

Pecyn Dogfennau Cyhoeddus

Cabinet

Man Cyfarfod
**Siambwr y Cyngor - Neuadd y Sir,
Llandrindod, Powys**

Dyddiad y Cyfarfod
Dydd Mawrth, 8 Chwefror 2022

Amser y Cyfarfod
10.00 am

I gael rhagor o wybodaeth cysylltwch â
Stephen Boyd
01597 826374
steve.boyd@powys.gov.uk



Neuadd Y Sir
Llandrindod
Powys
LD1 5LG

Dyddiad Cyhoeddi

Mae croeso i'r rhai sy'n cymryd rhan ddefnyddio'r Gymraeg. Os hoffech chi siarad Cymraeg yn y cyfarfod, gofynnwn i chi roi gwybod i ni erbyn hanner dydd ddau ddiwrnod cyn y cyfarfod

AGENDA

1.	YMDDIHEURIADAU
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Derbyn ymddiheuriadau am absenoldeb.

2.	COFNODION
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Awdurdodi'r Cadeirydd i lofnodi cofnodion y cyfarfodydd a gynhaliwyd ar 18 a 25 Ionawr fel cofnodion cywir.

(Tudalennau 1 - 8)

3.	DATGANIADAU O DDIDDORDEB
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Derbyn unrhyw ddatganiadau o ddiddordeb gan Aelodau yn ymwneud ag eitemau l'w hystyried ar yr agenda.

4.	YSGOL G.G. LLANFIHANGEL RHYDIEITHON
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Ystyried adroddiad gan y Cynghorydd Sir Phyl Davies, Aelod Portffolio ar faterion Addysg ac Eiddo

(Tudalennau 9 - 272)

5.	YSGOL ARBENNIG CEDEWAIN - RHAGLEN TRAWSNEWID ADDYSG
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Ystyried adroddiad gan y Cynghorydd Sir Phyl Davies, Aelod Portffolio ar faterion Addysg ac Eiddo.

(Tudalennau 273 - 358)

6.	CANFYDDIADAU ADOLYGU PORTH RHAGLEN YSGOLION YR UNFED GANRIF AR HUGAIN
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Ystyried adroddiad gan y Cynghorydd Sir Phyl Davies, Aelod Portffolio ar faterion Addysg ac Eiddo.

(Tudalennau 359 - 378)

7.	CYFRIF REFENIW TAI - NEWIDIADAU TALIADAU RHENT A CHYSYLLTIEDIG AR GYFER 2022-23
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Ystyried adroddiad gan y Cynghorydd Sir Myfanwy Alexander, Aelod Portffolio ar faterion Gofal Cymdeithasol Oedolion, yr Iaith Gymraeg, Tai a Newid yn yr Hinsawdd.

(Tudalennau 379 - 410)

8.	MABWYSIADU CYNLLUN GWEITHREDU GORFODAETH EIDDO GWAG POWYS
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Ystyried adroddiad gan y Cynghorydd Sir Myfanwy Alexander, Aelod Portffolio ar faterion Gofal Cymdeithasol Oedolion, yr Iaith Gymraeg, Tai a Newid yn yr Hinsawdd.

(Tudalennau 411 - 430)

9.	STRATEGAETH GAFFAEL 2022 -25
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Ystyried adroddiad gan y Cynghorydd Sir Aled Davies, Aelod Portffolio ar faterion Cyllid a Thrafnidiaeth.

(Tudalennau 431 - 448)

10.	PENDERFYNIADAU DIRPRWYEDIG A WNAED ERS Y CYFARFOD DIWETHAF
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Nodi'r penderfyniadau dirprwyedig a gymerwyd gan yr Aelod Portffolio.

(Tudalennau 449 - 450)

11.	BLAENRAGLEN WAITH
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Ystyried blaenraglen waith y Cabinet.

(Tudalennau 451 - 452)

**MINUTES OF A MEETING OF THE CABINET HELD AT BY TEAMS ON TUESDAY,
18 JANUARY 2022**

PRESENT

County Councillor M R Harris (Chair)

County Councillors MC Alexander, B Baynham, A W Davies, H Hulme and R Powell

1.	APOLOGIES
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Apologies for absence were received from County Councillor Phyl Davies who had technical difficulties joining the meeting and from the Executive Director, People and Organisational Development.

2.	MINUTES
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The Leader was authorised to sign the minutes of the meetings held on 14th and 21st December 2021 as correct records.

3.	DECLARATIONS OF INTEREST
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There were no declarations of interest reported.

4.	DRAFT MEDIUM-TERM FINANCIAL STRATEGY 2022-2027 AND DRAFT 2022-23 BUDGET AND CAPITAL PROGRAMME FOR 2022-2027
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Cabinet considered the draft Medium Term Financial Strategy (MTFS) for 2022-27, which included a Financial Resource Model (FRM) for 2022-27, a draft revenue budget for 2022-23 and a draft capital programme for 2022-23 to 2026-27. Each had been reviewed and developed by the Cabinet and Executive Management Team as part of the overall strategic planning process alongside Vision 2025, the Council's Corporate Improvement Plan.

The updated draft Strategy captured the financial, regulatory and policy drivers affecting the council and identified the Council's service and resource priorities for the next five financial years. It delivered a balanced budget for 2022/23, and indicative budgets for the following 4 years to March 2027.

The draft MTFS included the principles that would govern the strategy and a five-year Financial Resource Model (FRM), comprising detailed proposals for 2022-23 and outline proposals for 2023-24 to 2026-27, the Capital Financing Strategy and the Treasury Management Strategy and Capital Programme for 2022-23 to 2026-27.

The Portfolio Holder noted that over the last ten years the Council's finances had been significantly impacted from funding settlements that did not cover the cost of inflation and service pressures which resulted in savings being required to

balance the budget. This year the cost of responding to COVID-19 had caused additional and unprecedented pressures. Additional financial support had been provided by Welsh Government during the last 2 years to support the Council's costs and loss of income which had been instrumental in sustaining the financial position over this period. Funding to support the Council's ongoing costs in response to the pandemic had now been included in the annual revenue settlement and would be managed within the Revenue Budget from 2022/23.

The 2022-23 provisional settlement gave Powys County Council a cash increase of £18.374 million (9.6%) on 2021-22. The settlement ensured that the Council could meet the increased demand for services, increasing inflationary costs, and support investment in improvement and transformation and in services that underpin the priorities set out as part of Vision 2025.

The Council also funded its expenditure by generating income from grants, fees and charges and council tax. The balancing of the Council's 2022-23 budget was dependent upon a 3.9% increase in the council tax in 2022-23, generating £3.45 million, and £0.71 million delivered through changes to the council tax base, by £7.7 million of cost reduction proposals and by increases in fees and charges as set out in the report. The recommended 3.9% council tax increase was lower than the 5% assumed in the MTFs approved by Council in 2021.

The proposed Capital Programme totalling £371 million (including the Housing Revenue Account) reflected the existing commitments made in previous years as well as new schemes already approved. Maintaining the capital programme had a significant regeneration impact for the economy of Powys alongside the direct effect of better infrastructure to deliver services. Capital investment also had a significant input into the delivery of revenue cost reductions, and it was essential that both budget strategies are developed in tandem.

The Section 151 Officer gave her opinion that the estimates used in the budget proposal for 2022-23 were adequately robust but a level of risk remained. Based on the assessment of reserves, the overall level was adequate but remained at the lower end of acceptability given the scale of savings required, the ongoing impact of the pandemic and the financial uncertainty facing the Council over the medium term.

In moving the recommendations the Portfolio Holder for Finance and Transportation thanked the Head of Finance and her team and his Cabinet colleagues for their work on the budget.

RECOMMENDED to Council to approve the	Reason for Recommendation:
1. MTFs for 2022-2027 as set out in Appendix A to the report be agreed in principle.	To aid business planning and development of the budget over a five-year period
2. Draft Revenue Budget for 2022-23 with the inclusion of a 3.9% increase in Council Tax in 2022-23 shown in the Financial Resource Model in Appendix B and Table 3	Statutory Requirement

of the report.	
3. Fees and Charges Register in Appendices D and E.	To comply with Powys County Council Income Policy
4. Capital Strategy and Capital Programme for 2022-23 shown in Appendix F.	Statutory Requirement
5. Minimum Revenue Provision Statement as set out on Appendix F.	Statutory Requirement
6. Treasury Management Strategy and the Annual Investment Strategy in Appendix F.	Statutory Requirement
7. Authorised borrowing limit for 2022-23 as required under section 3(1) of the Local Government Act 2003 at £492 million as set out in section 3.70 of the report.	Statutory Requirement
8. Prudential Indicators for 2022-23 as set out in section 3.66 to 3.70 of the report and Appendix F.	Statutory Requirement

5.	2022 ANNUAL REVIEW OF VISION 2025 OUR CORPORATE IMPROVEMENT PAN, INCLUDING OUR STRATEGIC EQUALITY OBJECTIVES 2020-2024
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Cabinet considered the annual update of Vision 2025: Our Corporate Improvement Plan (CIP). A number of amendments to the plan for the 2022-2023 financial year had been proposed following a light review of the current CIP objectives and performance measures. Mindful of the Council elections in May 2022, the amendments proposed were minor as an incoming administration might choose different priorities. It was noted that the Cabinet had delivered on its priorities, building new social housing, investing in services for vulnerable people, improving the Education service and building investment into the county.

