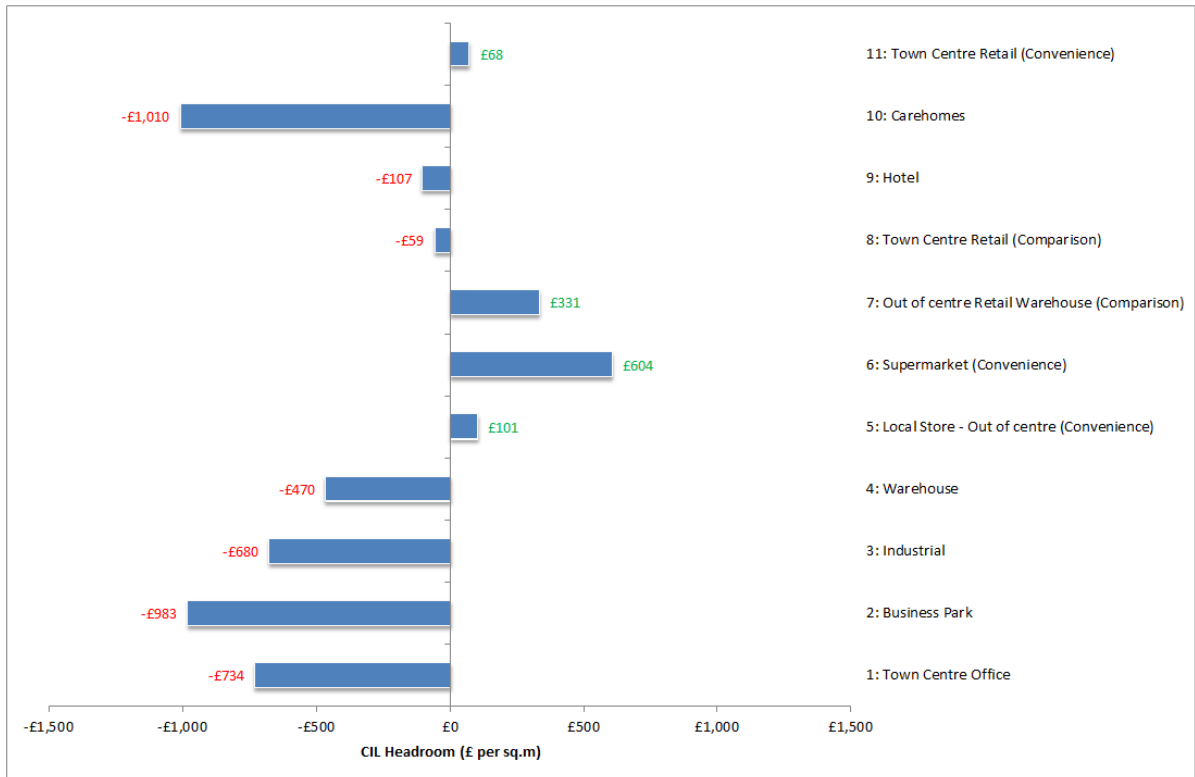
**Other non-residential development**

- 7.14 In addition to the development considered above there are other non-residential uses that we have considered. PAS guidance suggests that there needs to be evidence that community uses are not able to support CIL charges. Our view is that it would not be helpful to set a CIL for the type of facilities that will be paid for by CIL (amongst other sources).
- 7.15 Our approach to this issue is that the commercial values for community uses are £0 but there are build costs of around £1,800 per sq m plus the range of other development costs; with a net negative residual value. Therefore we recommend a £0 CIL for these uses.

**Results summary**

- 7.16 The following figure (7.1) illustrates the levels of value in our tested schemes when all costs have been subtracted from the values. As can be seen positive values exist for all convenience and out of town centre comparison retail development.
- 7.17 As can be seen below there is scope to charge a maximum of £604 per sq m for Supermarkets, £331 per sq m for Retail warehouse, £68 per sq m for Town centre convenience retail units and £101 per sq m for local store - out of centre convenience units.
- 7.18 The evidence suggests that a zero charge applies to all the other forms of non-residential development. All other tested uses show negative values, although, it is important to note that this does not mean that these uses will never come forward in Monmouthshire. Bespoke schemes with identified end users and land owners willing to sell at lower prices will enable development to come forward in the future.

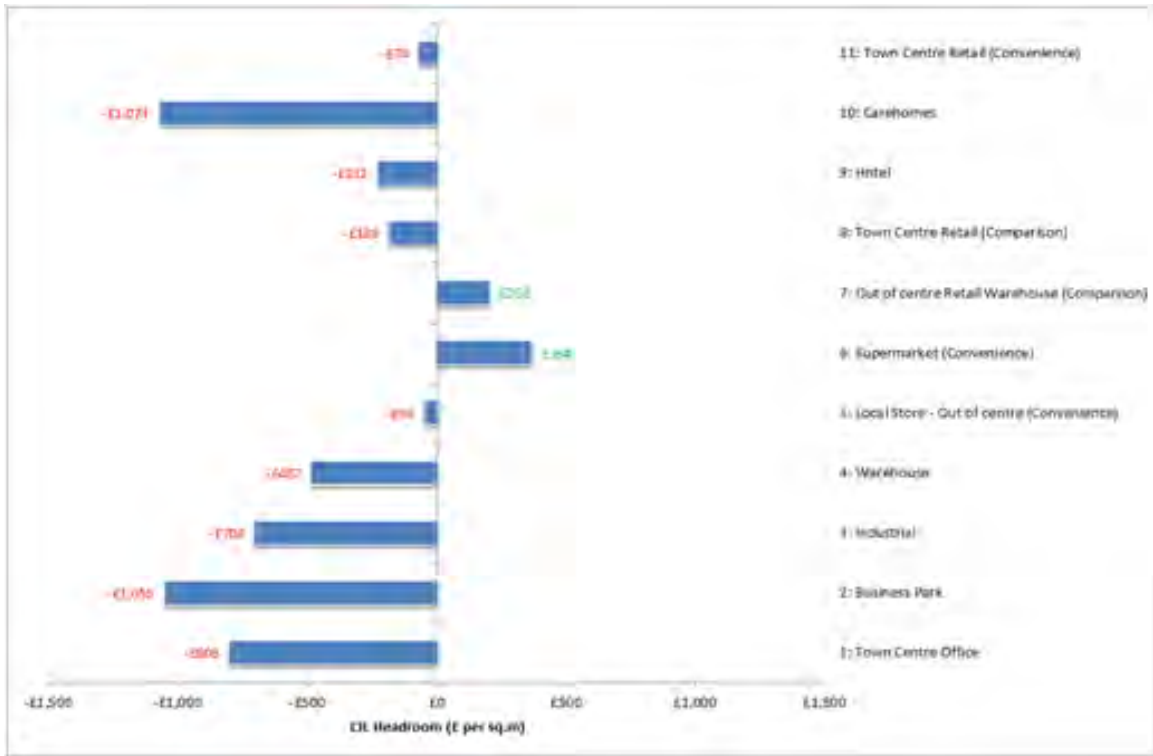
**Figure 7-1 Scope for CIL**



Source: PBA research

- 7.19 To help the council decide as to where they may wish to set their CIL rates we have also undertaken some sensitivity testing in terms of values rising and falling. This will assist the council by illustrating how sensitive particular uses are to shifts in the market. The council will need to decide in setting the rate how much they want to put at risk that particular development type and what effect non delivery would have on the plan delivery strategy. The sensitivity analysis will also help the council in thinking about suitable trigger points whereby a review of the CIL is required – for example if the economy worsens and retail values drop by 10% then it may be appropriate to lower or drop the charge. Alternatively if the economy recovers there may be scope to charge CIL on more uses in the future.
- 7.20 Figure 7.2 shows what will happen if there is depreciation in the values of 10%. As can be seen all of the retail units suggested are still viable with a depreciation of rents of 10%. Both supermarkets and out of town retail units appear relatively resilient to fluctuations in the rental market however, with these lower rental values, both town centre convenience units and local out of centre units become unviable. Therefore the council may wish to exercise caution for charging a levy on town centre units, particularly comparison units.
- 7.21 Based on these sensitivity test findings, if town centre retail comparison is an important part of the plan’s delivery strategy and the council is risk adverse, this sensitivity test would suggest that in the current climate whereby there is potential for values to drop, setting a lower charge may be appropriate.

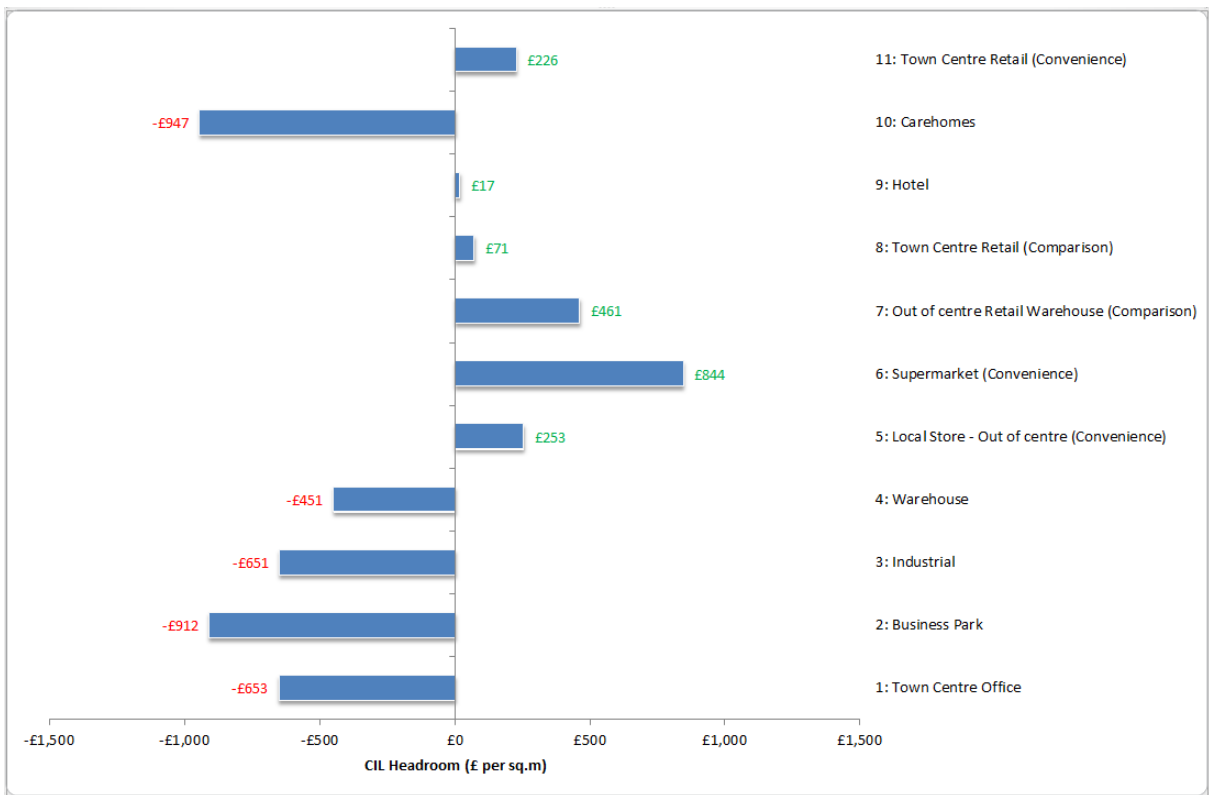
**Figure 7-2 Sensitivity analysis – minus 10% on values**



Source: PBA research

7.22 However if the council has a more optimistic view of the market and believes that values will rise, Figure 7.3 indicates that the retail uses identified are more viable. A 10% increase in rental values for hotels and town centre retail comparison units improves their viability from a negative to a positive value, however this is still only a very minimal figure and would be very difficult to justify a levy here. All other uses such as employment and care homes continue to be negative.

**Figure 7-3 Sensitivity analysis – plus 10% on values**



Source: PBA research

**Synthesising the results**

- 7.23 The assessment shown above illustrates the **maximum theoretical rates** rather than recommended rates. We draw attention to the need for the council to set CIL rates that are not at the margin of viability and provide a buffer to allow for individual site circumstances and market change.
- 7.24 Unlike the residential market where there is substantial supporting data on values and costs, viability assessment for commercial and other non-residential development is based on far fewer transactions both in terms of assessing development cost and values. Whilst we have analysed the best available data, the Council needs to be wary about setting CIL rates at the margin of viability if the form of development is important to the delivery of the Plan.
- 7.25 The only form of tested non-residential development that is sufficiently viable in Monmouthshire is retail development. As previously described the retail sector performs differently across the different types, i.e. convenience and comparison and in centre and out of centre. However in the interest of a simple charging regime as recommended by the guidance it is recommended that the authority take a two zone charging approach as opposed to scale or specific types and set a charge for in centre and a charge for out of centre development, utilising the existing policy boundaries for identified centres as set out in the Plan.



- 7.26 The charge for in centre, regardless of specific retail use would be £0 per sq. m, because the appraisals show that retail development in these locations of the type envisaged as likely to come forward would either be limited or marginal at best.
- 7.27 Out of centre is more complex as the maximums for the type of development that could come forward range from £101-£604 per sq m. The Council could choose a cautious approach and set the charge at the lowest denominator, however as discussed above it is considered that whilst a buffer should be applied that this should be to the middle use value (out of centre retail park/warehouse) of £331 per sq m, rather than the lowest value use (local out of centre convenience store) of £101 per sq m, as developments of this type are more likely to be either under the threshold or reuse existing floorspace and therefore not chargeable. Therefore as there is limited data of transactions it is recommended that a 40% buffer is applied in this instance, which means a recommended charge for out of centre retail development of £200 per sq m.

**Summary**

- 7.28 The potential CIL rates that the Council may like to consider are:
- Out of centre retail - £200 sq. m
  - All other non-residential development - £0 sq. m

# **ANNEX 1**

## **Benchmark Land Values**

## Land value benchmarks

1. Establishing suitable land value benchmarks is an important part of any viability testing. Welsh Government guidance<sup>1</sup> states that viability is a key factor in striking the balance between collecting revenue and not setting rates too high (para 2.2); and that viability studies should concentrate on sites where the imposition of CIL may have an impact on viability (para 2.18). It is noted that land values across an area may already result in development becoming unviable or marginal and this needs to be considered (para 2.20).
2. Department for Communities and Local Government CIL guidance<sup>2</sup> applies in Wales and states that a charging authority should use 'appropriate available evidence', recognising that it is unlikely to be fully comprehensive and this will include values of land in both existing and planned uses (2.2.2.4).
3. The Advice for planning practitioners<sup>3</sup> sets out a preferred approach in the following extract from page 29:

*"We recommend that the Threshold Land Value is based on a premium over current use values and credible alternative use values (noting the exceptions below.....)."*
4. The exceptions referred to in the Advice for planning practitioners reflect the significant differences in the types of current use found within settlements and on greenfield land adjoining settlements. The exceptions are summarised as:
  - Larger scale sites for urban extensions on greenfield land where the uplift on current use value (agricultural land) sought by the landowner will be significantly higher than in an urban context.
  - Smaller, edge-of-settlement greenfield sites, where landowners' required returns will be more like those for sites within the settlement.
5. Advice for planning practitioners states that reference to market values can still provide a useful 'sense check' on the benchmark values that are being used for testing, but it is not recommended that these are used as the basis for the input to a model. This is an important concept and explains why the land value benchmark used to test plan policies (and CIL rates) can be **less** than the value at which land is being traded in the market. This point was highlighted in a recent CIL examiner's report<sup>4</sup>:

*"Finally the price paid for development land may be reduced. As with profit levels there may be cries that this is unrealistic, but a reduction in development land value is an inherent part of the CIL concept. It may be argued that such a reduction may be all very well in the medium to long term but it is impossible in the short term because of the price already paid/agreed for development land. The difficulty with that argument is that if accepted the prospect of raising funds for infrastructure would be forever receding into the future. In any event in some instances it may be possible for contracts and options to be re-negotiated in the light of the changed circumstances arising from the imposition of CIL charges." (para 32)*
6. The Homes and Communities Agency is the housing and regeneration agency for England. As part of its work it is concerned with viability to ensure delivery of market and affordable

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<sup>1</sup> Welsh Government, 2011, Community Infrastructure Levy Preparation of a Charging Schedule,

<sup>2</sup> DCLG, 2014, Community Infrastructure Levy Guidance

<sup>3</sup> Local Housing Delivery Group, 2012, Viability Testing Local Plans

<sup>4</sup> Report to The Mayor of London, by Keith Holland January 2012

housing. It provides some generic guidance on land value benchmarking<sup>5</sup> which states that in relation to the required premium above existing use value (EUV):

*“Benchmarks and evidence from planning appeals tend to be in a range of 10% to 30% above EUV in urban areas. For greenfield land, benchmarks tend to be in a range of 10 to 20 times agricultural value”. (page 9)<sup>6</sup>*

7. Another report in 2011 also undertaken in England for the Department for Communities and Local Government<sup>7</sup> also provides generic guidance on land value benchmarking. It suggested that a premium of 25% over existing use value was required to bring forward industrial land for redevelopment. The premium for greenfield land was said to be higher, recognising that while the existing use value base is low, the costs normally associated with realising new development on unserviced greenfield land are considerable.
8. For residential land, current use value is taken as industrial land for urban sites and agricultural land for strategic sites/urban extensions, with appropriate uplifts applied.

#### ***Implications for Residential Benchmark Land Values in Monmouthshire***

9. The key factors to be taken into consideration are:
  - The land values used for the Affordable Housing Viability Study in the Local Development Plan, which was examined in 2013 and adopted in 2014.
  - Published research reports on land values.
  - Consultation with the development industry active in Monmouthshire.
  - Data from Land Registry.

#### ***Local Development Plan***

10. The Monmouthshire Local Development Plan examination ended in October 2013 and the Plan was adopted in February 2014. The evidence base for this plan was also considered at examination and included land values as part of the Affordable Housing Viability Study (AHVS). The AHVS was originally undertaken and then updated in 2011 and 2012 to reflect progress in the LDP and to take account of market changes. The AHVS stated that

*“Based on information from the Valuation Office Agency (VOA), local data and local industry experience a benchmark of £650,000 per hectare, allowing for an uplift on industrial land values (as an alternative/existing use), appears to be a realistic minimum level at which land might be expected to come forward for residential development.”*

#### ***Published Land Value Research***

11. Recent information on agricultural land values can be found through the reports published by estate agents. In 2014, Smiths Gore<sup>8</sup> suggests that the value of farmland in Wales has risen since 2010, and varied between £20,000 and £28,000 per ha. Knight Frank stated that

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<sup>5</sup> Annex 1 (Transparent Viability Assumptions) to the Homes and Communities Agency guidance for its Area Wide Viability Model, August 2010

<sup>6</sup> Homes and Communities Agency, 2010, Annex 1 (Transparent Viability Assumptions)

<sup>7</sup> Turner Morum, 2011, Cumulative impacts of regulations on house builders and landowners

<sup>8</sup> Smiths Gore, 2014, Farmland Market Great Britain 2014Q1

Wales farmland is between £11,000 per ha to £27,000 per ha in 2014<sup>9</sup> (excluding upland grazing, which has less value).

12. The latest information from the Valuation Office Agency showed that cleared industrial development sites 0.5-1 ha in Cardiff had a value of £620,000 per ha in 2011<sup>10</sup>, although we acknowledge that this information is somewhat dated.
13. Elsewhere in South Wales, the residential benchmark land values referred to in the Caerphilly CBC CIL examination<sup>11</sup> were typically £500,000 per ha, although this fell to £200,000 per hectare in some areas. The benchmark land values in Merthyr Tydfil (jointly examined with Caerphilly<sup>12</sup>), ranged between £250,000 per ha to £500,000 per ha. In Caerphilly the examiner rejected evidence of higher value land transactions which were based on permissions with lower affordable housing. House price data<sup>13</sup> shows that Monmouthshire has higher values than Caerphilly and Merthyr Tydfil and this may result in higher land values.

#### *Consultation with the Development Industry*

14. The development industry workshop held at Monmouthshire Council's offices in March 2014 discussed the proposed threshold land values of £650,000 per ha for urban sites based on an uplift on alternative use (taken to be industrial land) and £250,000 per ha for strategic greenfield sites. Development industry representatives considered that these values are low but no specific alternatives were put forward and it was acknowledged that there has been limited activity in recent years. Taking into account that the benchmark should represent what a realistic landowner might be willing to bring land forward for with policies in place rather than the highest values that might be achieved, £650,000/ha was considered acceptable. The development industry workshop did not suggest that there were specific different thresholds within Monmouthshire.
15. The discussion in the development industry workshop was supported by separate discussion with agents, which indicated land values for industrial and other non-residential development were in the region of £400,000 to £700,000 depending largely upon location.

#### *Land Registry*

16. Land registry is able to provide information on recorded sale prices in land titles. Titles were identified within the strategic site allocations in the Local Development Plan and a subset of these were able to reveal the price paid. This information from Land Registry shows that there have been agricultural value land transactions at £11,600 per ha to £14,500 per ha in Monmouthshire 2010-2012, similar to the data noted above.
17. There is also evidence of prices rising well above agricultural values as the residential development potential is identified as part of the site promotion process. The variation in these transaction values is large, both above and below the benchmarks suggested in the workshop. By itself, the transaction evidence does not indicate that the suggested benchmarks are incorrect although the paucity of transactions and spread of values mean

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<sup>9</sup> Knight Frank, 2014,

<sup>10</sup> VOA, 2012, Property Market Report

<sup>11</sup> Philip Staddon, 2014, Report to Caerphilly CBC

<sup>12</sup> Philip Staddon, 2014, Report to Merthyr Tydfil CBC

<sup>13</sup> Land Registry, 2014, House price index

that it would be difficult to set a benchmark on this evidence alone. The transaction data did not suggest that it was necessary to set specific benchmarks in different part of Monmouthshire.

***Land Value Summary***

18. As illustrated above, there is no single source of information or approach that can be drawn on to identify an appropriate land value benchmark. Furthermore the guidance suggests a composite view is taken based on premium over existing use, checked against market values.
19. There is a measure of consensus that £650,000 per gross ha is a suitable benchmark for urban sites. This figure is 60% over the estimated industrial land value. There is also some consensus that the £250,000 per gross ha is a suitable benchmark for strategic greenfield sites, which is 15-20 times agricultural values.
20. The benchmarks are applicable across Monmouthshire as there is no clear evidence to vary them by location.

# **ANNEX 2**

## **Testing Assumptions**

## Residential Development Assumptions

All market value areas to be tested at 30dph, 40dph and 50dph.

The affordable housing requirements for each market value area are noted in the table below. These were provided by MCC.

### % affordable housing

Market Value Area	% AH
Sevenside	25%
Market towns (Monmouth, Chepstow and Abergavenny)	35%
Rural rest of Monmouthshire	35%
	60%

The standard tenure make up for affordable housing is 50% social rent, 25% intermediate rent and 25% Homebuy (Equity Share, 50% average share size with no rent payment on unbought share).

### The breakdown of units per tenure is as follows:-

%ages of total Affordable homes	Social Rent	Intermediate Rent	Homebuy	Total
1 bed flat	20%			20%
2 bed flat	10%	10%		20%
2 bed terrace	2.5%	15%	12.5%	30%
3 bed terrace	7.5%		12.5%	20%
4 bed terrace	10%			10%
<b>Total</b>	<b>50%</b>	<b>25%</b>	<b>25%</b>	<b>100%</b>

### Rents (net of service charge)/week

House type	Social Rent	Intermediate Rent
1 bed flat	£78	£90
2 bed flat	£85	£110
2 bed terrace	£85	£115
3 bed terrace	£89	£135
4 bed terrace	£92	£160

### Other Affordable Homes Costs

Model as capitalized net rent, without grant, with the following assumptions:-

Cost of management/ maintenance/ voids etc £1,500

Capitalisation Rate 6%

### Mixes (for notional 1 hectare scheme)

#### For Market units

	30 dph	40 dph	50 dph
	%s	%s	%s
1 bed flat			
2 bed flat		5%	10%
2 bed terrace		10%	15%
3 bed terrace	10%	25%	40%
4 bed terr			
3 bed semi	15%	35%	15%
3 bed det	5%	5%	
4 bed det	60%	20%	20%
5 bed det	10%		



### Dwelling sizes (in sq m GIA)

House type description	Affordable	Market
1 Bed Flat	48	45
2 Bed Flat	60	55
2 Bed Terrace	73	65
3 Bed Terrace	80	80
4 bed terrace	100	
3 Bed Semi		80
3 Bed Detached		85
4 Bed Detached		130
5 Bed Detached		155

Assume all flats are 1 - 2 storey. No circulation space allowed for flats.

### Development costs

#### **Build costs**

£s /sq m – using Building Cost Information Service (BCIS 5) year median values, using location factor for Gwent with a 15% uplift for external works.

Houses £993

Flats £1,080 (assume 1 and 2 storey)

For small sites of 3 dwellings or less, BCIS indicates that build costs will be higher. For small sites we have therefore used a 10% increase over the figures noted above.

Houses £1,092

Flats £1,188

For the retirement case study site, a build cost of £1,163/ sq m has been used.

#### **Additional build costs per dwelling**

- Sprinklers £3,075/house  
£879/flat

#### **Other development costs**

- Professional Fees % 10% of build costs
- Finance 6% of build costs
- Marketing Fees 3% of market value
- Developers Return 20% of GDV
- Contractors Return 6% of development costs
- Agents Fees 2.0%
- Legal Fees 0.5%
- SDLT Variable

#### **DCF Assumptions (for larger case study sites)**

- Debit Interest Rate 6%
- Credit Interest Rate 2%
- Annual Discount Rate 3.5%

#### **Residual s106 costs**

£1,000 per dwelling (market and affordable)

## Market Values

	Abergavenny	Chepstow	Monmouth	Severnside	Rural rest of Monmouthshire
<b>1 bed flat</b>	£115,000	£120,000	£125,000	£100,000	£115,000
<b>2 bed flat</b>	£130,000	£140,000	£140,000	£120,000	£130,000
<b>2 bed terrace</b>	£170,000	£180,000	£180,000	£140,000	£170,000
<b>3 bed terrace</b>	£190,000	£200,000	£190,000	£170,000	£190,000
<b>3 bed semi</b>	£190,000	£210,000	£190,000	£170,000	£200,000
<b>3 bed detached</b>	£210,000	£215,000	£195,000	£185,000	£215,000
<b>4 bed detached</b>	£300,000	£330,000	£290,000	£260,000	£330,000
<b>5 bed detached</b>	£350,000	£380,000	£320,000	£290,000	£380,000

On case study sites of 3 units or less, the selling prices listed above have been uplifted by 10% to reflect the higher prices achievable on small sites.

Retirement Housing Market Values used are as follows

	Abergavenny	Chepstow	Monmouth	Severnside	Rural rest of Monmouthshire
<b>1 bed flat</b>	£173,000	£180,000	£188,000	£150,000	£173,000
<b>2 bed flat</b>	£215,000	£231,000	£231,000	£198,000	£215,000

Retirement Housing scheme

- 50 unit - 20x1 bed (50 sq m), 30x2 bed (75 sq m).
- 25% of total area is communal (non-saleable) space

Retirement Housing affordable housing assumptions are the same to those used in the other case studies:

- 50% shared ownership
- 50% intermediate rent
- Use intermediate rents - 1 bed £90, 2 bed £110

Other retirement housing assumptions are:

- Marketing – 6%
- Empty Property costs allowed - £120,000 (as scheme built before any significant number of occupations) for utilities, staff etc.

Retirement housing delivery:

- 12 months until 1st sale.
- 40% sales in yr 1
- 30% sales in yr 2
- 30% sales in yr 3

# **ANNEX 3**

## **Case Study Profiles**

## Large Case Studies

AREA/ LOCATION/ DETAILS											
Case Study	Scheme	MVA	Dwgs	Gross ha	Net ha	Net to gross (%)	Opening Up Costs (Strategic sites)	Additional Development Costs	Development Rate; Dev Period	Market %	AH %
<b>STRATEGIC SITES</b>											
1	SAH1 Deri Farm Abergavenny	Abergavenny	250	8.70	7.70	89%	100,000	4,250,000	20pa yr 1 then 40 pa; 7 yrs	65%	35%
2	SAH2 Crick Road Portskewett	Severnside	285	9.95	7.70	77%	100,000	120,000	55pa; 6 yrs	75%	25%
3.1	SAH3 Fairfield Mabey, Chepstow (alt 1)	Chepstow	350	13.10	9.50	73%	100,000	3,600,000	40pa yr 1 then 80 pa; 5 yrs	65%	35%
3.2	SAH3 Fairfield Mabey, Chepstow (alt 2)	Chepstow	350	13.10	9.50	73%	100,000	5,290,000	40pa yr 1 then 80 pa; 5 yrs	65%	35%
4	SAH4 Wonastow Rd Monmouth	Monmouth	450	19.61	16.46	84%	100,000	420,000	62pa yr 1 then 100 pa; 5 yrs	65%	35%
5.1	SAH5 Rockfield Farm Undy (Alt 1)	Severnside	270	9.00	7.45	83%	100,000	1,700,000	55pa; 5 yrs	75%	25%
5.2	SAH5 Rockfield Farm Undy (Alt 2)	Severnside	270	9.00	7.45	83%	100,000	1,970,000	55pa; 5 yrs	75%	25%
5.3	SAH5 Rockfield Farm Undy (Alt 3)	Severnside	270	9.00	7.45	83%	100,000	400,000	55pa; 5 yrs	75%	25%
6.1	SAH6 Vinegar Hill Undy (Alt 1)	Severnside	225	7.81	6.91	88%	100,000	2,000,000	50pa; 5 yrs	75%	25%
6.2	SAH6 Vinegar Hill Undy (Alt 2)	Severnside	225	7.81	6.91	88%	100,000	2,320,000	50pa; 5 yrs	75%	25%
6.3	SAH6 Vinegar Hill Undy (Alt 3)	Severnside	225	7.81	6.91	88%	100,000	450,000	50pa; 5 yrs	75%	25%
7	SAH7 Paper Mill Sudbrook	Severnside	190	6.60	6.60	100%	100,000	38,000	50pa; 4 yrs	75%	25%

Note – opening up costs are per net hectare.

## Small Case Studies

Case Study	Scheme	MVA	Dwgs	Net ha	Net to gross (%)	Development period	Market %	AH %
8	Severnside Windfall (35 dwgs)	Severnside	35	1.17	100%	1 year	75%	25%
9	Severnside Windfall (10 dwgs)	Severnside	10	0.33	100%	1 year	75%	25%
10	Severnside Small (4 dwgs)	Severnside	4	0.13	100%	1 year	75%	25%
11	Severnside Small (3 dwgs)	Severnside	3	0.10	100%	1 year	75%	25%
12	Main Towns Windfall (35 dwgs)	Abergavenny	35	1.17	100%	1 year	65%	35%
13	Main Towns Windfall (10 dwgs)	Abergavenny	10	0.33	100%	1 year	65%	35%
14	Main Towns Small (4 dwgs)	Abergavenny	4	0.13	100%	1 year	65%	35%
15	Main Towns Small (3 dwgs)	Abergavenny	3	0.10	100%	1 year	65%	35%

## Other Case Studies

Case Study	Scheme	MVA	Dwgs	Gross ha	Net ha	Net to gross (%)	Development period	Market %	AH %
16	Main villages Small (4 dwgs)	Rural	4	0.13	0.13	100%	1 year	40%	60%
17	Main villages Small (3 dwgs)	Rural	3	0.10	0.10	100%	1 year	40%	60%
18	Main Villages (15dwgs)	Rural	15	0.50	0.50	100%	1 year	40%	60%
19	Minor Village Small (4 dwgs)	Rural	4	0.13	0.13	100%	1 year	25%	75%
20	Minor Village Small (3 dwgs)	Rural	3	0.10	0.10	100%	1 year	33%	67%

## **ANNEX 4**

### **Development Industry Workshops 18<sup>th</sup> March – notes**

**Monmouthshire County Council**  
**Community Infrastructure Levy – Development Industry Workshop**  
**18<sup>th</sup> March 2014**

Organisations attending the workshop:

- Taylor Wimpey
- Edenstone Homes
- Monmouthshire Housing Association
- Melin Homes
- Persimmon Homes
- Savills
- Johnsey Estates
- Martin Davies (MD), Monmouthshire County Council
- Shirley Wiggam, Monmouthshire County Council
- Rachel Jones, Monmouthshire County Council
- Jane Coppock, Monmouthshire County Council
- Deb Hill-Howells, Monmouthshire County Council
- Ben Winstanley, Monmouthshire County Council
- Lin Cousins (LC), Three Dragons
- Dominic Houston (DH), Three Dragons
- Mark Felgate (MF), PBA

MD welcomed everyone to the workshop.

**Community Infrastructure Levy (CIL) Introduction**

LC introduced CIL and described how it operates and process for setting CIL. She explained that CIL applies to all development (that people go into) and is based on a payment rate per sq m. The rate could be set at £0. Setting rates for a local authority area must be based on viability evidence and not policy considerations. Presentation slides for this section of the workshop are shown in the Annex.

Workshop attendees who wanted to understand better the process for setting CIL and the stages of consultation may find the following WG publication helpful -

<http://wales.gov.uk/docs/desh/publications/110912cilleafleten.pdf>. DCLG has also published CIL guidance.

Other questions raised were:

- What happens about brownfield versus greenfield sites (brownfield sites have extra costs and an established use value – both factors need to be taken into account – LC indicated that if viability analysis indicated the need for a lower CIL rate, this could be accommodated in a charging schedule (as long as a distinct zone could be identified on an OS base).
- How is CIL reviewed? What triggers a review? - LC explained that it was up to the charging authority when a review takes place but when this happens, the authority need to complete a full CIL setting process.

**Update on Local Development Plan and Introduction of CIL**

MD explained that the LDP has been found sound by the planning inspector who presided over its examination and is currently subject to a 6 week period for legal challenge. The onward timetable is as follows:

## Monmouthshire Local Development Plan

- Adopted 27 February 2014
- Six week legal challenge period from 6 March 2014

### Level of Growth

- 450 dwellings per year 2011-21
- Provision for a total of 4,500 dwellings 2011-2021 by identifying opportunities for 4,950 dwellings to enable a 10% flexibility allowance

The level of growth set out in the LDP is:

## Achieving the LDP Level of Housing Growth

	Dwellings
Committed 1/4/13	1012
Completions 2011 -2013	596
Large Site Windfall	338
Small Site Windfall	566
New Site Allocations	2445
<b>Total</b>	<b>4957</b>

MD set out the key housing allocations in the Plan and highlighted that the new site allocations account for about half of housing supply over the plan period (2011 to 2021) at 2,445.

The 7 strategic sites in the LDP are:

## Strategic Housing Sites

Location	Dwellings
Abergavenny/Llanfoist – Deri Farm, Mardy	250
Caldicot/Portskewett – Crick Road, Portskewett	285
Chepstow – Land at Lower Chepstow (Fairfield Mabey)	350
Monmouth – Land at Wonastow Road, Monmouth	450
Magor/Undy – Rockfield Farm, Undy	270
Magor/Undy – Land at Vinegar Hill, Undy	225
Sudbrook, Former Paper Mill	190
<b>Total</b>	<b>2,020</b>

MD outlined that there is also a series of smaller housing sites as follows:

## Smaller Housing Sites

Sites	Dwellings
Wyesham	35
Coed Glas, Abergavenny	60
Usk	20
Penperlleni	65
Raglan	45
<b>Total</b>	<b>225</b>

- Rural Allocations (200 dwellings)
  - 17 ‘Main Villages’
  - Maximum 15 dwellings per site
  - To provide affordable housing for local people
  - Affordable/Market Split 60:40

MD outlined the council’s approach to s106 and CIL. MCC has a draft infrastructure plan that sets out requirements associated with delivery of the Plan. Policy S7 in the Plan sets out a list of infrastructure requirements to be met and indicates priorities for delivery.