RESOLVED that the proposed amendments to Vision 2025: Our CIP (as outlined in Appendix A to the report) are approved for publication in the CIP Update 2022, with implementation from April 2022.

6.	POST-ERW WORKING IN THE MID WALES EDUCATION PARTNERSHIP
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Cabinet considered a proposal to enter into a partnership with Ceredigion County Council for professional learning through the Mid Wales Education Partnership.

The working arrangements were set out in a draft Memorandum of Understanding attached to the report.

RESOLVED that

- 1. Powys and Ceredigion continue to work together as the Mid Wales Education Partnership**
- 2. Officers from across the partnership will collaborate on a number of agreed local and national priorities**
- 3. The Mid Wales Education Partnership is represented on the full range of cross-regional working parties to ensure equity of provision for schools in Powys and Ceredigion.**
- 4. That the draft Memorandum of Understanding as set out in Appendix 1 to the report is approved, with delegated authority to the Director of Education and the Monitoring Officer to make any further minor amendments that may be required.**

7.	ANNUAL REPORT 2020/21 SOCIAL SERVICES COMPLAINTS, COMPLIMENTS AND REPRESENTATIONS REPORT
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Cabinet received the annual complaints and compliments report for Social Services for 2020/21. 2020/21 had seen a small increase in the number of complaints, which was not unexpected given the Coronavirus pandemic and the impact this has had on the service and the overnight change in the way services had been delivered. The Portfolio Holders thanked everyone who had taken time to respond and to the staff who dealt with them.

RESOLVED that the report be noted.

8.	DIGITAL POWYS PROGRAMME UPDATE
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Cabinet received details of the achievements of the Digital Powys Transformation Programme. Phase One of the programme, which was drawing to a close, had delivered considerable benefits to the Council's customers and staff and significant financial efficiency. It had supported the Council's transformation programme, updating the website and increasing the number of services residents could book on-line. The service was also supporting 21 community broadband initiatives.

In addition, Digital Services had played an important role throughout the pandemic, supporting the Track and Trace programme and schools through the Ed-Tech programme supplying laptops to pupils and teachers.

The Leader thanked the Head of Economy and Digital Services and her team for their work. It was suggested that the information in the report should be shared with all Members and put on the agenda for the Town and Community Councils liaison meeting.

RESOLVED to note the Digital Transformation programme phase 1 achievements.

9.	DELEGATED DECISIONS TAKEN SINCE THE LAST MEETING
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Cabinet noted the delegated decisions taken by Portfolio Holders since the last meeting.

10.	FORWARD WORK PROGRAMME
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Cabinet noted the forward work programme.

County Councillor M R Harris (Chair)

Mae'r dudalen hon wedi'i gadael yn wag yn fwriadol

**MINUTES OF A MEETING OF THE CABINET HELD BY TEAMS ON TUESDAY, 25
JANUARY 2022**

PRESENT

County Councillor M R Harris (Chair)

County Councillors MC Alexander, B Baynham, P Davies, A W Davies, H Hulme and R Powell

In attendance: County Councillors P Roberts and E Vaughan

1. APOLOGIES

Apologies for absence were received from the Executive Director, People and Organisational Development and the Executive Director Economy and Environment.

2. DECLARATIONS OF INTEREST

There were no declarations of interest reported.

3. WELSH IN EDUCATION STRATEGIC PLAN (WESP) 2022-2032
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Cabinet considered the results of the consultation on the authority's draft Welsh in Education Strategic Plan (WESP) for 2022-2032. The WESP had been developed in order to contribute towards the Welsh Government target to increase the percentage of Year 1 children taught through the medium of Welsh in Powys from 22.2% in 2019/20 to 36% by 2030/31.

The Plan was based on 7 Outcomes which reflect a learner's education journey. Detailed implementation plans would be developed for each of the 7 Outcomes and monitored by both the Welsh-medium Education Forum and the Council's internal Welsh-medium Education Workstream.

A summary of consultation responses and copies of the detailed responses received from stakeholders were provided in an appendix to the report. The WESP had been reviewed and updated in light of the responses. The Director of Education noted that Estyn had observed that the WESP aligned well with the council's strategy for transforming education and had encouraged other local authorities to look at it as an example of good practice.

County Councillor Elwyn Vaughan speaking as the Chair of the Welsh-medium Education Forum welcomed the plan and the progress made over the last year in strengthening Welsh-medium education in the county.

County Councillor Pete Roberts presented the recommendations and observations of the Learning and Skills Scrutiny Committee which had met the previous day. The Committee had made four recommendations, two of which had been accepted and two which were partially accepted. In respect of the

recommendation that the details for the locations of proposed Welsh Medium secondary provision be replaced in the strategy with the aim to establish three all through Welsh Medium schools in the county, it was proposed to add the following text to the WESP

“Any changes to schools that require a statutory school reorganisation process are included in this WESP without prejudice to any decisions that the Cabinet may make in relation to that process.”

RESOLVED to approve the updated Welsh in Education Strategic Plan for 2022-2032 as contained in Appendix A with the addition of the text above in italics for submission to Welsh Government.

County Councillor M R Harris (Chair)

CYNGOR SIR POWYS COUNTY COUNCIL.

CABINET EXECUTIVE

8 February 2022

REPORT AUTHOR: County Councillor Phyl Davies
Portfolio Holder for Education and Property

REPORT TITLE: Llanfihangel Rhydithon C.P. School

REPORT FOR: Decision

1. Purpose

- 1.1 Further to the decision made by Cabinet on the 28th September 2021, the Council published a Statutory Notice proposing to close Llanfihangel Rhydithon C.P. School from the 31st August 2022, with pupils to attend their nearest alternative schools.
- 1.2 The purpose of this report is to inform Cabinet members of the outcome of the statutory objection period and objections received.
- 1.3 The report includes a recommendation to proceed with implementation of the proposal to close Llanfihangel Rhydithon C.P. School from the 31st August 2022.
- 1.4 The report is supported by the following appendices:
 - **Appendix A** – Statutory Notice
 - **Appendix B** – Objection Report
 - **Appendix C** – Updated Impact Assessments

2. Background

Strategy for Transforming Education in Powys

- 2.1 On the 14th April 2020, a new Strategy for Transforming Education in Powys was approved by the Leader via a delegated decision.
- 2.2 The Strategy was developed following extensive engagement with a range of stakeholders during two separate periods between October 2019 and March 2020. The Strategy sets out a new vision education in Powys, as follows:

'All children and young people in Powys will experience a high quality, inspiring education to help develop the knowledge, skills and attributes that will enable them to become healthy, personally fulfilled,

economically productive, socially responsible and globally engaged citizens of 21st century Wales.'

2.3 The new strategy also sets out a number of guiding principles which will underpin the transformation of education in Powys. These are as follows:

- *A world class rural education system that has learner entitlement at its core*
- *Schools that are fully inclusive, with a culture of deep collaboration in order to improve learner outcomes and experience*
- *A broad choice and high quality of provision for 14 – 19 year old learners, that includes both academic and vocational provision, meeting the needs of all learners, communities and the Powys economy*
- *Welsh-medium provision that is accessible and provides a full curriculum in Welsh from Meithrin to age 19 and beyond*
- *Provision for learners with Special Educational Needs (SEN)/Additional Learning Needs (ALN) that is accessible as near to home as is practicably possible, with the appropriate specialist teaching, support and facilities that enables every learner to meet their potential*
- *A digitally-rich schools sector that enables all learners and staff to enhance their teaching and learning experience*
- *Community-focused schools that are the central point for multi-agency services to support children, young people, families and the community*
- *Early years provision that is designed to meet the needs of all children, mindful of their particular circumstances, language requirements or any special or additional learning needs*
- *Financially and environmentally sustainable schools*
- *The highest priority is given to staff wellbeing and professional development*

2.4 The new strategy sets out a number of Strategic Aims and Objectives, to shape the Council's work to transform the Powys education system over the coming years. One of the Strategic Aims of the Strategy is to '*improve learner entitlement and experience.*' Within this aim, the Strategy sets out a Strategic Objective to '*rationalise primary provision.*'

2.5 On the 9th February 2021, the Council's Cabinet considered an options appraisal paper in respect of Llanfihangel Rhydithon C.P. School, and agreed to carry out consultation on the following:

- To close Llanfihangel Rhydithon C.P. School from the 31st August 2022, with pupils to attend their nearest alternative schools

The Consultation Period

- 2.7 Consultation on the proposal to close Llanfihangel Rhydithon C.P. School was carried out in accordance with the requirements of the School Organisation Code (2018) from the 14th April 2021 to the 2nd June 2021.
- 2.8 A Consultation Report listing the issues raised during the consultation and the Council's response to them was published. This was considered by Cabinet on the 28th September 2021.
- 2.9 At the meeting on the 28th September 2021, Cabinet agreed to proceed with the publication of a Statutory Notice in order to proceed with the process to close Llanfihangel Rhydithon C.P. School from the 31st August 2022, with pupils to attend their nearest alternative schools.

Statutory Notice

- 2.10 Further to the decision made by Cabinet on the 28th September 2021, the Council published a Statutory Notice proposing the following:

'i. To discontinue Llanfihangel Rhydithon Community Primary School, Dolau, Llandrindod Wells, Powys, LD1 5TW.'

It is proposed to implement the proposal on 31st August 2022.'

- 2.11 The Statutory Notice was published on the 21st October 2021 for a period of 28 days, in accordance with the guidance within the School Organisation Code (2018). A copy of the Statutory Notice is attached as Appendix A.
- 2.12 The objection period ended on the 18th November 2021.

Objections

- 2.13 284 objections were received during the statutory objection period.
- 2.14 Objections were received from the following:

- Parents and members of the community
- Llanfihangel Rhydithon C.P. School Governing Body
- Llanfihangel Rhydithon Community Council
- Llanbadarn Fawr Community Council
- Llanbdarn Fynydd Community Council
- Llanyre Community Council
- New Radnor Community Council
- Old Radnor Community Council
- Gladestry Community Council

- Llanddewi Ystradenni Community Council
- Nantmel Community Council
- Abbeycwmhir Community Council
- Llangynog Community Council
- Penybont and Llandegley Community Council
- Llangunllo and Bleddfa Community Council
- Pen-y-bont-fawr Community Council
- Llangynog Community Council
- Vale of Grwyney Community Council
- Jane Dodds MS
- Cllr Jake Berriman
- Cllr Hywel Lewis
- Cllr Kelvyn Curry
- Cllr Ange Williams

2.15 A summary of the objections received are included in Section 3 of the Objection Report (Appendix B), along with the Council's response to the issues raised in the Objections.

2.16 As outlined in the Objection Report, the main issues raised in the Objections are as follows:

1. Comments about Llanfihangel Rhydithon C.P. School
2. Impact on pupils
3. Travel implications
4. Impact on staff
5. Impact on the community
6. Comments about housing developments
7. Comments about the Curriculum for Wales
8. Comments about early years provision
9. Comments about small and rural schools
10. Comments about other schools pupils might transfer to
11. Impact on Llanelwedd C. in W. School
12. Financial impact
13. Comments about the process
14. Comments about meetings which have taken place as part of this process
15. Comments about documentation
16. Comments about other proposals
17. Comments about the Council's strategies
18. Criticism of the Council
19. Alternative options

3 Advice

3.1 Having considered the objections received, it is recommended that the Council proceeds with implementation of the proposal to close

Llanfihangel Rhydithon C.P. School from the 31st August 2022, as outlined in the Statutory Notice (Appendix A).

3.2 The reasons for this are as follows:

- To address the issue of low pupil numbers
- To reduce the Council's overall surplus capacity in primary schools
- To realise a financial saving to the Council
- To enable pupils to attend larger schools, which would be better equipped to meet the requirements of the new curriculum
- To enable pupils to attend larger schools, which could provide a wider range of educational and extra-curricular opportunities
- To enable pupils to attend schools with better quality accommodation
- The proposal meets all the Critical Success Factors

4. Resource Implications

4.1 The amount of funding provided to schools is driven by the funding formula. Any change to the formula funding provided will impact on the Council's revenue budget. A new funding formula for primary phase schools was agreed in December 2021 which changes the estimated savings previously provided.

4.2 Based on the current formula and the pupil numbers at the time of consultation on this proposal, it was estimated that implementation of the proposal would deliver annual revenue savings to the Council of around £59,000 per annum. The overall figure comprised a potential saving on Schools' delegated funding of over £52,000 and savings on catering costs of around £6,600.

Based on the newly agreed formula, the anticipated formula funding saving on this proposal is now estimated to be just under £70,000.

It continues to be anticipated that any additional transport requirements would be managed within the current arrangements and that the estimated savings on catering costs have not changed. The revised estimated saving, including catering is now approximately **£76,000**.

4.3 The school had a cumulative surplus balance of £40,972 as at the 31st March 2021. The budget approved by the Governing Body for the current year shows this decreasing to £38,999 by 31st March 2022.

4.4 The Scheme for Financing Schools also states the following in section 3.7.2:

'In order to ensure effective stewardship of the resources available to schools, the Authority may impose additional restrictions on a school scheduled to close, including but not limited to:

- Restriction of expenditure to agreed plans
- Removal of powers of virement'

4.5 It is therefore proposed that:

- Spend at the school is restricted to that included in its approved budget plan and no virement of funds between budget headings is permitted unless approved by the Authority;
- Any staffing changes are subject to approval by the Authority;
- Any contracts awarded for the supply of goods or services are subject to approval by the Authority.

This will ensure that expenditure is limited to that which is absolutely necessary to protect Council resources.

4.6 Implementation of the proposal would require involvement from a number of service areas, including staff from the Schools Service, HR and Finance.

4.7 The Head of Finance (Section 151 Officer) notes the financial implications of the proposal and supports the proposals set out in section 4.5 above.

5. Legal implications

5.1 Legal: the recommendations can be accepted from a legal point of view.

5.2 The Head of Legal and Democratic Services (Monitoring Officer) has commented as follows: " I note the legal comment and have nothing to add to the report".

6. Comment from local member(s)

6.1 Cllr Hywel Lewis:

'As the Local Member for Llangunllo Ward which encompasses Dolau I am writing to **object** to the Notice of Proposal to Discontinue Llanfihangel Rhydithon CP School.

Being Local Member I was given the opportunity to present my concerns to Cabinet which I appreciate, however I come away from those Cabinet meetings feeling the whole process was merely a tick box exercise where the well-argued objections of consultees and my questions and comments were totally disregarded or merely brushed aside as of no consequence.

The Rural Schools Policy sets out a presumption against closure and requires that all viable alternatives have been conscientiously

considered and as Llanfihangel Rhydithon CP School is the only school in east Radnor with a Cylch Meithryn, further detailed investigation should take place into converting the school to a Welsh language facility over time as recommended by the Learning and Skills Scrutiny Committee.

Cabinet has only recently approved the Welsh in Education Strategic Plan, and as this viable option was not conscientiously and diligently considered it would seem the Council is undermining its own strategy. Paying lip service to a policy while dismissing opportunities to implement that policy, is unacceptable.

It is also unacceptable that whilst commenting on the likely impact of option 18.6 a) that the Education Department was unclear whether staff at the school had the appropriate language skills to deliver the curriculum through the medium of Welsh. Had the Welsh language option been conscientiously carried out it would have become clear that two teachers are fluent in the Welsh language, and three members of staff have gone through the Welsh Sabbatical Scheme.

Llanfihangel Rhydithon CP School and Llanelwedd Church in Wales School have had a shared arrangement which has worked to the benefit of both schools for the past six and a half years, this shared arrangement has delivered savings against budget for both schools. The Director of Education for the Diocese of Swansea has confirmed that communication with Powys County Council Education Department regarding Llanfihangel Rhydithon CP School becoming a Church in Wales School in order to facilitate Federation, have taken place, yet despite this, the Council are implying that it was unaware that the school was interested in becoming a Church in Wales School.

During the Cabinet meeting of 28th October, I asked for an explanation as to why there were discrepancies between the reported savings at different parts of the consultation documentation, no explanation was given.

I reiterate – why does 4.1 of the report give an annual saving of £59,000.00 while in the Draft Impact Assessment, page 3, profile of savings delivery the savings are quoted as: - 2022/23 = £34,416.67
2023/24 = £24,583.33 Total of savings over two years = £59,000.00.
WHY? No saving are indicated for 2024/25

I have previously challenged, and again have not received a detailed response as to the published cost per pupil quoted as £6304. When the Governing body challenged this with the Education Department, they were informed that the actual cost per pupil was £4939 which throws into question the validity of the above quoted savings.