If CIL is introduced it will be used for strategic and place making elements as follows:



### Council's Approach to s106/CIL - 3

- s106 to provide site infrastructure plus scaled back S106 on-site requirements (e.g. play areas at, say, £1,000 per dwelling)
- CIL to be used for more general 'place making' schemes, e.g.
  - Green Infrastructure
  - Sustainable transport
  - Education
  - Strategic sports/leisure/adult recreation
  - Town centre improvements
  - Digital (i.e. broadband)

In answer to a question from a workshop attendee, MD stated that CIL could to be used to fund drainage infrastructure if the council chooses to include this in their R123 list (yet to be decided), but care would be needed to ensure that CIL was not used to fund infrastructure that was the responsibility of Welsh Water. MD also emphasised that, in terms of sites allocations, no issues had been raised re flooding issues for the sites (that had not already been taken onto account in the allocation).

LC explained that the CIL Regulations allowed for different CIL rates (even £0 CIL rates) for different areas and that this could include, subject to the viability testing, rural sites where the council's priority is delivery of affordable housing.

MD emphasised that the council appreciates the importance of balancing s106 requirements and use of CIL (and how it is set).

The timetable for preparation of the CIL is as follows:

### Council's Approach to s106/CIL - 4

- Timetable:
  - Development industry workshop 18th March
  - Finalise all testing assumptions (including strategic sites) - end March
  - Testing completed - mid April
  - Draft final report - end April
  - Report finalised - May 12th
- Council resolution to consult on Draft Charging Schedule June/July

### Non-residential development testing approach and assumptions

MF described the types of non-residential uses that it was intended to test. This was agreed by the workshop.

#### Non residential uses – are these the right ones?

	GIA sq.m	Net site area (ha)
1: Town Centre Office	500	0.04
2: Business Park	2,000	0.29
3: Industrial	1,000	0.20
4: Warehouse	2,000	0.40
5: Local Store - Out of centre (Convenience)	200	0.02
6: Supermarket (Convenience)	1,200	0.24
7: Out of centre Retail Warehouse (Comparison)	1,000	0.20
8: Town Centre Retail (Comparison)	200	0.02
9: Hotel	800	0.10
10: Carehomes	2,600	0.37
11: Town Centre Retail (Convenience)	250	0.03

MF then reviewed the assumptions to be used.

## Non-residential model assumptions

- Building costs: £ per GIFA sqm (BCIS)
- Add on external works = +10%
- Project/design team fees = 10% of build costs
- Contingency – 5% of construction costs
- Marketing, legal and sales – 4% of GDV
- Finance – 6.5% of development cost
- Market incentive based on rent free periods (3 months?)
- Developer return – 20% of GDV incl: overheads

## Build costs assumptions

	£/Sqm
1: Town Centre Office	£1,103
2: Business Park	£1,251
3: Industrial	£665
4: Warehouse	£440
5: Local Store - Out of centre (Convenience)	£785
6: Supermarket (Convenience)	£1,073
7: Out of centre Retail Warehouse (Comparison)	£615
8: Town Centre Retail (Comparison)	£785
9: Hotel	£993
10: Carehomes	£1,223
11: Town Centre Retail (Convenience)	£846

## Land value assumptions

1: Town Centre Office	£800,000
2: Business Park	£500,000
3: Industrial	£400,000
4: Warehouse	£400,000
5: Local Store - Out of centre (Convenience)	£800,000
6: Supermarket (Convenience)	£1,000,000
7: Out of centre Retail Warehouse (Comparison)	£800,000
8: Town Centre Retail (Comparison)	£800,000
9: Hotel	£500,000
10: Carehomes	£500,000
11: Town Centre Retail (Convenience)	£800,000

Workshop generally felt that rent free periods – should be longer than 3 months and 12 months was put forward.

In reply to a Q – MF noted that acquisition costs would be included in the analysis and using the following assumptions

Post meeting note – for clarity the following sets out the assumptions regarding sales and land purchase costs:

Sale costs	Industry standards	These rates are based on industry accepted scales at the following rates: Legals, surveyors, marketing etc	1.00% 4.0%	Gross development value
Professional fees on Land Purchase	Industry standards	Fees associated with the land purchase are based upon the following industry standards: Surveyor - Legals -	1.00% 0.75%	

Generally development funding is not available without a pre let in place. There may be more funding available but rates are still high. DH explained that finance assumed for 100% of the development. In reality this is likely to be a mix of borrowed and equity money. Workshop indicated that interest rates are on the increase and LC asked for any further information to justify higher interest rates in the testing.

Require a 7/8% interest costs. Lenders are still looking for a higher rate of return. Situation is not as bad as 2 or 3 years ago but still considered to be risky.

Require 25/30% return on value was suggested but MF explained that the consultant team would need to see some evidence to change a figure that has generally been accepted elsewhere i.e. why is Monmouthshire different?

MF set out assumptions on rent and yields and explained that these were sourced from property transaction databases and reports such as CoStar Focus and Estates Gazette.

### Rent and yield assumptions

	Rent	Yield
1: Town Centre Office	£90	8.00%
2: Business Park	£80	8.00%
3: Industrial	£51	13.00%
4: Warehouse	£35	13.00%
5: Local Store - Out of centre (Convenience)	£152	8.00%
6: Supermarket (Convenience)	£190	5.50%
7: Out of centre Retail Warehouse (Comparison)	£140	7.50%
8: Town Centre Retail (Comparison)	£165	8.50%
9: Hotel	£130	7.27%
10: Carehomes	£3,700	7.00%
11: Town Centre Retail (Convenience)	£185	8.00%

No comments were offered as to whether the proposed figures were correct. MF stated that he would undertake further consultation with local agents and asked for suggestions of who to speak to consult.

MF explained that lack of activity in Monmouthshire means have had to widen search to include surrounding areas.

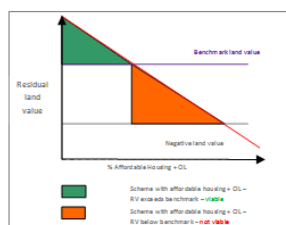
Comments indicated that it was important to understand the hotel market and that future development was likely to be budget hotels – modelling must reflect the way the hotel market operates.

Land values – no immediate comments were received.

## Residential development approach and assumptions

DH set out the overall approach to be taken to the assessment of viability, using a residual value approach as follows:

### Residual value approach



Total development value
<b>Minus</b>
Development costs (incl. build costs and return to developer)
=
Gross residual value
<b>Minus</b>
CIL + planning obligations (including AH)
=
Net residual value (available to pay for land)

DH noted that the consultant team would make use of the guidance set out in the Harman report (*Viability Testing Local Plans - Advice for planning practitioners*)<sup>14</sup> MD commented that the 'Harman guide' is being used widely by local authorities in Wales. Workshop agreed that this is not a problem but the viability testing must take into account specific Welsh issues. DH also noted that the DCLG CIL guidance is also common across England and Wales.

The principles by which the modelling is to be undertaken were set out as follows:

### What assumptions to use

- Current costs and values
- Must take into account all plan policies (with a viability implication)
- Must allow for affordable housing
- Must allow for realistic 'scaled back' s106

DH explained the approach to identifying the land value threshold to be used. As with the previous studies, two thresholds are to be used (per **gross hectare**) - £650,000 for sites generally and £250,000 for larger scale strategic sites. The former is over 30% above CUV (industrial/commercial) and the latter is over 15 times agricultural land value at £15k per hectare.

### Threshold Land Values

Site Type	Value per gross hectare	Notes
Generally	£650,000	Over 30% premium over industrial EUV
Strategic sites	£250,000	About 15 times agricultural value

The workshop generally considered that these values are too low but no specific alternatives were put forward and it was acknowledged that there has been limited activity in recent years. The consultant team also emphasised that the benchmark should represent what a realistic landowner might be willing to bring land forward for with policies in place; the benchmark was not intended to represent the highest values that might be achieved in the market today. Through debate it became clear that different measures were being used when discussing land values— including a value per **net** hectare and a value for the element of schemes that is market

<sup>14</sup> The guide was published in June 2012 and is the work of the Local Housing Delivery Group, chaired by Sir John Harman, which is a cross-industry group, supported by the Local Government Association and the Home Builders Federation.

housing only. It also became clear that views on threshold land values depended on the stage of the development process, with some land cost suggestions referring to development-ready land with consent.

It was noted by one attendee that the average land cost per dwelling was £8/10k per plot at the previous policy of 20%. Through this discussion it was suggested that for 40 units or more with 20% affordable housing (as under the former unitary development plan) and some open space and highways obligations, £650k/ha was acceptable.

LC asked for evidence of land values within 2 weeks (say by 11 April). Consultant team will also explore available data further and, with feedback from the workshop, provide a separate land value note for workshop attendees.

LC noted that experience to date in Wales allowed testing below AH policy.

### Testing 1 ha scheme

Minimum density to be tested should be 30 dph generally. Densities at c 50 dph relevant only to town centres – these densities are not found in more rural developments.

DH presented the following notional mix for a 30 dph scheme:

### What to test – 1 ha scheme

Dwelling type	Market dwellings	Affordable dwellings
1 bed flat		2
2 bed flat		1
2 bed terrace		2
3 bed terrace		1
4 bed terrace		1
3 bed semi	2	
3 bed detached	6	
4 bed detached	14	
5 bed detached	1	
<b>Total</b>	<b>28</b>	<b>7</b>

- What densities to test?  
– 30, 40 and 50 dph for the AH study
- Mix on left - 30 dph at 25% AH – based on recent applications. Any views? Should it include smaller market units? (We will take away and develop other mixes for feedback)

Workshop comments:

- Mixes are moving towards the middle of the market – with an emphasis on 3 bed detached and small 4 bed detached; and flats are not favoured as a market product, although may be required for affordable housing.

Post meeting note – in light of the workshop comments, following revised mix for market housing put forward for further comment:

Type	%	Dwg size sq m GIA
2 bed terrace	15%	60
3 bed terrace	15%	70
3 bed detached	20%	85
4 bed detached (small)	20%	110
4 bed detached (large)	30%	140
5 bed detached	Nil	160

Consultant team will review this proposal in light of mixes for recent permitted developments.

DH then presented the proposed case studies and assumptions for testing:



## What to test - case studies

Notional Sites	Dwellings	Net to gross
Severnside strategic sites	300	*90%
Market Towns strategic sites	300	*90/100%
Severnside windfall	100, 35 and 10	85%-100%
Market Towns windfall	100, 35 and 10	85%-100%
Severnside small sites	5, 4 and 3	100%
Market Towns small sites	5, 4 and 3	100%
Main Villages small sites	4, 3 and 2	100%

- Net to gross - \* as previously tested (not Sudbrook)
- Delivery pace
  - Large sites 1-2 year to first completions, max 60 completions pa
  - Smaller sites 30-35pa, complete within a year

### Workshop comments:

- Net/gross development area must allow for the LPA standard for open space – NPFA standards (Policy CRF2) and which include play (likely provided on site) and other open spaces (with details of provision sorted out on a site by site basis);
- Some attendees suggested that viability analysis should be on basis of net developable area so that issues around net/gross area of sites would be minimised;
- Maximum pace of development is 50 per developer but schemes over 250 dw would expect 2 developers to be active and therefore assume a max annual pace of 80 to 100 dwellings per annum (say 90 dw per annum).

### Market values

DH presented following notional market values for new houses. He explained that the values were derived from a number of sources including Land Registry data for new build properties 2011 to 2012. This had been supplemented by available information for 2014 sales (of current properties on the market - deducting 8% from asking prices to derive best estimate of actual sales values).

## Market Housing Values

Type/location	Abergavenny	Chepstow	Severnside	Monmouth	Rural
1 bed flat	£114,000	£123,500	£104,500	£114,000	£118,750
2 bed flat	£126,000	£136,500	£115,500	£126,000	£131,250
2 bed terrace	£180,500	£190,000	£156,750	£185,250	£171,000
3 bed terrace	£199,500	£210,000	£173,250	£204,750	£189,000
3 bed semi	£205,000	£215,000	£200,000	£200,000	£210,000
4 bed detached	£350,000	£360,000	£270,000	£290,000	£330,000
5 bed detached	£385,000	£396,000	£297,000	£319,000	£363,000

Data = 3 years Land Registry (new only) + current sales (92% asking price)  
 Market appears to be driven by detached properties – certainly not flats (5 in 2013!)  
 Severnside – big increase on AHVS values – Caerwent development – how typical?  
 Monmouth and Chepstow – very little market evidence (even with 3 years data)

### Workshop comments:

- Reflecting earlier comments about typical mixes – market values for 3bed detached and small 4 bed detached need to be sourced. Small 4 bed at c 1200 sq ft;



- Caerwent is not typical for Severnside and the values for Severnside should be amended to reflect this;
- Persimmon selling in Monmouth – 3 bed semis at £150K and struggling (note average Land Registry sales price for new build semi detached in Monmouth in 2013 was £191,000 but sample size very limited)
- Alternative approach to market values is to identify an average price per sq ft for each location – which will vary with mix of dwellings in a scheme – depending on relative values for different dwelling types. Suggested values from developers present as follows:
  - Abergavenny/Monmouth - £185 per sq ft;
  - Severnside similar
  - Chepstow will be higher than this
  - Rural areas are very mixed but suggested at £175 per sq ft

Post workshop note – consultant team to review market values in light of workshop feedback and analysis of actual per sq m sales values. Separate note to follow.

## Dwelling size

The following presented as average dwelling sizes:

### Dwelling sizes – sq m GIA

Dwelling sizes	Affordable	Market
1 bed flat	48	50
2 bed flat	60	55
2 bed terrace	73	55
3 bed terrace	80	80
3 bed semi	80	80
4 bed detached	100	130
5 bed detached	???	150

Affordable 4 bed = 4 bed terr = 100 sq m  
Flats + 10% non saleable

Workshop comments:

- 1 bed flat – 500 sq ft – with nil circulation space
- 2 bed flat - 550-600 sq ft
- 2 bed terrace – 600-650 sq ft
- 3bed terrace – 750-800sq ft
- 3 bed semi – 800-900 sq ft
- 3 bed detached – 900-950 sq ft
- 4 bed detached – 1200-1500 sq ft
- 5 bed detached – 1600-1700 sq ft

Post workshop note: - Following put forward by consultant team as GIA for market units (in light of workshop comments and review of recent planning permissions)

Type	Sq m GIA
1 bed flat*	45
2 bed flat	55
2 bed terrace	65
3 bed terrace	75
3 bed semi	80
3 bed detached	90
4 bed detached (small)	110
4 bed detached (large)	140
5 bed detached	160

\*Nil circulation space

## Development costs

Following were presented to the workshop:

### Development Costs

Build - Flats (1-2 storeys)	£1,080/1134	sq m includes 15% for external works (Gwent v Monmouthshire)
Build - Houses (2-3 storeys)	£993/1043	sq m includes 15% for external works (Gwent v Monmouthshire)
Sprinklers	£3,075 houses, £879 flats	But not until Jan 2016 (sensitivity test?)
Professional fees	10%	of build costs
Finance	6%	of development costs
Marketing fees	3%	of market GDV
Developer return (market)	20%	of market GDV
Contractor return (AH)	6%	of build costs
SDLT	Variable	
Agents/legal costs	2.5%	Of RV
Residual s106	£1,500	Per dwelling for immediate site access and children's play
Abnormals	Depends....	Assessment for each case study
Strategic infrastructure costs	£100,000	net ha for strategic sites

### Workshop feedback:

- Build costs for mainstream development are similar across south Wales and reasonable to use the averages shown;
- But traditionally a lot of smaller development/developers and costs tend to be higher;
- Sprinkler costs agreed;
- Other costs agreed (noted that c60% borrowed for development);
- Developer return of 20% is more realistic in the current market;
- Return for affordable housing should be c£15k per dw (but this is necessary to cover prof fees and finance) – Three Dragons agreed to use this as a sensitivity test. But LC also noted that Savills had agreed 6% return in statement of common ground for Caerphilly CIL examination;
- Abnormals – for strategic sites, LC explained that consultant team will review information used in previous strategic sites testing and MCC will contact scheme promoters to update this information (including infrastructure requirements);
- LC also asked for any evidence about need to include a standard abnormal cost for smaller sites

### Affordable housing testing

LC explained that the team would assume nil grant for all the testing. The following proposed assumptions were presented:

#### Affordable Housing

- Test policy – 25% Severnside, 35% market towns and higher % AH in villages
- Composition of AH = 50% rent and 50% intermediate (Homebuy/intermediate rent) (50% average share)
- ACG versus 'capitalised net rent' for social rent – views please
- If ACG – assume 38% for rent, 50% Homebuy, 60% intermediate rent)

The workshop agreed that, for rental housing, the capitalised net rent approach should be followed and this would represent the minimum payment possible from a housing association. On this basis, LC presented the following proposed assumptions for comment.

### Affordable Housing – if not ACG based

Property	Rent pw (net of service charge)	
	Social	Intermediate
1 bed flat	£60	£90
2 bed flat	£65	£110
2 bed house	£80	£115
3 bed house	£85	£135
4 bed house	£95	£160
5 bed house	?	?
Management, maintenance, repairs, voids etc	£1,500	
Capitalisation rate	6%	

The discussion indicated that:

- The policy position was noted and agreed
- The affordable housing tenure was noted and agreed
- Values – discussion suggested that capitalised net rent should be the main approach but ACG should be used as a sensitivity test; with the higher value of the two used in the modelling.
- There are additional costs to meet Development Quality Requirements (DQR) say £1100/sq m for social rent; while shared ownership would just be building regulations. Discussion indicated that DQR could amount to £3,500 per dwelling. Consultant team and SW to follow up with housing associations, on use of DQR.
- Rents were broadly correct.

## **Annex – other information presented to the workshop**

### **Purpose**

- What is the Community Infrastructure Levy – how does it work?
- Local Development Plan update
- Council's approach to CIL and timetable
- Viability evidence – residual value approach
- Assumptions - non residential
- Assumptions - residential
- Next steps – meeting note, further comment

### **CIL**

- By regulation + guidance notes
- For infrastructure needed because of development
- Wide definition - transport, flood defences, schools, health, social care facilities, green spaces, leisure etc
- Collected from new development - with few exceptions
- Not mandatory BUT.....  
2015 deadline – stopping pooled s 106 contributions

### **Council's Approach to s106/CIL - 1**

- 27 June 2013 resolved to commence preparatory work for CIL
- Interim Policy Approach to Planning Obligations March 2013
- Draft Infrastructure Plan March 2013
- Appendix 1 of Adopted LDP – Schedule of Infrastructure Provision for Strategic Sites

### **Council's Approach to s106/CIL - 2**

- LDP Strategic Policy S7 – Infrastructure Provision
- Long List of Potential Planning Obligations but priority given to:
  - Measures necessary to physically deliver development and ensure acceptable in planning terms
  - Affordable Housing

# **Annex 5**

## **1ha Notional Site Results**

Notional 1ha sites								
AREA/ LOCATION								
Housing Market Area	DPH	Market %	AH %	Total Mkt Floor Area (Sq m)	Residual Value	Benchmark	RV less benchmark	Max CIL £s per sq m
Severnside	30 dph	75%	25%	<b>2,649.38</b>	<b>£709,000</b>	650,000	59,000	<b>£22</b>
Severnside	40 dph	75%	25%	<b>2,625.00</b>	<b>£763,000</b>	650,000	113,000	<b>£43</b>
Severnside	50 dph	75%	25%	<b>3,196.88</b>	<b>£909,000</b>	650,000	259,000	<b>£81</b>
Monmouth	30 dph	65%	35%	<b>2,296.13</b>	<b>£922,000</b>	650,000	272,000	<b>£118</b>
Monmouth	40 dph	65%	35%	<b>2,275.00</b>	<b>£1,016,000</b>	650,000	366,000	<b>£161</b>
Monmouth	50 dph	65%	35%	<b>2,770.63</b>	<b>£1,268,000</b>	650,000	618,000	<b>£223</b>
Chepstow	30 dph	65%	35%	<b>2,296.13</b>	<b>£1,420,000</b>	650,000	770,000	<b>£335</b>
Chepstow	40 dph	65%	35%	<b>2,275.00</b>	<b>£1,371,000</b>	650,000	721,000	<b>£317</b>
Chepstow	50 dph	65%	35%	<b>2,770.63</b>	<b>£1,629,000</b>	650,000	979,000	<b>£353</b>
Abergavenny	30 dph	65%	35%	<b>2,296.13</b>	<b>£1,054,000</b>	650,000	404,000	<b>£176</b>
Abergavenny	40 dph	65%	35%	<b>2,275.00</b>	<b>£1,031,000</b>	650,000	381,000	<b>£167</b>
Abergavenny	50 dph	65%	35%	<b>2,770.63</b>	<b>£1,246,000</b>	650,000	596,000	<b>£215</b>
Rural	30 dph	65%	35%	<b>2,296.13</b>	<b>£1,373,000</b>	650,000	723,000	<b>£315</b>
Rural	40 dph	65%	35%	<b>2,275.00</b>	<b>£1,213,000</b>	650,000	563,000	<b>£247</b>
Rural	50 dph	65%	35%	<b>2,770.63</b>	<b>£1,421,000</b>	650,000	771,000	<b>£278</b>
Rural	30 dph	40%	60%	<b>1,413.00</b>	<b>£589,000</b>	650,000	-61,000	<b>-£43</b>
Rural	40 dph	40%	60%	<b>1,400.00</b>	<b>£410,000</b>	650,000	-240,000	<b>-£171</b>
Rural	50 dph	40%	60%	<b>1,705.00</b>	<b>£452,000</b>	650,000	-198,000	<b>-£116</b>



# **Annex 6**

## **Case Study Results**

Case Study	Scheme	MVA	Dwgs	Gross ha	Net ha	Net to gross (%)	AH %	Total Mkt Floor Area (Sq m)	Scheme Residual Value	sq m/gross ha	Residual value/gross ha	Upper Benchmark/gross ha	Lower Benchmark/gross ha	Residual Value less upper benchmark/gross ha	Residual Value less lower benchmark/gross ha	Upper Benchmark Max CIL £s per sq m	Lower Benchmark Max CIL £s per sq m
<b>STRATEGIC SITES</b>																	
1	SAH1 Deri Farm Abergavenny	Abergavenny	250	8.70	7.70	89%	35%	19,134.38	£4,299,942	2,199.35	£494,246	£300,000	£250,000	£194,246	£244,246	£88	£111
2	SAH2 Crick Road Portskewett	Severnside	285	9.95	7.70	77%	25%	18,703.28	£5,240,711	1,879.73	£526,705	£300,000	£250,000	£226,705	£276,705	£121	£147
3.1	SAH3 Fairfield Mabey, Chepstow (alt 1)	Chepstow	350	13.10	9.50	73%	35%	19,906.25	£10,203,212	1,519.56	£778,871	£650,000	£650,000	£128,871	£128,871	£85	£85
3.2	SAH3 Fairfield Mabey, Chepstow (alt 2)	Chepstow	350	13.10	9.50	73%	35%	19,906.25	£8,674,864	1,519.56	£662,203	£650,000	£650,000	£12,203	£12,203	£8	£8
4	SAH4 Wonastow Rd Monmouth	Monmouth	450	19.61	16.46	84%	35%	34,441.88	£12,783,907	1,756.34	£651,908	£300,000	£250,000	£351,908	£401,908	£200	£229
5.1	SAH5 Rockfield Farm Undy (Alt 1)	Severnside	270	9.00	7.45	83%	25%	23,844.38	£4,911,732	2,649.38	£545,748	£300,000	£250,000	£245,748	£295,748	£93	£112
5.2	SAH5 Rockfield Farm Undy (Alt 2)	Severnside	270	9.00	7.45	83%	25%	23,844.38	£4,675,816	2,649.38	£519,535	£300,000	£250,000	£219,535	£269,535	£83	£102
5.3	SAH5 Rockfield Farm Undy (Alt 3)	Severnside	270	9.00	7.45	83%	25%	23,844.38	£6,065,977	2,649.38	£673,997	£300,000	£250,000	£373,997	£423,997	£141	£160
6.1	SAH6 Vinegar Hill Undy (Alt 1)	Severnside	225	7.81	6.91	88%	25%	19,870.40	£3,528,484	2,544.22	£451,791	£300,000	£250,000	£151,791	£201,791	£60	£79
6.2	SAH6 Vinegar Hill Undy (Alt 2)	Severnside	225	7.81	6.91	88%	25%	19,870.40	£3,239,092	2,544.22	£414,736	£300,000	£250,000	£114,736	£164,736	£45	£65
6.3	SAH6 Vinegar Hill Undy (Alt 3)	Severnside	225	7.81	6.91	88%	25%	19,870.40	£4,899,641	2,544.22	£627,355	£300,000	£250,000	£327,355	£377,355	£129	£148
7	SAH7 Paper Mill Sudbrook	Severnside	190	6.60	6.60	100%	25%	16,779.38	£4,509,569	2,542.33	£683,268	£650,000	£650,000	£33,268	£33,268	£13	£13

## Other Sites Results

Case Study	Scheme	MVA	Dwgs	Net ha	Net to gross (%)	Market %	AH %	Total Mkt Floor Area (Sq m)	Scheme Residual Value	sq m/gross ha	Residual value/gross ha	Benchmark/gross ha	Residual Value less benchmark/gross ha	Max CIL £s per sq m
<b>OTHER SITES</b>														
8	Severnside Windfall (35 dwgs)	Severnside	35	1.17	100%	75%	25%	3,091.02	£827,000	2,641.90	£706,838	£650,000	£56,838	<b>£22</b>
9	Severnside Windfall (10 dwgs)	Severnside	10	0.33	100%	75%	25%	883.13	£239,000	2,676.14	£724,242	£650,000	£74,242	<b>£28</b>
10	Severnside Small (4 dwgs)	Severnside	4	0.13	100%	75%	25%	353.25	£97,000	2,717.31	£746,154	£650,000	£96,154	<b>£35</b>
11	Severnside Small (3 dwgs)	Severnside	3	0.10	100%	75%	25%	265.02	£80,000	2,650.20	£800,000	£650,000	£150,000	<b>£57</b>
12	Main Towns Windfall (35 dwgs)	Abergavenny	35	1.17	100%	65%	35%	2,678.90	£1,228,000	2,289.65	£1,049,573	£650,000	£399,573	<b>£175</b>
13	Main Towns Windfall (10 dwgs)	Abergavenny	10	0.33	100%	65%	35%	765.38	£356,000	2,319.32	£1,078,788	£650,000	£428,788	<b>£185</b>
14	Main Towns Small (4 dwgs)	Abergavenny	4	0.13	100%	65%	35%	306.15	£146,000	2,355.00	£1,123,077	£650,000	£473,077	<b>£201</b>
15	Main Towns Small (3 dwgs)	Abergavenny	3	0.10	100%	65%	35%	229.70	£117,000	2,296.95	£1,170,000	£650,000	£520,000	<b>£226</b>

Case Study	Scheme	MVA	Dwgs	Gross ha	Net ha	Net to gross (%)	AH %	Total Mkt Floor Area (Sq m)	Scheme Residual Value	sq m/gross ha	Residual value/gross ha	Benchmark/gross ha	Lower Benchmark/gross ha	Residual Value less upper benchmark/gross ha
<b>OTHER SITES</b>														
Case Study	Scheme	MVA	Dwgs	Gross ha	Net ha	Net to gross (%)	AH %	Total Mkt Floor Area (Sq m)	Scheme Residual Value	sq m/gross ha	Residual value/gross ha	Benchmark/gross ha	Residual Value less benchmark/gross ha	Benchmark Max CIL £s per sq m
16	Main villages Small (4 dwgs)	Rural	4	0.13	0.13	100%	60%	208.00	£97,000	1,600.00	£746,154	£600,000	£146,154	£91
17	Main villages Small (3 dwgs)	Rural	3	0.10	0.10	100%	60%	156.00	£79,000	1,560.00	£790,000	£600,000	£190,000	£122
18	Main Villages (15dwgs)	Rural	15	0.50	0.50	100%	60%	855.00	£324,000	1,710.00	£648,000	£600,000	£48,000	£28
19	Minor Village Small (4 dwgs)	Rural	4	0.13	0.13	100%	75%	130.00	£25,000	1,000.00	£192,308	£600,000	-£407,692	-£408
20	Minor Village Small (3 dwgs)	Rural	3	0.10	0.10	100%	67%	130.00	£52,000	1,300.00	£520,000	£600,000	-£80,000	-£62

Case Study	Scheme	MVA	Dwgs	Gross ha	Net ha	Net to gross (%)	AH %	Total Mkt Floor Area (Sq m)	Scheme Residual Value	sq m/gross ha	Residual value/gross ha	Benchmark/gross ha	Residual Value less benchmark	Max CIL £s per sq m
<b>RETIREMENT SCHEMES</b>														
21a	Sevenside Retirement (50 dwgs)	Sevenside	50	0.50	0.50	100%	25%	3,255.00	-£83,691	6,510.00	-£167,382	£650,000	-£817,382	-£126
21b	Monmouth Retirement (50 dwgs)	Monmouth	50	0.50	0.50	100%	35%	2,821.00	£342,413	5,642.00	£684,826	£650,000	£34,826	£6
21c	Chepstow Retirement (50 dwgs)	Chepstow	50	0.50	0.50	100%	35%	2,821.00	£264,711	5,642.00	£529,422	£650,000	-£120,578	-£21
21d	Abergavenny Retirement (50 dwgs)	Abergavenny	50	0.50	0.50	100%	35%	2,821.00	-£38,472	5,642.00	-£76,944	£650,000	-£726,944	-£129
21e	Rural Retirement (50 dwgs)	Rural	50	0.50	0.50	100%	35%	2,821.00	-£38,472	5,642.00	-£76,944	£650,000	-£726,944	-£129


# **Annex 7**


## **Non-residential Testing Assumptions and Results**


Assumption	Source	Notes																																																
<b>Costs</b>																																																		
		<p>Through the course of the development plan period the Council envisages commercial development to occur. We have reflected future commercial development through testing the following commercial uses and unit sizes:</p> <table border="1"> <thead> <tr> <th></th> <th>GIA sq.m</th> <th>NIA sq.m</th> <th></th> </tr> </thead> <tbody> <tr><td>1: Town Centre Office</td><td>500</td><td>475</td><td></td></tr> <tr><td>2: Business Park</td><td>2,000</td><td>1,900</td><td></td></tr> <tr><td>3: Industrial</td><td>1,000</td><td>950</td><td></td></tr> <tr><td>4: Warehouse</td><td>2,000</td><td>1,900</td><td></td></tr> <tr><td>5: Local Store - Out of centre (Convenience)</td><td>200</td><td>190</td><td></td></tr> <tr><td>6: Supermarket (Convenience)</td><td>1,200</td><td>1,140</td><td></td></tr> <tr><td>7: Out of centre Retail Warehouse (Comparison)</td><td>1,000</td><td>950</td><td></td></tr> <tr><td>8: Town Centre Retail (Comparison)</td><td>200</td><td>190</td><td></td></tr> <tr><td>9: Hotel</td><td>800</td><td>760</td><td></td></tr> <tr><td>10: Carehomes</td><td>2,600</td><td>2,470</td><td>40</td></tr> <tr><td>11: Town Centre Retail (Convenience)</td><td>250</td><td>238</td><td></td></tr> </tbody> </table>		GIA sq.m	NIA sq.m		1: Town Centre Office	500	475		2: Business Park	2,000	1,900		3: Industrial	1,000	950		4: Warehouse	2,000	1,900		5: Local Store - Out of centre (Convenience)	200	190		6: Supermarket (Convenience)	1,200	1,140		7: Out of centre Retail Warehouse (Comparison)	1,000	950		8: Town Centre Retail (Comparison)	200	190		9: Hotel	800	760		10: Carehomes	2,600	2,470	40	11: Town Centre Retail (Convenience)	250	238	
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Net to gross site developable area	PBA & developer workshop	<p>We have assumed the following net to gross site development percentages to allow for roads, SuDs, landscape and open space:</p> <table border="1"> <thead> <tr> <th></th> <th>Net site area (ha)</th> </tr> </thead> <tbody> <tr><td>1: Town Centre Office</td><td>0.04</td></tr> <tr><td>2: Business Park</td><td>0.29</td></tr> <tr><td>3: Industrial</td><td>0.20</td></tr> <tr><td>4: Warehouse</td><td>0.40</td></tr> <tr><td>5: Local Store - Out of centre (Convenience)</td><td>0.02</td></tr> <tr><td>6: Supermarket (Convenience)</td><td>0.24</td></tr> <tr><td>7: Out of centre Retail Warehouse (Comparison)</td><td>0.20</td></tr> <tr><td>8: Town Centre Retail (Comparison)</td><td>0.02</td></tr> <tr><td>9: Hotel</td><td>0.10</td></tr> <tr><td>10: Carehomes</td><td>0.33</td></tr> <tr><td>11: Town Centre Retail (Convenience)</td><td>0.03</td></tr> </tbody> </table>		Net site area (ha)	1: Town Centre Office	0.04	2: Business Park	0.29	3: Industrial	0.20	4: Warehouse	0.40	5: Local Store - Out of centre (Convenience)	0.02	6: Supermarket (Convenience)	0.24	7: Out of centre Retail Warehouse (Comparison)	0.20	8: Town Centre Retail (Comparison)	0.02	9: Hotel	0.10	10: Carehomes	0.33	11: Town Centre Retail (Convenience)	0.03																								
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	BCIS Quarterly Review of Building Prices Issue (January 2014)	<p>Build costs are based on median rates adjusted for location derived from BCIS Review of Building Prices online version data of actual prices in the marketplace. All major non-domestic development which does not qualify for assessment under Code for Sustainable Homes will be encouraged to be built to a minimum BREEAM (Building Research Establishment Assessment Method) Very Good standard.</p> <p>This excludes any allowance for externals which is treated separately.</p> <table border="1"> <thead> <tr> <th></th> <th>£/Sqm</th> </tr> </thead> <tbody> <tr><td>1: Town Centre Office</td><td>£1,103</td></tr> <tr><td>2: Business Park</td><td>£1,251</td></tr> <tr><td>3: Industrial</td><td>£665</td></tr> <tr><td>4: Warehouse</td><td>£440</td></tr> <tr><td>5: Local Store - Out of centre (Convenience)</td><td>£945</td></tr> <tr><td>6: Supermarket (Convenience)</td><td>£1,251</td></tr> <tr><td>7: Out of centre Retail Warehouse (Comparison)</td><td>£615</td></tr> <tr><td>8: Town Centre Retail (Comparison)</td><td>£907</td></tr> <tr><td>9: Hotel</td><td>£993</td></tr> <tr><td>10: Carehomes</td><td>£1,223</td></tr> <tr><td>11: Town Centre Retail (Convenience)</td><td>£1,062</td></tr> </tbody> </table>		£/Sqm	1: Town Centre Office	£1,103	2: Business Park	£1,251	3: Industrial	£665	4: Warehouse	£440	5: Local Store - Out of centre (Convenience)	£945	6: Supermarket (Convenience)	£1,251	7: Out of centre Retail Warehouse (Comparison)	£615	8: Town Centre Retail (Comparison)	£907	9: Hotel	£993	10: Carehomes	£1,223	11: Town Centre Retail (Convenience)	£1,062																								
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Plot external	Industry standards	<p>These covers external build costs for site preparation and includes items such as internal access roads, car parking, landscaping, drainage, utilities and services within the site. We have allowed the following percentage of build costs for these items.</p> <p><b>10%</b></p> <p>These exclude abnormal site development costs and exceptional offsite infrastructure.</p>																																																
Developer contribution (Section 106/278)	Client team & developer workshop	<p>In discussion with the local authority it is considered that S106/278 requirements for these types of uses are likely to be focused on mitigating transport impacts and thus an allowance has been made within our appraisals.</p> <table border="1"> <thead> <tr> <th>Amount</th> <th>Apply?</th> </tr> </thead> <tbody> <tr> <td>£25,000</td> <td>Yes</td> </tr> </tbody> </table> <p>Calculated as a £ psm</p>	Amount	Apply?	£25,000	Yes																																												
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1: Town Centre Office							
							