A further aspect which casts doubt on the expected savings is that officers anticipate the current school bus service to transport 29 pupils

which would qualify for home to school transport, should the school close, without incurring extra costs, to possibly as many as 5 different destinations, whereas currently only 7 pupils receive home to school transport.

If satisfactory answers are not forthcoming, I can only conclude that the decision of Cabinet to proceed with the Notice of Proposal to Discontinue Llanfihangel Rhydithon CP School was based on inaccurate and misleading information.

The Council claims that the new School's Curriculum will be more challenging to deliver for small schools but has not produced any evidence in support of their claims. Prof. Donaldson, who created the programme said that the New Curriculum moving forward must be shaped to represent the community of the children and where they live and has not indicated that it cannot be delivered by a small school. The Education Minister was also quoted on a BBC Radio Wales programme (Country Focus 12th September) as saying that small schools are ideally placed to deliver the New Curriculum. Is the Council of the opinion that it knows better than Prof. Donaldson and the Education Minister?

It has been clearly evidenced by Parents and Governors that the extra-curricular activities currently enjoyed by pupils of Llanfihangel Rhydithon CP School are far superior to anything that would be available at any of the receiving schools. Accessing any of the activities at any school other than Llanfihangel Rhydithon would be further hampered due to transport.

The school building is fit for purpose being in good overall condition equalling other school buildings in the overall area. As projections of pupil numbers show an increase in future years another classroom could be easily and economically be brought into service. The Council's claims that the pupils would be taught in better quality accommodation do not therefore accurately reflect the position.

The Parents and Governors of Llanfihangel Rhydithon CP School have always shown their willingness to embrace new opportunities such as the shared headship with Llanelwedd and are now showing a preparedness to progress down the Welsh language continuum to deliver on the Council's Welsh in Education Strategy. This is transformation not wielding the axe as the Council is proposing, I do not agree that the Council adequately demonstrated that closure of this excellent rural school which is delivering an education to its pupils equalling the best in Powys can offer, and is at the heart of a vibrant community, is an appropriate response to its policy for Schools Transformation.'

7. Integrated Impact Assessment

- 7.1 An initial impact assessment was considered by Cabinet on the 9th February 2021.
- 7.2 In addition, a range of draft impact assessments were produced as part of the consultation documentation. These included an Integrated Impact Assessment, an Equalities Impact Assessment, and a Community Impact Assessment.
- 7.3 The draft impact assessments were updated to reflect issues raised during the consultation period and the updated impact assessments were considered by Cabinet on the 28th September 2021 when considering whether or not to proceed with the publication of a statutory notice.
- 7.4 These have been further updated following the objection period, and the updated versions are attached as Appendix C.

8. Recommendation

- To receive the Objection Report in respect of closing Llanfihangel Rhydithon C.P. School.
- To approve the proposal to close Llanfihangel Rhydithon C.P. School from the 31st August 2022, with pupils to attend their nearest alternative schools.
- In accordance with the Scheme for Financing Schools, to introduce the following restrictions on Llanfihangel Rhydithon C.P. School:
 - Spend at the school is restricted to that included in its approved budget plan and no virement of funds between budget headings is permitted unless approved by the Authority;
 - Any staffing changes are subject to approval by the Authority;
 - Any contracts awarded for the supply of goods or services are subject to approval by the Authority.

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Head of Service:	Emma Palmer – Head of Transformation & Communications Debbie Lewis – Interim Chief Education Officer
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CABINET REPORT TEMPLATE VERSION X

Mae'r dudalen hon wedi'i gadael yn wag yn fwriadol

POWYS COUNTY COUNCIL

SCHOOL STANDARDS AND ORGANISATION (WALES) ACT 2013

NOTICE OF PROPOSAL TO DISCONTINUE LLANFIHANGEL RHYDITHON COMMUNITY PRIMARY SCHOOL

Notice is hereby given in accordance with section 43 of the School Standards and Organisation (Wales) Act 2013 (“the Act”) and the School Organisation Code 011/2018 (“the Code”), that Powys County Council of County Hall, Llandrindod Wells, Powys, LD1 5LG (“the Council”), having consulted such persons as required, proposes the following: -

- i. To discontinue Llanfihangel Rhydithon Community Primary School (“Llanfihangel Rhydithon C.P. School”), Dolau, Llandrindod Wells, Powys, LD1 5TW.

It is proposed to implement the proposal on 31st August 2022.

The school is currently maintained by Powys County Council.

Powys County Council undertook a period of consultation before deciding to publish this proposal. A consultation report containing a summary of the issues raised by consultees, the proposer’s responses and the views of Estyn is available on the Council’s website: <https://en.powys.gov.uk/article/10580/Llanfihangel-Rhydithon-C.P.-School>

Admissions

From 1st September 2022, pupils currently attending Llanfihangel Rhydithon C.P. School will be able to express a preference for an alternative school. The Council will comply with any such expressed preference subject to Section 86(3) of the School Standards and Framework Act 1998.

In future, any new pupils living in the area currently served by Llanfihangel Rhydithon C.P. School will be able to apply for a place in any school in accordance with the Council’s Admissions Policy.

Details of nearest alternative schools

The nearest alternative schools for pupils currently attending Llanfihangel Rhydithon C.P. School would be as follows:

	School Type	Language Category	Admission Number ¹
Crossgates C.P. School	Community Primary	English medium	30
Llanbister C.P. School	Community Primary	English medium	7
Ysgol Cefnlllys	Community Primary	English medium	37
Ysgol Trefonnen C. in W. Community School	Voluntary Controlled Primary	Dual stream	28
Knighton C. in W. School	Voluntary Controlled Primary	English medium	34

Details of any other measures proposed to be taken to increase number of school places at the nearest alternative schools

The expectation is that the number of pupils transferring to each of the nearest alternative schools would be small, and therefore the impact on these schools would not be significant. Therefore, no measures are proposed to be taken to increase the number of school places available on consequence of the proposed discontinuance of Llanfihangel Rhydithon C.P. School.

¹ Powys Schools – Powys County Council Admission Arrangements and Information 2022/23

Alongside this proposal, the capacity of Llanbister C.P. School has increased from 45 to 73 following the addition of a third classroom, which provides additional school places at Llanbister C.P. School. The school's admission number as indicated above does not reflect this increase in capacity. This will be updated in future versions of the Council's Admission Arrangements and Information document.

Home-to-School Transport Arrangements

Transport arrangements will be in accordance with the Council's Home-to-School Transport Policy.

Implementation

The proposal will be implemented by Powys County Council.

Proposal to close a rural school

The proposal to discontinue Llanfihangel Rhydithon C.P. School is considered the most appropriate response to the reasons for formulating the proposal, and are as follows:

- To address the issue of low pupil numbers
- To reduce the Council's overall surplus capacity in primary schools
- To realise a financial saving to the Council
- To enable pupils to attend larger schools, which would be better equipped to meet the requirements of the new curriculum
- To enable pupils to attend larger schools, which could provide a wider range of educational and extra-curricular opportunities
- To enable pupils to attend schools with better quality accommodation
- The proposal meets all of the Critical Success Factors

How to Object to this Notice

Within a period of 28 days after the publication of this proposal, that is to say by **18th November 2021**, any person may object to the proposal.

Objections should be sent to Lynette Lovell, Director of Education, Powys County Council, Powys County Hall, Llandrindod Wells, Powys, LD1 5LG, or by e-mail to school.organisation@powys.gov.uk

Powys County Council will publish a summary of any such objections made within the objection period (and not withdrawn in writing), together with the Council's observations thereon, within the period set out in the Code.

**Lynette Lovell,
Director of Education
For Powys County Council**

Dated this day 21st October 2021.

Explanatory Note:

(This explanatory note does not form part of the Notice but is offered by way of explanation).

- The Council's intention is to close Llanfihangel Rhydithon C.P. School on the 31st August 2022.
- From 1st September 2022, pupils currently attending Llanfihangel Rhydithon C.P. School will be able to express a preference for an alternative school. The Council will comply with any such expressed preference subject to Section 86(3) of the School Standards and Framework Act 1998. In future, any new pupils living in the area currently served by Llanfihangel Rhydithon C.P. School will be able to apply for a place in any school in accordance with the Council's Admissions Policy.
- The rationale for this proposal was set out in a Consultation Document which was issued in April 2021. The Council subsequently published a Consultation Report which summarises the issues raised during the consultation period and provides the Council's response to these issues. The Consultation Report is available on the Council's website: <https://en.powys.gov.uk/article/10580/Llanfihangel-Rhydithon-C.P.-School>
- Transport arrangements would be made for pupils in accordance with the Council's Home-to-School Transport Policy.



**Proposal to close Llanfihangel Rhydithon
C.P. School**
Objection Report



Proposal to close Llanfihangel Rhydithon C.P. School

Objection Report

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If you require a copy of the document in a different format, please contact the Transforming Education Team on 01597 826618, or e-mail school.organisation@powys.gov.uk.

Consultation on the closure of Llanfihangel Rhydithon C.P. School

Objection Report

1. BACKGROUND

Powys County Council consulted on proposals to close Llanfihangel Rhydithon C.P. School. The consultation took place from the 14th April 2021 to the 2nd June 2021. The Council published a consultation report outlining the findings of the consultation exercise.

On 28th September 2021, the Council's Cabinet agreed to proceed with the proposal, and a Statutory Notice was published from the 21st October 2021 to the 18th November 2021.

The proposal was as follows:

'To close Llanfihangel Rhydithon C.P. School from the 31st August 2022, with pupils to attend their nearest alternative school'.

2. SUMMARY OF OBJECTIONS RECEIVED

284 objections were received during the statutory objection period.

As well as objections from parents, governors and pupils at Llanfihangel Rhydithon C.P. School and members of the community, objections were received from the following organisations and individuals:

- Llanfihangel Rhydithon C.P. School Governing Body
- Llanfihangel Rhydithon Community Council
- Llanbadarn Fawr Community Council
- Llanbdadarn Fynydd Community Council
- Llanyre Community Council
- New Radnor Community Council
- Old Radnor Community Council
- Gladestry Community Council
- Llanddewi Ystradenni Community Council
- Nantmel Community Council
- Abbeycwmhir Community Council
- Llangynog Community Council
- Penybont and Llandegley Community Council
- Llangunllo and Bleddfa Community Council
- Pen-y-bont-fawr Community Council
- Llangynog Community Council
- Vale of Grwyney Community Council

- Jane Dodds MS
- Cllr Jake Berriman
- Cllr Hywel Lewis
- Cllr Kelvyn Curry
- Cllr Ange Williams

The issues raised in the objections received are summarised in section 3 of this report, along with the Council's response. The issues raised relate to the following headings:

1. Comments about Llanfihangel Rhydithon C.P. School
2. Impact on pupils
3. Travel implications
4. Impact on staff
5. Impact on the community
6. Comments about housing developments
7. Comments about the Curriculum for Wales
8. Comments about early years provision
9. Comments about small and rural schools
10. Comments about other schools pupils might transfer to
11. Impact on Llanelwedd C. in W. School
12. Financial impact
13. Comments about the process
14. Comments about meetings which have taken place as part of this process
15. Comments about documentation
16. Comments about other proposals
17. Comments about the Council's strategies
18. Criticism of the Council
19. Alternative options

3. SUMMARY OF ISSUES RAISED IN THE OBJECTIONS RECEIVED

The issues raised in the objections received are summarised below, along with the local authority's response to each issue.

1. COMMENTS ABOUT LLANFIHANGEL RHYDITHON C.P. SCHOOL

1.1 Comments about the quality of provision at Llanfihangel Rhydithon C.P. School

1.1.1	The school provides an excellent standard of education.	<p>The Council notes these positive comments about the provision at Llanfihangel Rhydithon C.P. School. As stated in the Consultation Document, the authority recognises the strengths and qualities of Llanfihangel Rhydithon C. P. School, as it includes information relating to the latest Estyn inspection in March 2019, which judged the school to be 'good' across all areas of inspection. It is also recognised that the National School Categorisation System for 2019 (the last time that the categorisation exercise was undertaken) put the school in the 'green' support capacity, which identifies how much support a school needs. The school was also graded as B for the 'improvement capacity' category. The quality of the provision at the school is not one of the reasons for the proposal.</p> <p>Should the Council proceed with the proposal to close the school, pupils currently attending the school would transfer to alternative schools in the area. The local authority has no concerns about the quality of education in the schools which pupils may attend if the school was to close. Therefore, the quality of education for pupils would not be impacted by a change to a neighboring</p>
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		school. Estyn, in its response to this consultation, has concluded that 'It is Estyn's opinion that the proposal is likely to at least maintain the current standards of education in the area.'
1.1.2	The quality of education is excellent and the school is classified as green.	As above.
1.1.3	Dolau is a Green school and offers the highest standards of education.	As above.
1.1.4	Dolau school is categorised as green by ERW, this is the highest educational standard in Wales.	As above.
1.1.5	The school is the only one in the area that is rated green, which indicates that it is a better-run school than the (larger) schools elsewhere in the vicinity.	As above.
1.1.6	The school has been deemed good in all areas according to Estyn.	As above.
1.1.7	In March 2019, Estyn reported that the school was good across all areas and the report praises the whole school community.	As above.
1.1.8	The school has a Good Estyn report, which is better than the majority of surrounding schools	As above.
1.1.9	Estyn has acknowledged the good standard of education in this school, not so with surrounding establishments.	As above.
1.1.10	Anyone who read the consultation document will see that Dolau school is a well performing 'good' and 'green' school whereas the school that you wish to send the children to is a 'adequate' and 'yellow' school. These judgements are from Estyn and School Categorisation system.	As above.
1.1.11	This is a thriving school with the highest standard of primary education possibly in Powys, but certainly in Radnorshire.	As above.

		There is no evidence to support the statement that the school provides ‘the highest standard of primary education possibly in Powys, but certainly in Radnorshire.’
1.1.12	Back in 2019 ESTYN came into the school and said “The school is a happy, caring community in which pupils thrive as confident, capable, learners. Their behaviour in and around school is exemplary. Most pupils make good progress in developing their skills in literacy, numeracy and information and communication technology (ICT). Pupils enjoy belonging to the school and rates of attendance are consistently high. Teachers provide pupils with valuable activities that engage them and excite their curiosity. Most pupils have positive attitudes to their learning, and they are curious and eager to gain new knowledge and skills. Leaders and managers have a clear vision for the future of the school. They set high standards and ensure that they deploy the schools resources efficiently”.	As above. The Council notes these comments from Estyn’s inspection of the school in 2019.

1.2 Comments about the school’s ability to deliver the Curriculum for Wales

1.2.1	Dolau school started to use the new curriculum in 2019...so as has been reported small schools are ideally placed to deliver the new curriculum.	The Council notes these comments stating that Llanfihangel Rhydithon C.P. School is already delivering the Curriculum for Wales. All schools are working towards delivering the new curriculum by September 2022. The Council is monitoring how schools are developing on their ‘Journey to 2022’ through termly reporting by Challenge Advisors. Most are equipped to meet the requirements of the new curriculum.
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		To ensure equity for learners, leaders and teachers (across Wales) need to have a shared understanding of learner progression, including expectations around what progression may look like and the pace at which learners progress. This shared understanding is developed through professional learning and as an ongoing process both within and across schools, of which professional dialogue is a fundamental aspect. Practitioners can share and learn from each other's understanding of progression. This can be challenging in a small school with only two teachers, for example. In larger schools there might be a wider range of academic activities that further embed the four purposes and include more age appropriate activities due to larger numbers to make the offer more viable and more staff expertise.
1.2.2	Llanfihangel Rhydithon School is already using the New Curriculum, and is clearly meeting its requirements, and as I'm sure you are aware, Jeremy Miles is an enthusiastic supporter of this.	As above.
1.2.3	The school has been using the new curriculum for the past two years. They have the infrastructure and resources to meet this and it is working successfully.	As above.
1.2.4	Much work has been done by staff and governors at the school to ready it to deliver the new School's Curriculum which it is well placed to do.	As above.
1.2.5	Dolau has been applying the New Curriculum since 2019. It is well known that the small schools have not only found this easy to deliver but they have in fact been doing something very similar for years.	As above.