<b>ITEM</b>							
Net Site Area	0.04	Residual value		-£7,402,279.36 per ha			
<b>1.0 Development Value</b>							
1.1	1: Town Centre Office	No. of units 1	Size sq.m 475	Rent 90	Yield 8.00%	Value per unit £534,375	Capital Value £534,375.00
					No. of months 3	Rent free period 3	Adjusted for rent free £524,192
							5.75%
<b>Total development value</b>							<b>£494,051</b>
<b>2.0 Development Cost</b>							
<b>2.1 Site Acquisition</b>							
2.1.1	Site value (residual land value)						-£303,124
	Less Purchaser Costs						1.75%
							<b>-£308,428.31</b>
<b>2.2 Build Costs</b>							
2.2.1	1: Town Centre Office	No. of units 1	Size sq.m 500	Cost per sq.m £1,103		Total Costs £551,500	
							<b>£551,500</b>
<b>2.3 Externals</b>							
2.3.1	external works as a percentage of build costs		10.0%		£55,150		
							<b>£55,150</b>
<b>2.4 Professional Fees</b>							
2.4.1	as percentage of build costs & externals		12%		£72,798		
							<b>£72,798</b>
<b>Total construction costs</b>							<b>£679,448</b>
<b>3.0 Contingency</b>							
3.1.1	as a percentage of total construction costs		5%		£33,972.40		
							<b>£33,972</b>
<b>TOTAL DEVELOPMENT COSTS (including land payment)</b>							<b>£404,992</b>
<b>4.0 Developers' Profit</b>							
4.1	as percentage of total development costs		Rate 20%		£80,998		
							<b>£80,998</b>
<b>TOTAL PROJECT COSTS [EXCLUDING INTEREST]</b>							<b>£485,991</b>
<b>TOTAL INCOME - TOTAL COSTS [EXCLUDING INTEREST]</b>							<b>£8,060</b>
<b>5.00 Finance Costs</b>							
		APR 6.50%			PCM 0.526%	-£8,060	
<b>TOTAL PROJECT COSTS [INCLUDING INTEREST]</b>							<b>£494,051</b>
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2: Business Park							
							
<b>ITEM</b>							
Net Site Area	0.29	Residual value		-£6,295,487.70 per ha			
<b>1.0 Development Value</b>							
1.1	2: Business Park	No. of units 1	Size sq.m 1900	Rent 80	Yield 8.0%	Value per unit £1,900,000	Capital Value £1,900,000
					No. of months	Rent free period 3	Adjusted for rent free £1,863,793
							5.75%
<b>Total development value</b>							<b>£1,756,625</b>
<b>2.0 Development Cost</b>							
<b>2.1 Site Acquisition</b>							
2.1.1	Site value (residual land value)						-£1,767,775
	Less Purchaser Costs						1.75%
							<b>-£1,798,711</b>
<b>2.2 Build Costs</b>							
2.2.1	2: Business Park	No. of units 1	Size sq.m 2,000	Cost per sq.m £1,251		Total Costs £2,502,000	
							<b>£2,502,000</b>
<b>2.3 Externals</b>							
2.3.1	external works as a percentage of build costs		10.0%		£250,200		
							<b>£250,200</b>
<b>2.4 Professional Fees</b>							
2.4.1	as percentage of build costs & externals		12%		£330,264		
							<b>£330,264</b>
<b>Total construction costs</b>							<b>£3,082,464</b>
<b>3.0 Contingency</b>							
3.1.1	as a percentage of total construction costs		5%		£154,123.20		
							<b>£154,123</b>
<b>TOTAL DEVELOPMENT COSTS (including land payment)</b>							<b>£1,437,876</b>
<b>4.0 Developers' Profit</b>							
4.1	as percentage of total development costs		Rate 20%		£287,575		
							<b>£287,575</b>
<b>TOTAL PROJECT COSTS [EXCLUDING INTEREST]</b>							<b>£1,725,452</b>
<b>TOTAL INCOME - TOTAL COSTS [EXCLUDING INTEREST]</b>							<b>£31,173</b>
<b>5.00 Finance Costs</b>							
		APR 6.50%			PCM 0.526%	-£31,173	
<b>TOTAL PROJECT COSTS [INCLUDING INTEREST]</b>							<b>£1,756,625</b>
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3: Industrial							
ITEM							
Net Site Area	0.20	Residual value	-£2,873,052.90 per ha				
							
<b>1.0 Development Value</b>							
1.1	3: Industrial	No. of units	Size sq.m	Rent	Yield	Value per unit	Capital Value
		1	950	50	13.0%	£365,385	£365,385
					No. of months	Rent free period	Adjusted for rent free
						3	£354,389.34
							4.75%
<b>Total development value</b>							<b>£348,028.85</b>
<b>2.0 Development Cost</b>							
<b>2.1 Site Acquisition</b>							
2.1.1	Site value (residual land value)						-£564,728
	Less Purchaser Costs						1.75%
							<b>-£574,610.58</b>
<b>2.2 Build Costs</b>							
2.2.1	3: Industrial	No. of units	Size sq.m	Cost per sq.m		Total Costs	
		1	1,000	£665		£665,000	
							<b>£665,000</b>
<b>2.3 Externals</b>							
2.3.1	external works as a percentage of build costs		10.0%			£66,500	
							<b>£66,500</b>
<b>2.4 Professional Fees</b>							
2.4.1	as percentage of build costs & externals		12%			£87,780	
							<b>£87,780</b>
<b>Total construction costs</b>							<b>£819,280</b>
<b>3.0 Contingency</b>							
3.1.1	as a percentage of total construction costs		5%			£40,964.00	
							<b>£40,964</b>
<b>TOTAL DEVELOPMENT COSTS (including land payment)</b>							<b>£285,633</b>
<b>4.0 Developers' Profit</b>							
4.1	as percentage of total development costs		Rate 20%			£57,127	
							<b>£57,127</b>
<b>TOTAL PROJECT COSTS [EXCLUDING INTEREST]</b>							<b>£342,760</b>
<b>TOTAL INCOME - TOTAL COSTS [EXCLUDING INTEREST]</b>							<b>£5,269</b>
<b>5.00 Finance Costs</b>							
		APR	PCM				
		6.50%	0.526%		-£5,269		
<b>TOTAL PROJECT COSTS [INCLUDING INTEREST]</b>							<b>£348,029</b>
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4: Warehouse							
ITEM							
Net Site Area	0.40	Residual value	-£1,886,549.68 per ha				
							
<b>1.0 Development Value</b>							
1.1	4: Warehouse	No. of units	Size sq.m	Rent	Yield	Value per unit	Capital Value
		1	1900	£35	13.0%	£511,538	£511,538
					No. of months	Rent free period	Adjusted for rent free
						3	496,145
							5.75%
<b>Total development value</b>							<b>£467,617</b>
<b>2.0 Development Cost</b>							
<b>2.1 Site Acquisition</b>							
2.1.1	Site value (residual land value)						-£741,641
							Less Purchaser Costs
							1.75%
							<b>-£754,620</b>
<b>2.2 Build Costs</b>							
2.2.1	4: Warehouse	No. of units	Size sq.m	Cost per sq.m			Total Costs
		1	2,000	£440			£880,000
							<b>£880,000</b>
<b>2.3 Externals</b>							
2.3.1	external works as a percentage of build costs		10.0%				£88,000
							<b>£88,000</b>
<b>2.4 Professional Fees</b>							
2.4.1	as percentage of build costs & externals		12%				£116,160
							<b>£116,160</b>
<b>Total construction costs</b>							<b>£1,084,160</b>
<b>3.0 Contingency</b>							
3.1.1	as a percentage of total construction costs		5%				£54,208.00
							<b>£54,208</b>
<b>TOTAL DEVELOPMENT COSTS (including land payment)</b>							<b>£383,748</b>
<b>4.0 Developers' Profit</b>							
4.1	as percentage of total development costs		Rate				£76,750
			20%				
							<b>£76,750</b>
<b>TOTAL PROJECT COSTS [EXCLUDING INTEREST]</b>							<b>£460,498</b>
<b>TOTAL INCOME - TOTAL COSTS [EXCLUDING INTEREST]</b>							<b>£7,119</b>
<b>5.00 Finance Costs</b>							
			APR		PCM		-£7,119
			6.50%		0.526%		
<b>TOTAL PROJECT COSTS [INCLUDING INTEREST]</b>							<b>£467,617</b>
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5: Local Store - Out of centre (Convenience)							
ITEM							
Net Site Area	0.02	Residual value	£2,836,878.75 per ha				
<b>1.0 Development Value</b>							
1.1	5: Local Store - Out of centre (Cc)	No. of units 1	Size sq.m 190	Rent 160	Yield 7.5%	Value per unit £405,333	Capital Value £405,333
					No. of months 3	Rent free period 3	Adjusted for rent free 398,071
							4.75%
<b>Total development value</b>							<b>£379,162</b>
<b>2.0 Development Cost</b>							
<b>2.1 Site Acquisition</b>							
2.1.1	Site value (residual land value)						£61,957
							Less Purchaser Costs 1.75%
							<b>£63,042</b>
<b>2.2 Build Costs</b>							
2.2.1	5: Local Store - Out of centre (Cc)	No. of units 1	Size sq.m 200	Cost per sq.m £945			Total Costs £189,000
							<b>£189,000</b>
<b>2.3 Externals</b>							
2.3.1	external works as a percentage of build costs		10.0%				£18,900
							<b>£18,900</b>
<b>2.4 Professional Fees</b>							
2.4.1	as percentage of build costs & externals		12%				£24,948
							<b>£24,948</b>
<b>Total construction costs</b>							<b>£232,848</b>
<b>3.0 Contingency</b>							
3.1.1	as a percentage of total construction costs		5%				£11,642.40
							<b>£11,642</b>
<b>TOTAL DEVELOPMENT COSTS (including land payment)</b>							<b>£307,532</b>
<b>4.0 Developers' Profit</b>							
4.1	as percentage of total development costs		Rate 20%				£61,506
							<b>£61,506</b>
<b>TOTAL PROJECT COSTS [EXCLUDING INTEREST]</b>							<b>£369,039</b>
<b>TOTAL INCOME - TOTAL COSTS [EXCLUDING INTEREST]</b>							<b>£10,124</b>
<b>5.00 Finance Costs</b>							
			APR 6.50%			PCM 0.526%	£-10,124
<b>TOTAL PROJECT COSTS [INCLUDING INTEREST]</b>							<b>£379,162</b>





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6: Supermarket (Convenience)							
ITEM							
Net Site Area	0.24	Residual value		£4,124,424.59 per ha			
							
<b>1.0 Development Value</b>							
1.1	6: Supermarket (Convenience)	No. of units 1	Size sq.m 1140	Rent 190	Yield 5.5%	Value per unit £3,938,182	Capital Value £3,938,182
					No. of months	Rent free period 3	Adjusted for rent free 3,885,820
							5.75%
<b>Total development value</b>							<b>£3,662,385</b>
<b>2.0 Development Cost</b>							
<b>2.1 Site Acquisition</b>							
2.1.1	Site value (residual land value)						£936,040
							Less Purchaser Costs 5.75%
							<b>£989,861.90</b>
<b>2.2 Build Costs</b>							
2.2.1	6: Supermarket (Convenience)	No. of units 1	Size sq.m 1,200	Cost per sq.m £1,251			Total Costs £1,501,200
							<b>£1,501,200</b>
<b>2.3 Externals</b>							
2.3.1	external works as a percentage of build costs		10.0%				£150,120
							<b>£150,120</b>
<b>2.4 Professional Fees</b>							
2.4.1	as percentage of build costs & externals		12%				£198,158
							<b>£198,158</b>
<b>Total construction costs</b>							<b>£1,849,478</b>
<b>3.0 Contingency</b>							
3.1.1	as a percentage of total construction costs		5%				£92,473.92
							<b>£92,474</b>
<b>TOTAL DEVELOPMENT COSTS (including land payment)</b>							<b>£2,931,814</b>
<b>4.0 Developers' Profit</b>							
4.1	as percentage of total development costs		Rate 20%				£586,363
							<b>£586,363</b>
<b>TOTAL PROJECT COSTS [EXCLUDING INTEREST]</b>							<b>£3,518,177</b>
<b>TOTAL INCOME - TOTAL COSTS [EXCLUDING INTEREST]</b>							<b>£144,208</b>
<b>5.00 Finance Costs</b>							
			APR 6.50%			PCM 0.526%	-£144,208
<b>TOTAL PROJECT COSTS [INCLUDING INTEREST]</b>							<b>£3,662,385</b>
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7: Out of centre Retail Warehouse (Comparison)							
							
<b>ITEM</b>							
Net Site Area	0.20	Residual value		£2,582,305.93 per ha			
<b>1.0 Development Value</b>							
1.1	7: Out of centre Retail Warehouse	No. of units 1	Size sq.m 950	Rent £140	Yield 7.5%	Value per unit £1,773,333	Capital Value £1,773,333
					No. of months 3	Rent free period 3	Adjusted for rent free £1,741,559
							5.75%
<b>Total development value</b>							<b>£1,641,420</b>
<b>2.0 Development Cost</b>							
<b>2.1 Site Acquisition</b>							
2.1.1	Site value (residual land value)						£493,042
							Less Purchaser Costs 4.75%
							<b>£516,461</b>
<b>2.2 Build Costs</b>							
2.2.1	7: Out of centre Retail Warehouse	No. of units 1	Size sq.m 1,000	Cost per sq.m £615			Total Costs £615,000
							<b>£615,000</b>
<b>2.3 Externals</b>							
2.3.1	external works as a percentage of build costs		10.0%				£61,500
							<b>£61,500</b>
<b>2.4 Professional Fees</b>							
2.4.1	as percentage of build costs & externals		12%				£81,180
							<b>£81,180</b>
<b>Total construction costs</b>							<b>£757,680</b>
<b>3.0 Contingency</b>							
3.1.1	as a percentage of total construction costs		5%				£37,884.00
							<b>£37,884</b>
<b>TOTAL DEVELOPMENT COSTS (including land payment)</b>							<b>£1,312,025</b>
<b>4.0 Developers' Profit</b>							
4.1	as percentage of total development costs		Rate 20%				£262,405
							<b>£262,405</b>
<b>TOTAL PROJECT COSTS [EXCLUDING INTEREST]</b>							<b>£1,574,430</b>
<b>TOTAL INCOME - TOTAL COSTS [EXCLUDING INTEREST]</b>							<b>£66,989</b>
<b>5.00 Finance Costs</b>							
			APR 6.50%			PCM 0.526%	£-66,989
<b>TOTAL PROJECT COSTS [INCLUDING INTEREST]</b>							<b>£1,641,420</b>
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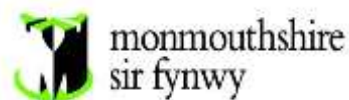
8: Town Centre Retail (Comparison)							
<b>ITEM</b>							
Net Site Area	0.02	Residual value	£1,459,164.04 per ha				
							
<b>1.0 Development Value</b>							
1.1	8: Town Centre Retail (Comparis	No. of units 1	Size sq.m 190	Rent £165	Yield 9.0%	Value per unit £348,333	Capital Value £348,333
					Rent free period No. of months 3		Adjusted for rent free £340,908.96
							4.75%
<b>Total development value</b>							<b>£324,716</b>
<b>2.0 Development Cost</b>							
<b>2.1 Site Acquisition</b>							
2.1.1	Site value (residual land value)						£28,681
			Less Purchaser Costs				1.75%
							<b>£29,183</b>
<b>2.2 Build Costs</b>							
2.2.1	8: Town Centre Retail (Comparis		Size sq.m 200	Cost per sq.m £907			Total Costs £181,400
							<b>£181,400</b>
<b>2.3 Externals</b>							
2.3.1	external works as a percentage of build costs		10.0%				£18,140
							<b>£18,140</b>
<b>2.4 Professional Fees</b>							
2.4.1	as percentage of build costs & externals		12%				£23,945
							<b>£23,945</b>
<b>Total construction costs</b>							<b>£223,485</b>
<b>3.0 Contingency</b>							
3.1.1	as a percentage of total construction costs		5%				£11,174.24
							<b>£11,174</b>
<b>TOTAL DEVELOPMENT COSTS (including land payment)</b>							<b>£263,842</b>
<b>4.0 Developers' Profit</b>							
4.1	as percentage of total development costs		Rate 20%				£52,768
							<b>£52,768</b>
<b>TOTAL PROJECT COSTS [EXCLUDING INTEREST]</b>							<b>£316,611</b>
<b>TOTAL INCOME - TOTAL COSTS [EXCLUDING INTEREST]</b>							<b>£8,105</b>
<b>5.00 Finance Costs</b>							
		APR 6.50%			PCM 0.526%		-£8,105
<b>TOTAL PROJECT COSTS [INCLUDING INTEREST]</b>							<b>£324,716</b>
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9: Hotel									
ITEM									
Net Site Area	0.10	Residual value		-£106,993.31 per ha					
<b>1.0 Development Value</b>									
1.1	9: Hotel	No. of units 1	No of Bed's 0	Size sq.m 760	Rent 130	Yield 7.3%	Value per unit £1,359,010	Capital Value £1,359,010	
							Rent free period No. of months 3	Adjusted for rent free £1,335,374.15	5.75%
<b>Total development value</b>								<b>£1,258,590</b>	
<b>2.0 Development Cost</b>									
<b>2.1 Site Acquisition</b>									
2.1.1	Site value (residual land value)							£10,515	
							Less Purchaser Costs	1.75%	
								<b>-£10,699</b>	
<b>2.2 Build Costs</b>									
2.2.1	9: Hotel	No. of units 1	Size sq.m 800	Cost per sq.m £993		Total Costs £794,400			
								<b>£794,400</b>	
<b>2.3 Externals</b>									
2.3.1	external works as a percentage of build costs			10.0%		£79,440			
								<b>£79,440</b>	
<b>2.4 Professional Fees</b>									
2.4.1	as percentage of build costs & externals			12%		£104,861			
								<b>£104,861</b>	
<b>2.5 Total construction costs</b>								<b>£978,701</b>	
<b>3.0 Contingency</b>									
3.1.1	as a percentage of total construction costs			5%		£48,935.04			
								<b>£48,935</b>	
<b>TOTAL DEVELOPMENT COSTS (including land payment)</b>								<b>£1,016,937</b>	
<b>4.0 Developers' Profit</b>									
4.1	as percentage of total development costs			Rate 20%		£203,387			
								<b>£203,387</b>	
<b>TOTAL PROJECT COSTS [EXCLUDING INTEREST]</b>								<b>£1,220,324</b>	
<b>TOTAL INCOME - TOTAL COSTS [EXCLUDING INTEREST]</b>								<b>£38,266</b>	
5.00	Finance Costs		APR 6.50%	PCM 0.526%		-		£38,266	
<b>TOTAL PROJECT COSTS [INCLUDING INTEREST]</b>								<b>£1,258,590</b>	
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10: Carehomes									
ITEM									
Net Site Area	0.33	Residual value		-£7,505,394.53 per ha					
<b>1.0 Development Value</b>									
1.1	10: Carehomes	No. of units 1	No of Bed's 40	Size sq.m 2470	Rent 3700	Yield 7.0%	Value per unit £52,857	Capital Value £2,114,285.71	
							Rent free period No. of months 3	Adjusted for rent free £2,078,824.04	
							1.75%		
<b>Total development value</b>								<b>£2,042,445</b>	
<b>2.0 Development Cost</b>									
<b>2.1 Site Acquisition</b>									
2.1.1	Site value (residual land value)							-£2,397,300	
							Less Purchaser Costs	1.75%	
								<b>-£2,439,253</b>	
<b>2.2 Build Costs</b>									
2.2.1	10: Carehomes	No. of units 1	Size sq.m 2,600	Cost per sq.m £1,223				Total Costs £3,179,800	
								<b>£3,179,800</b>	
<b>2.3 Externals</b>									
2.3.1	external works as a percentage of build costs		10.0%					£317,980	
								<b>£317,980</b>	
<b>2.4 Professional Fees</b>									
2.4.1	as percentage of build costs & externals		12%					£419,734	
								<b>£419,734</b>	
<b>2.5 Total construction costs</b>								<b>£3,917,514</b>	
<b>3.0 Contingency</b>									
3.1.1	as a percentage of total construction costs		5%					£195,875.68	
								<b>£195,876</b>	
<b>TOTAL DEVELOPMENT COSTS (including land payment)</b>								<b>£1,674,136</b>	
<b>4.0 Developers' Profit</b>									
4.1	as percentage of total development costs		Rate 20%					£334,827	
								<b>£334,827</b>	
<b>TOTAL PROJECT COSTS [EXCLUDING INTEREST]</b>								<b>£2,008,963</b>	
<b>TOTAL INCOME - TOTAL COSTS [EXCLUDING INTEREST]</b>								<b>£33,481</b>	
<b>5.00 Finance Costs</b>									
			APR 6.50%				PCM 0.526%	-£33,481	
<b>TOTAL PROJECT COSTS [INCLUDING INTEREST]</b>								<b>£2,042,445</b>	

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11: Town Centre Retail (Convenience)						
ITEM						
Net Site Area	0.03	Residual value	£2,484,964.69	per ha		
						
<b>1.0 Development Value</b>						
1.1	11: Town Cer	No. of units 1	Size sq.m 238	Rent 185	Yield 8.0%	Value per unit £549,219
						Capital Value £549,218.75
						Adjusted for rent free £538,752.65
						5.75%
Total development value						£507,774
<b>2.0 Development Cost</b>						
<b>2.1 Site Acquisition</b>						
2.1.1	Site value (residual land value)					£61,056
						Less Purchaser Costs
						1.75%
						£62,124.12
<b>2.2 Build Costs</b>						
2.2.1	11: Town Centre Retail (Convenie	No. of units 1	Size sq.m 250	Cost per sq.m £1,062	Total Costs £265,500	
						£265,500
<b>2.3 Externals</b>						
2.3.1	external works as a percentage of build costs		10.0%	£26,550		
						£26,550
<b>2.4 Professional Fees</b>						
2.4.1	as percentage of build costs & externals		12%	£35,046		
						£35,046
<b>2.5 Total construction costs</b>						£327,096
<b>3.0 Contingency</b>						
3.1.1	as a percentage of total construction costs		5%	£16,354.80		
						£16,355
<b>TOTAL DEVELOPMENT COSTS (including land payment)</b>						£405,575
<b>4.0 Developers' Profit</b>						
4.1	as percentage of total development costs		Rate 20%	£81,115		
						£81,115
<b>TOTAL PROJECT COSTS [EXCLUDING INTEREST]</b>						£486,690
<b>TOTAL INCOME - TOTAL COSTS [EXCLUDING INTEREST]</b>						£21,084
<b>5.00 Finance Costs</b>						
			APR 6.50%	PCM 0.526%	-£21,084	
<b>TOTAL PROJECT COSTS [INCLUDING INTEREST]</b>						£507,774
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**SUBJECT: REVIEW OF ADDITIONAL LEARNING NEEDS STRATEGY AND POLICY**

**DIRCTORATE: CHILDREN AND YOUNG PEOPLE**

**MEETING: CABINET MEETING**

**DATE: 19<sup>TH</sup> NOVEMBER 2014**

**DIVISION/WARDS AFFECTED: ALL**

**1 PURPOSE:**

- 1.1 To provide members with the updated Additional Learning Needs Strategy and Policy for pupils with Additional Learning Needs across Monmouthshire.
- 1.2 To seek approval to implement the updated Additional Learning Needs Strategy and Policy

**2 RECOMMENDATION:**

- 2.1 Members approve the updated Additional Learning Needs Strategy and Policy for pupils with Additional Learning Needs (Appendix 2) across Monmouthshire for full implementation in all schools and settings within the authority.

**3 BACKGROUND:**

- 3.1 In November 2012 Estyn, Her Majesty's Inspectorate for Education and Training in Wales, reported that the quality of local authority education for children and young people with additional learning needs in Monmouthshire County Council was unsatisfactory.
- 3.2 Our updated ALN Strategy and Policy clarifies the steps we will take to address the recommendations identified by Estyn in 2012.

**4 KEY ISSUES:**

- 4.1 The ALN Strategy and Policy Executive Summary can be found in Appendix One.
- 4.2 Appendix two contains the full ALN Strategy and Policy.
- 4.3 An extensive consultation has been conducted with key clients to review the provision across the county to identify areas for improvement and to determine the nature and extent of the provision in the future to meet the needs of as many children and young people within the county.
- 4.4 Consideration has been given to all current legislation and guidance, including the SEN Code of Practice for Wales (2002) and the Equality Act (2010).
- 4.5 In addition, consideration was given to future legislation regarding the statutory review of ALN in line with the direction of national policy including; 'Forward in Partnership for Children and Young People with Additional Needs (Welsh Government, 2012)' and the legislative proposals for additional learning needs 2014 (White Paper Reform of ALN).
- 4.6 The proposal clarifies the role and responsibilities of the LA, schools and settings are clearly defined in the revised policy in relation to statutory responsibilities and school responsibilities for meeting the needs of all pupils with special educational needs.
- 4.7 The Authority has amended the Graduated Response to include a School (or Early Years) Action Plus Resourced Agreement (S.A.P.R.A.) to meet individual needs without the need for the formal Statementing process to ensure that individual receive support in a timely and cost effective manner. This has been enhanced by the introduction of an SEN Matrix Scoring Grid, which clearly defines the thresholds for each stage.
- 4.8 The implementation of the ALN strategy, policies and procedures are subject to continuous quarterly monitoring by the Authority as part of the Service Improvement Plan. The impact of the strategy on outcomes for children and young people with ALN will be reviewed annually, as part of this overall programme of self-evaluation and service improvement planning.
- 4.9 The policy will be reviewed regularly to reflect any changes to legislation and to address matters that arise from authority monitoring and evaluation.

**5 REASONS:**

5.1 The proposal will work to address the following Estyn judgements, which led to the overall unsatisfactory outcome in 2012.

- strategic planning was weak;
- the number of Statements of educational needs was too high;
- resources were directed towards the statutory assessment process;
- data was not systematically collected to enable the Authority to know how well pupils with additional learning needs progressed and to analyse the impact of interventions on standards overall;
- there was a lack of specialist facilities for pupils with Autistic Spectrum Disorder, behavioural difficulties and severe learning difficulties, resulting in pupils travelling long distances to attend out of county placements

**6 RESOURCE IMPLICATIONS:**

6.1 There are no additional resource implications anticipated arising from the change to the ALN Strategy and Policy

**7 SUSTAINABLE DEVELOPMENTAL AND EQUALITY IMPLICATIONS:**

7.1 The equality impacts identified in the assessment (Appendix Three) are summarised below for members' consideration:

7.2 There is an identified positive impact on 'disability' as the updated ALN Strategy and Policy will increase inclusion for all children and young people.

7.3 The actual impact from this report's recommendation will be reviewed quarterly and annually.

**8 CONSULTEES:**

8.1 Parents,  
Carers,



Children and young people,  
Headteachers,  
Social Services  
Schools and Clusters  
SNAP

**9 BACKGROUND PAPERS:**

- 'A report on the quality of local authority education services for children and young people in Monmouthshire County Council' (Estyn 2012)
- 'Forward in Partnership for Children and Young People with Additional Needs (Welsh Government, 2012)
- White Paper Reform of ALN (Welsh Government, 2014)
- ALN Consultation (MCC 2013/14)

**10 AUTHOR:**

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## **Executive Summary**

### **An Outline of the ALN Strategy and Policy how the authority has judged its impact on pupils**

#### **Background**

Monmouthshire's Special Educational Needs and Inclusion Strategy was updated in 2003 to take account of the changes following the introduction and implementation of the SEN Code of Practice 2002. Despite minor amendments to the policy, practice remained relatively unchanged until 2012.

In November 2012 Estyn, Her Majesty's Inspectorate for Education and Training in Wales, reported that the quality of local authority education for children and young people with additional learning needs in Monmouthshire County Council was Unsatisfactory.

Estyn arrived at this outcome because they judged that:

- strategic planning was weak;
- the number of Statements of educational needs was too high;
- resources were directed towards the statutory assessment process;
- data was not systematically collected to enable the authority to know how well pupils with additional learning needs progressed and to analyse the impact of interventions on standards overall;
- there was a lack of specialist facilities for pupils with Autistic Spectrum Disorder, behavioural difficulties and severe learning difficulties, resulting in pupils travelling long distances to attend out of county placements.

The Authority conducted an extensive consultation with key clients to review the current provision across the county, to identify areas for improvement and to determine the nature and extent of the provision in the future to meet the needs of as many children and young people within the county.

At the same time, Welsh Government continued to consult on proposed changes to the legislative framework for supporting children and young people with additional learning needs, which would create:

- a unified legislative framework to support learners aged 0 to 25 with additional learning needs;
- an integrated, collaborative process of assessment, planning and monitoring which facilitates early, timely and effective interventions; and
- a fair and transparent system for providing information and advice, and for resolving concerns and appeals.

Consequently, as a result of the above, Monmouthshire has reviewed its strategy and policy for ALN provision across the county.

## **Purpose of the Policy**

The purpose of the ALN Strategy and Policy is to maximise the educational achievements and wellbeing of all pupils with ALN by providing a relevant, inclusive and effective education that meets their individual needs. The document outlines Monmouthshire's strategy for educating children and young people with Additional Learning Needs and provides guidance for key clients for identifying and supporting Additional Learning Needs, including the range of provision available.

In addition, the revised ALN Policy and Strategy seeks to address the following two key themes arising from Monmouthshire's consultation with key clients.

- Processes around Additional Learning Needs and Statements to:
- Meeting the needs of as many of our children and young people as possible within the county to:

In implementing the strategy and policy, the local authority will seek to

- Reduce the number of Statements of educational;
- Ensure resources were directed towards the statutory assessment process;
- Make effective use of data to improve outcomes for all groups of pupils including those with additional learning needs and ultimately on standards overall;
- Provide an inclusive education as close to home and the local community as possible.

## **Outline of ALN Policy and Strategy**

The ALN Policy and Strategy defines the overarching approach that Monmouthshire will take to improve ALN provision for all pupils across the authority.

The following areas are included in the document to provide clarity and transparency for key clients and to ensure consistency in access to provision for all pupils across the authority. The policy addresses the following aspects that will support the revised model for ALN provision.

### **1. Roles and Responsibilities**

The role and responsibilities of the LA, schools and settings are clearly defined in the revised policy in relation to statutory responsibilities and responsibilities for meeting the needs of all pupils with special educational needs.

### **2. Strategies for Identifying and Meeting Special Educational Needs as early as possible**

The Authority provides a range of specialist services for children and young people with ALN, their families and their schools to ensure that all children and young people have access to effective learning opportunities and support as soon as possible through the early identification of ALN. These services include both central and jointly pan-Gwent commissioned services such as Hearing Impaired and Communication Intervention Services.

Arrangements for early Identification have been reviewed to clarify the roles and responsibilities for the local authority and schools in identifying and meeting the needs of children and young people.

The authority has amended the Graduated Response to include a School (or Early Years) Action Plus Resourced Agreement (S.A.P.R.A.) to meet individual needs without the need for the formal Statementing process to ensure that individual receive support in a timely and cost effective manner. This is supported by the introduction of an SEN Matrix Scoring Grid, which clearly defines the thresholds for each stage (see attached). The authority will support schools to implement this process according to the following four levels:

- School (or Early Years) Action (S.A.)
- School (or Early Years) Action Plus (S.A.P)
- School (or Early Years) Action Plus Resourced Agreement (S.A.P.R.A.)
- Statement (S)

As part of this Graduated Response, the authority have proposed the introduction of a School (or Early Years) Action Plus Resourced Agreement (S.A.P.R.A.) to reduce the need for lengthy and costly statutory assessment processes. However, the authority acknowledges that, for a small number of pupils, including all those for whom an out-of-county special school placement is appropriate, it is possible for the Authority to maintain a Statement in the usual way.

Responsibilities for meeting the needs of pupils at all levels are now clearly defined for the authority and schools, to ensure that the most effective provision is available in a timely and consistent manner.

**3. Strategies for Providing Effective Teaching and Support for all pupils with ALN in accordance with the statutory requirements of the Equality Act 2010 and the SEN Code of Practice for Wales, 2002.**

The Authority is committed to providing effective teaching and support for all pupils within modern learning environments, both to ensure that pupils with ALN achieve the highest possible standards and also to enable schools to meet the needs of pupils with 'low level' learning and behavioural difficulties at an early stage.

The Authority and commissioned school improvement services (EAS) focus closely on early identification of difficulties at school level, and in so doing help to reduce the number of pupils who underachieve in learning and/or develop behavioural difficulties.

A range of targeted support and intervention is available through the Authority's Graduated Response system to assist individual pupils and groups of pupils who are experiencing learning and/or behaviour difficulties that meet the criteria within the Code of Practice for SEN.

#### **4. Strategies for Educating Pupils with SEN within the Authority's Mainstream Schools wherever possible.**

The Authority offers pupils with ALN a range of provision in mainstream schools and, through partnerships, commissioned services and other agencies. These include:

- Pre-school settings such as nurseries, non-maintained settings and play groups;
- Mainstream classes;
- Resources classes in mainstream schools;
- Other provision (Special Schools)

#### **5. Strategies for Working in Partnership**

The Authority is committed to working in partnership with pupils, parents and carers and a range of agencies including Social Services, Health, SNAP Cymru (Parent Partnership Service) and pan-Gwent commissioned services (HI, VI, MSI and ComIT).

EPS, ALN Officers, the Early Years Advisory Teacher and Inclusion Officers are always available to support and advise schools and parents through meetings, on the telephone and by email. The Authority has informative leaflets on statutory assessment, educational psychology and specific learning difficulties.

A monthly, Authority based, Parent 'Drop-in', held at County Hall, Usk is available to all parents, carers and guardians of pupils with ALN who may be experiencing difficulty with their child's provision. This service affords parents the opportunity to discuss their concerns with appropriate Monmouthshire staff and work together with schools towards a positive outcome for the child or young person.

This Partnership ensures that all parents, guardians and carers of youngsters with ALN will have the opportunity to freely access accurate, impartial and confidential advice, support and information regarding additional needs.

Monmouthshire also recognises the needs and rights of pupils to have access to an independent person who will work in an open and accessible manner to promote and realise their rights.

The Authority will support schools and pre-school settings in the delivery of the ALN Strategy and Policy.

#### **6. Settings for pupils whose needs cannot be met in Monmouthshire Schools**

For the very few pupils whose needs cannot be met through mainstream education, the Authority seeks to provide high quality specialised education and support by working in partnership with other authorities and providers.

Each year, the Authority places a very small number of pupils with exceptionally complex needs in provision outside Monmouthshire.

Out-of-county provision is normally in a day special school maintained by another authority, or in the independent sector. In exceptional circumstances, residential provision may be sought in conjunction with Social Services and Health.

Decisions to place pupils in independent out of county special schools are taken by a multi-agency Complex Needs Panel, with membership from the Authority's CYP, Social Services and the Aneurin Bevan Health Board.

#### **7. The Authority's Monitoring and Evaluation Data on outcomes for pupils with ALN in order to inform the development of policies and provision.**

The Authority regards the collection and recording of precise information and data for children with additional learning needs as a crucial factor in the development of policies and planning for effective provision.

The Authority maintains electronic data that includes information from schools' SEN registers, the annual PLASC SEN data records, individual and school-level progress data, records of school planning meetings and pupil assessment information.

Through regular analysis of this comprehensive data record, the Authority is able to:

- monitor and evaluate the impact of resources for individual pupils, groups of pupils and at school level;
- monitor and evaluate the impact of additional funding, both delegated and centrally held, on outcomes for pupils with SEN;
- target additional funding appropriately, and identify future funding needs; and

monitor trends and identify emerging areas of need.

#### **8. Monitoring and Evaluation of the Impact of the ALN Strategy**

The implementation of the ALN strategy, policies and procedures are subject to continuous quarterly monitoring by the Authority as part of the Service Improvement Plan.

The impact of the strategy on outcomes for children and young people with ALN will be reviewed annually, as part of this overall programme of self-evaluation and service improvement planning.

The expected impact of the ALN Strategy and Policy is outlined in appendix 2.

This policy will also be reviewed in the light of any statutory changes.

#### **Implementation Schedule**

The draft ALN Policy and Strategy has been issued to schools, Governors, stakeholders, and Members. The draft will be presented to the Scrutiny Committee in October 2014 and then to Council in November for acceptance and ratification. Full implementation of the policy will be from April 2015.

#### **Next Steps**

- Continue with consultation following implementation and review the ALN Policy and Strategy after the first year.
- Monitor the impact of the ALN Policy and Strategy on outcomes for pupils.
- Amend the policy to take account of changes to legislation and/or further service delivery changes.



**Appendix 1 - SEN Matrix Scoring Grid****Cognition and Learning**

Entry Criteria	
School Action ( S.A.)	The pupil has regular and consistent difficulties in accessing the curriculum. The pupil requires support over and above normal classroom differentiation. Standardised score in Literacy and Numeracy 75 – 84. For example CATS/BPVS 75-84
School Action Plus ( S.A.P.)	The pupil's main difficulty is in the area of Cognition and Learning. The pupil has received additional appropriate support at S.A. over at least two terms but has made little or no progress. The pupil's difficulties cause substantial barriers to learning, and require increased differentiation.  Scores within lowest 5th percentile. Standardised scores in Literacy, Numeracy and, for example, CATS/BPVS: 74 or less.
School Action Plus Resourced Agreement ( S.A.P.R.A.)	The pupil's main difficulty is in the area of Cognition and Learning. The pupil has received additional appropriate support at S.A.P over at least two terms but has made little or no progress. The difficulties continue to cause substantial barriers to learning.  Scores at, or below, the lowest 1st percentile.  Standardised score in Literacy, Numeracy, for example CATS, BPVS or WISC/BAS: below 70. Agreement through ALN resource panel, based on detailed evidence of Graduated Response to be submitted by schools.
Evidence provided by the school or Early Years Setting.	
S.A.	Continues to make little or no progress in specific areas despite mainstream classroom differentiation and basic skills intervention. Evidence provided by school of consultation with parents. Classroom assessment with details of intervention.
S.A.P.	Continues to make little or no progress in most areas despite School Action support. (i.e. intervention which is <b>additional to or otherwise different from</b> mainstream differentiation and Basic Skills groups) Previous IEPs / targets with outcomes.  Support Services involvement (whose advice / recommendations should be incorporated into the new IEP).

S.A.P.R.A.	<p>Difficulties are likely to persist for the child's school career.</p> <p>Indications of how the difficulty affects access to the curriculum.</p> <p>Information about the involvement of Health professionals / Multi Agency involvement from an early age.</p> <p>Indication of which resources are required and how they will be allocated to improve outcomes.</p>
<b>Curriculum and Teaching Methods</b>	
S.A.	<p>Mainstream curriculum with some targeted differentiation.</p> <p>Timed intervention of tasks and activities within an 'inclusive' approach.</p> <p>Access to individualised programmes according to need.</p>
S.A.P.	<p>Mainstream Curriculum with significant and targeted differentiation sustained over time.</p> <p>Implementation of Literacy/ Numeracy programmes as advised. Access to individualized programmes according to need.</p> <p>Use of an 'inclusive' teaching approach.</p> <p>(Alternative programmes at KS4 where relevant).</p>
S.A.P.R.A.	<p>Some curriculum modifications and individualised programmes sustained over time. Significantly differentiated curriculum.</p> <p>Access to individualised programmes according to need.</p> <p>Use of an inclusive teaching approach.</p> <p>(Alternative programmes at K.S.4 where relevant)</p>
<b>Grouping and Support</b>	
SA	<p>Mainstream class provision with occasional additional support in class.</p>

SAP	<p>Mainstream class provision for most of the time with targeted and sustained additional support in class and / or in a small group.</p> <p>Careful planning of class grouping / seating. Structured classroom management.</p>
SAPRA	<p>Small group and / or class provision for most of the time.</p> <p>Structured classroom management.</p>
<b>Specialised Resources</b>	
S.A.	<p>Some individual access to equipment including ICT, normally available in class and shared with other children.</p> <p>Provision is school based.</p> <p>Use of allocated ALN funding to provide school based small group or individual support and / or resources.</p>
S.A.P.	<p>Individual access to normally available equipment as and when required.</p> <p>Home / School Link system.</p> <p>Specific programme materials as advised.</p> <p>Access to a store of individualised materials to meet objectives.</p> <p>Reference books and literature as advised.</p> <p>Provision is school based.</p> <p>Use of allocated ALN funding to provide school based small group support or individual support.</p> <p>K.S. support time for organisation, course work, and proof reading is advised.</p>

## Appendix 1

S.A.P.R.A.	<p>Individualised access to more specialist equipment sustained over time.</p> <p>ICT and other specific resources and adaptations assessed on an individual basis.</p> <p>Mainstream evaluation of needs &amp; access to a supportive adult if required.</p> <p>Access to core staffing provision.</p> <p>Access to specialised provision according to need.</p> <p>Provision agreed through Service Level Agreement.</p>
<b>Advice and Assessment</b>	
S.A.	<p>Class teacher and Additional Learning Needs Coordinator (ALNCO) assess needs, consulting occasionally with external agencies.</p> <p>Attendance. Regular monitoring of effectiveness of provision.</p> <p>Regular monitoring and review of targets within IEP in consultation with child and Parents.</p>
S.A.P.	<p>Class teacher and ALNCO take advice from external agencies when reviewing IEP.</p> <p>Attendance. Regular monitoring of effectiveness of provision.</p> <p>Regular monitoring and review of targets within IEP in consultation with child and Parents. Review with all agencies providing additional support.</p>
S.A.P.R.A.	<p>External agencies provide specialised assessments and advice that lead to a modified IEP. Regular monitoring of effectiveness of provision.</p> <p>Regular monitoring and review of targets within IEP in consultation with child and parents. Review with all agencies providing additional support.</p>
<b>L.A / Other Support Services &amp; Monitoring</b>	
Whole school	<p>Local Authority via Education Achievement Service (EAS) and Schools monitor and evaluate Whole School Performance as part of the self-evaluation and School Improvement agenda.</p>
S.A.	<p>Class teacher and ALNCO assess needs, consulting occasionally with external agencies.</p>

Appendix 1

	<p>School</p> <p>Attendance.</p> <p>Regular monitoring of effectiveness of provision.</p> <p>Regular monitoring and review of targets within IEP in consultation with child and parents.</p> <p>Review of ALN stage according to criteria.</p>	<p>Local Authority</p> <p>Training for ALNCo.</p> <p>Training for T.A. and Teachers.</p> <p>Discussion in ALN Planning meetings.</p> <p>Access to INSET courses and support</p> <p>Sessions from EAS+ L.A. menu.</p> <p>Review of ALN stage according to criteria.</p> <p>Annual ALN Audit.</p>
S.A.P.	Class teacher and ALNCo take account of advice and /or assessment from external agencies when reviewing IEP	
	<p>School</p> <p>monitor attendance</p> <p>monitor effectiveness of provision regularly</p> <p>regular monitoring and review of targets within IEP with consultation with the child, Parents and other agencies.</p> <p>Review with all agencies providing additional support.</p> <p>Review ALN stage according to criteria.</p> <p>Annual ALN audit.</p>	<p>Local Authority</p> <p>Support and advice when requested from EPS/ Outreach/Inclusion or other agencies.</p> <p>Access to INSET courses and support sessions from LA or EAS Menu.</p> <p>Review ALN stage according to criteria.</p> <p>Annual ALN audit.</p>
S.A.P.R.A.	External agencies provide specialised assessment and advice that leads to modified IEP (AA3) and / or contribute to the direct support for the pupil.	
	<p>School</p> <p>monitor attendance</p> <p>monitor effectiveness of provision regularly.</p>	<p>Local Authority</p> <p>EPS involvement to advise on needs and inform IEP.</p> <p>Health/social care and Careers support services to contribute to IEP (IDP) when appropriate.</p>

Appendix 1

	<p>Regular monitoring and review of targets within IEP with consultation with the child, parents and other agencies.</p> <p>Review with all agencies providing additional support.</p> <p>Evidence of the utilisation of funding for the child by school during the previous year.</p> <p>Advice from any other relevant agencies as appropriate.</p> <p>Annual ALN audit.</p>	<p>LA officer attendance at yearly IEP (IDP) reviews if requested.</p> <p>Attendance at transition reviews (end of Key stages (if requested)).</p> <p>Review of ALN stage according to criteria and individual needs.</p> <p>Annual ALN audit.</p> <p>Annual review of SAPRA</p> <p>Careers Wales and Further Education representative to attend Year 9 review.</p>
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**Behavioural, Emotional and Social Difficulties (BESD)**

Entry Criteria	
S.A.	The child has regular and consistent difficulties in accessing the curriculum. They require support over and above normal classroom differentiation.
S.A.P.	<p>The child's main presenting difficulty is in the area of social, emotional and /or behavioural difficulties.</p> <p>Significant difficulties that persist disrupting the normal functioning of the classroom over a period of half an academic term.</p> <p>Schools should employ a screening measure, which is relevant to the main concern.</p>
S.A.P.R.A.	<p>The child's main presenting difficulty is in the area of social, emotional and / or behavioural difficulties.</p> <p>Significant additional learning needs in an ordinary classroom impossible without a high level of intervention.</p> <p>Schools should employ a screening measure, which is relevant to the main concern.</p>
Evidence provided by the school or the early years setting.	
S.A.	<p>Continues to make little or no progress in specific areas despite normal classroom differentiation.</p> <p>Evidence provided by school of consultation with parents.</p> <p>Classroom assessment with details of strategies and intervention.</p>
S.A.P.	<p>Continues to make little or no progress in specific areas despite School Action Support ( documentation enclosed).</p> <p>Latest IEP / Individual Behavioural Plan (IBP) / targets with outcomes.</p> <p>Record of significant incidents / behaviour patterns.</p> <p>Support services involvement.</p>

S.A.P.R.A.	<p>SA / SAP documentation in place. Needs are likely to persist for the child's school career. Indications of how the difficulty affects access to the curriculum. Latest IEP / IBP / targets with outcomes. Record of significant incidents / behaviour patterns. Indication of how allocated funds would be used. Training initiatives.</p>
Curriculum and Teaching Methods	
S.A.	<p>Ordinary curriculum with some targeted differentiation. Timed intervention of tasks and activities within an inclusive approach. Access to individualized multi-sensory programmes according to need. An inclusive teaching approach.</p>
S.A.P.	<p>Curriculum with significant and targeted differentiation sustained over time within a mainstream setting. Careful planning of class grouping / seating. An inclusive teaching approach. A Personal, Social and Health Education (PSHE) programme to include emotional health sessions on self-awareness and awareness of others. Incorporation of, e.g. Circle Time, to resolve conflict and to teach specific Social Skills. Circle of Friends / Buddy system / Peer mentoring. Specific programmes as advised. Access to interim arrangements including PRU / alternative curriculum.</p>
S.A.P.R.A.	<p>Some curriculum modifications and individualised programme sustained over time(CT3). Significantly differentiated curriculum. SpLD friendly approaches to include multisensory Literacy / Numeracy and adapted activities. Access to individualised multisensory programmes according to need.</p>



	Use of an inclusive teaching approach.
<b>Grouping and Support</b>	
S.A.	Mainstream class provision with occasional additional support in class.
S.A.P.	Mainstream class provision for most of the time with targeted and sustained additional support in class and / or in a small group. Careful planning of class grouping / seating. Structured classroom management. Access to interim support from the PRU.
S.A.P.R.A.	Small group and / or class provision for most of the time. Structured classroom management.
<b>Specialised Resources</b>	
S.A.	Some individual access to equipment including ICT that is normally available in class and shared with other children. Provision is school based. Use of allocated ALN funding to provide school based small group or individual support and resources.
S.A.P.	Individual access to normally available equipment as and when required. Home / school link system. Specific programme materials as advised. Access to a store of individualised materials to meet objectives. Home / school link system. Provision is school based. Use of allocated ALN funding to provide school based small group teaching or individual teaching. K.S.4: support time for organization, course work, and proof-reading advised.

S.A.P.R.A.	<p>Individualised access to more specialist equipment sustained over time.                  ICT and other specific resources and adaptations assessed on an individual basis.                  Mainstream evaluation of needs.                  Access to a supportive adult if required.                  Access to core staffing provision if available.                  Access to specialised provision according to needs.                  Provision agreed through Service Level Agreement.</p>	
<p>Advice and Assessment</p>		
S.A.	<p>Class teacher and ALNCO assess needs, consulting occasionally with external agencies.                  Regular monitoring of effectiveness of provision.                  Regular monitoring and review of targets within IEP in consultation with child and parents.</p>	
S.A.P.	<p>Class teacher and ALNCO take advice from external agencies when reviewing IEP.                  Regular monitoring of effectiveness of provision.                  Regular monitoring and review of targets within IEP in consultation with child and parents.                  Review with all agencies providing additional support.</p>	
S.A.P.R.A.	<p>External agencies provide specialised assessments and advice that lead to modified IEP.                  Regular monitoring of effectiveness of provision.                  Regular monitoring and review of targets within IEP in consultation with child and parents.                  Review with all agencies providing additional support.</p>	
<p>L.A / Other Support Services and Monitoring</p>		
S.A.	<p>Class teacher and ALNCO assess needs, consulting occasionally with external agencies.</p>	
	<p>School:                   Regular monitoring of effectiveness of provision.                  Regular monitoring and review of targets within IEP in consultation with child and parents.                  Review of ALN stage according to</p>	<p>Local Authority:                   Training for ALNCO.                  Discussion in ALN Planning meetings.                  Access to INSET                  Courses and support sessions from                  Review of ALN stage according to criteria.</p>

	criteria. Annual ALN Audit.	Annual ALN Audit.
S.A.P.	Class teacher and ALNCO take account of advice and / or assessment from external agencies when reviewing IEP	
	School:  Regular monitoring of effectiveness of provision. Regular monitoring and review of targets within IEP in consultation with child, parents and other agencies. Review with all agencies providing additional support. Review of ALN stage according to criteria. Annual ALN Audit.	Local Authority:  Support and advice when requested from Education Inclusion Team or any other agencies Access to INSET courses and support sessions (from L.A. Menu) Review of ALN stage according to criteria Annual ALN Audit.
S.A.P.R.A.	External agencies provide specialised assessment and advice that lead modified IEP and / or contribute to the direct support for the pupil	
	School:  Regular monitoring of effectiveness of provision. Regular monitoring and review of targets within IEP in consultation with child and parents and SALT. Evidence regarding the utilisation of funding for the child during the previous year. Advice from any other relevant agencies as appropriate. Annual ALN Audit.	Local Authority:  EPS involvement to advise on needs and inform IEP. Health, Social Care and Career based Support Services contribute to IEP when appropriate. Review of ALN stage according to criteria and individual needs. Annual ALN Audit. Annual review of SLA. Careers Wales representative attend Year 9 Review.

**Communication and Social Difficulties**

Entry Criteria	
S.A.	The child has consistent difficulties in the area of communication and interaction. The child requires support over and above normal classroom differentiation.
S.A.P.	The child's main difficulty is in the area of communication and interaction. The child's difficulties impede the development of social relationships and cause substantial barriers to learning levels as advised by the relevant professional. Child's potential.
S.A.P.R.A.	The child's main presenting difficulty is in the area of communication and interaction The child's difficulties impede the development of social relationships and cause substantial barriers to learning levels as advised by the relevant professional. Child's potential.
Evidence provided by the school or the Early Years Setting.	
S.A.	Continues to make little or no progress in specific areas despite normal classroom differentiation and basic skills intervention. Evidence provided by school of consultation with parents. Classroom assessment with details of intervention.
S.A.P.	Continues to make little or no progress in specific areas despite School Action support (i.e. intervention over and above differentiation and basic skills groups). Previous IEPs / targets with outcomes. Support services involvement whose advice / recommendations should be incorporated into the new IEP. Indication of how allocated funds would be used.

SAPRA	<p>Continues to make little or no progress in specific areas despite School Action Plus support.</p> <p>Previous IEPs / targets with outcomes.</p> <p>Difficulties are likely to persist for the child's school career without an intense programme of specialised intervention.</p> <p>Indications of how the difficulty affects access to the curriculum.</p> <p>EPS involvement.</p> <p>Multi-agency involvement from an early age.</p> <p>Information about the involvement of health professionals.</p> <p>Support services involvement whose advice/ recommendations should be incorporated into the new IEP.</p> <p>Training initiatives.</p> <p>Indication of what resources are required and how they will be allocated to improve outcomes.</p>
<b>Curriculum and Teaching Methods</b>	
S.A.	<p>Mainstream curriculum with some targeted differentiation.</p> <p>Timed intervention of tasks and activities within an inclusive approach.</p> <p>Access to individualised multi-sensory programmes according to need.</p>
S.A.P.	<p>Mainstream curriculum with significant and targeted differentiation sustained over time.</p> <p>Individualised approaches to promote attention and listening; comprehension of spoken language, conceptual awareness, verbal reasoning, expression, vocabulary and social skills.</p> <p>Incorporation of specific programmes as advised: methods including Circle Time; Social Stories; Visual Timetables; Language Builder. (e.g. based on Elklan course )</p> <p>Access to individualized and structured multi-sensory programmes according to need.</p> <p>Use of an inclusive teaching approach.</p> <p>Alternative programmes at K.S.4 where relevant.</p>
S.A.P.R.A.	<p>Some curriculum modifications and individualised programme sustained over time.</p> <p>Significantly differentiated curriculum with use of e.g. TEACCH, PECS methods and materials.</p> <p>Alternative communication techniques as appropriate.</p>
<b>Specialised Resources</b>	
S.A.	<p>Some individual access to equipment including ICT, this is normally available in class and shared with other children.</p> <p>Provision is school based.</p> <p>Access to individualised multi-sensory programmes according to child's individual needs.</p> <p>Use of allocated ALN funding to provide school based small group or individual support and resources.</p>

SAP	<p>Individual access to normally available equipment as and when required.  Home /School Link system.  Specific programme materials as advised.  Access to individualised materials to meet objectives.  Reference books and literature as advised.  Provision is school based.  Access to individualised programmes using classroom resources and I.C.T.  Multi-sensory materials relevant to the child's needs.  Specific programme materials / software e.g. Elklan, Social Stories, Circle Time, Social Use of Language  Use of allocated ALN funding to provide school based small group teaching or individual teaching.</p>
SAPRA	<p>Individualised access to more specialist equipment sustained over time.  ICT and other specific resources and adaptations assessed on an individual basis.  Access to advice and outreach according to need.  Provision agreed through Service Level Agreement.</p>
<b>Grouping and Support</b>	
S.A	<p>Mainstream class provision with occasional additional support in class.</p>
S.A.P	<p>Mainstream class provision for most of the time with targeted and sustained additional support in class and /or in a small group.  Careful planning of class grouping / seating.  Structured classroom management.</p>
S.A.P.R.A.	<p>Small group and /or class provision for most of the time.  Structured classroom management.</p>
<b>Advice and Assessment</b>	
S.A.	<p>Class teacher and ALNCO assess needs, consulting, occasionally, with external agencies.  Regular monitoring of effectiveness of provision.  Regular monitoring and review of targets within IEP in consultation with child and parents.</p>
S.A.P.	<p>Class teacher and ALNCO take advice from external agencies when reviewing IEP.  Regular monitoring of effectiveness of provision.  Regular monitoring and review of targets within IEP in consultation with child and parents.  Review with all agencies providing additional support.</p>

<p>S.A.P.R.A.</p>	<p>External agencies provide specialised assessments and advice that leads to a modified IEP.                  EPS involvement to advise on needs and inform IEP.                  Health based, social care based and career based support services contribute to IEP where appropriate.                  Regular monitoring of effectiveness of provision.                  Regular monitoring and review of targets within IEP in consultation with child and parents.                  Review with all agencies providing additional support.</p>	
<p>L.A. / Other Support Services and Monitoring</p>		
<p>S.A.</p>	<p>Class teacher and ALNCO assess needs, consulting occasionally with external agencies</p>	
	<p>School:</p> <p>Attendance.                  Regular monitoring of effectiveness of provision.                  Regular monitoring and review of targets within IEP in consultation with child and parents.                  Review of ALN stage according to criteria.                  Annual ALN Audit.</p>	<p>Local Authority:</p> <p>Training for ALNCOs.                  Discussion in ALN.                  Planning meetings.                  Access to training.                  Review of ALN stage according to criteria.                  Annual ALN Audit.</p>
<p>S.A.P.</p>	<p>Class teacher and ALNCO take account of advice and / or assessment from external agencies when reviewing IEP.</p>	
	<p>School:</p> <p>Regular monitoring of effectiveness of provision.                  Regular monitoring and review of targets within IEP in consultation with child, parents and SALT.                  Review with all agencies providing additional support.                  Review of ALN stage according to criteria.                  Annual ALN Audit.</p>	<p>Local Authority:</p> <p>Support and advice when requested from ALN Team or any other agencies.                  Access to training (e.g. Elklan training)                  Review of ALN stage according to criteria.                  Annual ALN Audit.</p>
	<p>External agencies provide specialised assessment and advice that</p>	

S.A.P.R.A.	lead to modified IEP and / or contribute to the direct support for the pupil.	
	<p>School:</p> <p>Regular monitoring of effectiveness of provision.  Regular monitoring and review of targets within IEP in consultation with child and parents and SALT.  Evidence regarding the utilisation of funding for the child during the previous year.  Advice from any other relevant agencies as appropriate.  Annual ALN Audit.</p>	<p>Local Authority:</p> <p>EPS involvement to advise on need and inform IEP.  Health, Social Care, and Career based Support Services contribute to IEP when appropriate.  Attendance at Transition Reviews (end of Key Stages) if requested.  Review of ALN stage according to criteria and individual needs.  Annual ALN Audit  Annual review of SLA.  Careers Wales representative to attend Year 9 Review.</p>



**Sensory and / or Physical Impairment**

Entry Criteria      Hearing Impairment	
S.A.	<p>The child's main difficulty is in the area of hearing.</p> <p><i>When the school suspects / observes that a child's hearing is affecting their learning development they should consult with parents in order to refer to their GP and / or seek permission to refer to school nurse and / or the visiting Teacher of the HI</i></p> <p>Mild to moderate hearing loss (Sensory neural or conductive).</p> <p>Classroom audit.</p> <p>Possible amplification.</p>
S.A.P.	<p>Moderate hearing loss causing substantial barrier to learning (sensory neural or long term conductive).</p> <p>Requires amplification.</p>
S.A.P.R.A.	<p>Severe to profound hearing loss causing substantial barriers to learning which will persist throughout their school career (sensory neural).</p> <p>Requires amplification.</p> <p>They require support over and above normal classroom provision.</p>

## Evidence provided by the school or the early years setting.

S.A.	<p>Evidence of difficulties with listening / attention, concentration, understanding and / or responding and possibly mild speech, language and communication difficulties.</p> <p>Evidence provided in conjunction with parents.</p>
S.A.P.	<p>Evidence of a hearing loss that can result in significant speech and language difficulties and access to areas of the curriculum, which are not well supported by visual / practical activities.</p>

S.A.P.R.A.	Evidence of severe speech and language difficulties, which restrict communication and access to all areas of the curriculum, which will persist throughout the child's school career. Information of the involvement of Health professionals. Indication of how allocated funds will be used.
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Curriculum and Teaching Methods	
S.A.	Ordinary curriculum with some targeted differentiation. An inclusive teaching approach. Access to individualised multi-sensory programmes according to need.
S.A.P.	Mainstream class with an inclusive teaching approach. Visual and kinaesthetic learning strategies. Language differentiation and delivery of the curriculum. Possibly modification of learning materials. Advice on curriculum modification and access. Specific language and communication skills programmes. Some additional support to access the curriculum
S.A.P.R.A.	Curriculum modifications and individualised programmes sustained over a long time. Differentiation of the curriculum Considerable additional support to access the curriculum A total communication environment or natural oral approach.

Grouping and Support	
S.A	Class based with occasional support. All staff should speak clearly using simple phrases. Ensure the child has understood. Consider the seating arrangements. Adopt visual and kinaesthetic learning strategies.

S.A.P.	<p>Main class and / or small group provision with targeted and sustained additional support.</p> <p>Advice on curriculum modification and access.</p> <p>Specific language and communication skills programmes.</p> <p>Differentiation of the curriculum and specialist support across the curriculum.</p> <p>Some additional support for core subjects with a total communication environment or natural oral approach.</p>
S.A.P.R.A.	<p>Small group and / or class provision for most of the time.</p> <p>Structured classroom management.</p> <p>Differentiation of the curriculum and specialist support in all core subject areas.</p> <p>Considerable additional support for core subjects with a total communication environment or natural oral approach.</p>

Specialised Resources	
S.A.	<p>Audit of learning environment.</p> <p>Amplification equipment (e.g. hearing aids) and daily monitoring.</p> <p>Some individual access to ICT equipment normally available in class and shared with other pupils.</p> <p>Use of allocated ALN funding to provide school based individual / small group support.</p>
S.A.P.	<p>Audit of learning environment.</p> <p>Amplification equipment (e.g. hearing aids and possibly radio microphone systems assessed on individual need).</p> <p>Daily monitoring.</p> <p>Technical support.</p> <p>Individual access to ICT equipment available in class as and when required.</p> <p>Subtitling and visual aids.</p> <p>Use of allocated ALN funding to provide school based individual / small group support.</p>
S.A.P.R.A.	<p>Audit of learning environment.</p> <p>Amplification equipment (e.g. hearing aids and possibly radio microphone systems )</p> <p>Daily monitoring.</p> <p>Technical support. Subtitling and visual aids.</p> <p>ICT resources and other specific resources based on an individual need.</p> <p>Signed interpretation.</p>

Advice and Assessment	
S.A.	<p>Class teacher and ALNCo assess needs consulting occasionally with external agencies.</p> <p>Regular monitoring of effectiveness of provision.</p> <p>Regular monitoring and review of IEP targets with child, parents and specialised staff.</p>
S.A.P.	<p>IEP based on programmes devised by Sensory Service.</p> <p>Ongoing by the TA (following advice given by the Sensory Service).</p> <p>Access to INSET courses and support.</p>
S.A.P.R.A.	<p>Sensory Service provide specialised assessments and advice that lead to a modified IEP</p> <p>Regular monitoring of effectiveness of provision.</p> <p>Regular monitoring and review of targets within IEP in consultation with child, parents and Sensory Service.</p> <p>Review with all agencies providing additional support.</p> <p>Access to INSET courses and support.</p>

L.A / Other Support Services and Monitoring			
S.A.	Class teacher and ALNCO assess needs, consulting occasionally with external agencies.		
	<table border="1"> <tr> <td> <p>School:</p> <p>Attendance.</p> <p>Regular monitoring of effectiveness of provision.</p> <p>Regular monitoring and review of targets within IEP in consultation with child and parents and Sensory Service.</p> <p>Review of ALN stage according to criteria.</p> <p>Annual ALN Audit.</p> </td> <td> <p>Local Authority:</p> <p>Training for ALNCo / Class teacher</p> <p>Discussion in ALN Planning meetings.</p> <p>Access to training.</p> <p>Review of ALN stage according to criteria.</p> <p>Annual ALN Audit.</p> </td> </tr> </table>	<p>School:</p> <p>Attendance.</p> <p>Regular monitoring of effectiveness of provision.</p> <p>Regular monitoring and review of targets within IEP in consultation with child and parents and Sensory Service.</p> <p>Review of ALN stage according to criteria.</p> <p>Annual ALN Audit.</p>	<p>Local Authority:</p> <p>Training for ALNCo / Class teacher</p> <p>Discussion in ALN Planning meetings.</p> <p>Access to training.</p> <p>Review of ALN stage according to criteria.</p> <p>Annual ALN Audit.</p>
<p>School:</p> <p>Attendance.</p> <p>Regular monitoring of effectiveness of provision.</p> <p>Regular monitoring and review of targets within IEP in consultation with child and parents and Sensory Service.</p> <p>Review of ALN stage according to criteria.</p> <p>Annual ALN Audit.</p>	<p>Local Authority:</p> <p>Training for ALNCo / Class teacher</p> <p>Discussion in ALN Planning meetings.</p> <p>Access to training.</p> <p>Review of ALN stage according to criteria.</p> <p>Annual ALN Audit.</p>		
S.A.P.	Class teacher and ALNCO take account of advice and / or assessment from external agencies when reviewing IEP (AA2)		

	<p>School:</p> <p>Attendance. Regular monitoring of IEP targets in consultation with child, parents and other agencies. Review with all agencies providing additional support. Review of ALN stage according to criteria. Annual ALN Audit.</p>	<p>Local Authority:</p> <p>Support and advice when requested from Sensory Team and /or other agencies. Access to ALN training Review of ALN stage according to criteria. Annual ALN Audit.</p>
S.A.P.R.A.	<p>External agencies provide specialised assessment and advice that leads to modified IEP and / or contribute to the direct support for the pupil.</p>	
	<p>School:</p> <p>Regular monitoring of effectiveness of provision. Regular monitoring and review of targets with IEP in consultation with child and parents and Sensory Service. Evidence regarding the utilisation of funding for the child during the previous year. Advice from any other relevant agencies as appropriate. Annual ALN Audit.</p>	<p>Local Authority:</p> <p>Access to additional training for Manual Communication. Sensory Service, EPS involvement to advise on needs and inform IEP. Health, Social Care and Career based Support Services contribute to IEP when appropriate. Attendance at transition reviews if requested. Review of ALN stage according to criteria and individual needs. Annual ALN Audit. Annual review of SLA. Careers Representative attend Year 9 review.</p>

Entry Criteria Visual Impairment	
S.A.	<p>The child's main difficulty is in the area of vision. The child's difficulties cause some barriers to learning. Visual acuity 6/18-6/24 for distance and near vision good to slightly reduced. <i>When the school suspects / observes that a child's vision is affecting their learning development they should consult with parents in order suggest a vision test, and / or seek permission to refer to school nurse and /or the visiting Teacher of the VI.</i></p>
S.A.P.	<p>The child's main difficulty is in the area of vision. The child's difficulties cause substantial barriers to learning. Significant to severe visual impairment. Visual acuity 6/36-6/60 and/or severe field loss. There would also be reduced near vision (N18-N24) with possibly nystagmus and / or adverse reaction to glare.</p>
S.A.P.R.A.	<p>Permanent severe visual impairment, which will persist throughout the pupil's school career. Visual acuity 6/60 or less. Pupil has no useful vision for educational purposes.</p>

### Evidence provided by the school or the early years setting.

S.A.	<p>Evidence provided by school or parent. Classroom audit of strategies and / or intervention. Evidence that visual impairment cannot be corrected by spectacles.</p>
S.A.P.	<p>Evidence provided of long term visual impairment. Vision cannot be corrected by spectacles. Has a significant impact on learning and access to the curriculum.</p>
S.A.P.R.A.	<p>Evidence of a permanent visual impairment which cannot be corrected by spectacles and which is likely to persist throughout the pupil's school career. Indications of how the difficulty has a significant impact on learning and access to the curriculum. Multi-agency involvement from an early age. Unable to travel independently.</p>

Curriculum and Teaching Methods	
S.A.	Ordinary curriculum with some targeted differentiation. An inclusive teaching approach. Access to individualised multi-sensory programmes according to need.
S.A.P.	Mainstream class with an inclusive teaching approach. Appropriately differentiated curriculum sustained over time. Kinaesthetic learning strategies. Careful planning of class seating. Specific programmes as advised. Possible enlarging of print and some modification.
S.A.P.R.A.	Curriculum modifications and individualised programmes sustained over a long time. Mainstream placement or Support Centre or a combination of settings. Tactile: Braille, diagrams, tape.
Grouping and Support	
S.A	Class based with occasional support. Consider the seating arrangements. Adopt multi-sensory learning strategies.
S.A.P.	Main class and / or small group provision with targeted and sustained additional support. Advice on curriculum modification and access. Individual support for core subjects. Differentiation of the curriculum and specialist support in all core subject areas.
S.A.P.R.A.	Small group and / or class provision for most of the time. Structured classroom management. Differentiation of the curriculum and specialist support in all core subject areas. Considerable individual support for core subjects with a tactile approach.
Specialised Resources	
S.A.	Some individual access to ICT equipment normally available in class and shared with other pupils. Use of allocated ALN funding to provide school based individual / small group support.

S.A.P.	Individual access to equipment, including ICT that is normally available in class as and when required. ICT and other specific resources and adaptations assessed on an individual level. Low vision aids, sloping desks, lamps etc., as required in order to access the curriculum
S.A.P.R.A.	Individual access to more specialised equipment, including ICT sustained over time. Low vision aids, sloping desks, lamps etc., as required in order to access the curriculum. Typing, Braille technology (embosser, IT, Fuser, thermoform)

### Advice and Assessment

S.A.	<p>Class teacher and ALNCo assess needs consulting occasionally with external agencies</p> <p>Regular monitoring of effectiveness of provision</p> <p>Regular monitoring and review of IEP targets with child parents and Sensory Service.</p>
S.A.P.	Class teacher and ALNCo take advice from Sensory Service and external Agencies when reviewing IEPs
S.A.P.R.A.	<p>Sensory Service provide specialised assessments and advice that lead to a modified IEP</p> <p>Regular monitoring of effectiveness of provision</p> <p>Regular monitoring and review of targets within IEP in consultation with child</p> <p>Parents and Sensory Service</p> <p>Review with all agencies providing additional support.</p> <p>Access to INSET courses and support.</p>



L.A / Other Support Services and Monitoring		
S.A.	Class teacher and ALNCO assess needs, consulting occasionally with external agencies.	
	School:  Attendance. Regular monitoring of effectiveness of provision. Regular monitoring and review of targets within IEP in consultation with child and parents and Sensory Service. Review of ALN stage according to criteria. Annual ALN Audit.	Local Authority:  Training for ALNCo / Class teacher Discussion in ALN planning meetings. Access to training. Review of ALN stage according to criteria. Annual ALN Audit.
S.A.P.	Class teacher and ALNCO take account of advice and / or assessment from external agencies when reviewing IEP (AA2)	
	School:  Attendance. Regular monitoring of IEP targets in consultation with child, parents and other agencies. Review with all agencies providing additional support. Review of ALN stage according to criteria. Annual ALN Audit.	Local Authority:  Support and advice when requested from Sensory Team and /or other agencies. Access to training Review of ALN stage according to criteria. Annual ALN Audit.
S.A.P.R.A.	External agencies provide specialised assessment and advice that leads to modified IEP and / or contribute to the direct support for the pupil.	
	School:  Regular monitoring of effectiveness of provision. Regular monitoring and review of targets with IEP in consultation with child and parents and Sensory Service. Evidence regarding the utilisation of funding for the child during the previous year. Advice from any other relevant agencies as appropriate.	Local Authority:  Sensory Service, EPS involvement to advise on needs and inform IEP. Health, Social Care and Career based Support Services contribute to IEP when appropriate. Attendance at transition reviews if requested. Review of ALN stage according to criteria and

	Annual ALN Audit.	individual needs. Annual ALN Audit. Annual review of SLA. Careers Wales representative attend Year 9 review.
Entry Criteria Physical and / or Medical		
S.A.	<p>The child has low level medical or physical needs. The child requires support over and above normal classroom differentiation. The pupil is independent in most activities.</p>	
S.A.P.	<p>The child's main presenting difficulty is in the area of medical or physical needs. The difficulties cause substantial barriers to learning and require increased differentiation. Low to moderate level difficulties e.g. toileting or accessing some aspects of Curriculum due to difficulties with mobility. Pupil is independent in most activities.</p>	
S.A.P.R.A.	<p>The child's main presenting difficulty is in the area of medical or physical needs. The child has significant physical difficulties with associated health and personal care issues, which will persist throughout their school career. In addition to long term physical and other associated areas of difficulty the child has other distinct areas of need. e.g. associated language / communication and learning difficulties affecting their access to the curriculum.</p>	

Evidence provided by the school or the early years setting.	
S.A.	Evidence that despite differentiation, medical and/or physical needs continue to hinder/delay progress. Evidence provided by the school of consultation with parents. Classroom assessment with details of support/intervention.
S.A.P.	Continues to make little or no progress in specific areas despite SA support. Has a significant impact on learning and access to the curriculum. Latest IEP outcomes. Medical reports.
S.A.P.R.A.	Needs are likely to persist for child's school career. SA/SAP documentation in place. Indications as to how the difficulty affects access to the curriculum. EPS involvement. Information of involvement of health professionals. Medical and/or Therapist reports. Multi-agency involvement from an early age.
Curriculum and Teaching Methods	
S.A.	Mainstream curriculum with some targeted differentiation. An inclusive teaching approach. Access to individualised multi-sensory programmes according to need.
S.A.P.	Mainstream curriculum with significant and targeted differentiation sustained over time. Appropriately differentiated curriculum. Careful planning of class grouping/seating. An inclusive teaching approach. Incorporation of specific programmes as advised. Pace of teaching/demands on child, to take account of child's possible natural fatigue. Adaptations to curriculum areas e.g. implementing advice from therapists. Modifications by outcomes especially for recording work and practical activities specified in IEP. Social and Communication needs/targets addressed in context of curriculum.
S.A.P.R.A.	Some curriculum modifications and individualised programmes sustained over time. An individually planned curriculum to accommodate the physical/medical language/learning needs of the child. Additional programme for mobility/life skills/social skills/leading to appropriate degrees of independence.