1.2.6	Teachers at Dolau have been ably delivering the new curriculum for the last 2 years. It is insulting to suggest that they are incapable of doing their job.	As above.
1.2.7	Dolau School is already delivering the new curriculum successfully. It has been mentioned by the Education Secretary in the Senedd as an example of best practice. Other Schools should be following their lead.	As above.
1.2.8	Dolau demonstrates that it is more than ready to meet the demands of the 4 main purposes of New Curriculum for Wales. One example of this is the way that they already helped form “ambitious, capable learners, ready to learn throughout their lives” (Hwb - Curriculum for Wales, 2021) as evidenced in their recent inspection. Estyn praised the school for being a “happy, caring community in which pupils thrive as confident, capable learners.”	As above.
1.2.9	You have no idea how the teaching of the 'new curriculum' would have been managed at Dolau because you are not allowing it a chance to provide it by closing it. You arrogantly presume that the new curriculum requirements will not be met by Dolau school.	As above.
1.2.10	The new curriculum has been designed in conjunction with small schools and Dolau have been successfully delivering this new curriculum.	As above.
1.2.11	PCC have not investigated the school's ability to deliver the new curriculum for Wales thoroughly. PCC can offer no evidence-based reasons for this point.	As above.
1.2.12	The Council has said that it will be very hard for a two-teacher school to manage the delivery of the new curriculum and its 6 Areas of Learning Experience. We have seen our two teachers implement effectively the current curriculum made up of 7 Foundation Phase and 12 Key Stage 2 subject areas, therefore how are you able to justify saying that it will be very	Small schools have fewer qualified teachers in a school to design the curriculum and have the disciplinary-specific expertise for the learners in that school. Therefore, the expertise for all six areas of learning and experience may not be as strong as a team of teachers in a larger school who will lead on a specific area. As

	<p>hard for them to manage the delivery of the new curriculum and its 6 Areas of Learning Experience? Your statement is, once again, untrue.</p>	<p>learners progress, effective teaching and learning around disciplinary-specific expertise will become increasingly relevant in developing a curriculum. Although the guidance on the new curriculum promotes interchanging approaches between AoLEs, it also recognises the importance that disciplinary-specific expertise plays.</p> <p>Teachers in small schools would need to plan for a mixed age range for all Areas of learning and experience up to four age group. To ensure equity for learners, leaders and teachers (across Wales) there needs to have a shared understanding of learner progression, including expectations around what progression may look like and the pace at which learners progress. This shared understanding is developed through professional learning and as an ongoing process both within and across schools, of which professional dialogue is a fundamental aspect. Practitioners can share and learn from each other's understanding of progression. This can be challenging in a small school with only two teachers, for example.</p>
1.2.13	<p>The word "individual" appears in Successful Futures document a total of 51 times. The pupils of Llanfihangel Rhydithon school are taught and cared for as such: individual interests, individual needs, and individual voices! "...developing a curriculum which is consistent with national expectations, but which is also able to reflect the needs of the children and young people in their school." (Successful Futures, 2015).</p>	<p>All pupils should be treated as individuals whichever school then attend. The four purposes of the new curriculum will support and develop all learners as individuals.</p>

1.3 Comments about the school's small size

1.3.1	<p>Because of the size of the school all the children are well known, staff know their needs and irrespective of ability their needs are very well met.</p>	<p>The Council notes these comments about the benefits of small schools. Whilst acknowledging that some pupils / parents may prefer smaller schools, the Council faces a challenge due to the high proportion of small schools in the county and the lack of equity amongst schools, as outlined in the Council's Strategy for Transforming Education in Powys 2020-30.</p> <p>Llanfihangel Rhydithon C.P. School teaches children in two classes of mixed aged groups. With such low pupil numbers, the teacher-pupil ratio is notably different to many other schools in the area, and due to the Council's funding formula, the school's funding per pupil is higher than the Council's average. This does not provide equity across the education system – teachers in larger schools are required to provide the same education as smaller schools for less funding per pupil. Powys' Strategy is intended to improve equity across the education system and to ensure an improvement for every pupil's learning entitlement and experience.</p> <p>It is clear that the Council's expenditure on children in the smallest schools is very generous. Through the engagement with stakeholders which took place when developing the Strategy to Transform Education in Powys, it became apparent that there was a need for a vision for a stronger entitlement for all learners in Powys and equity for learners across the county. As the education profession moves towards the realisation of the new Curriculum for Wales, that vision requires the Council to pursue a transformational vision that secures</p>
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		<p>an attractive entitlement and equity for all learners, professional learning for all staff and secure leadership across all schools.</p> <p>The Council's primary specialists have been exploring how the authority can best support schools to deliver the new curriculum for 2022. These education professionals are of the view that this will be significantly more challenging, and will place significantly greater demands on teachers in very small two-class schools. This does not mean that it would be impossible to deliver the new curriculum in these schools but it is clear that the skills required by teachers will need to be very wide ranging to support the full and effective fulfilment of the curriculum's high ambitions.</p> <p>The new Curriculum for Wales is locally influenced and often pupil-led. All schools will design the detail of their own curriculum to suit their learners based on the four purposes and the six Areas of Learning and Experience (AoLE). Learners' views about their experiences and about what, how and where they learn should be taken seriously when a curriculum is being designed. The school's curriculum needs to be co-constructed, encouraging learners, parents, carers and the local community to understand and contribute to its development. It should also draw on a wider range of experts and stakeholders who can contribute to learning.</p> <p>The curriculum needs to be innovative and creative. Teachers, with pupils, will select the content, with no prescription on how areas should be taught, but with</p>
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		<p>guidance provided nationally on a wide range of widely-recognised pedagogical principles. Additionally, planning and designing the curriculum in schools is a teacher responsibility, not one for support staff.</p> <p>Teachers in two class schools would need to plan for a mixed age range for all Areas of Learning and Experience. In some cases, this could involve preparing for and delivering for up to four different year groups for all six AoLEs. To ensure equity for learners, leaders and teachers across Wales, there needs to be a shared understanding of learner progression, including expectations around what progression may look like and the pace at which learners progress. This shared understanding is being developed through professional learning and dialogue, as an ongoing process both within and across schools. Practitioners can share and learn from each other's understanding of progression and adapt their teaching in the light of what is learned. This will be particularly challenging in a very small school with only two teachers, for example. If a member of staff is linking up with practitioners from other schools for all 6 AoLEs and across a wide age range they would need to be away from their class for a far greater amount of time than a teacher teaching a single year group or two year groups in a class, and who also leads on behalf of the whole school on a single AoLE such as Humanities.</p> <p>High levels of flexibility and organisation are needed in lesson planning to ensure that teaching caters for both</p>
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		<p>age groups and all abilities within the class. This additional workload is a risk that the education profession needs to manage together, given the limited numbers of teachers to carry the additional roles and responsibilities in a very small school. Two-class schools not only have fewer qualified teachers in school to design the curriculum, but generally the limited numbers of staff will in all probability between them have a narrower range of disciplinary-specific expertise for the learners in that school than would probably be the case in a large school. In a larger school, each member of staff can lead on a specified area where they may have an appropriate background and in which they can continue to gain growing levels of expertise. Effective learning and teaching requires disciplinary-specific expertise which will become increasingly relevant in developing a curriculum as learners progress. Although the guidance promotes inter-disciplinary approaches, it also recognises the importance that disciplinary-specific expertise plays in such approaches.</p> <p>A significant responsibility for the Council, and others, over the coming years will be to ensure that every learner in Powys benefits from the step change that is anticipated through the changing curriculum. The Council will work with all the schools in our care, of whatever size, and will provide significant support, whilst also encouraging collaboration. However, it would be inappropriate if officers of the authority did not stress the additional demands on staff in very small schools, whilst doing all we can to facilitate the lightening of the load.</p>
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		Additionally, it is only fair that professional primary experts within the Council comment on the balance of potential risks and benefits to a child when being taught by the same person over 3 or 4 years of their primary education.
1.3.2	In small village schools like Llanfihangel, there is a far higher opportunity for pupils to be given 1:1 emotional support when needed, and a chance for a more intimate discussion in circle time around sensitive topics within class when pupils feel comfortable with their peers.	As above.
1.3.3	The school can ensure that every child has an education that is specifically targeted to their individual needs. It can give each child opportunities to build their confidence and learn at their own pace. No child is 'lost' within the group.	As above.
1.3.4	The school's teacher:pupil ratio means that the school is better placed to build confidence in pupils than larger hub primaries	As above.
1.3.5	The teacher-pupil ratio is low at 12.8, where the Powys average 20.2 (Wales average 22). It's a matter of logic: smaller schools typically have smaller classes, and low teacher-pupil ratios translate into more focus per child and their education.	As above.
1.3.6	Children gain more socially and educationally from their early years of education from low teacher/pupil ratios, such as those at Dolau.	As above.
1.3.7	In Dolau there are smaller class sizes which mean that teachers can spend time with each individual during every lesson.	As above.
1.3.8	In mixed age classes, I have observed older children develop their higher order thinking by helping younger ones to	As above.

	construct meaning from set activities, and have seen how well the younger children learn from their older role models.	
1.3.9	There are many benefits to the school's mixed age classes – the children are independent, inquisitive and want to work with both older and younger peers.	As above.
1.3.10	When older pupils in the class have finished their work, they have the opportunity to help the younger ones.	As above.
1.3.11	The school has often accepted pupils with behavioural difficulties from other schools. These pupils have been accepted and have benefitted greatly from the small school setting.	As above.