Grouping and Support	
S.A	<p>Class based with occasional support.            Inclusive teaching approach.            Consider the seating arrangements.            Adopt visual and kinaesthetic learning strategies.</p>
S.A.P.	<p>Mainstream class provision for most of the time with targeted and sustained support in class and / or in a small group.            Classroom Audit of grouping and seating.            Structured classroom management.            Inclusive teaching approach.</p>
S.A.P.R.A.	<p>Small group and / or class provision for most of the time.            Structured classroom management.            Differentiation of the curriculum and specialist support across the curriculum.            Considerable additional kinaesthetic support across the curriculum.</p>
Specialised Resources	
S.A.	<p>Provision is school based.            Audit of learning environment.            Some individual access equipment normally available in class and shared with other pupils.            Use of allocated ALN funding to provide school based individual/small group support.</p>
S.A.P.	<p>Audit of learning environment.            Individual access to normally available equipment as and when required.            ICT and other specific resources and adaptations assessed on an individual need.            Use of allocated ALN funding to provide school based individual/small group support.            Modification of building access, toileting facilities, mobility aids in conjunction with L.A. and external agencies in order to promote independence.</p>

S.A.P.R.A.	<p>Individualised access to more specialist equipment sustained over time.</p> <p>Audit of learning environment.</p> <p>ICT and other specific resources and adaptations assessed on an individual need.</p> <p>Additional modifications for the physical environment and support for mobility around the school.</p> <p>Specialised resources on an individual needs basis as recommended by Support Services (ranging from low tech—high tech).</p>
Advice and Assessment	
S.A.	<p>Class teacher and ALNCo assess the child's needs, consulting occasionally with external agencies.</p> <p>Regular monitoring of effectiveness of provision.</p> <p>Regular monitoring and review of IEP targets in consultation with child, (where appropriate) parents, and other involved agencies.</p>
S.A.P.	<p>Class teacher and ALNCo take advice from external agencies when reviewing IEP.</p> <p>Support and advice as requested from L.A.</p> <p>Access to INSET courses and support.</p> <p>Regular consultation with parents based on programmes devised by therapist or support services.</p> <p>Possible involvement of the Children and Disabilities Team and/or Health agencies.</p>
S.A.P.R.A.	<p>External agencies provide specialised assessments and advice that lead to modified IEP.</p> <p>Adult support and / or/ guidance needed for all curriculum areas and close supervision in social settings.</p> <p>High level of mobility instruction and help in gaining personal independence.</p> <p>Involvement of EPS. Disabled Children's Team and / or Health agencies.</p> <p>Evidence regarding the utilization of funding for the child.</p>

L.A / Other Support Services and Monitoring			
S.A.	Class teacher and ALNCO assess needs, consulting occasionally with external agencies.		
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; vertical-align: top;"> <p>School:</p> <p>Attendance. Regular monitoring of effectiveness of provision.</p> <p>Regular monitoring and review of targets within IEP in consultation with child and parents and appropriate external agencies. Review of ALN stage according to criteria. Annual ALN Audit.</p> </td> <td style="width: 50%; vertical-align: top;"> <p>Local Authority:</p> <p>Training for ALNCo / Class teacher Discussion in ALN planning meetings.</p> <p>Access to training. Review of ALN stage according to criteria. Annual ALN Audit.</p> </td> </tr> </table>	<p>School:</p> <p>Attendance. Regular monitoring of effectiveness of provision.</p> <p>Regular monitoring and review of targets within IEP in consultation with child and parents and appropriate external agencies. Review of ALN stage according to criteria. Annual ALN Audit.</p>	<p>Local Authority:</p> <p>Training for ALNCo / Class teacher Discussion in ALN planning meetings.</p> <p>Access to training. Review of ALN stage according to criteria. Annual ALN Audit.</p>
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S.A.P.	Class teacher and ALNCO take account of advice and / or assessment from external agencies when reviewing IEP		
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; vertical-align: top;"> <p>School:</p> <p>Attendance. Regular monitoring of IEP targets in consultation with child, parents and other agencies Review with all agencies providing additional support. Review of ALN stage according to criteria. Annual ALN Audit.</p> </td> <td style="width: 50%; vertical-align: top;"> <p>Local Authority:</p> <p>Support and advice when requested from Sensory Team and /or other agencies. Access to training Review of ALN stage according to criteria. Annual ALN Audit.</p> </td> </tr> </table>	<p>School:</p> <p>Attendance. Regular monitoring of IEP targets in consultation with child, parents and other agencies Review with all agencies providing additional support. Review of ALN stage according to criteria. Annual ALN Audit.</p>	<p>Local Authority:</p> <p>Support and advice when requested from Sensory Team and /or other agencies. Access to training Review of ALN stage according to criteria. Annual ALN Audit.</p>
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S.A.P.R.A.	External agencies provide specialised assessment and advice that leads to modified IEP and / or contribute to the direct support for the pupil.		

	<p><b>School:</b></p> <p>Regular monitoring of effectiveness of provision.          Regular monitoring and review of targets with IEP in consultation with child and parents and all other agencies.          Evidence regarding the utilisation of funding for the child during the previous year.          Advice from any other relevant agencies as appropriate.          Annual ALN Audit.</p>	<p><b>Local Authority:</b></p> <p>Access to additional and appropriate training.          ALN Service, EPS involvement to advise on needs and inform IEP.          Health, Social Care and Career based Support.          Services contribute to IEP when appropriate.          Attendance at transition reviews if requested.          Review of ALN stage according to criteria and individual needs.          Annual ALN Audit.          Annual review of SLA.          Careers Wales Representative attend Year 9 review.</p>
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**Appendix 2 - Impact of ALN Policy and Strategy**

Aims and Objectives	How this will be achieved	Impact	How this will be measured	What will be put in place to effect this change
<p>Identify and meet pupils' needs as early as possible;</p>	<p>The Authority will:</p> <ul style="list-style-type: none"> <li>● provide schools and settings with an Education Psychology Service (EPS), an Advisory Teacher (SpLD) and Inclusion services, consisting of consultation, advice and training to enable teachers to accurately assess and address whole school needs, as well as those of individuals and groups of pupils;</li> <li>● ensure that ALN registers in schools and settings provide a comprehensive record of all pupils with ALN and the provision made for those pupils; and</li> <li>● use pupil-level data, including attendance records and standardised testing at the end of each Key Stage, to inform the identification of needs, to target intervention appropriately and to evaluate the effectiveness of provision.</li> </ul>	<p>Schools will:</p> <ul style="list-style-type: none"> <li>● make full use of all available classroom and school resources; differentiate learning opportunities to meet individual learning needs;</li> <li>● monitor review and evaluate all pupils' progress;</li> </ul>	<p>SEN Matrix Scoring Grid                      SEN Planning Documents.                      Analysis of pupil data and attainment.</p>	<p>SEN Matrix Scoring Grid                      SEN Planning Documents.                      Targeting resources to the School Action Plus Resource Assist package, which will ensure that resources are directed to the child without the need to resort to a statutory process.</p>



Appendix 1

<p><b>Provide appropriate teaching and learning environments, which meet the needs of pupils.</b></p>	<p>21<sup>st</sup> Century Schools Development Programme: The authority view this schools programme as the appropriate vehicle to deliver modern, state of the art, fit for purpose teaching and learning facilities which meet the needs of all learners and support services within mainstream primary and secondary schools.</p>	<p>The Authority is committed to providing effective teaching and support for all pupils within modern learning environments, both to ensure that pupils with ALN achieve the highest possible standards and also to enable schools to meet the needs of pupils with ‘low level’ learning and behavioural difficulties at an early stage. The Authority and commissioned school improvement services (EAS) focus closely on early identification of difficulties at school level, and in so doing help to reduce the number of pupils whose education provision is outside the Authority.</p>	<p>Audit of learning environment.  SEN Planning document.  EAS School Visit Reports.  Half Termly Meetings with the EAS.  SENCO and Teacher In Charge of SNRB meetings.</p>	<p>Schools’ Audit of the learning environment.  An effective and budgeted 21<sup>st</sup> Century Schools Development Programme is in place.</p>
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Appendix 1

<p>Educate pupils with SEN within the authority's mainstream schools wherever possible;</p>	<p>In order to achieve this goal, the Authority ensures that:</p> <ul style="list-style-type: none"> <li>● the EAS meet regularly with Authority officers to share expertise, support and information, through ALN planning meetings and link visits to all schools;</li> <li>● support for individual schools ensures consistency and effectiveness of approach throughout the Authority;</li> <li>● all Co-ordinators of ALN have induction training and the opportunity to work together at the Authority's ALN Co-ordinators termly networking and monitoring sessions. These meetings are led by Officers, the Advisory Teacher and EPs together with visiting professionals;</li> <li>● pupils needs are effectively identified through individual school ALN planning meetings as well as through centrally collated data;</li> <li>● teachers and teaching assistants have opportunities to attend appropriate training in ALN, delivered as part of the Authority's ongoing programme of capacity</li> </ul>	<p>The Authority's schools will build their capacity to meet the needs of pupils and therefore a greater number of them will remain within their local community and will access their local provision.</p> <p>More efficient and effective use of the Authority's resources.</p>	<p>Number of pupils placed outside of the Authority to be educated.</p>	<ul style="list-style-type: none"> <li>● a set of common criteria for identification and assessment of needs;</li> <li>● implementation of the resourcing strategy;</li> <li>● make a variety of appropriate resources available;</li> <li>● provide effective training opportunities for all staff and Governors;</li> <li>● establishment and support effective transition between Key Stages; and</li> <li>● sharing of good practice.</li> </ul>
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Appendix 1

	<p>building in schools;</p> <ul style="list-style-type: none"> <li>● staff in the Foundation Phase are supported in developing skills in early identification of children’s needs; and</li> <li>● appropriate, ICT enriched teaching and learning environments are provided to effectively meet the needs of learners.</li> </ul>			
<p>Provide effective teaching and support for all pupils with ALN in accordance with the statutory requirements of the Equality Act 2010 and the SEN Code of Practice for Wales, 2002, whilst also taking into account the recommendations of the legislative proposals for ALN in the White paper 2014;</p>	<ul style="list-style-type: none"> <li>● Whole Authority training for maintained and non-maintained schools/settings on Personal Centred Planning and Individual Development Plans.</li> <li>● Specific Learning Difficulties (SpLD) Service-Advisory Teachers.</li> <li>● Educational Psychology Service (EPS).</li> <li>● Early Bird Plus Support.</li> <li>● Early Years/Pre-school Link Advisory Teacher.</li> <li>● ALN Administrative Team.</li> <li>● Inclusion Services- Education Welfare Officers (EWOs), Pupil Referral Unit (PRU), Looked After Children (LAC) and Education Other than at School</li> </ul>	<p>The wide and flexible range of teaching and support for all pupils with ALN will build the capacity of schools to meet the needs of children with learning and/or behaviour difficulties.</p>	<p>Quarterly updated Service Improvement Plans .</p> <p>EP Service performance and delivery annual report.</p> <p>Outreach User evaluation.</p> <p>Annual analysis of pupil views of the ALN Service.</p>	<p>The set of common criteria will ensure equality and consistency of identification and support for additional learning needs across the Authority.</p>

Appendix 1

	<p>(EOTAS).</p> <ul style="list-style-type: none"><li>• Outreach Services for Autistic Spectrum Disorder (ASD) and Severe Learning Difficulties (SLD).</li><li>• Hearing Impairment Team.</li><li>• Visual Impairment Team (including mobility support).</li><li>• Multi-sensory impairment Team.</li><li>• Speech and Language (Communication Intervention Team (COMiT) Service.</li><li>• Gwent Ethnic Minority Support Service (GEMSS).</li></ul>			
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Appendix 1

<p>Work in partnership with pupils, parents, early years settings, schools and external agencies;</p>	<p>Pupils with ALN are given the opportunity to be actively involved, at an appropriate level, in discussions about their IEP/IDP including target setting and a review of their progress in achieving those targets.</p> <p>The Authority provides through SNAP Cymru a parent partnership service.</p> <p>Service level agreements with: Hearing Impairment Service Visual Impairment Service Multi-Sensory Impairment Service. COMiT GEMSS</p> <p>Annual consultation with key clients (children and young people, parents/carers and schools) regarding learning needs.</p>	<p>Annual Consultation with parents, carers, children and schools.</p> <p>Monthly drop in ALN Surgery.</p> <p>SNAP included on statutory panels.</p> <p>Working Party on Parent Partnership.</p>	<p>Number of Appeals to the SEN Tribunal Wales.</p> <p>Number of Appeals regarding Disability Discrimination.</p>	<p>Annual Consultation with key clients.</p> <p>Monthly ALN Drop in Sessions for parents and carers.</p> <p>Reviews of IDP/SAPRA agreements.</p>
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Appendix 1

<p>Work in partnership with other providers to arrange high quality, specialised education and services for the very few pupils whose needs cannot be met in a mainstream school;</p>	<p>Out-of-county provision is normally in a day special school maintained by another authority, or in the independent sector. In exceptional circumstances residential provision may be sought in conjunction with Social Services and Health. Decisions to place pupils in independent out of county special schools are taken by a multi-agency Complex Needs Panel, with membership from the Authority's CYP, Social Services and the Aneurin Bevan Health Board. All out-of-county placements are subject to regular review. Schools are visited prior to placement to establish their suitability. Once pupils are placed, the Authority's central ALN team monitors and evaluates progress by: attending annual review meetings; listening to the voice of the pupil; and by analysing progress data.</p>	<p>Personal Centred Planning, which ensures the child, is placed at the centre of provision.</p> <p>At primary level, pupils with PMLD will usually access education through one of the Authority's resource bases. At secondary level, there are ranges of approaches, which consider both in county and more specialist provision in neighbouring Authorities.</p>	<p>Annual Review of Statement</p> <p>Analysis of pupil achievement data.</p>	<p>By ensuring that the majority of pupils needs are met at SAP Resource Assist, the number of out of county placements will reduce.</p>
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Appendix 1

<p>Monitor and evaluate data on outcomes for pupils with ALN in order to inform the development of policies and provision;</p>	<p>Use pupil-level data collated by the EAS, including target setting, standardised testing and attendance data at the end of each Key Stage, to inform the identification of needs, to target intervention appropriately and to evaluate the effectiveness of provision.</p>	<p>Target setting data:</p> <ol style="list-style-type: none"> <li>1. End of Key Stage Data</li> <li>2. Literacy/Numeracy outcomes</li> <li>3. PLASC data</li> <li>4. Vulnerable groups data</li> <li>5. Interventions outcomes.</li> </ol>	<p>SEN Planning and pupil tracking documentation</p>	<p>Data for Individual targets for all pupils made available by the EAS.</p>
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# The Strategic Review of Additional Learning Needs (August 2014)





# **The Strategic Review of Additional Learning Needs Monmouthshire County Council, Children and Young People's Directorate August 2014**

## **Background and Context**

In November 2012 Estyn, Her Majesty's Inspectorate for Education and Training in Wales, reported that the quality of local authority education for children and young people with additional learning needs in Monmouthshire County Council was Unsatisfactory; the number of Statements of educational needs was too high and resources were directed towards the statutory assessment process, strategic planning was weak, data was not collected regarding pupil progress and there was a lack of specialist facilities for pupils with Autistic Spectrum Disorder, behavioural difficulties and severe learning difficulties, resulting in pupils travelling long distances to attend out of county placement.

Actions taken to address the following shortcomings identified by Estyn:

- The number of Statements of educational needs was too high and resources were directed towards the statutory assessment process,  
ACTION: To introduce SAPRA 6.3.3 to focus resources on children and schools rather than the statutory process and in doing so pupils will access appropriate support in a timely manner without resort to statutory processes. The impact of this will be monitored quarterly and consulted upon annually.
- That strategic planning was weak,  
ACTION: that Monmouthshire engaged in a review of the strategy, policy and procedures for pupils with additional learning needs.
- Data was not collected regarding pupil progress.  
ACTION: The Authority will monitor and evaluate the effectiveness and value for money of school provision by reviewing data annually on pupils' attainments at the planning meeting.
- There was a lack of specialist facilities for pupils with ASD, behavioural difficulties and severe learning difficulties resulting in pupils travelling long distances to attend out of county placement:  
ACTION: With 21<sup>st</sup> Century Schools to facilitate 2 special needs resources bases for pupils within key stages 3 and 4 within Caldicot and Monmouth

Comprehensive Schools. To include 3 special needs resource bases within Key Stage 2. To review the designation of Mounton House Special School to consider pupils with a range of learning difficulties and the inclusion of girls.

In order to address the issues identified, Monmouthshire County Council, Children and Young People's Directorate, engaged in a review of the strategy and policy for pupils with Additional Learning Needs (ALN). ALN is an umbrella term used to describe individuals or groups of learners with a diverse and often complex range of needs. The term encompasses all children and young people with learning needs which are greater than those of the majority of their peers. It includes learners who may require additional support either due to their circumstances or because they have a longer-term disorder or condition. The term ALN is much wider in scope than the term "special educational needs" in order to recognise the diverse and complex needs of learners and to reflect a more holistic approach to meeting the needs of individuals. Learners may therefore require additional learning support if they have:

- special educational needs;
- a disability;
- medical needs;
- gaps in their knowledge or skills due to prolonged absences from the education system, e.g. school refusers;
- difficult family circumstances, e.g. bereavement; and
- accessed education inconsistently, e.g. Gypsy and traveller pupils.

The Additional Learning Needs Service seeks to identify and support pupils with special educational needs in having access to practical and flexible learning. The Service focuses on the achievement, attainment and wellbeing of those children and young people with additional learning needs to ensure they are safe, valued equally, treated with respect and afforded equal opportunities. The core aims are:

- Ensure children and young people are kept safe from harm, free from abuse and victimisation.
- Improve the inclusion and educational outcomes of children and young people with ALN and enhance their wellbeing.
- Ensure that the Authority fulfils its statutory obligations in respect of inclusion and ALN.
- Monitor, support and challenge schools in meeting the needs of learners with additional needs and ensure effective quality assurance mechanisms are in place that measure the outcomes for learners.
- Provide learners, their parents and schools with appropriate advice and support provided by a well-trained specialist workforce.

- Work in partnership with learners, parents, schools, the local health board, social services, the voluntary sector and other key stakeholders in the interest of all children and young people.
- Work in a way that will ensure the efficient and effective use of the Authority's resources.
- Intervene early to identify, assess and support children and young people with ALN.
- Build schools' capacity to meet the needs of all vulnerable learners.

ALN services and functions to support and meet the needs of children and young people with ALN can begin, in some cases at birth and continue until they reach the age of 19. This review recognised the need to plan for their needs across all phases of transition: from birth to early years; across stages of education; and onto further education, training and employment.

In addition to existing general education law, specific legislation covers groups of learners with ALN. The Authority has a statutory duty in relation to safeguarding, attendance, special education needs, looked after children, exclusions, employment of children, children who perform and education other than at school.

The Authority has also recognised the need to have regard to Welsh Government's preliminary consultation, The Programme for Government 2011 and the 2014 White Paper for Legislative Proposals ALN.

## Method

The review began by consulting with key clients regarding learning needs. These clients were identified as children and young people, parents and carers and schools. A sub-set was carried out independently by the parent partnership group SNAP Cymru. An on-line survey was available to those unable to attend events.

- Children and Young People

The views of children and young people's views were gathered during three tasks designed to explore their understanding of ALN: how they thought ALN was met in their schools; and how things could improve for children and young people. Pupils from a wide range of Monmouthshire schools took part in the consultation. In total, 29 different schools and establishments participated, with pupils ranging from Year 5 up to Year 10 (9 years to 15 years of age). The event took place over one day at Shire Hall, Monmouth.

- Parents and Carers

Parents and carers were given the opportunity of attending four consultation evenings during which they were taken through a process of thinking about ALN provision when they were at school and then thinking about how attitudes and provision for ALN had changed in the current era. They were asked what they knew about provision for ALN in their child's school and about provision in general and, specifically, what they would consider as ways forward and how these could be prioritised and their visions for the future.

- Schools

Head Teachers and school staff were consulted via a survey to all schools, cluster meetings and an ALN Co-ordinators meeting. The survey asked questions about early identification, gaps in provision, funding arrangements, extended services, levels of support, staff training, transition, resource bases and the Authority's special school. Schools responded individually or within the context of their cluster.

- SNAP Cymru

SNAP consulted with a group of parents who they were supporting using the same consultancy questions used in the online survey and evening events.

## Outcomes of Consultation

<b>Theme</b>	<b>Outcomes of Consultation</b>
<b>1. Behaviour of children and young people</b>	<ol style="list-style-type: none"> <li>1. Support for CYP with BESD, ASD and Attachment difficulties.</li> <li>2. Support for both girls and boys.</li> <li>3. Centre of Excellence and Outreach facility for CYP with BESD, ASD and Attachment difficulties across all Key stages.</li> <li>4. Co-ordinated approach from PRS and ALN.</li> <li>5. Nurture provision for Early Years children.</li> <li>6. More joined up working between the Health Service and Education with regards CAMHS</li> <li>7. A county wide behaviour policy.</li> <li>8. Training programmes for all schools on behaviour.</li> </ol>
<b>2. The processes around additional learning needs and Statements.</b>	<ol style="list-style-type: none"> <li>1. General lack of understanding of the Authority's ALN processes.</li> <li>2. Earlier identification pathways.</li> <li>3. Equitable levels of support identified.</li> <li>4. Speeding up all the processes so every child gets the help they need when, and as soon, as they need it.</li> <li>5. A shorter time frame for support being given.</li> <li>6. Statementing and diagnosis to be given at the same time.</li> <li>7. Improvements in communication between Health and Education.</li> <li>8. Health and Education records to be held jointly.</li> <li>9. All approaches to be multi-agency.</li> <li>10. Not enough educational psychologists to give time to parental concerns.</li> <li>11. More inclusion, not relying on adult support only but considering strategies,</li> </ol>

resources, grouping, differentiation and peer support.

**3. Meeting the needs of as many of our children and young people as possible within Monmouthshire.**

1. Better advice and support for parents entering the system (post code lottery with regard to Early Years provision to ensure equality of opportunity in all schools).
2. Parity of opportunity and funding for all children and young people in school placements.
3. Jointly commissioned services from Health, Social Services and Education.
4. Inclusive support for children and young people with ASD.
5. Clear visibility of the support available and the location of that support.
6. Parents given inadequate information about opportunities and availability of resources.
7. No specialist provision for ASD, Attachment, PMLD and SLD within county in Key stages 3, 4 and 5.
8. More training given to staff to enable them to meet the needs of children and young people within all schools.
9. More focused initial teacher training on SEN.
10. More training given to TAs to meet specialist needs

## Acknowledgement

*The research, experimental design, analysis and completion of the resulting Strategy, Policy and Procedures Review Documentation 2014 has been completed by the ALN Team; Educational Psychology Service, Special Educational Needs and Specific Learning Difficulties Service.*

*The Authority wishes to express their sincere thanks to parents, pupils, Head Teachers, ALN Co-ordinators and school staff, County Councillors, CYP Officers, School Governors and SNAP Cymru for their valuable contributions during the consultation process and towards the production of this document.*

## Version Control

<b>Title</b>	ALN Strategy and Policy
<b>Purpose</b>	To be determined
<b>Owner</b>	Sarah McGuinness
<b>Approved by</b>	N/A at present
<b>Date</b>	August 2014
<b>Version Number</b>	0.1
<b>Status</b>	Draft
<b>Review Frequency</b>	Subject to annual review
<b>Next review date</b>	2015
<b>Consultation</b>	Yes

## Contents

1. Introduction
2. Scope and Definitions
3. Vision Statement
4. Aims and Objectives
5. Roles and Responsibilities
6. Strategies for Identifying and Meeting Special Educational Needs as early as possible
7. Strategies for Providing Effective Teaching and Support for all pupils with ALN in accordance with the statutory requirements of the Equality Act 2010 and the SEN Code of Practice for Wales, 2002.
8. Strategies for Educating Pupils with SEN within the Authority's Mainstream Schools wherever possible.
9. Strategies for Working in Partnership
10. Settings for pupils whose need cannot be met in Monmouthshire Schools
11. The Authority's Monitoring and Evaluation Data on outcomes for pupils with ALN in order to inform the development of policies and provision.
12. Monitoring and Evaluation of the Impact of the ALN Strategy



# Educating Children and Young People with Additional Learning Needs in Monmouthshire



## Strategy, Policy and Procedures (Review 2014) For Additional Learning Needs

## 1. Introduction

This document outlines Monmouthshire County Council's strategy for educating children and young people with Additional Learning Needs (ALN).

It also provides guidance on the Authority's policies and procedures for identifying and supporting ALN, including the range of provision available, and funding to meet needs.

The ALN strategy is an integral part of the Authority's framework for meeting the needs of all children and young people between the ages of 0 and 19.

It plays a vital role in the Authority's work to ensure high standards for all and is closely allied with policies for school improvement and inclusion.

The Authority's educational priorities include promoting high standards for all learners, achieving high levels of attendance, preventing exclusion and providing high quality support for learners with individual needs.

This strategy reaffirms the Authority's commitment to maintain and improve on these priorities.

It is the Authority's policy to educate all pupils as far as possible within its mainstream schools in order to enable them to achieve their potential and to ensure their well-being.

This policy is at the heart of its School Improvement, Inclusion and ALN strategies and will inform the development of the 21<sup>st</sup> Century Schools programme.

The strategy, policies and procedures set out in this document take account of all current legislation and guidance, including the SEN Code of Practice for Wales (2002) and the Equality Act (2010). Also future legislation in regard to the statutory review of ALN.

In line with the direction of national policy and changes proposed in 'Forward in Partnership for Children and Young People with Additional Needs (Welsh Government, 2012)' and the Legislative proposals for additional learning needs 2014 (White Paper Reform of ALN) the Authority is committed to put in place effective strategies to make provision for pupils with ALN without a Statement of special educational needs wherever possible. This document will be reviewed regularly to incorporate legislative changes as they are confirmed and become statutory.

## 2. Scope and Definitions

The strategy, policies and procedures within this document apply to all children and young people with ALN, aged between 0 and 19 years, who are:

- below statutory school age and resident in the Authority;
- on roll in one of the Authority's settings or schools; or
- resident in the Authority and on roll in a school outside the Authority.

### Special Educational Needs/Additional Learning Needs

In the White Paper on Statutory Reform, the term SEN is replaced with ALN.

The statutory framework for SEN/ALN is outlined in the Education Act 1996 and the Equality Act 2010.

Children have **special educational needs (ALN)** if they have:

- a learning difficulty that calls for special educational provision to be made for them.

Children have a **learning difficulty** if they:

- have a significantly greater difficulty in learning than the majority of children of the same age;
- have a disability which prevents or hinders them from making use of educational facilities of a kind generally provided for pupils of the same age in schools within the area of the Education Authority; or
- are under compulsory school age and fall within the definitions above or would do so if special educational provision was not made for them.

**The SEN Code of Practice for Wales states that needs fall within the following broad areas:**

- Cognition and Learning
- Behaviour, Emotional and Social Development
- Communication and Interaction
- Sensory and /or Physical

**A disabled person:**

- has a physical or mental impairment;
- the impairment has a substantial and long-term adverse effect on the person's ability to carry out normal day-to-day activities.

**Special educational provision** means:

- for children of two or over, educational provision which is additional to, or otherwise different from, the educational provision made generally for children of their age in schools maintained by the local authority, other than special schools, in the area; or
- for children under two, educational provision of any kind.

### 3. Vision Statement

The Authority is committed to raising individual achievement and narrowing the gap for pupils with ALN so that they achieve the best outcomes, is independent, have high levels of self-esteem and well-being and have the best possible long term life chances. The Authority believes that improving outcomes for pupils with special educational needs is everyone's responsibility. Accordingly, it works in partnership with schools, parents and other agencies to ensure that all pupils in Monmouthshire, whatever their need, are valued, experience success in their learning, achieve their potential and personal goals and maximize their chances of a full and meaningful life.

This vision is achieved by providing:

- an inclusive education as close to home and the local community as possible;
- high quality support, advice and training for schools;
- a broad, balanced and relevant range of learning opportunities;
- early and accurate assessment of needs;
- modern teaching and learning environments which are inspirational;
- monitor and evaluate data on outcomes for pupils with ALN in order to inform the development of policies and provision;
- engaging, supportive as well as responsive to the needs of individual pupils;
- timely, accurate and relevant information for parents and carers;
- a range of mainstream, enhanced and specialist provision;
- resources and services that are appropriate, effective, equitable, transparent, consistent, efficient and accountable; and
- access to social and leisure activities within the community.

## 4. Aims and Objectives

The overall aim of this strategy is to maximise the educational achievements and wellbeing of all pupils with ALN by providing a relevant, inclusive and effective education that meets their needs.

To achieve this aim, the Authority will:

- identify and meet pupils' needs as early as possible;
- provide effective teaching and support for all pupils with ALN in accordance with the statutory requirements of the Equality Act 2010 and the SEN Code of Practice for Wales, 2002, whilst also taking into account the recommendations of the legislative proposals for ALN in the White paper 2014;
- educate pupils with SEN within the authority's mainstream schools wherever possible;
- work in partnership with pupils, parents, early years settings, schools and external agencies;
- work in partnership with other providers to arrange high quality, specialised education and services for the very few pupils whose needs cannot be met in a mainstream school;
- monitor and evaluate data on outcomes for pupils with ALN in order to inform the development of policies and provision;
- provide appropriate teaching and learning environments which meet the needs of pupils.

## 5. Roles and Responsibilities

The Authority has a range of roles and responsibilities, some of which fall into the category of statutory duties. For ALN, a statutory responsibility of the Authority is to provide parent partnership services; SNAP Cymru deliver this service for the Authority.

The Authority ensures that parents and schools receive clear information about services and providers through monthly parental drop in sessions and leaflets covering Statutory Assessment, Educational Psychology and Specific Learning Difficulties.

The Authority makes arrangements that include meetings with parents, their children and schools with a view to avoiding or resolving disagreements.

Through partnership working, the Authority will be responsible for coordinating the response to:

- provide pupils, parents and schools with access to specialist staff qualified in hearing and visual impairment, autism, speech and language and specific learning difficulties;
- collate and evaluate performance data in relation to all pupils with ALN;
- keep up-to-date with guidance in relation to provision and overseeing the distribution of resources in the most cost effective way;
- monitor and review the ALN strategy, provision and services;
- challenging all providers to improve their performance and ensure that all pupils with ALN are able to fulfil their potential;
- ensure efficiency and effectiveness of services.

All schools and settings will:

- maintain an inclusive ethos for all pupils with special educational needs;
- ensure that the responsibility for meeting the needs of pupils with SEN is shared by all staff;
- provide learning environments and ICT enriched facilities which are supportive and engaging to pupils, staff and partner agencies;
- take advantage of training opportunities provided in order to develop ALN expertise throughout the school;

- ensure systems are in place for the early identification, assessment, provision and monitoring of individual needs in line with the Graduated Response included within the SEN Code of Practice;
- provide an appropriately differentiated curriculum across all areas of learning in order to match the pupil's need;
- ensure that delegated resources for SEN are allocated fairly, efficiently and address identified needs;
- ensure the identified needs and objectives as recorded in a pupil's Statement or School Action Plus Resourced Agreement (SAPRA) are met;
- ensuring they have access to information about the pupil's needs and difficulties and, where appropriate, access to independent advice and support;
- work in partnership with pupils, their parents/carers ensuring they have access to information about the pupil's needs and difficulties and, where appropriate, access to independent advice and support; and
- identify an appropriate person from the governing body, to take responsibility, along with the Head Teacher, for ensuring the setting or school maintains provision for pupils with ALN according to the SEN Code of Practice.



## 6. Strategies for Identifying and Meeting Additional Learning Needs as early as possible.

The Authority provides a range of specialist services for children and young people with ALN, their families and their schools to ensure that all children and young people have access to effective learning opportunities and support as soon as possible through the early identification of ALN.

These services focus on enabling schools to identify and meet the special needs of individual pupils as early and as effectively as possible. In addition, the close connection between specialist services and the Authority's commissioned School Improvement Service (Education Achievement Service) is designed to ensure that priorities for whole-school improvement are fully aligned with those for inclusion and ALN.

Monmouthshire provides the following central services for children, families and schools; (Fuller information on support services is included in Appendix 1.)

- Specific Learning Difficulties (SpLD) Service-Advisory Teachers.
- Educational Psychology Service (EPS).
- Early Bird Plus Support.
- Early Years/Pre-school Link Advisory Teacher.
- ALN Administrative Team.
- Inclusion Services- Education Welfare Officers (EWOs), Pupil Referral Unit (PRU), Looked After Children (LAC) and Education Other than at School (EOTAS).
- Outreach Services for Autistic Spectrum Disorder (ASD) and Severe Learning Difficulties (SLD).

Monmouthshire provides the following services on a jointly commissioned basis with other previously 'pan-Gwent' Authorities:

- Hearing Impairment Team.
- Visual Impairment Team (including mobility support).
- Multi-sensory impairment Team.
- Speech and Language (Communication Intervention Team (COMiT) Service.
- Gwent Ethnic Minority Support Service (GEMSS).

### 6.1. Early Identification (Pre-school)

When it is thought likely that a pupil will or may have additional learning needs they will be brought to the attention of the Authority by Health (e.g. Speech Therapists and Paediatricians), Social Services or the Pre-school setting.

As a result of this referral, the Local Authority Early Years Advisory Teacher monitors and supports early identification of children who may have additional learning needs.

Upon receipt, and consideration, of evidenced information, the setting, where appropriate, will be offered additional support so that intervention strategies can be implemented by staff. This enables the setting to increase their capacity to address the additional needs of individual pupils and aids transition into mainstream schools.

**For the most part pupils transferring to mainstream school will have their additional needs met through the Graduated Response.**

**A minority of pupils, whose individual needs and difficulties are particularly complex, and who will require specialist support or equipment, will be discussed at the Authority's complex needs panel.**

## **6.2 Early Identification (Schools and Settings)**

The Authority's teams (ALN, SpLD, EPS and Inclusion) work in partnership with parents, teachers, co-ordinators of ALN and Head teachers to identify and meet the needs of children and young people in the Authority's schools and settings.

### **The Authority:**

- provides schools and settings with an Education Psychology Service (EPS), an Advisory Teacher (SpLD) and Inclusion services, consisting of consultation, advice and training to enable teachers to accurately assess and address whole school needs, as well as those of individuals and groups of pupils;
- ensures that ALN registers in schools and settings provide a comprehensive record of all pupils with ALN and the provision made for those pupils; and
- uses pupil-level data, including attendance records and standardised testing at the end of each Key Stage, to inform the identification of needs, to target intervention appropriately and to evaluate the effectiveness of provision.

### **Schools and settings will:**

- make full use of all available classroom and school resources; differentiate learning opportunities to meet individual learning needs;
- monitor review and evaluate all pupils' progress;

- identify at the earliest possible stage any pupils who may need educational provision '*different from, or otherwise in addition to*' that normally provided.

### 6.3 Graduated Response

The Authority adheres to the principles and practice embodied in the SEN Code of Practice for Wales. It relies on the consistent and effective implementation of its Graduated Response procedures for the success of this strategy.

The Authority monitors and evaluates the effectiveness and value for money of school provision, by reviewing data annually on pupils' attainments at the planning meeting.

The Authority's approach to the Graduated Response recognises that:

- children learn in different ways and have different kinds and levels of additional needs;
- pupils may need help through the Graduated Response for just a short time or for many years;
- *all* teachers are teachers of children with special needs;
- the range and style of support can be increased or reduced according to pupils individual needs; and
- where a pupil's progress continues to cause concern, additional support and expertise *must be made available* as part of a continuous cycle of planning, action and review.

**Where there is clear evidence of concern about a pupil's progress, the Authority will work with schools to support and implement the Graduated Response procedures according to the following four levels:**

- School (or Early Years) Action (S.A.)
- School (or Early Years) Action Plus (S.A.P)
- School (or Early Years) Action Plus Resourced Agreement (S.A.P.R.A.)
- Statement (S)

### 6.3.1. School Action

School Action is defined as provision that is '*additional to, or otherwise different from*' expected mainstream differentiated provision.

- It is made available at the earliest possible stage to any pupil who experiences greater difficulty in learning than the majority of his/her peers.
- Their needs, and the action required to meet those needs, must be discussed with the parents and be recorded in school, both as part of the SEN Register and, on the pupil's Individual Education Plan (IEP).
- The class teacher, in consultation with the Co-ordinator of ALN reviews the pupil's progress at regular intervals to determine whether the provision is effective or not, and to determine whether to continue or remove the additional support, or move up to the next Graduated Response level.

**The responsibility for identifying and meeting the needs of pupils, and for organising and delivering provision at *School Action*, rests with schools. Funding for this provision is included in schools' budgets. The role of the Authority is to advise and support schools in how best to provide effectively at *School Action*.**

***(Fuller details of the Authority's strategy for funding ALN are provided in Appendix 2.)***

The Authority monitors and evaluates the effectiveness and value for money of school provision, by reviewing data annually on pupils' attainments at the planning meeting.

### 6.3.2. School Action Plus

Where a pupil makes very little or no progress in response to appropriately differentiated and targeted provision at *School Action* over at least two terms, then the school should consider making additional provision at *School Action Plus*.

- The class teacher and Co-ordinator of ALN reassess the pupil's needs, according to the appropriate criteria (*full details of the ALN criteria are provided in Appendix 3*).
- The Co-ordinator of ALN must seek additional support and/or advice from the Authority, (e.g. the EPS, SpLD Service, Inclusion) and outside agencies (Health Services e.g. Speech and Language Therapy (SALT), Occupational Therapy before moving the pupil to School Action Plus.

- On receipt of additional advice and/or assessment information, the school is responsible for recording the pupil's needs at *School Action Plus*, for incorporating the new information within the pupil's IEP and for continued delivery of the IEP.
- The school will continue to monitor, evaluate and review the pupil's progress, to determine whether the programme is effective.

**As with *School Action*, funding for School Action Plus is delegated to schools. The Authority's central SEN team will monitor and evaluate the impact of funding for additional support on pupils' progress.**

### • 6.3.3. School Action Plus Resourced Agreement (SAPRA)

Where a pupil makes very little or no progress in response to appropriately differentiated and targeted provision at School Action Plus over at least two terms, then **the school** must request additional support from the authority by making a referral to the SAPRA Panel.

The panel will consider the evidence presented by the school, together with any assessment information from support services and/or outside agencies, and, if appropriate, will meet with the school and parents to consider a SAPRA.

Funding for the pupil's Graduated Response provision may be an additional award by the Authority or via the delegated school budget. It is the responsibility of the school to evidence impact and pupil progress with monitoring by the Authority.

The pupil's needs, the provision to meet those needs, the respective roles and responsibilities of the school and the Authority, as well as and the funding allocated by each party will be set out in a Joint Resource Agreement (SAPRA).

**For purposes of review, monitoring and evaluation, the Authority regards a SAPRA as equivalent to a Statement of SEN.**

### 6.3.4. Statutory Assessment

The Authority accepts the basic principle incorporated in the SEN Code of Practice that only a very small minority of pupils will have ALN of a severity or complexity that requires a statutory assessment and a Statement of SEN.

Normally, the Authority will carry out a Statutory Assessment:

- if there is evidence to show that the school has implemented the Graduated Response and that the pupil continues to underachieve despite receiving the highest level of support available without a Statement; or
- if there is convincing and well-documented evidence of the immediate need for a Statutory Assessment, for example where a pupil has experienced a sudden and traumatic change of circumstances; or
- where the Authority is aware that a pupil may need a special school placement.

### **6.3.5. Statement**

The Authority aims to meet the needs of as many pupils as possible without recourse to a Statement i.e. through provision of SAPRA.

However, for a small number of pupils, including all those for whom an out-of-county special school placement is needed, it is possible for the Authority to maintain a Statement in the usual way. Additional funding for these pupils is met from the Authority's delegated/centrally retained ALN budget.

## **6.4 School Planning Meetings**

ALN planning meetings are a vital element of the Authority's work with schools to ensure effective implementation of the Graduated Response, provision and resources, and the monitoring of pupils' progress.

All schools are expected to complete a planning document detailing their use of ALN budget, expected needs, intervention provision and details of specific pupils or cohorts of pupils whose progress may be a cause for concern. This document will be completed at a joint planning meeting at the beginning of the financial year between the Authority and the school. If the planning document is not completed, funding will be withheld until completion.

A copy of the document is held centrally and the information used to aid decisions on future planning for policies, provision, training, funding and expected outcomes. During these sessions school staff have the opportunity to share immediate concerns with relevant Authority staff and exchange expertise and good practice with colleagues. This document will be used throughout the year to inform resource decisions.

In undertaking individual school meetings and visits, Authority personnel take the opportunity to review, monitor and discuss the effectiveness of individual school's ALN provision, and provide advice and support which will enable schools to maintain high standards of provision and provide for future needs.

## **6.5 ALN Panels**

The Authority holds ALN panels for the following: Steering, SAPRA, Statutory Assessment, Funding and Mounton House Special School. ALN Officers also take part in a joint Complex Care Panel with Health and Social Services.

It is expected that schools can demonstrate they have followed the procedures above for meeting the needs of children and young people through the graduated response before they make any requests to the ALN panels for the majority of cases.

### **6.5.1 The Steering Panel**

The purpose of the panel is problem solving and comprises a Head Teacher, Educational Psychologist and ALN Officers who look at a range of individual pupil's difficulties. The panel meets fortnightly.

Pupils are referred by Authority staff for consideration of such issues as placement and provision. The panel agrees appropriate actions or involvements for a way forward.

### **6.5.2 The SAPRA Panel**

The SAPRA Panel meets once every half term and is made up of the Authority's ALN/Inclusion Officers, an Educational Psychologist, a representative from SNAP Cymru, a Head Teacher and a Finance Officer.

Following the request from the school, the panel will consider evidence received and whether the school has demonstrated that appropriate strategies have been implemented over a reasonable period of time (e.g. 2 terms School Action and 2 terms School Action Plus).

The Panel will also seek to identify any areas of success and ways that this can be built upon in the future to meet the child's needs more effectively. Using their ALN Planning document, schools should seek to clearly identify ways in which additional resources will be deployed in order to enhance the provision they have already made (and will continue to make).



For each case presented, the Panel will consider the involvement of the Authority and additional support services in assessing the pupil and reviewing the provision.

It is likely that the authority will already have evidence of much involvement by ALN support services (SpLD, Educational Psychologist, Outreach, Inclusion Team) or Commissioned Services (COMiT, HI, VI) or Health Services at this point.

*(The types of evidence required to assist the Panel in decision making are set out in the Appendices)*

Following a decision by the SAPRA Panel to proceed, a SAPRA meeting will be held in the school with the Parents, Head Teacher, LA Officer, Educational Psychologist (and any other professionals involved) to agree the interventions and what targets for success are to be set for the pupil's Individual Education Plan (IEP) / Individual Development Plan (IDP). Wherever appropriate, the pupil should also be present at this meeting and/or have the opportunity to contribute to the process.

Should additional resources be required, the SAPRA will be presented to the Funding Panel for consideration.

Additional funding is awarded by the Authority for those pupils with high level/complex difficulties via a SAPRA agreement or Statement of SEN. The panel will look at what level of support a pupil will need access to in order to meet their additional learning needs and take into account factors such as educational interventions, specialist programmes to be implemented, personal care needs and health and safety requirements.

### **6.5.3 Statutory Assessment Panel**

The panel meets fortnightly and comprises a Head Teacher, Educational Psychologist, ALN Officers and a representative of SNAP Cymru. The purpose of the panel is to decide whether a pupil's special educational needs should be determined by the education Authority by way of a statutory assessment.

When the statutory assessment process has been completed, the panel meets again to decide if the pupil should have a Statement or whether their needs can continue to be met at SAP and a Note in Lieu is issued.



#### **6.5.4 Mounton House Special School**

The panel meets monthly and comprises the School's Head Teacher and Social Worker, another Monmouthshire Head Teacher, an Educational Psychologist and ALN Officers.

The purpose of the panel is to consider applications made by Monmouthshire and other local authorities for a day or residential place. Mounton House caters for boys aged 11 – 16 who have behavioural, emotional and social difficulties (BESD) and where placement in a mainstream school is no longer appropriate.

## **7. Strategies for providing effective teaching and support for all pupils with ALN in accordance with the statutory requirements of the Equality Act 2010 and the SEN Code of Practice for Wales, 2002.**

### **7.1 Generic Strategies**

The Authority is committed to providing effective teaching and support for all pupils within modern learning environments, both to ensure that pupils with ALN achieve the highest possible standards and also to enable schools to meet the needs of pupils with 'low level' learning and behavioural difficulties at an early stage.

The Authority and commissioned school improvement services (EAS) focus closely on early identification of difficulties at school level, and in so doing help to reduce the number of pupils who underachieve in learning and/or develop behavioural difficulties.

These National consortia and local Authority strategies include:

- Literacy.
- Numeracy.
- Foundation Phase.
- Advice, support and training for teachers and teaching assistants in strategies that promote Inclusion.

### **7.2 Targeted Support and Intervention**

A range of targeted support and intervention is available through the Authority's Graduated Response system to assist individual pupils and groups of pupils who are experiencing learning and/or behaviour difficulties that meet the criteria within the Code of Practice for SEN.

The types of support available are described below, and are grouped according to the main types of ALN.

The Authority is committed to responding flexibly to the wide range of severity and complexity of pupils' needs, and to meeting those needs for as long as necessary.

It should be noted that individual pupils may well have needs that span two or more areas, in which case the appropriate support is tailored accordingly. The areas are:

- **Cognition and Learning.**
- **Behaviour, Emotional and Social Development.**
- **Communication and Interaction.**
- **Sensory and/or Physical Needs.**

*(These areas are described more fully in Appendix 3)*

Pupil progress is monitored through individual pupil targets in relation to the impact of the effectiveness of interventions and support.

## **8. Strategies for educating pupils with ALN within the Authority's mainstream schools wherever possible.**

The Authority offers pupils with ALN a range of provision in mainstream schools and, through partnerships, commissioned services and other agencies.

### **Pre-school settings:**

Children in Nurseries attached to an Authority maintained primary school can access ALN support via the main school Co-ordinator of ALN, this will be through the graduated response.

Children in non-authority maintained (private) pre-school settings can access ALN support via the Early Years Advisory Teacher who works closely with the EPs and other ALN officers to offer advice on appropriate interventions and training.

The Early Years Advisory Teacher and EPS provides information to the Authority to help determine forward planning of provision and resources to ensure a smooth transition to a mainstream primary setting or other provision.

### **8.2 Mainstream Class Provision**

Monmouthshire aims to educate almost all children and young people with ALN either within their local mainstream schools or within more specialised (resourced) classes which are located in specific authority primary and secondary schools.

In order to enable pupils with ALN to reach their potential within their local school and in a mainstream class wherever possible, the Authority will ensure that mainstream schools have the capacity to identify and meet pupils' needs.

In order to achieve this goal, the Authority ensures that:

- the EAS meet regularly with Authority officers to share expertise, support and information, through ALN planning meetings and link visits to all schools;
- support for individual schools ensures consistency and effectiveness of approach throughout the Authority;
- all Co-ordinators of ALN have induction training and the opportunity to work together at the Authority's ALN Co-ordinators termly networking and monitoring sessions. These meetings are led by Officers, the Advisory Teacher and EPs together with visiting professionals;
- pupils needs are effectively identified through individual school ALN planning meetings as well as through centrally collated data;

- teachers and teaching assistants have opportunities to attend appropriate training in ALN, delivered as part of the Authority's ongoing programme of capacity building in schools;
- staff in the Foundation Phase are supported in developing skills in early identification of children's needs; and
- appropriate, ICT enriched teaching and learning environments are provided to effectively meet the needs of learners.

### 8.3 Resourced classes in mainstream schools

Additionally resourced classes maintain a flexible programme of support to enable pupils with more severe and complex needs to access both specialist and local provision.

An outreach service is provided to local schools by specialist teachers.

The Authority provides resourced classes in mainstream schools as follows:

Overmonnow, Monmouth. (Primary)

Accommodates up to 20 pupils between the ages of 4 and 11.

This facility is resourced to meet the needs of pupils with a range of difficulties including: moderate/severe learning difficulties; profound and complex needs; autistic spectrum disorder and other pervasive developmental disorders. A pupil will usually be experiencing persistent difficulties in at least two of the following areas:

Communication  
Language  
Literacy  
Numeracy  
Personal Social Skills  
Physical Skills

Pembroke Primary School, Chepstow.

Accommodates up to 20 pupils between the ages of 4 and 11.

This facility is resourced to meet the needs of pupils with a range of difficulties including: moderate/severe learning difficulties; profound and complex needs; autistic spectrum disorder and other pervasive developmental disorders. A pupil will usually be experiencing persistent difficulties in at least two of the following areas:

Communication  
Language  
Literacy  
Numeracy  
Personal Social Skills  
Physical Skills

Deri View, Abergavenny. (Primary)

Accommodates up to 24 pupils between the ages of 4 and 11.

This facility is resourced to meet the needs of pupils with complex special educational needs, mainly those who are experiencing learning difficulties to a moderate degree, usually with additional BESD.

A pupil will usually be experiencing persistent difficulties in at least two of the following areas:

Communication  
Language  
Literacy  
Numeracy  
Personal Social Skills  
Physical Skills

Caldicot Comprehensive (Secondary)

Accommodates up to 75 pupils between the ages of 11 and 16.

This facility is resourced to meet the needs of pupils with moderate to severe learning difficulties. It also meets the needs of pupils with autistic spectrum disorder and children with physical difficulties.

A pupil will usually be experiencing persistent difficulties in at least two of the following areas:

Communication  
Language  
Literacy  
Numeracy  
Personal Social Skills  
Physical Skills

### Chepstow Comprehensive (Secondary)

Accommodates up to 12 pupils between the ages of 11 and 19.

This facility is resourced to meet the needs of pupils with severe learning and other complex difficulties. It also meets the needs of pupils with ASD. A pupil will usually be experiencing persistent difficulties in at least two of the following areas:

Communication  
Language  
Literacy  
Numeracy  
Personal Social Skills

## **8.4 Other provision (special school)**

### **Mounton House Special School**

The Authority maintains one residential special school, Mounton House, for boys aged 11 to 16 years with BESD based in Chepstow. A Statement of SEN is currently required for a pupil to access this provision.

### **21<sup>st</sup> Century Schools Development Programme**

The authority view this schools programme as the appropriate vehicle to deliver modern, state of the art, fit for purpose teaching and learning facilities which meet the needs of all learners and support services within mainstream primary and secondary schools.

## 9. Strategies for Working in Partnership

### 9.1 Pupils and Parents, Guardians/Carers

Under Section 332A of the Education Act (1996), Monmouthshire arranges for the parent, guardian or carer of any pupil with ALN residing in their area to be provided with advice and information about matters relating to their child's need.

Parental permission must be gained in order that a pupil can be placed on the school's SEN Register. The ALN Co-ordinator should inform them of the availability of the parent partnership service.

EPs, ALN Officers, the Early Years Advisory Teacher and Inclusion Officers are always available to support and advise schools and parents through meetings, on the telephone and by email. The Authority has informative leaflets on statutory assessment, educational psychology and specific learning difficulties.

A monthly, Authority based, Parent 'Drop-in' held at County Hall, Usk is available to all parents, carers and guardians of pupils with ALN who may be experiencing difficulty with their child's provision. This service affords parents the opportunity to discuss their concerns with appropriate Monmouthshire staff and work together with schools towards a positive outcome for the child or young person.

It is recognised that, occasionally parents, guardians or carers may not agree with the Authority on the level and/or type of support or the placement their child may need. Sometimes families may need help with regard to understanding the ALN process. In order to address these issues, in addition to central staff, the authority works closely with SNAP Cymru as the Parent Partnership Service.

This Partnership ensures that all parents, guardians and carers of youngsters with ALN will have the opportunity to freely access accurate, impartial and confidential advice, support and information regarding additional needs.

Monmouthshire also recognises the needs and rights of pupils to have access to an independent person who will work in an open and accessible manner to promote and realise their rights :

*'Children who are capable of forming views have a right to receive and make known information, to express an opinion and to have that opinion taken into account in any matter affecting them. The views of the child should be given due weight according to the age, maturity and capability of the child' (U.N Convention on the Rights of the Child.)*



Pupils with ALN should be actively involved, at an appropriate level, in discussions about their IEP/IDP including target setting and a review of their progress in achieving those targets.

All schools are expected to include pupils in their individual review meetings by seeking and recording their views. It is important that judgments should not be made about levels of understanding especially among very young children or pupils with communication or sensory difficulties.

Some pupils may need or wish for personal support or may wish to express their views through a parent, friend or peer, social worker, counsellor, advocate or a communicator.

## **9.2 Schools and settings**

The Authority will support schools and pre-school settings in the delivery of this strategy by:

- providing a set of common criteria for identification and assessment of needs;
- implementing its resourcing strategy;
- making a variety of appropriate resources available;
- providing effective training opportunities for all staff and Governors;
- establishing and supporting effective transition between Key Stages; and
- sharing of good practice.

## **9.3 External agencies**

Monmouthshire recognises the contribution of external agencies in improving outcomes for pupils with ALN by enhancing teaching and support for all pupils, in accordance with the statutory requirements of the SEN Code of Practice for Wales 2002 and the Equality Act 2010. The Authority works in partnership with a wide variety of agencies, including:

- Aneurin Bevan Health Board-Paediatric and specialist teams such as Speech Therapy, Physiotherapy and Occupational Therapy. Specialist Child and Adolescent Mental Health Services (CAMHS) and Child and Family Psychology Service.

- Colleagues within Social Services and partner agencies offering support to families via the Joint Assessment Family Framework (Youth Offending Team, Fusion (Specialist Under 18 Drink and Drugs prevention Service), Waimon (Women's Aid).
- Families First Joint Assessment Family Framework and Team around the Family Service (JAFF/TAF) the JAFF Co-ordinator attends regular monthly meetings within Local Authority schools offering co-ordinated support for families who have more than one area of need. JAFF/TAF provides early intervention support by creating a Team around the Family which consists of relevant professionals and agencies co-ordinating services with the family to address need in a variety of areas including education, emotional and physical health, relationships and social lives, access to training and employment, behaviour, parenting and home environment.
- Face-to-Face Counselling Service and Monmouthshire Youth Service.
- Wales PPA and Mudiad Meithrin.
- Monmouthshire also employs a dedicated ASD Co-ordinator and funds a National Autistic Society Support Worker for families to consult where a child has ASD.
- Monmouthshire commissions its school improvement service via the Education Achievement Service.

The contact details of all agencies can be found on the Monmouthshire Web site [www.monfis.org.uk](http://www.monfis.org.uk).

## **10. Specialist settings for pupils whose needs cannot be met in Monmouthshire schools.**

For the very few pupils whose needs cannot be met through mainstream education, the Authority seeks to provide high quality specialised education and support by working in partnership with other authorities and providers.

Each year, the Authority places a very small number of pupils with exceptionally complex needs in provision outside Monmouthshire.

Out-of-county provision is normally in a day special school maintained by another authority, or in the independent sector. In exceptional circumstances residential provision may be sought in conjunction with Social Services and Health.

Decisions to place pupils in independent out of county special schools are taken by a multi-agency Complex Needs Panel, with membership from the Authority's CYP, Social Services and the Aneurin Bevan Health Board.

All out-of-county placements are subject to regular review.

Schools are visited prior to placement to establish their suitability.

Once pupils are placed, the Authority's central ALN team monitors and evaluates progress by: attending annual review meetings; listening to the voice of the pupil; and by analysing progress data.

### **10.1. Complex Needs Panel**

This multi-agency strategic group meets on a monthly basis. Its role is to discuss and address the assessment, planning and service provision for children who have complex needs and are known to all agencies.

Where possible, the needs will be met locally, but for a few pupils it will be necessary to secure out-of-county placements. The panel works to a clear protocol as detailed below:

- Children and young people in need still living at home with their own families where the complexity and intensity of their needs cannot be met by one agency.
- Children and young people looked after by the Authority, where the complexity and intensity of their needs cannot be met by one agency.

- Children and young people with specific learning needs where the complexity and intensity of their needs cannot be met by one agency and, where there is an increasing likelihood that their needs will require intervention, which may only be available outside existing county resources.
- Children and young people with health needs (physical, mental or emotional) where the complexity and intensity of their needs cannot be met by existing universal or specialist health services, continuing and enduring social care or where there is an increasing likelihood that their needs will require intervention, which may only be available outside existing county resources.
- Children and young people in the above categories where it is identified at an early stage that intervention is necessary to prevent the later need for more intensive intervention.

## **11. The Authority's monitoring and evaluating data on outcomes for pupils with ALN in order to inform the development of policies and provision.**

The Authority regards the collection and recording of precise information and data for children with additional learning needs as a crucial factor in the development of policies and planning for effective provision. This is carried out through the monitoring of pupil tracking data by individual pupil target setting and the Annual SEN School Audit which tracks the use of the delegated budget to schools, school based interventions, staff continuous professional development and the management of resources.

The Authority maintains electronic data which includes information from schools' SEN registers, the annual PLASC SEN data records, individual and school-level progress data, records of school planning meetings and pupil assessment information.

Through regular analysis of this comprehensive data record, the Authority is able to:

- monitor and evaluate the impact of resources for individual pupils, groups of pupils and at school level;
- monitor and evaluate the impact of additional funding, both delegated and centrally held, on outcomes for pupils with SEN;
- target additional funding appropriately, and identify future funding needs;  
and
- monitor trends and identify emerging areas of need.

## **12. Monitoring and Evaluation of the Impact of the ALN Strategy.**

The implementation of the ALN strategy, policies and procedures outlined in this document is subject to continuous quarterly monitoring by the Authority as part of the Service Improvement Plan.

The impact of the strategy on outcomes for children and young people with ALN is reviewed annually, as part of this overall programme of self-evaluation and service improvement planning.

This policy will also be reviewed in the light of any statutory changes.

**APPENDIX 1**

**Central Support Teams**

**Roles**

**&**

**Responsibilities**

## **The Educational Psychology Service**

The Educational Psychology Service (EPS) supports pupils from 0 to 19 years of age.

The role of the EPS is to raise educational standards and to facilitate educational inclusion through the use of psychology.

The work of the Authority's educational psychologists can be divided into five main categories:

- The support of children's development and education.
- Supporting school improvement.
- Strategic and preventative work.
- Contribution to early identification.
- Statutory assessment work.

This will be achieved by operating a time allocation system to schools, based on a formula, which allows for a fair and transparent share of EPS resources.

Using a consultation model within its schools where the psychologist and members of staff work collaboratively to:

- look at, and think about, the current situation;
- identify areas where current strategies are proving successful;
- identify areas which would benefit from further development; and
- draw up possible strategies to facilitate development or change.

Consultation can take place with individual members of staff or groups of staff members and could be concerning individual children/groups of children or more general systemic issues, e.g. the development of literacy/behaviour within the school.

In order to try to bring about the change which will benefit the situation it may be appropriate for the psychologist to work with:



- Individual children.
- Whole schools.
- Parents and/or guardians/carers and outside agencies.

The EPS provides training courses to school staff, undertakes project work and carries out psychological research to inform their practice.

## SpLD Service

### Supports children with ALN (SpLD) and their schools by:

SpLD teachers work with children and young people in primary and secondary schools within the Authority, aged 6 to 16, with ALN. Monmouthshire SpLD Service aims to work in partnership with the whole school community, and multi-agency colleagues, to ensure that young people have the best possible opportunities to reach their individual potential.

The role of the SpLD teacher is to:

- facilitate educational inclusion for pupils with SpLD (literacy) within mainstream settings;
- support schools in the raising of educational standards for all pupils; and
- provide training and support to increase the capacity of schools to address the needs of pupils with SpLD.

This is achieved by:

- working closely with Co-ordinators of Additional Learning Needs, Educational Psychologists and school based staff working with young people on a daily basis to identify and support pupils with specific learning difficulties;
- providing advice and guidance on the management of specific learning difficulties;
- support schools in the early identification of a pupil's or young person's need;
- advising, modelling, monitoring and reporting on effective intervention strategies;
- advice and guidance on the appropriate use of individual and whole school resources;
- offering training for whole schools, groups or individuals in areas of learning within the category of SpLD;
- share information with parents in a timely manner by providing advice and relevant information;
- attend identified review/multi-agency meetings; and
- co-operative working on authority/national initiatives and processes with a view to 'closing the gap' and raising standards for all pupils.

### **The Inclusion Service (IS)**

The purpose of the Inclusion Service is to ensure that children and young people have access to provision thereby and support as require enabling them to continue to access educational provision, make progress and fulfil their potential.

The work of the Inclusion Service, more specifically, is linked to:

- The attendance of children and engagement of young people of statutory school age who are registered pupils at Monmouthshire schools.

### **Education Welfare Service**

The work of the EWOs comprises:

- promoting the regular attendance of children at school or other educational provision;
- assessing the reasons that contribute to poor attendance, and taking action to improve this by engaging with other agencies to promote the well-being and attendance of vulnerable pupils; and
- assisting in the delivery of alternative curricular provision.

This will be achieved by:

- working closely with schools to ensure that they have robust systems in place to secure good attendance;
- supporting and challenging parents with regard to attendance matters and other relevant issues;
- upon receipt of an appropriate referral from schools, monitoring the attendance pattern of individual pupils and encouraging regular attendance at school by the use of appropriate strategies;
- undertaking intensive casework and providing the opportunity for individuals to be supported / mentored by the Education Welfare Officer or an appropriate professional;
- locating and arranging suitable alternative training or educational provision for those pupils in Key Stage 4 identified by schools as being “disengaged”; and
- recording and analysing data, with particular regard to Welsh Government, county and school targets, and maintaining appropriate records on identified clients.

The Inclusion Service also works in partnership with the whole school community and multi-agency colleagues to promote the best possible outcomes for young people by:

- working with schools, pupils, parents/carers and other agencies where a pupil is at risk of permanent exclusion to provide appropriate support and intervention.

### The Pupil Referral Service

- The Pupil Referral Service comprises EOTAS and the PRU; this is a Local Authority provision which has its own management committee akin to a school's governing body.
- EOTAS provides provision for pupils (upon receipt of a supporting consultant's letter) who have been identified with significant medical/psychological needs which impact upon the pupil's ability to attend school.
- The Pupil Referral Unit provides educational support via outreach for pupils in Foundation Phase, Key Stage 2 and Key Stage 3 Provision. The Pupil Referral Unit provides provision for a small cohort of Year 10/11 pupils who are at risk of permanent exclusion from school.

### Supporting Vulnerable Groups such as LAC, Gypsy Traveller Pupils/Ethnic Minority Pupils.

This will be achieved by:

- working with schools to support vulnerable groups of pupils such as LAC so that this cohort of pupils' attainment and achievement is tracked and schools are challenged as to how they are supporting the progress;
- ensuring that commissioned services (GEMS) are providing appropriate support and intervention for schools/pupils as outlined in the service level agreement;
- ensuring that any grant funding allocated to schools is targeted in improving outcomes in numeracy/literacy and engagement for Gypsy Traveller Pupils; and
- ensuring consistency in recording racist incidents and incidences of bullying ensuring challenge to schools.

### Healthy Schools

This will be achieved by regular visits to schools to ensure progression via the healthy schools initiative.

## Sensory Service

The Authority defines the sensory services as:

- Hearing Impaired (HI) Service.
- Visually Impaired (VI) Service.
- COMiT.

The vast majority of hearing and visually impaired children will have been referred to the Education Authority ALN Department by the Health Authority prior to the pupil entering school.

Support for these children will be based on the Hearing and Visual Impairment Services jointly commissioned with neighbouring local authorities and secured by a Service Level Agreement.

Prior to entering school, the sensory service would involve parents and outside agencies, including voluntary bodies. When school entry is imminent, these services will liaise with the Head teacher and teaching staff in order to prepare for the hearing or visually impaired pupil's admission.

This will include any reports or information on the pupil and advice regarding the most beneficial physical environment for the pupil within the classroom and throughout the school building.

COMiT provide a training programme to staff in schools to help staff start groups to help pupils develop their communication and social skills.

Monmouthshire will aim to meet the needs of all pupils with Sensory Impairment at S.A. S.A.P. or S.A.P.R.A.

However, on the very rare occasions where an out-of-county placement is required a statutory assessment will be undertaken.

The HI and VI services will:

- Undertake auditory / visual assessment procedures in order to identify needs;
- Advise and liaise with teachers;
- Support the education of children with sensory impairments;
- Provide training for teaching and non-teaching staff;
- Monitor the progress of sensory impaired children;
- Provide reports for assessments;
- Work in partnership with parents; and
- Liaise closely with other professional bodies.

The sensory services provide pupil tracking data to the authority.

## **SEN Administrative Team**

The SEN Administrative Team is responsible for co-ordinating the statutory response to referrals made by schools, parents and other agencies to the ALN department.

This is achieved by:

- acting as the first point of contact in providing support/information for schools and parents with regard to provision for pupils with ALN;
- validating and monitoring referrals;
- monitoring the delivery and effectiveness of support;
- referring complex cases to the SAPRA panel and/or Complex Care Panel;
- managing out-of-county placements with regard to provision and funding;
- maintaining pupil data systems and carrying out an audit of the requirements of pupils with SEN;
- facilitating provision for pupil transport by liaising with PTU;
- managing the SAPRA, Statutory Assessment process and Annual review procedures; and
- co-ordinating ALN team meetings.

**The ALN Team:**

Principal Officer ALN      Stephanie Hawkins

**SEN Team:**

Senior Officer (SEN)      Ceri Bater

Support Officer      Gwen Phillips

Administrative Support      Mary Roberts

**Educational Psychologist Team:**

Acting Team Leader      Stephen Trow

Area Education  
Psychologists      Michelle Mansell  
   Lucie Doyle  
   Julia Young  
   Casey Stephens

Administrative Support      Barbara Derham

**Advisory Teachers:**

Senior Officer (SpLD)      Ruth Davies

Specialist SpLD  
Teachers      Brenda Rees  
   Sheridan Sharp  
   Kath Kippax  
   Pamela Martin  
   Alena Hickin

## Contact Details for Parent Partnership Agencies

### SNAP Cymru

Head office: 10 Coopers Yard, Curran Road, Cardiff CF10 5NB

e-mail: [headoffice@snapcymru.org](mailto:headoffice@snapcymru.org)

[www.snapcymru.org](http://www.snapcymru.org)

Advice line: 0845 1203730 Lines open 9.30 – 4.30 Mon – Fri.

Local office: Ty Derwen (GAVO), Church Road, Maindee Newport, NP19 7EJ

email: [gwent@snapcymru.org](mailto:gwent@snapcymru.org)

[www.snapcymru.org](http://www.snapcymru.org)

Advice line: 0845 1203730 Lines open 9.30 - 4.30 Mon - Fri

Local contact: Teresa Bradley

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## APPENDIX 2

### **How the Authority Funds Provision for Pupils with SEN**

Monmouthshire's formula for funding ALN services in schools is based on clear principles of early intervention and is designed to enable schools to support pupils with SEN within the mainstream class.

A significant proportion of funding available to support pupils with ALN is included within the schools dedicated budget.

This provides schools with maximum flexibility in using funding to support individuals and/or groups of pupils, according to the Graduated Response as required by the SEN Code of Practice for Wales.

In practice, schools are free to organise provision in the way that best meets pupils' needs, but should bear in mind that they are accountable for the progress of all pupils, including those for whom the ALN panel has authorised additional funding. The amount included in schools' delegated budgets for SEN funding is outlined in the current Funding Model.

Schools are expected to use their delegated funding flexibly to provide all necessary support for pupils at *Early Years/School Action or Early Years/School Action Plus*.

Where it can be clearly demonstrated via a SAPRA that a pupil's needs meet the criteria for provision of a greater degree of support than normally available at EY / School Action Plus, the authority will provide schools with additional funding from the central ALN budget.

These pupils will then move to Graduated Response level **School (or Early Years) Action Plus Resourced Agreement (SAPRA)**.

The ALN panel is responsible for all decisions to allocate, or discontinue, this additional funding at SAPRA.

Where the Authority contributes additional funding, i.e. for pupils at SAPRA, it will issue a **SAPRA** agreement that details:

- the needs of these pupils;
- the provision to meet needs; and
- the respective roles and funding commitments of the school and the authority in meeting those needs.

For a small number of pupils, including all those for whom an out of authority special school placement is needed, the authority will make and maintain a Statement in the usual way. Should additional funding be deemed appropriate for a Statement or a SAPRA, additional funding for these pupils comes from the Authority's centrally retained ALN budget.

Should the Authority make an additional contribution for a pupil at SAPRA, or with a Statement in a mainstream school, this does not replace the school's contribution from its delegated budget.

**Special provision made through a SAPRA or Statement of Special Educational Needs is intended to complement rather than substitute from school based resources.**

### **Current Funding Model**

An SEN Lump Sum is allocated to each Monmouthshire School. This is calculated on the number of full-time pupils on roll as per the annual January PLASC return and ACORN data. ACORN data is a value attributed to a school based on the post codes of the individual pupils on roll and the known social demographic features of the area where the pupils live.