1.4 Comments about the friendly nature of Llanfihangel Rhydithon CP School

1.4.1	It's a very friendly school and everyone gets along with each other. The older children all mix with and help the younger ones.	The Council notes these comments about the friendly nature of Llanfihangel Rhydithon C.P. School.
1.4.2	Llanfihangel Rhydithon is a happy school – children are happy, parents are happy, staff are happy.	As above.
1.4.3	There are only 2 classrooms and at break we all play together, we all help each other.	As above.
1.4.4	In our small school, everyone helps out, everyone has a part to play and no one is left behind.	As above.
1.4.5	Being a pupil at Dolau is like being part of a big family – something no other school is able to offer.	As above.
1.4.6	The children of Dolau School, have an instinctive knowledge of how to nurture and protect those in need of a little extra help or a friend help them up when they've fallen over. They just know. From watching and learning from previous peers, who have had the same values instilled in them.	As above.
1.4.7	The school has a very caring and inclusive atmosphere.	As above.

1.4.8	The school offers a nurturing and caring provision where the children feel they belong and where the parents feel they are safe.	As above.
1.4.9	In Llanfihangel Rhydithon CP School we have a buddy system which is where an older child is paired with a younger one. This works brilliantly and the children love working in their buddies and it gives them a sense of independence and responsibility.	The Council notes these comments about the buddy system at Llanfihangel Rhydithon C.P. School. Whilst the actual provision at alternative schools would be different, all schools would have systems in place to support pupil well-being. The Council has no concerns about the ability of any of the alternative schools to support pupil well-being.
1.4.10	Younger pupils have a buddy in the 'big' class who looks after them.	As above.
1.4.11	I know some of my friends in larger schools have issues with bullying and other pupils misbehaving, which interrupts their education – this doesn't happen at Dolau School.	<p>The Council notes these comments suggesting that there is no bullying at Llanfihangel Rhydithon C.P. School whilst there is bullying at alternative, larger schools.</p> <p>Llanfihangel Rhydithon C.P. School is a very small school, and therefore it is possible that there are fewer incidents of bullying at this school than at larger school. However, bullying can occur in all schools, and the important issue is how the school responds to bullying when it occurs, addressing the needs of both the young person who has experienced the bullying and the young person who has carried out the bullying.</p> <p>All schools have anti-bullying policies in place, which are regularly reviewed, and these are part of the Safeguarding arrangements within those schools.</p>

1.4.12	Bullying, often the scourge of larger schools, which is so destructive to some children's learning, is almost non-existent in smaller schools such as Llanfihangel Rhydithon C.P. School.	As above.
1.4.13	There is no bullying in our lovely Dolau School, which is one of the reasons we chose to bypass our nearest school for our children and transport them daily to Dolau, also making additional trips four times a week for our youngest child to attend the four setting.	As above.
1.4.14	There is no bullying and bad behaviour within the school, we are always taught about well-being and respect for others.	As above.
1.4.15	Throughout the school, equality and diversity is promoted and anti-bullying practices are permitted.	As above.
1.4.16	Dolau school has never expelled anyone and that is what I call a good school.	As above.

1.5 Comments about extra-curricular provision at the school

1.5.1	The extra-curricular activities currently enjoyed by pupils of Llanfihangel Rhydithon CP School are far superior to anything that would be available at any of the receiving schools.	<p>The Council notes these positive comments about the extra-curricular provision available at Llanfihangel Rhydithon C.P. School. The Council has acknowledged throughout the process that there are a number of extra-curricular activities available at the school, including after-school clubs. This was outlined in the Consultation Document and within the draft Community Impact Assessment, as well as in the Consultation Report and the updated Impact Assessment document which was considered by Cabinet when determining whether or not to proceed with the process.</p> <p>All schools offer extra-curricular activities, and should the school close, pupils would be able to access extra-</p>
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		<p>curricular provision at their alternative school, although the range of activities available may be different to those available at Llanfihangel Rhydithon C.P. School.</p> <p>The Council has acknowledged that should Llanfihangel Rhydithon C. P. School close, then it may be more difficult for some pupils to access after-school activities due to reliance on home-to-school transport. However, the alternative schools also have pupils that rely on home-to-school transport and they are experienced in ensuring that all pupils are able to take part in a range of extra-curricular activities to enrich their experiences at those schools. In addition, Llanfihangel Rhydithon C.P. School is not the closest school for a high proportion of the pupils that currently attend. Should these pupils transfer to their nearest school, it should be easier for them to access activities held after school.</p> <p>As well as the activities provided by schools, extra-curricular activities provided by other organisations are also available in the area. Should Llanfihangel Rhydithon C.P. School close, children would still be able to access these activities.</p>
1.5.2	Dolau school has provided a wide range of extra-curricular activities to all age groups.	As above.
1.5.3	Dolau school provides Craft club, Eco club, Sports club, piano, brass and singing lessons, Choir club, Eisteddfod club, Football club and Gardening club, and a busy Breakfast club. Nearby primary schools provide very few of these!	As above.
1.5.4	The school provides lots of extra-curricular activities to enhance their education, including piano, brass and guitar	As above.

	lessons, football club, Eco club, Eisteddfod/choir club, Gardening club, Craft club, Welsh club and Sports club.	
1.5.5	There are lots of opportunities to do extra-curricular activities and after school clubs. Some of these include: Art clubs, Sport Clubs, Music, Welsh club and choir.	As above.
1.5.6	Most days there is a club or extra-curricular activity available for ALL children to attend, whether it is IT, sport, Eco or a Forest school, no child is left out.	As above.
1.5.7	The school excels at the local Llandrindod children's eisteddfod, winning many prizes including the choir competition, they are also the holders of the small school Swimming Gala, and very recently in a Times Table Rock stars maths competition came a brilliant 28th place out of 222 schools taking part across Wales!!	As above.
1.5.8	The school recently took part in Llandrindod eisteddfod, coming second overall with Ysgol Trefonnen CoW School coming first, the largest primary school in the area.	As above.
1.5.9	There is a well-attended breakfast club.	Breakfast Clubs are also available at Crossgates C.P. School, Ysgol Trefonnen C.in W. School, Ysgol Cefnlllys, Knighton C.in W. School.
1.5.10	Dolau school offers a wide range of extra-curricular activities that are open to all pupils to attend. Larger schools are not inclusive and offer activities to certain age groups.	It is acknowledged that there could be more opportunity for pupils in a smaller school to participate in different activities due to the pupil ratio within the school. However, all schools, regardless of size, have a range of activities and are expected to ensure that pupils can participate fully with these.
1.5.11	If the children move to a larger school the types of clubs available at Dolau would NOT be available to ALL children.	As above.
1.5.12	If I attended larger school I would never have been picked for cross country, football or any other team events because other children would have been picked.	As above.

1.5.13	At Dolau School everyone gets to have ago, no matter what their ability – it isn't just the best people that get to take part. I don't think pupils would have the same opportunity in a larger school.	As above.
1.5.14	In the year beginning 2019 the school visited Caerleon Roman Lodge, Kington Sportwear, Holy Trinity Church and Chester Zoo to support our topics and learning. Most schools in the cluster go on one trip per year rather than having these immersive trips throughout the year.	It would be an individual school decision as to what educational visits they attend. Over the pandemic period, many schools have made use of virtual visits to museums or attractions which have benefitted pupils' learning.

1.6 Comments about pupils' transition to high school

1.6.1	Pupils from Dolau settle very quickly into high school life.	The Council notes these comments about the transition of pupils from Llanfihangel Rhydithon C.P. School to high school.
1.6.2	Pupils are able to move to High School as confident and capable young individuals thanks to the start they had at Llanfihangel Rhydithon.	As above.
1.6.3	It's not true that pupils from Dolau lack confidence and struggle when they get to high school.	The Council has not said that 'pupils from Dolau lack confidence and struggle when they get to high school'. In the Cabinet meeting held on the 28 th September 2021, a Cabinet member made a general observation regarding the transition of year 6 pupils from small schools to high school, however this observation was not specific to Llanfihangel Rhydithon C.P. School. This is not one of the reasons for the proposal.
1.6.4	It seems that the Council is concerned that year 6 children are not as well prepared for going to high school after attending a	As above.

	small school – this is not true of learners who leave Dolau, who are well rounded and capable learners.	
1.6.5	Many Dolau pupils are on Ysgol Calon Cymru’s School Council and other committees such as the ‘Pupils Voice’ committee and other activities such as sports teams and the orchestra.	The Council is pleased to note that former pupils from Llanfihangel Rhydithon C.P. School have been actively involved in a range of activities following their transfer to high school.