Schools are placed in bands according to their ACORN value and a weighting added to the numbers of pupils on roll (Full Time Equivalent) to reflect increasing levels of deprivation. This is demonstrated as follows:

Schools' ACORN Value	Social Deprivation Weighting
0 to 9	1.1 x size of the school
10 to 19	1.2 x size of the school
20 to 29	1.3 x size of the school
30 to 39	1.4 x size of the school
40 to 49	1.5 x size of the school

This is now subject to change as the ACORN data is no longer available from FFT and alternatives are to be presented to the Funding Forum Group.

The SEN delegated lump sum is allocated to schools to meet the needs of those pupils requiring 50% teaching assistant support or less, either with a SAPRA or Statement of SEN.

It is only those pupils with more complex and severe needs who have been issued with a Statement of SEN or SAPRA who may be allocated either Band D or E funding.

## APPENDIX 3

**Guidance for Schools  
On the  
Criteria for  
SEN Provision**

This section gives advice that will enable parents, pupils, schools, the education service and other agencies to determine:

- the pupil's main area(s) of special educational need or difficulty; and
- the appropriate level of provision, according to the Authority's **Graduated Response** procedures.

The local criteria incorporated in this document are based on interpreting the guidance offered within the SEN Code of Practice for Wales.

The aims of the criteria are:

- to ensure that pupils who need additional support and for whom the authority may provide some additional resource '*which is in addition to or otherwise different from*' that offered via the school's delegated budget are identified objectively, consistently and in a way that is fair to all; and
- that the authority and its schools are able to target appropriate support and funding towards pupils with the most severe and/or complex needs.

All schools should be aware that any request to the authority for additional support and/or statutory assessment should be accompanied by detailed evidence based on these criteria and on the outcomes of the **Graduated Response** provision to date.

Currently the Authority is undertaking a pilot study in all schools of Individual Development Plans. This is in recognition of future developments and proposals in line with the White Paper Reform of ALN from the Welsh Government (22 May 2014).

### **Underlying principles**

Through application of common criteria, the authority will ensure that the needs of individual pupils and their respective schools are considered within a framework that is:

- **equitable** - fairness of structure and procedure;
- **transparent** - clear criteria and process;
- **consistent** - within and between schools across the authority;
- **efficient and effective in its use of resources** - clear access and exit criteria, with funding targeted towards pupils with the highest needs, and with close monitoring of the impact of funding; and
- **accountable** - the respective roles and responsibilities of all are clearly defined.

## Identification

The SEN Code of Practice makes it clear that a small percentage of **all** pupils will have a degree of special educational needs that require enhanced provision. It is therefore expected that most pupils who are progressing at a slower / quicker rate will make 'adequate progress' and have their needs met through everyday mainstream differentiated teaching within their appropriate groups.

In line with this, pupils should not be placed in a higher or lower chronological aged registration group on a permanent basis.

Adequate progress is defined in a number of ways and can include progress that:

- closes the attainment gap between the pupil and their peers;
- prevents the attainment gap growing wider;
- similar to that of peers starting from the same attainment baseline, but less than that of the majority of peers;
- matches or betters the pupil's previous rate of progress;
- ensures access to the full curriculum;
- demonstrates an improvement in self-help, social or personal skills;
- is likely to lead to an appropriate accreditation; and
- is likely to lead to participation in further education, training and employment.

Provision for pupils who do not make progress in their learning/behaviour is a matter for the school as a whole. It should not be assumed that all pupils can and will progress at the same rate.

*'All teachers are teachers of children with special educational needs.'* (COP 5:1)

In addition, the Governing Body, the Head teacher and the Co-ordinator of ALN have specific responsibilities. The key to meeting all pupils needs lies in the teachers' knowledge of each pupil's skills and abilities.

It is for individual schools to decide the procedures they adopt to meet the pupil's needs and to monitor and assess progress and outcomes. The evidence gained from observations and assessments will provide details of the areas in which the pupil is not progressing even though the teaching styles have been differentiated.

Having gathered these evidence teachers should consult with the Co-ordinator of ALN to review the current strategies and decided whether or not the pupil requires something '*in addition to*' or '*otherwise different from*' in order to progress and experience success.

### **Entry Criteria at School Action: (SA)**

When a pupil's difficulties prove less responsive to mainstream differentiated provision, then an early start must be made in considering provision at *School Action* that is '*additional to, or otherwise different from*' that already provided.

At this point:

- the school has the duty to inform parents, guardians and / or carers that special educational provision is being made for their pupil (Education Act 1996 317A);
- the pupil's needs and the provision to meet those needs should be recorded according to the criteria laid out in this document; and
- strategies introduced to enable the pupil to progress should be recorded in an Individual Education Plan (IEP).

The IEP should be individual to the pupil and include:

- the start and review date of the plan;
- Specific, **M**easured, **A**chievable, **R**ealistic and **T**imed targets;
- the specific strategies to be used to achieve the targets;
- the provision to be put in place over and above that of the normal mainstream setting;
- success and/or exit criteria; and
- outcomes and, if appropriate, the next steps.

It is good practice to provide parents, guardians and / or carers with a concise and easily understood copy of the pupil's IEP. This will enable them to understand their pupil's difficulties and support them, as far as is realistic, in achieving success and in accordance with the Authority's Guidance on IEP Writing.

IEPs should be working documents and as such be continually kept 'under review,' in such circumstances there cannot simply be a 'fixed term' or a formal meeting for review.

Using this evidence, teachers should consult with the Co-ordinator of ALN to review the current strategies and decided whether or not the pupil requires something '*in addition to*' or '*otherwise different from*,' in order to progress and experience success. However, at Foundation Stage & KS2, one term should be the maximum time before a review meeting is held to review the targets.

### **Exit Criteria at School Action:**

When a pupil's difficulties prove responsive to specifically differentiated provision as outlined in their IEP at *School Action* and, progress is maintained over a term, class teachers should consult with the Co-ordinator of ALN to reassess the pupil's progress. The IEP targets should be revised in order that the pupil begins to access differentiated mainstream class provision and by the end of the second term begins to develop independence in their learning.

**Where progress is maintained over two terms and the pupil no longer requires provision '*additional to*' or '*otherwise different from*', as defined in the criteria, schools should no longer record the pupil as having additional learning needs.**

### **Further Support at School Action Plus: (SAP)**

Where a pupil's difficulties do not prove responsive to specifically differentiated provision as outlined in his/her IEP and very little, or no progress, is noted over two terms, class teachers should consult with the Co-ordinator of ALN to reassess the pupil's need according to the appropriate criteria (*usually the targets on the IEP*).

At this point, the pupil's needs should be recorded at *School Action Plus* with all advice received incorporated into the pupil's IEP. Where the school feels the pupil's needs arise specifically from a Speech & Language Impairment, the school should make a direct referral to the Speech Therapy Service and, where appropriate, COMiT.

The pupil's needs and provision should be recorded at SAP while the provision remains. Where the pupil receives COMiT support the school should, as far as is possible, identify a Teaching Assistant so that any specific programmes continue to be delivered in the classroom setting and that the capacity of the school to address such needs is increased.



**Exit Criteria at School Action Plus:**

The pupil's needs remain recorded at SAP until the advice/support received from the LA/outside agency is fully implemented and there is evidence of progress.

At this point, in order to ensure the school continues to implement the advice and the pupil's progress is sustained and built on, his/her needs should be recorded at *School Action*.

**Further Support at School Action Plus Resourced Agreement:**

Where a pupil continues to make very little, or no progress, in response to appropriately differentiated and targeted provision at School Action Plus, and meets the criteria for consideration of SAPRA, then the school should make a request to the SAPRA panel, along with supporting evidence, for further advice and/or support. If granted, the provision of additional support/resources will be reviewed annually or as needs direct at the SAPRA review meeting.

**P Levels:**

In order to ensure adequate, measurable and accountable progress for all pupils with ALN, the Authority advises that, *where a pupil has been working towards Level 1 for more than 2 terms*, the P. Level structure should be adopted as defined and monitored by the Authority.

Unless already recorded at a higher level, the pupil's needs should then be recorded at S.A.P. Exemption from National Standardised Tests will be dependent on pupils' P. Level Scale attainment.

AREAS  
OF  
LEARNING

## Cognition and Learning

### Specific Learning Difficulties (SpLD)

SpLD is an umbrella term which indicates that pupils display differences across their learning. Pupils with SpLD may have a particular difficulty in learning to read, write, spell or manipulate numbers so that their performance in these areas is below their performance in other areas. Pupils may also have problems with:

- fine or gross motor control skills;
- tasks involving specific abilities such as sequencing, organisation or phonological or short-term memory abilities;
- language development;
- forming concepts, especially when information requires first hand sensory experiences; and
- frustration and / or low self-esteem, taking the form, in some cases, of behaviour difficulties.

Pupils with SpLD cover the whole ability range, and the severity of their learning difficulty varies widely. Specific learning difficulties include:

#### Dyslexia:

- Pupils with dyslexia may learn readily in some areas of the curriculum but have a marked and persistent difficulty in acquiring accuracy or fluency in learning to read, write and/or spell.
- They may have poor reading comprehension, handwriting and punctuation.
- They may also have difficulties in concentration and organisation and in remembering sequences of words. They may mispronounce common words, or reverse letters and sounds in words.

#### Dyscalculia:

- Pupils with dyscalculia have difficulty in acquiring mathematical skills.
- They may have difficulty understanding simple number concepts, lack and intuitive grasp of numbers and have problems learning number facts and procedures.

### **Dyspraxia:**

- Pupils with dyspraxia are affected by an impairment or immaturity of the organisation of movement, often appearing to be clumsy.
- They find gross and fine motor skills hard to learn and difficult to retain and generalise.
- They may have poor balance and co-ordination, and poor awareness of body position.
- Their language may be late to develop, and they may have immature articulation.

### **Moderate Learning Difficulty (MLD)**

Pupils with MLD will have attainments well below expected levels for pupils of similar age in all or most areas of the curriculum, despite appropriate interventions. They may have much greater difficulty than their peers in:

- acquiring basic literacy and numeracy skills;
- in understanding concepts; and
- in dealing with abstract ideas and generalising from experience.

They may also have problems with:

- developing speech and language skills;
- low self-esteem;
- concentration and attention; and
- social skills.

Usually these children will tend to make progress more slowly than the majority of their peers in most areas of learning and are likely to need plenty of repetition and practice before learning becomes secure. In this sense, these children are described as having general, rather than specific, learning difficulties and the type of support they need will differ to that advised for children with SpLD (Dyslexia). Most children with MLD are able to access mainstream education with the right levels of differentiation and support.

### **Severe Learning Difficulty (SLD)**

Pupils with SLD have significant intellectual or cognitive impairments. This has a major effect on their ability to participate in the school curriculum without support. They may also have:

- associated difficulties in mobility and co-ordination, communication and perception and the acquisition of self-help skills.

Pupils with SLD will need support in all areas of the curriculum; they are likely to require teaching of self-help, independence and social skills.

Some pupils may use sign and symbols but most will be able to hold simple conversations and gain some literacy skills.

Their attainments may be below Level 1 of the National Curriculum (P Levels being used) for much of their school careers.

### **Profound and Multiple Learning Difficulty (PMLD)**

Pupils with PMLD have a profound cognitive impairment/learning difficulty, leading to significant delay in reaching developmental milestones. In addition they display one or more of the following:

- Significant motor impairments.
- Significant sensory impairments.
- Complex health care needs/dependence on technology.

The inter-relationship of these disabilities increases the complexity of need, in turn affecting all areas of learning.

Pupils with PMLD will need a distinctive curriculum to help them develop sensory, motor, social and communication skills all through their school careers, and into adult life.

- Some pupils communicate by gesture, eye pointing or symbols, others by very simple language.
- These pupils require a very high level of adult support, both for their learning needs and also for their personal care.
- This will be based on a continuum of support and provision appropriate to needs and will incorporate the principles of integration and entitlement.
- These pupils will more often than not need continuous support throughout their adult lives.

At primary level, pupils with PMLD will usually access education through one of the Authority's resource bases. At secondary level, there are a range of approaches which consider both in county and more specialist provision in neighbouring Authorities.

Admission to a Resource Base follows the recommendations of the EP and confirmation at a Statutory Assessment or SAPRA Panel. The admissions meeting, in which parents are vital partners, is convened by the school in consultation with the Authority. The monitoring of the provision is ongoing and should be formally discussed at the annual review meeting.

Lack of competence in either English or Welsh must not be equated with learning difficulties as understood in the SEN Code of Practice.

A medical diagnosis or a disability does not necessarily imply the pupil or young person has special educational needs that will require educational support that is '*in addition to*' or '*otherwise different from*' mainstream provision.

Entry Criteria	
School Action ( S.A.)	The pupil has regular and consistent difficulties in accessing the curriculum. The pupil requires support over and above normal classroom differentiation. Standardised score in Literacy and Numeracy 75 – 84. For example CATS/BPVS 75-84
School Action Plus ( S.A.P.)	The pupil's main difficulty is in the area of Cognition and Learning. The pupil has received additional appropriate support at S.A. over at least two terms but has made little or no progress. The pupil's difficulties cause substantial barriers to learning, and require increased differentiation.  Scores within lowest 5th percentile. Standardised scores in Literacy, Numeracy and, for example, CATS/BPVS: 74 or less.
School Action Plus Resourced Agreement ( S.A.P.R.A.)	The pupil's main difficulty is in the area of Cognition and Learning. The pupil has received additional appropriate support at S.A.P over at least two terms but has made little or no progress. The difficulties continue to cause substantial barriers to learning.  Scores at, or below, the lowest 1st percentile.  Standardised score in Literacy, Numeracy, for example CATS, BPVS or WISC/BAS: below 70. Agreement through ALN resource panel, based on detailed evidence of Graduated Response to be submitted by schools.
Evidence provided by the school or Early Years Setting.	
S.A.	Continues to make little or no progress in specific areas despite mainstream classroom differentiation and basic skills intervention. Evidence provided by school of consultation with parents. Classroom assessment with details of intervention.
S.A.P.	Continues to make little or no progress in most areas despite School Action support. (i.e. intervention which is <b>additional to or otherwise different from</b> mainstream differentiation and Basic Skills groups) Previous IEPs / targets with outcomes.  Support Services involvement (whose advice / recommendations should be incorporated into the new IEP).

S.A.P.R.A.	<p>Difficulties are likely to persist for the child's school career.</p> <p>Indications of how the difficulty affects access to the curriculum.</p> <p>Information about the involvement of Health professionals / Multi Agency involvement from an early age.</p> <p>Indication of which resources are required and how they will be allocated to improve outcomes.</p>
Curriculum and Teaching Methods	
S.A.	<p>Mainstream curriculum with some targeted differentiation.</p> <p>Timed intervention of tasks and activities within an 'inclusive' approach.</p> <p>Access to individualised programmes according to need.</p>
S.A.P.	<p>Mainstream Curriculum with significant and targeted differentiation sustained over time.</p> <p>Implementation of Literacy/ Numeracy programmes as advised. Access to individualized programmes according to need.</p> <p>Use of an 'inclusive' teaching approach.</p> <p>(Alternative programmes at KS4 where relevant).</p>
S.A.P.R.A.	<p>Some curriculum modifications and individualised programmes sustained over time. Significantly differentiated curriculum.</p> <p>Access to individualised programmes according to need.</p> <p>Use of an inclusive teaching approach.</p> <p>(Alternative programmes at K.S.4 where relevant)</p>
Grouping and Support	
SA	<p>Mainstream class provision with occasional additional support in class.</p>



SAP	<p>Mainstream class provision for most of the time with targeted and sustained additional support in class and / or in a small group.</p> <p>Careful planning of class grouping / seating. Structured classroom management.</p>
SAPRA	<p>Small group and / or class provision for most of the time.</p> <p>Structured classroom management.</p>
Specialised Resources	
S.A.	<p>Some individual access to equipment including ICT, normally available in class and shared with other children.</p> <p>Provision is school based.</p> <p>Use of allocated ALN funding to provide school based small group or individual support and / or resources.</p>
S.A.P.	<p>Individual access to normally available equipment as and when required.</p> <p>Home / School Link system.</p> <p>Specific programme materials as advised.</p> <p>Access to a store of individualised materials to meet objectives.</p> <p>Reference books and literature as advised.</p> <p>Provision is school based.</p> <p>Use of allocated ALN funding to provide school based small group support or individual support.</p> <p>K.S. support time for organisation, course work, proof reading is advised.</p>
S.A.P.R.A.	<p>Individualised access to more specialist equipment sustained over time.</p> <p>ICT and other specific resources and adaptations assessed on an individual basis.</p> <p>Mainstream evaluation of needs &amp; access to a supportive adult if required.</p> <p>Access to core staffing provision.</p>

	<p>Access to specialised provision according to need.</p> <p>Provision agreed through Service Level Agreement.</p>
Advice and Assessment	
S.A.	<p>Class teacher and Additional Learning Needs Coordinator (ALNCO) assess needs, consulting occasionally with external agencies.</p> <p>Attendance. Regular monitoring of effectiveness of provision.</p> <p>Regular monitoring and review of targets within IEP in consultation with child and Parents.</p>
S.A.P.	<p>Class teacher and ALNCO take advice from external agencies when reviewing IEP.</p> <p>Attendance. Regular monitoring of effectiveness of provision.</p> <p>Regular monitoring and review of targets within IEP in consultation with child and Parents. Review with all agencies providing additional support.</p>
S.A.P.R.A.	<p>External agencies provide specialised assessments and advice that lead to a modified IEP. Regular monitoring of effectiveness of provision.</p> <p>Regular monitoring and review of targets within IEP in consultation with child and parents. Review with all agencies providing additional support.</p>
L.A / Other Support Services & Monitoring	
Whole school	<p>Local Authority via Education Achievement Service (EAS) and Schools monitor and evaluate Whole School Performance as part of the self-evaluation and School Improvement agenda.</p>
S.A.	<p>Class teacher and ALNCO assess needs, consulting occasionally with external agencies.</p>

	<p>School</p> <p>Attendance.</p> <p>Regular monitoring of effectiveness of provision.</p> <p>Regular monitoring and review of targets within IEP in consultation with child and parents.</p> <p>Review of ALN stage according to criteria.</p>	<p>Local Authority</p> <p>Training for ALNCo.</p> <p>Training for T.A. and Teachers.</p> <p>Discussion in ALN Planning meetings.</p> <p>Access to INSET courses and support</p> <p>Sessions from EAS+ L.A. menu.</p> <p>Review of ALN stage according to criteria. Annual ALN Audit.</p>
S.A.P.	Class teacher and ALNCo take account of advice and /or assessment from external agencies when reviewing IEP	
	<p>School</p> <p>monitor attendance</p> <p>monitor effectiveness of provision regularly</p> <p>regular monitoring and review of targets within IEP with consultation with the child, Parents and other agencies.</p> <p>Review with all agencies providing additional support.</p> <p>Review ALN stage according to criteria.</p> <p>Annual ALN audit.</p>	<p>Local Authority</p> <p>Support and advice when requested from EPS/ Outreach/Inclusion or other agencies.</p> <p>Access to INSET courses and support sessions from LA or EAS Menu.</p> <p>Review ALN stage according to criteria.</p> <p>Annual ALN audit.</p>
S.A.P.R.A.	External agencies provide specialised assessment and advice that leads to modified IEP (AA3) and / or contribute to the direct support for the pupil.	
	<p>School</p> <p>monitor attendance</p> <p>monitor effectiveness of provision regularly.</p>	<p>Local Authority</p> <p>EPS involvement to advise on needs and inform IEP.</p> <p>Health/social care and Careers support services to contribute to IEP</p>

	<p>Regular monitoring and review of targets within IEP with consultation with the child, parents and other agencies.</p> <p>Review with all agencies providing additional support.</p> <p>Evidence of the utilisation of funding for the child by school during the previous year.</p> <p>Advice from any other relevant agencies as appropriate.</p> <p>Annual ALN audit.</p>	<p>(IDP) when appropriate.</p> <p>LA officer attendance at yearly IEP (IDP) reviews if requested.</p> <p>Attendance at transition reviews (end of Key stages (if requested).</p> <p>Review of ALN stage according to criteria and individual needs.</p> <p>Annual ALN audit.</p> <p>Annual review of SAPRA</p> <p>Careers Wales and Further Education representative to attend Year 9 review.</p>
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## Behavioural, Emotional and Social Difficulties (BESD)

Their emotional needs and behaviours present a barrier to learning and persist despite the implementation of an effective school behaviour policy, pastoral support and the personal / social curriculum.

Pupils may fail to meet expectations of the school and in some cases, but by no means all, may disrupt the education of others.

In some cases the difficulties may arise from, or be exacerbated by, circumstances within the school environment or be associated with frustrations resulting from other learning difficulties.

At the milder end of the continuum, pupils may have difficulties with social interaction which makes it difficult to work in a group or cope in unstructured time/ sessions.

Pupils may have poor concentration, temper outbursts and be verbally aggressive to peers and adults.

Some pupils may display similar signs of low esteem, under achievement and inappropriate social interaction, but without outwardly challenging behavioural outbursts. They may be withdrawn, quiet and find it difficult to communicate.

Some pupils may be unwilling or unable to form and maintain positive relationships with peers and / or adults.

## Attention Deficit Disorder (ADD) and Attention Deficit Hyperactive Disorder (ADHD)

ADD/ADHD is a developmental disorder that occurs in 1 - 3% of the population.

It is not related to intelligence and affects children from all walks of life although boys tend to be more affected than girls.

There is a strong genetic component in the condition which manifests itself in signs of inattention, hyperactivity and impulsiveness;

It is not explained by developmental level or another condition and cannot be explained by other factors such as laziness, lack of sleep, too much television or food additives.

Entry Criteria	
S.A.	The child has regular and consistent difficulties in accessing the curriculum. They require support over and above normal classroom differentiation.
S.A.P.	<p>The child's main presenting difficulty is in the area of social, emotional and /or behavioural difficulties.</p> <p>Significant difficulties that persist disrupting the normal functioning of the classroom over a period of half an academic term.</p> <p>Schools should employ a screening measure which is relevant to the main concern.</p>
S.A.P.R.A.	<p>The child's main presenting difficulty is in the area of social, emotional and / or behavioural difficulties.</p> <p>Significant additional learning needs in an ordinary classroom impossible without a high level of intervention.</p> <p>Schools should employ a screening measure which is relevant to the main concern.</p>
Evidence provided by the school or the early years setting.	
S.A.	<p>Continues to make little or no progress in specific areas despite normal classroom differentiation.</p> <p>Evidence provided by school of consultation with parents.</p> <p>Classroom assessment with details of strategies and intervention.</p>
S.A.P.	<p>Continues to make little or no progress in specific areas despite School Action Support ( documentation enclosed).</p> <p>Latest IEP / Individual Behavioural Plan (IBP) / targets with outcomes.</p> <p>Record of significant incidents / behaviour patterns.</p> <p>Support services involvement.</p>

S.A.P.R.A.	<p>SA / SAP documentation in place. Needs are likely to persist for the child's school career. Indications of how the difficulty affects access to the curriculum. Latest IEP / IBP / targets with outcomes. Record of significant incidents / behaviour patterns. Indication of how allocated funds would be used. Training initiatives.</p>
<p>Curriculum and Teaching Methods</p>	
S.A.	<p>Ordinary curriculum with some targeted differentiation.  Timed intervention of tasks and activities within an inclusive approach.  Access to individualized multi-sensory programmes according to need.  An inclusive teaching approach.</p>
S.A.P.	<p>Curriculum with significant and targeted differentiation sustained over time within a mainstream setting.  Careful planning of class grouping / seating.  An inclusive teaching approach.  A Personal, Social and Health Education (PSHE) programme to include emotional health sessions on self-awareness and awareness of others.  Incorporation of, e.g. Circle Time, to resolve conflict and to teach specific Social Skills.  Circle of Friends / Buddy system / Peer mentoring.  Specific programmes as advised.  Access to interim arrangements including PRU / alternative curriculum.</p>

S.A.P.R.A.	<p>Some curriculum modifications and individualised programme sustained over time(CT3).</p> <p>Significantly differentiated curriculum.</p> <p>SpLD friendly approaches to include multisensory Literacy / Numeracy and adapted activities.</p> <p>Access to individualised multisensory programmes according to need.</p> <p>Use of an inclusive teaching approach.</p>
<b>Grouping and Support</b>	
S.A.	Mainstream class provision with occasional additional support in class.
S.A.P.	<p>Mainstream class provision for most of the time with targeted and sustained additional support in class and / or in a small group.</p> <p>Careful planning of class grouping / seating.</p> <p>Structured classroom management.</p> <p>Access to interim support from the PRU.</p>
S.A.P.R.A.	<p>Small group and / or class provision for most of the time.</p> <p>Structured classroom management.</p>
<b>Specialised Resources</b>	
S.A.	<p>Some individual access to equipment including ICT that is normally available in class and shared with other children.</p> <p>Provision is school based.</p> <p>Use of allocated ALN funding to provide school based small group or individual support and resources.</p>



S.A.P.	<p>Individual access to normally available equipment as and when required. Home / school link system. Specific programme materials as advised. Access to a store of individualised materials to meet objectives. Home / school link system. Provision is school based. Use of allocated ALN funding to provide school based small group teaching or individual teaching. K.S.4: support time for organization, course work, proof-reading advised.</p>
S.A.P.R.A.	<p>Individualised access to more specialist equipment sustained over time. ICT and other specific resources and adaptations assessed on an individual basis. Mainstream evaluation of needs. Access to a supportive adult if required. Access to core staffing provision if available. Access to specialised provision according to needs. Provision agreed through Service Level Agreement.</p>
Advice and Assessment	
S.A.	<p>Class teacher and ALNCO assess needs, consulting occasionally with external agencies. Regular monitoring of effectiveness of provision. Regular monitoring and review of targets within IEP in consultation with child and parents.</p>
S.A.P.	<p>Class teacher and ALNCO take advice from external agencies when reviewing IEP. Regular monitoring of effectiveness of provision. Regular monitoring and review of targets within IEP in consultation with child and parents. Review with all agencies providing additional support.</p>
S.A.P.R.A.	<p>External agencies provide specialised assessments and advice that lead to modified IEP. Regular monitoring of effectiveness of provision. Regular monitoring and review of targets within IEP in consultation with child and parents. Review with all agencies providing additional support.</p>

L.A / Other Support Services and Monitoring		
S.A.	Class teacher and ALNCO assess needs, consulting occasionally with external agencies.	
	School:  Regular monitoring of effectiveness of provision. Regular monitoring and review of targets within IEP in consultation with child and parents. Review of ALN stage according to criteria. Annual ALN Audit.	Local Authority:  Training for ALNCO. Discussion in ALN Planning meetings. Access to INSET Courses and support sessions from Review of ALN stage according to criteria. Annual ALN Audit.
S.A.P.	Class teacher and ALNCO take account of advice and / or assessment from external agencies when reviewing IEP	
	School:  Regular monitoring of effectiveness of provision. Regular monitoring and review of targets within IEP in consultation with child, parents and other agencies. Review with all agencies providing additional support. Review of ALN stage according to criteria. Annual ALN Audit.	Local Authority:  Support and advice when requested from Education Inclusion Team or any other agencies Access to INSET courses and support sessions (from L.A. Menu) Review of ALN stage according to criteria Annual ALN Audit.
S.A.P.R.A.	External agencies provide specialised assessment and advice that lead modified IEP and / or contribute to the direct support for the pupil	
	School:  Regular monitoring of effectiveness of provision. Regular monitoring and review of targets within IEP in consultation with child and parents and SALT. Evidence regarding the utilisation of funding for the child during the previous year. Advice from any other relevant agencies as appropriate. Annual ALN Audit.	Local Authority:  EPS involvement to advise on needs and inform IEP. Health, Social Care and Career based Support Services contribute to IEP when appropriate. Review of ALN stage according to criteria and individual needs. Annual ALN Audit. Annual review of SLA. Careers Wales representative attend Year 9 Review.

## Communication and Social Difficulties

### Speech, Language and Communication Difficulties (SLCD)

Pupils with speech, language and communication needs cover the whole ability range.

They have difficulty in understanding and / or making others understand information conveyed through spoken language.

Pupils may have specific language impairment which is not typical of their other abilities.

Linguistic difficulties may also be associated with developmental delay or learning difficulties.

Speech and language difficulties may show themselves in the following ways:

- Problems with the production of speech.
- Difficulty in finding words and joining them together in meaningful and expressive language.
- A reduced vocabulary or difficulty recalling words.
- May use words incorrectly with inappropriate grammatical patterns.
- Problems in communicating through speech and other forms of language.
- Difficulties or delays in understanding or responding to the verbal cues of others.
- Difficulties with the acquisition and expression of thoughts and ideas.
- Difficulty in understanding and using appropriate social language.
- Frustrations and anxieties arising from a failure to communicate that may possibly lead to apparent behavioural difficulties and deteriorating social and peer relationships.

Some primary aged children will require more specialist support through attending a language support centre.

This does not apply to pupils whose first language is not English / Welsh unless they also have a special educational need in this area.

Referrals for Speech and Language assessment /advice should be made directly to the Speech and Language Therapy Service using their specific criteria and referral form.

## Autistic Spectrum Disorders (ASD)

It is recognised that autism covers a wide spectrum. Pupils with autism cover the full range of ability and the severity of their impairment varies widely. Each child is an individual in their response to the world around them.

There are three main areas of impairment (Triad of Impairment):

- Social Interaction.
- Social Communication.
- Rigidity of Thought.

Some pupils also have learning disabilities or other difficulties, making diagnosis difficult. Pupils with ASD may have difficulty in understanding the communication of others and in developing effective communication themselves.

Young pupils may not play with toys in a conventional and imaginative way but instead use toys rigidly or repetitively.

They can find it hard to generalise skills and have difficulty adapting to new situations often preferring routine.

Pupils with ASD may also have difficulty in:

- understanding and using non-verbal and verbal communication;
- understanding social behaviour, which affects their ability to interact with children and adults;
- thinking and behaving flexibly, which may show in restricted, obsessional or repetitive activities;
- understanding the social behaviour of others;
- understanding the social context of speech and behaviour as they tend to be literal thinkers;
- adapting to changes in routine or a new situation; this can lead to inappropriate behaviour; and
- managing high levels of stress and anxiety in settings that do not meet their needs.

Some pupils with ASD have a different perception of sounds, sights, smell, touch and taste and this affects their response to these sensations.

## Asperger's Syndrome

Pupils with Asperger's syndrome exhibit similar difficulties to those described under autism.

Pupils share the same triad of impairments but have higher intellectual abilities and their language development is different from the majority of pupils with autism.

They may not have any clinically significant delay in language or cognitive development.

Pupils with this disorder may have impairment in social interactions and communication skills. They may also develop stereotyped behaviour, interests or activities.

Entry Criteria	
S.A.	The child has consistent difficulties in the area of communication and interaction. The child requires support over and above normal classroom differentiation.
S.A.P.	The child's main difficulty is in the area of communication and interaction. The child's difficulties impede the development of social relationships and cause substantial barriers to learning levels as advised by the relevant professional. Child's potential.
S.A.P.R.A.	The child's main presenting difficulty is in the area of communication and interaction The child's difficulties impede the development of social relationships and cause substantial barriers to learning levels as advised by the relevant professional. Child's potential.
Evidence provided by the school or the Early Years Setting.	
S.A.	Continues to make little or no progress in specific areas despite normal classroom differentiation and basic skills intervention. Evidence provided by school of consultation with parents. Classroom assessment with details of intervention.

S.A.P.	<p>Continues to make little or no progress in specific areas despite School Action support (i.e. intervention over and above differentiation and basic skills groups).</p> <p>Previous IEPs / targets with outcomes.</p> <p>Support services involvement whose advice / recommendations should be incorporated into the new IEP.</p> <p>Indication of how allocated funds would be used.</p>
SAPRA	<p>Continues to make little or no progress in specific areas despite School Action Plus support.</p> <p>Previous IEPs / targets with outcomes.</p> <p>Difficulties are likely to persist for the child's school career without an intense programme of specialised intervention.</p> <p>Indications of how the difficulty affects access to the curriculum.</p> <p>EPS involvement.</p> <p>Multi agency involvement from an early age.</p> <p>Information about the involvement of health professionals.</p> <p>Support services involvement whose advice/ recommendations should be incorporated into the new IEP.</p> <p>Training initiatives.</p> <p>Indication of what resources are required and how they will be allocated to improve outcomes.</p>
<b>Curriculum and Teaching Methods</b>	
S.A.	<p>Mainstream curriculum with some targeted differentiation.</p> <p>Timed intervention of tasks and activities within an inclusive approach.</p> <p>Access to individualised multi-sensory programmes according to need.</p>
S.A.P.	<p>Mainstream curriculum with significant and targeted differentiation sustained over time.</p> <p>Individualised approaches to promote attention and listening; comprehension of spoken language, conceptual awareness, verbal reasoning, expression, vocabulary and social skills.</p> <p>Incorporation of specific programmes as advised: methods including Circle Time; Social Stories; Visual Timetables; Language Builder. (e.g. based on Elklan course )</p> <p>Access to individualized and structured multi-sensory programmes according to need.</p> <p>Use of an inclusive teaching approach.</p> <p>Alternative programmes at K.S.4 where relevant.</p>
S.A.P.R.A.	<p>Some curriculum modifications and individualised programme sustained over time.</p> <p>Significantly differentiated curriculum with use of e.g. TEACCH, PECS methods and materials.</p> <p>Alternative communication techniques as appropriate.</p>

Specialised Resources	
S.A.	<p>Some individual access to equipment including ICT, this is normally available in class and shared with other children. Provision is school based. Access to individualised multi-sensory programmes according to child's individual needs. Use of allocated ALN funding to provide school based small group or individual support and resources.</p>
SAP	<p>Individual access to normally available equipment as and when required. Home /School Link system. Specific programme materials as advised. Access to individualised materials to meet objectives. Reference books and literature as advised. Provision is school based. Access to individualised programmes using classroom resources and I.C.T. Multi-sensory materials relevant to the child's needs. Specific programme materials / software e.g. Elklan, Social Stories, Circle Time, Social Use of Language Use of allocated ALN funding to provide school based small group teaching or individual teaching.</p>
SAPRA	<p>Individualised access to more specialist equipment sustained over time. ICT and other specific resources and adaptations assessed on an individual basis. Access to advice and outreach according to need. Provision agreed through Service Level Agreement.</p>
Grouping and Support	
S.A	Mainstream class provision with occasional additional support in class.
S.A.P	<p>Mainstream class provision for most of the time with targeted and sustained additional support in class and /or in a small group. Careful planning of class grouping / seating. Structured classroom management.</p>
S.A.P.R.A.	<p>Small group and /or class provision for most of the time. Structured classroom management.</p>
Advice and Assessment	
S.A.	<p>Class teacher and ALNCO assess needs, consulting, occasionally, with external agencies. Regular monitoring of effectiveness of provision. Regular monitoring and review of targets within IEP in consultation with child and parents.</p>
S.A.P.	<p>Class teacher and ALNCO take advice from external agencies when reviewing IEP. Regular monitoring of effectiveness of provision. Regular monitoring and review of targets within IEP in consultation</p>



	<p>with child and parents. Review with all agencies providing additional support.</p>	
S.A.P.R.A.	<p>External agencies provide specialised assessments and advice that leads to a modified IEP. EPS involvement to advise on needs and inform IEP. Health based, social care based and career based support services contribute to IEP where appropriate. Regular monitoring of effectiveness of provision. Regular monitoring and review of targets within IEP in consultation with child and parents. Review with all agencies providing additional support.</p>	
L.A. / Other Support Services and Monitoring		
S.A.	<p>Class teacher and ALNCO assess needs, consulting occasionally with external agencies</p>	
	<p>School:</p> <p>Attendance. Regular monitoring of effectiveness of provision. Regular monitoring and review of targets within IEP in consultation with child and parents. Review of ALN stage according to criteria. Annual ALN Audit.</p>	<p>Local Authority:</p> <p>Training for ALNCOs. Discussion in ALN. Planning meetings. Access to training. Review of ALN stage according to criteria. Annual ALN Audit.</p>
S.A.P.	<p>Class teacher and ALNCO take account of advice and / or assessment from external agencies when reviewing IEP.</p>	
	<p>School:</p> <p>Regular monitoring of effectiveness of provision. Regular monitoring and review of targets within IEP in consultation with child, parents and SALT. Review with all agencies providing additional support. Review of ALN stage according to criteria. Annual ALN Audit.</p>	<p>Local Authority:</p> <p>Support and advice when requested from ALN Team or any other agencies. Access to training (e.g. Elklan training) Review of ALN stage according to criteria. Annual ALN Audit.</p>



<p>S.A.P.R.A.</p>	<p>External agencies provide specialised assessment and advice that lead to modified IEP and / or contribute to the direct support for the pupil.</p>	
	<p>School:</p> <p>Regular monitoring of effectiveness of provision.                  Regular monitoring and review of targets within IEP in consultation with child and parents and SALT.                  Evidence regarding the utilisation of funding for the child during the previous year.                  Advice from any other relevant agencies as appropriate.                  Annual ALN Audit.</p>	<p>Local Authority:</p> <p>EPS involvement to advise on need and inform IEP.                  Health, Social Care, and Career based Support Services contribute to IEP when appropriate.                  Attendance at Transition Reviews (end of Key Stages) if requested.                  Review of ALN stage according to criteria and individual needs.                  Annual ALN Audit                  Annual review of SLA.                  Careers Wales representative to attend Year 9 Review.</p>

## Sensory and / or Physical Impairment

It is difficult to generalise the impact of Sensory impairment on a child's development. The needs of each child will vary and factors such as personality, age of onset of impairment, degree of loss, the presence of additional disabilities and cognitive ability will make each child unique.

Hearing Impairment (HI):

- HI affects pupils across the whole range of ability.
- The degree of hearing impairment ranges from pupils with a mild hearing loss to those who are profoundly deaf.
- Some children are born deaf while others may become deaf later on due to, illness or trauma.

For educational purposes, pupils are regarded as having a hearing impairment if they require hearing aids, adaptations to their environment and / or particular teaching strategies in order to access the concepts and language of the curriculum.

The majority of Hearing Impaired children are integrated into local mainstream schools.

Early diagnosis and the enormous development in amplification and hearing aid technology ensures that this is an effective placement.

More recently, digital hearing aids have come available and more and more Monmouthshire children will be fitted with digital hearing aids if considered appropriate for their needs.

These hearing aids offer advanced technology and provide pupils with excellent opportunities for developing their auditory skills.

There are two distinct types of hearing impairment in children:

### Conductive Hearing Loss:

- This does not often pose serious problems and is treatable.
- Pre-school children and children of Nursery School age are very likely to acquire conductive hearing losses.
- It is estimated that in any Nursery class anything up to twenty to twenty five per cent of children can have this type of loss at one time or another.

### Sensory Neural Hearing Loss:

- This is a more serious form of hearing impairment as it affects the auditory nerves.
- In the vast majority of cases the condition is irreversible.
- Children who have a moderate to profound hearing loss will be prescribed hearing aids.

The following terminology and definitions have been nationally agreed.

- SLIGHTLY HEARING-IMPAIRED: children whose hearing loss does not exceed 40 dB
- MODERATELY HEARING-IMPAIRED: children whose hearing loss is from 41 dB to 70 dB
- SEVERELY HEARING-IMPAIRED: children whose hearing loss is from 71 dB to 96 dB
- PROFOUNDLY HEARING-IMPAIRED: children whose hearing loss is greater than 96 dB

### Visual Impairment (VI)

Visual Impairment affects pupils across the whole range of ability.

The degree of visual impairment ranges from slight difficulties and minor impairment through to blindness.

Categories such as “blind” or “partially sighted” are used for medical and legal purposes.

These can carry different connotations if used in educational contexts.

Although representing only one aspect of vision, and in some instances not the most salient, VISUAL ACUITY is the basis on which an individual’s visual impairment is usually categorised.

Apart from clear vision at a distance, visual impairment may also have an impact on other aspects of vision, such as loss of peripheral vision, loss of central vision or disturbances in the visual field.

For educational purposes, pupils are considered to be Visually Impaired if they require adaptations to their environment or specific differentiation of learning materials in order to access the curriculum.

Educationally blind children will rely on tactile and auditory information in order to learn and are potential braille users.

However, most of these children, approximately 80% of those classed as blind, may have some residual vision or light perception that they can use to help orientate themselves, avoid obstacles and interpret the environment.

### World Health Organisation categories of vision:

Category of Visual	Degree of impairment	Visual Acuity with correction	Alternative Definition
Normal	None / Slight	6 / 6 – 6 / 9	Near normal
Low Vision	Moderate	Less than 6 / 18	Moderate low vision
	Severe	6 / 36	Severe low vision
Blindness	Profound	Less than 3 / 60	Profound low vision or Moderate blindness
	Near Total	Less than 1 / 60	Severe or total blindness
	Total	No light perception	Total Blindness

## Multi-Sensory Impairment:

When someone is born with combined sight and hearing difficulties the condition is defined as:

**Congenital Deaf-Blindness.**

When these problems develop later in life the condition is termed:

**Acquired Deaf-Blindness.**

Where children have severe developmental problems in addition to their deaf-blindness they are known to have:

**Multi-Sensory Impairment.**

## Physical Impairment:

There are a wide range of physical disabilities affecting pupils within the whole ability range.

Some pupils are able to access the curriculum and learn effectively without additional educational provision.

These pupils have a disability but do not have a special educational need. For others, the impact on their education may be severe.

## Medical Conditions / Syndromes:

A medical diagnosis does not necessarily mean that pupils have ALN.

It is dependent on the impact the condition has on their educational needs.

In such cases, an individual assessment of the child's and school's needs will be undertaken and, where appropriate, advice sought from other agencies.

Entry Criteria      Hearing Impairment	
S.A.	<p>The child's main difficulty is in the area of hearing.</p> <p><i>When the school suspects / observes that a child's hearing is affecting their learning development they should consult with parents in order to refer to their GP and / or seek permission to refer to school nurse and / or the visiting Teacher of the HI</i></p> <p>Mild to moderate hearing loss (Sensory neural or conductive).</p> <p>Classroom audit.</p> <p>Possible amplification.</p>
S.A.P.	<p>Moderate hearing loss causing substantial barrier to learning (sensory neural or long term conductive).</p> <p>Requires amplification.</p>
S.A.P.R.A.	<p>Severe to profound hearing loss causing substantial barriers to learning which will persist throughout their school career (sensory neural).</p> <p>Requires amplification.</p> <p>They require support over and above normal classroom provision.</p>
Evidence provided by the school or the early years setting.	
S.A.	<p>Evidence of difficulties with listening / attention, concentration, understanding and / or responding and possibly mild speech, language and communication difficulties.</p> <p>Evidence provided in conjunction with parents.</p>
S.A.P.	<p>Evidence of a hearing loss that can result in significant speech and language difficulties and access to areas of the curriculum which are not well supported by visual / practical activities.</p>
S.A.P.R.A.	<p>Evidence of severe speech and language difficulties which restrict communication and access to all areas of the curriculum which will persist throughout the child's school career.</p> <p>Information of the involvement of Health professionals.</p> <p>Indication of how allocated funds will be used.</p>

Curriculum and Teaching Methods	
S.A.	<p>Ordinary curriculum with some targeted differentiation. An inclusive teaching approach. Access to individualised multi-sensory programmes according to need.</p>
S.A.P.	<p>Mainstream class with an inclusive teaching approach. Visual and kinaesthetic learning strategies. Language differentiation and delivery of the curriculum. Possibly modification of learning materials. Advice on curriculum modification and access. Specific language and communication skills programmes. Some additional support to access the curriculum</p>
S.A.P.R.A.	<p>Curriculum modifications and individualised programmes sustained over a long time. Differentiation of the curriculum Considerable additional support to access the curriculum A total communication environment or natural oral approach.</p>
Grouping and Support	
S.A	<p>Class based with occasional support. All staff should speak clearly using simple phrases. Ensure the child has understood. Consider the seating arrangements. Adopt visual and kinaesthetic learning strategies.</p>
S.A.P.	<p>Main class and / or small group provision with targeted and sustained additional support. Advice on curriculum modification and access. Specific language and communication skills programmes. Differentiation of the curriculum and specialist support across the curriculum. Some additional support for core subjects with a total communication environment or natural oral approach.</p>
S.A.P.R.A.	<p>Small group and / or class provision for most of the time. Structured classroom management. Differentiation of the curriculum and specialist support in all core subject areas. Considerable additional support for core subjects with a total communication environment or natural oral approach.</p>

Specialised Resources	
S.A.	<p>Audit of learning environment.            Amplification equipment (e.g. hearing aids) and daily monitoring.            Some individual access to ICT equipment normally available in class and shared with other pupils.            Use of allocated ALN funding to provide school based individual / small group support.</p>
S.A.P.	<p>Audit of learning environment.            Amplification equipment (e.g. hearing aids and possibly radio microphone systems assessed on individual need).            Daily monitoring.            Technical support.            Individual access to ICT equipment available in class as and when required.            Subtitling and visual aids.            Use of allocated ALN funding to provide school based individual / small group support.</p>
S.A.P.R.A.	<p>Audit of learning environment.            Amplification equipment (e.g. hearing aids and possibly radio microphone systems )            Daily monitoring.            Technical support. Subtitling and visual aids.            ICT resources and other specific resources based on an individual need.            Signed interpretation.</p>
Advice and Assessment	
S.A.	<p>Class teacher and ALNCo assess needs consulting occasionally with external agencies.            Regular monitoring of effectiveness of provision.            Regular monitoring and review of IEP targets with child, parents and specialised staff.</p>
S.A.P.	<p>IEP based on programmes devised by Sensory Service.            Ongoing by the TA (following advice given by the Sensory Service).            Access to INSET courses and support.</p>



S.A.P.R.A.	Sensory Service provide specialised assessments and advice that lead to a modified IEP Regular monitoring of effectiveness of provision. Regular monitoring and review of targets within IEP in consultation with child, parents and Sensory Service. Review with all agencies providing additional support. Access to INSET courses and support.	
L.A / Other Support Services and Monitoring		
S.A.	Class teacher and ALNCO assess needs, consulting occasionally with external agencies.	
	School:  Attendance. Regular monitoring of effectiveness of provision. Regular monitoring and review of targets within IEP in consultation with child and parents and Sensory Service. Review of ALN stage according to criteria. Annual ALN Audit.	Local Authority:  Training for ALNCo / Class teacher Discussion in ALN Planning meetings. Access to training. Review of ALN stage according to criteria. Annual ALN Audit.
S.A.P.	Class teacher and ALNCO take account of advice and / or assessment from external agencies when reviewing IEP (AA2)	
	School:  Attendance. Regular monitoring of IEP targets in consultation with child, parents and other agencies. Review with all agencies providing additional support. Review of ALN stage according to criteria. Annual ALN Audit.	Local Authority:  Support and advice when requested from Sensory Team and /or other agencies. Access to ALN training Review of ALN stage according to criteria. Annual ALN Audit.
S.A.P.R.A.	External agencies provide specialised assessment and advice that leads to modified IEP and / or contribute to the direct support for the pupil.	

	<p>School:</p> <p>Regular monitoring of effectiveness of provision. Regular monitoring and review of targets with IEP in consultation with child and parents and Sensory Service. Evidence regarding the utilisation of funding for the child during the previous year. Advice from any other relevant agencies as appropriate. Annual ALN Audit.</p>	<p>Local Authority:</p> <p>Access to additional training for Manual Communication. Sensory Service, EPS involvement to advise on needs and inform IEP. Health, Social Care and Career based Support Services contribute to IEP when appropriate. Attendance at transition reviews if requested. Review of ALN stage according to criteria and individual needs. Annual ALN Audit. Annual review of SLA. Careers Representative attend Year 9 review.</p>
Entry Criteria Visual Impairment		
S.A.	<p>The child's main difficulty is in the area of vision. The child's difficulties cause some barriers to learning. Visual acuity 6/18-6/24 for distance and near vision good to slightly reduced. <i>When the school suspects / observes that a child's vision is affecting their learning development they should consult with parents in order suggest a vision test, and / or seek permission to refer to school nurse and /or the visiting Teacher of the VI.</i></p>	
S.A.P.	<p>The child's main difficulty is in the area of vision. The child's difficulties cause substantial barriers to learning. Significant to severe visual impairment. Visual acuity 6/36-6/60 and/or severe field loss. There would also be reduced near vision (N18-N24) with possibly nystagmus and / or adverse reaction to glare.</p>	
S.A.P.R.A.	<p>Permanent severe visual impairment which will persist throughout the pupil's school career. Visual acuity 6/60 or less. Pupil has no useful vision for educational purposes.</p>	

Evidence provided by the school or the early years setting.	
S.A.	Evidence provided by school or parent. Classroom audit of strategies and / or intervention. Evidence that visual impairment cannot be corrected by spectacles.
S.A.P.	Evidence provided of long term visual impairment. Vision cannot be corrected by spectacles. Has a significant impact on learning and access to the curriculum.
S.A.P.R.A.	Evidence of a permanent visual impairment which cannot be corrected by spectacles and which is likely to persist throughout the pupil's school career. Indications of how the difficulty has a significant impact on learning and access to the curriculum. Multi agency involvement from an early age. Unable to travel independently.
Curriculum and Teaching Methods	
S.A.	Ordinary curriculum with some targeted differentiation. An inclusive teaching approach. Access to individualised multi-sensory programmes according to need.
S.A.P.	Mainstream class with an inclusive teaching approach. Appropriately differentiated curriculum sustained over time. Kinaesthetic learning strategies. Careful planning of class seating. Specific programmes as advised. Possible enlarging of print and some modification.
S.A.P.R.A.	Curriculum modifications and individualised programmes sustained over a long time. Mainstream placement or Support Centre or a combination of settings. Tactile: Braille, diagrams, tape.
Grouping and Support	
S.A	Class based with occasional support. Consider the seating arrangements. Adopt multi-sensory learning strategies.

S.A.P.	<p>Main class and / or small group provision with targeted and sustained additional support.</p> <p>Advice on curriculum modification and access.</p> <p>Individual support for core subjects.</p> <p>Differentiation of the curriculum and specialist support in all core subject areas.</p>
S.A.P.R.A.	<p>Small group and / or class provision for most of the time.</p> <p>Structured classroom management.</p> <p>Differentiation of the curriculum and specialist support in all core subject areas.</p> <p>Considerable individual support for core subjects with a tactile approach.</p>
<b>Specialised Resources</b>	
S.A.	<p>Some individual access to ICT equipment normally available in class and shared with other pupils.</p> <p>Use of allocated ALN funding to provide school based individual / small group support.</p>
S.A.P.	<p>Individual access to equipment, including ICT that is normally available in class as and when required.</p> <p>ICT and other specific resources and adaptations assessed on an individual level.</p> <p>Low vision aids, sloping desks, lamps etc., as required in order to access the curriculum</p>
S.A.P.R.A.	<p>Individual access to more specialised equipment, including ICT sustained over time.</p> <p>Low vision aids, sloping desks, lamps etc., as required in order to access the curriculum.</p> <p>Typing, Braille technology (embosser, IT, Fuser, thermoform)</p>
<b>Advice and Assessment</b>	
S.A.	<p>Class teacher and ALNCo assess needs consulting occasionally with external agencies</p> <p>Regular monitoring of effectiveness of provision</p> <p>Regular monitoring and review of IEP targets with child parents and Sensory Service.</p>
S.A.P.	<p>Class teacher and ALNCo take advice from Sensory Service and external Agencies when reviewing IEPs</p>

S.A.P.R.A.	<p>Sensory Service provide specialised assessments and advice that lead to a modified IEP</p> <p>Regular monitoring of effectiveness of provision</p> <p>Regular monitoring and review of targets within IEP in consultation with child</p> <p>Parents and Sensory Service</p> <p>Review with all agencies providing additional support.</p> <p>Access to INSET courses and support.</p>	
L.A / Other Support Services and Monitoring		
S.A.	Class teacher and ALNCO assess needs, consulting occasionally with external agencies.	
	<p>School:</p> <p>Attendance. Regular monitoring of effectiveness of provision. Regular monitoring and review of targets within IEP in consultation with child and parents and Sensory Service. Review of ALN stage according to criteria. Annual ALN Audit.</p>	<p>Local Authority:</p> <p>Training for ALNCo / Class teacher Discussion in ALN planning meetings. Access to training. Review of ALN stage according to criteria. Annual ALN Audit.</p>
S.A.P.	Class teacher and ALNCO take account of advice and / or assessment from external agencies when reviewing IEP (AA2)	
	<p>School:</p> <p>Attendance. Regular monitoring of IEP targets in consultation with child, parents and other agencies. Review with all agencies providing additional support. Review of ALN stage according to criteria. Annual ALN Audit.</p>	<p>Local Authority:</p> <p>Support and advice when requested from Sensory Team and /or other agencies. Access to training Review of ALN stage according to criteria. Annual ALN Audit.</p>

S.A.P.R.A.	External agencies provide specialised assessment and advice that leads to modified IEP and / or contribute to the direct support for the pupil.	
	<p>School:</p> <p>Regular monitoring of effectiveness of provision. Regular monitoring and review of targets with IEP in consultation with child and parents and Sensory Service. Evidence regarding the utilisation of funding for the child during the previous year. Advice from any other relevant agencies as appropriate. Annual ALN Audit.</p>	<p>Local Authority:</p> <p>Sensory Service, EPS involvement to advise on needs and inform IEP. Health, Social Care and Career based Support Services contribute to IEP when appropriate. Attendance at transition reviews if requested. Review of ALN stage according to criteria and individual needs. Annual ALN Audit. Annual review of SLA. Careers Wales representative attend Year 9 review.</p>
<b>Entry Criteria Physical and / or Medical</b>		
S.A.	<p>The child has low level medical or physical needs. The child requires support over and above normal classroom differentiation. The pupil is independent in most activities.</p>	
S.A.P.	<p>The child's main presenting difficulty is in the area of medical or physical needs. The difficulties cause substantial barriers to learning and require increased differentiation. Low to moderate level difficulties e.g. toileting or accessing some aspects of Curriculum due to difficulties with mobility. Pupil is independent in most activities.</p>	

S.A.P.R.A.	<p>The child's main presenting difficulty is in the area of medical or physical needs.</p> <p>The child has significant physical difficulties with associated health and personal care issues which will persist throughout their school career.</p> <p>In addition to long term physical and other associated areas of difficulty the child has other distinct areas of need.</p> <p>e.g. associated language / communication and learning difficulties affecting their access to the curriculum.</p>
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Evidence provided by the school or the early years setting.	
S.A.	<p>Evidence that despite differentiation, medical and/or physical needs continue to hinder/delay progress.</p> <p>Evidence provided by the school of consultation with parents.</p> <p>Classroom assessment with details of support/intervention.</p>
S.A.P.	<p>Continues to make little or no progress in specific areas despite SA support.</p> <p>Has a significant impact on learning and access to the curriculum.</p> <p>Latest IEP outcomes.</p> <p>Medical reports.</p>
S.A.P.R.A.	<p>Needs are likely to persist for child's school career.</p> <p>SA/SAP documentation in place.</p> <p>Indications as to how the difficulty affects access to the curriculum.</p> <p>EPS involvement.</p> <p>Information of involvement of health professionals.</p> <p>Medical and/or Therapist reports.</p> <p>Multi agency involvement from an early age.</p>
Curriculum and Teaching Methods	
S.A.	<p>Mainstream curriculum with some targeted differentiation.</p> <p>An inclusive teaching approach.</p> <p>Access to individualised multi-sensory programmes according to need.</p>
S.A.P.	<p>Mainstream curriculum with significant and targeted differentiation sustained over time.</p> <p>Appropriately differentiated curriculum.</p> <p>Careful planning of class grouping/seating.</p> <p>An inclusive teaching approach.</p> <p>Incorporation of specific programmes as advised.</p> <p>Pace of teaching/demands on child, to take account of child's possible natural fatigue.</p> <p>Adaptations to curriculum areas e.g. implementing advice from therapists.</p> <p>Modifications by outcomes especially for recording work and practical activities specified in IEP.</p> <p>Social and Communication needs/targets addressed in context of curriculum.</p>
S.A.P.R.A.	<p>Some curriculum modifications and individualised programmes sustained over time.</p> <p>An individually planned curriculum to accommodate the physical/medical language/learning needs of the child.</p> <p>Additional programme for mobility/life skills/social skills/leading to appropriate degrees of independence.</p>



Grouping and Support	
S.A	<p>Class based with occasional support. Inclusive teaching approach. Consider the seating arrangements. Adopt visual and kinaesthetic learning strategies.</p>
S.A.P.	<p>Mainstream class provision for most of the time with targeted and sustained support in class and / or in a small group. Classroom Audit of grouping and seating. Structured classroom management. Inclusive teaching approach.</p>
S.A.P.R.A.	<p>Small group and / or class provision for most of the time. Structured classroom management. Differentiation of the curriculum and specialist support across the curriculum. Considerable additional kinesthetic support across the curriculum.</p>
Specialised Resources	
S.A.	<p>Provision is school based. Audit of learning environment. Some individual access equipment normally available in class and shared with other pupils. Use of allocated ALN funding to provide school based individual/small group support.</p>
S.A.P.	<p>Audit of learning environment. Individual access to normally available equipment as and when required. ICT and other specific resources and adaptations assessed on an individual need. Use of allocated ALN funding to provide school based individual/small group support. Modification of building access, toileting facilities, mobility aids in conjunction with L.A. and external agencies in order to promote independence.</p>

S.A.P.R.A.	Individualised access to more specialist equipment sustained over time. Audit of learning environment. ICT and other specific resources and adaptations assessed on an individual need. Additional modifications for the physical environment and support for mobility around the school. Specialised resources on an individual needs basis as recommended by Support Services (ranging from low tech—high tech).	
<b>Advice and Assessment</b>		
S.A.	Class teacher and ALNCo assess the child's needs, consulting occasionally with external agencies. Regular monitoring of effectiveness of provision. Regular monitoring and review of IEP targets in consultation with child, (where appropriate) parents, and other involved agencies.	
S.A.P.	Class teacher and ALNCo take advice from external agencies when reviewing IEP. Support and advice as requested from L.A. Access to INSET courses and support. Regular consultation with parents based on programmes devised by therapist or support services. Possible involvement of the Children and Disabilities Team and/or Health agencies.	
S.A.P.R.A.	External agencies provide specialised assessments and advice that lead to modified IEP. Adult support and / or/ guidance needed for all curriculum areas and close supervision in social settings. High level of mobility instruction and help in gaining personal independence. Involvement of EPS. Disabled Children's Team and / or Health agencies. Evidence regarding the utilization of funding for the child.	
<b>L.A / Other Support Services and Monitoring</b>		
S.A.	Class teacher and ALNCO assess needs, consulting occasionally with external agencies.	
	<b>School:</b>  Attendance. Regular monitoring of effectiveness of provision.	<b>Local Authority:</b>  Training for ALNCo / Class teacher Discussion in ALN planning meetings.

	Regular monitoring and review of targets within IEP in consultation with child and parents and appropriate external agencies. Review of ALN stage according to criteria. Annual ALN Audit.	Access to training. Review of ALN stage according to criteria. Annual ALN Audit.
S.A.P.	Class teacher and ALNCO take account of advice and / or assessment from external agencies when reviewing IEP	
	<p>School:</p> <p>Attendance. Regular monitoring of IEP targets in consultation with child, parents and other agencies Review with all agencies providing additional support. Review of ALN stage according to criteria. Annual ALN Audit.</p>	<p>Local Authority:</p> <p>Support and advice when requested from Sensory Team and /or other agencies. Access to training Review of ALN stage according to criteria. Annual ALN Audit.</p>
S.A.P.R.A.	External agencies provide specialised assessment and advice that leads to modified IEP and / or contribute to the direct support for the pupil.	
	<p>School:</p> <p>Regular monitoring of effectiveness of provision. Regular monitoring and review of targets with IEP in consultation with child and parents and all other agencies. Evidence regarding the utilisation of funding for the child during the previous year. Advice from any other relevant agencies as appropriate. Annual ALN Audit.</p>	<p>Local Authority:</p> <p>Access to additional and appropriate training. ALN Service, EPS involvement to advise on needs and inform IEP. Health, Social Care and Career based Support. Services contribute to IEP when appropriate. Attendance at transition reviews if requested. Review of ALN stage according to criteria and individual needs. Annual ALN Audit. Annual review of SLA. Careers Wales Representative attend Year 9 review.</p>

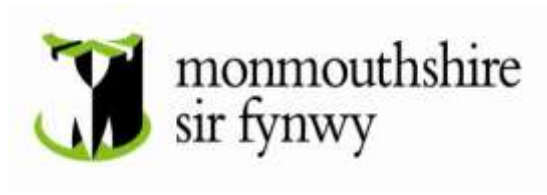
APPENDICES

**4. School Action Plus  
Resource Assist Form**

**5. ALN Planning Sheet**

**6. ALN Planning Sheet**

**7. Scoring Matrix**



## SAPRA

*School Action Plus Resource Agreement*

*This Agreement is for the Local Authority to make*

PUPIL DETAILS			
<b>Name</b>		<b>Date of birth</b>	
<b>Home Address</b>			
<b>Sex</b>		<b>Home Language</b>	
<b>Religion:</b>		<b>Looked After Child?</b>	
<b>1<sup>st</sup> Major Need</b>		<b>2<sup>nd</sup> Major Need</b>	

CHILD'S PARENT OR RESPONSIBLE PERSON			
<b>Name</b>			
<b>Address</b>			
<b>Tel No.</b>		<b>Relationship to child</b>	

SCHOOL DETAILS	
<b>School:</b>	
<b>Headteacher:</b>	
<b>SENCO:</b>	

OTHER SERVICES WITH INVOLVEMENT		
Agency	Name	Contact Details
102		296

*provision for a pupil who requires additional support over and above what is expected at School Action Plus. When assessing the child's additional learning needs the Authority takes into consideration the local criteria as defined in the ALN Strategy 2014.*

BACKGROUND INFORMATION & ADDITIONAL LEARNING NEEDS	

The school will...	
The LEA will...	

Support Services will:	
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Parents will...	
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<p>SIGNED BY</p>	<p>On behalf of Monmouthshire ALN Services: _____</p> <p>On behalf of the School: _____</p> <p>Parents: _____</p> <p>Dated: _____</p>
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Changes in the register 2014:15		Number who have moved forward a stage on the register	Number who have moved back a stage on the register	Number added to the register	Number removed from the register	<b>SEN Self Evaluation (2014-2015)</b>	
	Number					School :	
	Details of the individuals/ stage/ reason					Budget 2014-15	
						Expenditure	

Use of SEN budget 2014-2015	How was the SEN budget used?	In what way have the pupils benefited from this provision	What was the most effective element of the provision	What are the barriers to maintaining the provision? Training and support 2013-2014

Training and support 2014-2015	What was the effect on the pupils? What was the effect on the Teacher/ Assistant/ Provision?	Did this lead to increasing the school's capacity to address pupils learning difficulties?

What have you learnt in 2014/2015 which will enable you to plan ahead for the next year?	
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2015-2016	£	Use of Budget	Expected Outcomes
Delegated Lump Sum			
SAPRA or STATEMENT (Band Funding)			
SNRB Funding			
ALN Funding from whole school budget			
Total			

SEN Planning 2015 - 2016		School:
Head Teacher		
ALN CO		
Child Protection Governor		
ALN Governor		
LAC Governor		
ALN Officer		

Number of pupils at SA		Number of pupils at SA+		Number of pupils with a SAPRA		Number of pupils with a Statement					
Specific Learning Difficulties	Individual Pupils/groups	Provision		Way forward		Behavioural support/LAC pupils	Individual Pupils/groups	Provision		Way forward	
Psychology Services	Pupils	Provision		The Way Forward		Inclusion Support (Attendance)	Individual Pupils/Groups	The Way Forward			

**SEN Matrix Scoring grid**

\* Leadership

Schools	Data	Inclusive	SEN Policy*	Budget*	Staffing*	Structured Intervention	Relevant/ Timely Referrals	Implement Advice &	Management of Register*	Annual Reviews*	Parents/ Agencies*	Leadership	Outcomes

## Glossary

ALN	Additional Learning Needs
ALNCO	Additional Learning Needs Coordinator
ASD	Autistic Spectrum Disorder
BESD	Behaviour, Emotional and Social Difficulties
CAMHS	Child & Mental Health Services
COMiT	Communication Intervention Team
EAS	Education Achievement Service
EOTAS	Education Other than at School
EP	Educational Psychologist
EPS	Educational Psychology Service
EY	Early Years
EWO	Education Welfare Officer
GEMSS	Gwent Ethnic Minority Support Service
HI	Hearing Impairment
IBP	Individual Behaviour Plan
IDP	Individual Development Plan
IEP	Individual Education Plan
LAC	Looked After Child
MLD	Moderate Learning Difficulties
PMLD	Profound and Multiple Learning Difficulties
PSHE	Personal, Social and Health Education
PRU	Pupil Referral Unit
S	Statement
SA	School Action
SALT	Speech and Language Therapy
SAP	School Action Plus

SAPRA	School Action Plus Resource Assist
SEN	Special Educational Needs
SLCD	Speech, Language & Communication Difficulties
SLD	Severe Learning Difficulties
SpLD	Specific Learning Difficulties Service
TA	Teaching Assistant
VI	Visual Impairment

### Appendix 3

### The “Equality Initial Challenge”

Name: Stephanie Hawkins		Please give a <b>brief description</b> of what you are aiming to do.	
Service area: Additional Learning Needs (ALN)			
Date completed: 8 September 2014		Strategic Policy and Procedures (Review 2014) for ALN	
Protected characteristic	Potential <b>Negative</b> impact Please give details	Potential <b>Neutral</b> impact Please give details	Potential <b>Positive</b> Impact Please give details
Age		Involves all children and young people	
Disability			Increased inclusion for all children and young people
Marriage + Civil Partnership		N/A	
Pregnancy and maternity		N/A	
Race		Involves all children and young people	
Religion or Belief		Involves all children and young people	
Sex (was Gender)		Involves all children and young people	
Sexual Orientation		Involves all children and young people	
Transgender		Involves all children and young people	
Welsh Language		Involves all children and young people	

Please give details about any potential <b>negative Impacts</b> .	How do you propose to <b>MITIGATE</b> these <b>negative impacts</b>
➤ <i>none</i>	➤
➤	➤
➤	➤
➤	➤

**Signed S Hawkins**  
**Dated 8 September 2014.**

**Designation Principal Officer ALN**

## EQUALITY IMPACT ASSESSMENT FORM

<b>What are you impact assessing</b>	<b>Service area</b>
Strategy, Policy and Procedures (Review 2014) for ALN	ALN
<b>Policy author / service lead</b>	<b>Name of assessor and date</b>
Stephanie Hawkins	Stephanie Hawkins

### 1. What are you proposing to do?

**Background** November 2012 Estyn, Her Majesty’s Inspectorate for Education and Training in Wales reported that the quality of local authority education for children and young people with additional learning needs in Monmouthshire County Council was Unsatisfactory; the number of statements of educational needs was too high and resources were directed towards the statutory assessment process, strategic planning was weak, data was not collected regarding pupil progress and there was a lack of specialist facilities for pupils with ASD, behavioural difficulties and severe learning difficulties, resulting in pupils travelling long distances to attend out of county placement.

In order to address the issues identified, Monmouthshire County Council, Children and Young People’s Directorate, engaged in a review of the strategy and policy for pupils with Additional Learning Needs (ALN). ALN is an umbrella term used to describe individuals or groups of learners with a diverse and often complex range of needs. The term encompasses all children and young people with learning needs which are greater than those of the majority of their peers. It includes learners who may require additional support either due to their circumstances or because they have a longer-term disorder or condition. The term ALN is much wider in scope than the term “special educational needs” in order to recognise the diverse and complex needs of learners and to reflect a more holistic approach to meeting the needs of individuals.

2. Are your proposals going to affect any people or groups of people with protected characteristics in a **negative** way? If **YES** please tick appropriate boxes below. No.

Age		Race	
Disability		Religion or Belief	
Gender reassignment		Sex	
Marriage or civil partnership		Sexual Orientation	
Pregnancy and maternity		Welsh Language	

3. Please give details of the negative impact

This strategy review is designed to ensure equality of opportunity to all pupils in Monmouthshire and to direct resources and support where they are most needed in a transparent and robust way. The model has been drawn up in close consultation with Ceredigion Council who have a very similar demographic profile and who were faced with very similar challenges. Eg Low levels of BME population, rural authority etc

Also Ceredigion were highlighted by ESTYN as outstanding in their practice in this particular area

4. Did you take any actions to mitigate your proposal? Please give details below including any consultation or engagement.

n/a



5. Please list the data that has been used to develop this proposal? eg Household survey data, Welsh Govt data, ONS data, MCC service user data, Staff personnel data etc..

Thematic analysis of the consultation with

parents,

carers,

children and young people,

Headteachers,

Social Services

Individual sessions with Schools and clusters

SNAP carried an independent survey on our behalf .

A copy of the strategy and all accompanying evidence of consultation has been recorded and is available to share if required.

**Signed**...S Hawkins

**Designation** Principal Officer, ALN

**Dated** 18th September 2014

### The “Sustainability Challenge”

<b>Name of the Officer</b> completing “the Sustainability challenge”  Stephanie Hawkins	Please give a <b>brief description</b> of the <b>aims</b> proposed policy or service reconfiguration  ALN Review		
<b>Name</b> of the Division or service area	<b>Date</b> “Challenge” form completed		
Aspect of sustainability affected	<b>Negative impact</b>  Please give details	Neutral impact  Please give details	<b>Positive Impact</b>  Please give details
<b>PEOPLE</b>			
Ensure that more people have access to healthy food		N/A	
Improve housing quality and provision		N/A	
Reduce ill health and improve healthcare provision		N/A	
Promote independence			To improve levels of independence for children and young people who are supported in schools.
Encourage community		N/A	

participation/action and voluntary work			
Targets socially excluded			To reduce exclusions and increase accessibility of mainstream schools in Monmouthshire.
Help reduce crime and fear of crime		N/A	
Improve access to education and training			Increased inclusion for all learners.
Have a positive impact on people and places in other countries		N/A	
<b>PLANET</b>			
Reduce, reuse and recycle waste and water		N/A	
Reduce carbon dioxide emissions			There will be a reduction in transporting children to out of county placements.
Prevent or reduce pollution of the air, land and water		N/A	
Protect or enhance wildlife habitats (e.g. trees, hedgerows, open spaces)		N/A	
Protect or enhance visual appearance of environment		N/A	

<b>PROFIT</b>			
Protect local shops and services		N/A	
Link local production with local consumption		N/A	
Improve environmental awareness of local businesses		N/A	
Increase employment for local people			Possibility of increased staffing in schools to support CYP in mainstream settings within Monmouthshire.
Preserve and enhance local identity and culture			Children and young people are educated within their own community.
Consider ethical purchasing issues, such as Fairtrade, sustainable timber (FSC logo) etc		N/A	
Increase and improve access to leisure, recreation or cultural facilities			Children and young people are educated within their own community.

What are the potential negative Impacts	Ideas as to how we can look to <b>MITIGATE</b> the <b>negative impacts</b> (include any reasonable adjustments)
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➤	➤
➤	➤
➤	➤
➤	➤

### The next steps

- If you have assessed the proposal/s as having a **positive impact please give full details** below

The Strategy, Policies and Procedures aim to increase equal access to education for all children and young people within their own community.

Staff within local mainstream schools will be upskilled to manage the needs of all children and young people within their community.

- If you have assessed the proposal/s as having a **Negative Impact** could you please provide us with details of what you propose to do to mitigate the negative impact:

**Signed Stephanie Hawkins**

**Dated 8 September 2014.**