1.7 Comments about the use of Welsh at the school

1.7.1	Dolau school has also instilled in their children a sense of belonging to Wales, providing positive Welsh language experiences and cultural activities that many a larger school in Powys has yet to provide.	<p>The Council notes these positive comments about the use of Welsh at Llanfihangel Rhydithon C.P. School. Should the Council proceed with the proposal to close Llanfihangel Rhydithon C.P. School, pupils would continue to learn Welsh at the alternative schools. All the alternative schools named in the Consultation Document have signed up to the Siarter Iaith, and are working towards the Bronze Award.</p> <p>One of the key characteristics of the four purposes in the Curriculum for Wales is to develop ambitious, capable learners who can communicate effectively in different forms and settings, using both Welsh and English. All learners should have appropriate pathways for learning Welsh and English to enable them to develop the confidence to use both languages in everyday life. All Powys schools are well supported with excellent resources from the Athrawon Bro Team to enable teachers to teach Welsh. Staff from nearby schools have attended the sabbatical Welsh language course with further staff attending the sabbatical course in Newtown in September 2021. Opportunities to use Welsh within</p>
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		and beyond the classroom (including on digital platforms) support learners to use Welsh confidently and appreciate its usefulness to communication in a bilingual Wales and again all Powys schools are effectively supported with rich resources from the Athrawon Bro Team. Schools, through effective pupil voice forums, known as the 'Criw Cymraeg' plan a range of activities to increase the use of Welsh outside the classroom. Facilitating the use of Welsh, through planned linguistic progression in every phase of education from ages 3 to 16, and as part of a whole-school approach, offers opportunities for all learners to develop bilingually and this is a key priority for all schools in Wales.
1.7.2	The school has a Criw Cymraeg which promotes and encourages the children to use the Welsh Language. They do this by playing Welsh games during their break time, they also have "Welsh Phase of the Week". Members from Criw Cymraeg also pick a Welsh Speaker of the week.	As above.
1.7.3	I am confident that the teaching and non-teaching staff at Llanfihangel Rhydithon create an environment immersed in Welsh language and culture. A majority of teaching staff have very good Welsh language skills, some developed on the PCC educational sabbatical scheme, and actively encourage pupils to participate in Welsh language events.	As above.
1.7.4	The school has committed itself to the Welsh language, through the additional training of 3 teachers in a Welsh language training programme which the current Welsh in Education Strategy plan advocates for as a means of staff development in the Welsh language.	As above.
1.7.5	The only thing that Estyn said could be improved in 2019 was an increase in the use of the Welsh language...so teachers	As above.

	have since been on the Welsh sabbatical, and we opened a Cylch Meithrin which became a registered child care provision on 9th February 2021 on site, where parents are able to access the 3 year old funding.	
1.7.5	<p>Recently while rolling out a Welsh crash course programme, Cllr Phyl Davies said “We need to increase opportunities for children to become fully bilingual”. Is taking children from a school with 3 out of 4 teachers who have a very good understanding of the Welsh language going to help this? It seems that Powys can throw money at some projects at the detriment of good rural schools.</p>	<p>As above.</p> <p>The Council fully agrees with Cllr Davies’ statement that ‘We need to increase opportunities for children to become fully bilingual.’</p> <p>Whilst acknowledging the commitment of Llanfihangel Rhydithon C.P. School to developing the Welsh language skills of its staff through the Welsh Sabbatical Scheme, the current provision at Llanfihangel Rhydithon C.P. School does not enable children to become fully bilingual in Welsh and English.</p> <p>Should the Council proceed with the current proposal, pupils would continue to learn Welsh in the alternative schools, and could also choose to attend Welsh-medium provision at Ysgol Trefonnen should that be their preference, which would enable them to become fully bilingual.</p>
1.7.6	<p>The Llandrindod Wells Eisteddfod is a key event on the school calendar, and the pupils participate and succeed in many Welsh language aspects. How many other English medium schools offer such an opportunity in the area?</p>	<p>As above.</p> <p>All schools are expected to provide opportunities for pupils to use Welsh outside the classroom. Whilst involvement in the Llandrindod Wells Eisteddfod is one way of providing these opportunities, there are many other ways which this can be provided.</p>

1.8 Comments about the school buildings / grounds / facilities

1.8.1	The school is in good repair that general running costs must be minimal.	<p>The Council notes these comments about the Llanfihangel Rhydithon school building.</p> <p>The condition and suitability of the school building was judged to be B, according to the Welsh Government condition survey 2009. However, like all ageing buildings there is a level of deterioration at the school.</p> <p>The Council commissioned an updated condition assessment (not a suitability assessment) of Llanfihangel Rhydithon C.P. School in the autumn 2020 – this was undertaken by an external surveyor. The school was judged to be in condition category C following this assessment.</p>
1.8.2	The school building is fit for purpose being in good overall condition equalling other school buildings in the overall area.	As above.
1.8.3	The school building is similar in quality and condition to others locally and perfectly adequate for current and future needs.	As above.
1.8.4	The school building is commensurate with other school buildings across Powys. It does not impact on the children's learning – the quality of the teaching that happens inside the school is what matters.	As above.
1.8.5	Llanfihangel Rhydithon CP School building is well built and will be standing for the next 100 years.	As above.
1.8.6	Our school building is in no worse condition than other similar size schools in Powys. The school has recently been decorated. The mobile classroom used for the Cylch Meithrin has also recently been renovated to meet the needs of the	As above.

	children. There have also been reports of problems with quality in the new larger schools.	
1.8.7	It is true the building is not brand new but it is solid, does not leak, serves its purpose. Some of the new and newer build schools are in need of repair on a regular basis whereas this older building stands strong.	As above.
1.8.8	The buildings may be old but they provide very substantial classrooms. There are no classrooms that are not built soundly, ie: no mobile buildings that some school have which are not substantial etc...	As above.
1.8.9	You can build a 21st century school with shiny new windows and up to date IT equipment but it's down to the teaching and nurturing that creates well educated children and the children at Llanfihangel Rhydithon CP School get this.	As above. The Council fully agrees that it is the quality of teaching which ensures that pupils have a good quality education.
1.8.10	The school has the advantage of being able to use the community hall next door for concerts etc. This is a modern space and a good asset for the school activities.	The Council notes these comments regarding the co-location of the school and the community hall, and fully acknowledges the benefits to the school from being co-located with this facility. The alternative schools which pupils would transfer should the school close all have a hall on site, therefore this type of facility would continue to be available to them.
1.8.11	Dolau has a great community hall on site, I can remember it being built when I was in school. It's a terrific asset to the school, community and to the area. It is an excellent link to further space in a safe modern environment.	As above.
1.8.12	The community hall is located alongside the school. During the school day the school have full use of the facility, which is used at lunchtime, allowing the children to all eat together in a large and airy hall, also it is frequently used for a larger space	As above.

	for sports activities and exercise if the children are unable to access the outside space due to weather etc.	
1.8.13	I believe that Dolau has all of the facilities we could ever need. We have a lovely conservation area, story telling area, raised beds for planting vegetables, a pirate ship and play houses, a hobbit house, football and sports area.	Comment noted.
1.8.14	Dolau has a fantastic outdoor classroom, with a conservation area.	Comment noted.
1.8.15	Dolau school has a village location, it has a large play area, including a green and a tarmac space, it also has an area at the rear which could be transformed again into providing an area for outdoor education (forest school / gardening / environmental education).	Comment noted.
1.8.16	We have ICT resources at nearly a 1:1 ratio, no other school in the area can boast this level of ICT facility.	<p>The Council notes these comments about the ICT resources available at the school.</p> <p>There has been significant investment in digital equipment in all schools over the last two years as part of the Welsh Government Education Technology Programme. Most Powys primary schools now have a better ratio of devices than one device per pair of children.</p>
1.8.17	Each child in the Key Stage 2 class has a laptop which they can use throughout the day for their learning. In the Foundation Phase class, we have 11 laptops to use, over half the children have access to a laptop, we also have 3 iPads which are used throughout the school. As part of teaching learners to be 21st century citizens this is a great opportunity for each child to have, as they will be computer literate by the time they leave Dolau in Year 6. Most schools do not have this type of provision and usually have 2 laptops in a class	As above.

	and / or shared access to a computer room, which disrupts the children moving around a school and not always do those computers work.	
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1.9 Comments about pupil numbers at Llanfihangel Rhydithon C.P. School

1.9.1	The school is not running with low pupil numbers, its numbers are almost optimal for the premises and should not be used to justify the Council's response.	<p>The Council recognises that surplus capacity is not an issue at the school, however the school's capacity is very small at 36. The Council faces a challenge due to the high proportion of small schools in the county and the lack of equity amongst schools, as outlined in the Council's Strategy for Transforming Education in Powys 2020-30.</p> <p>Llanfihangel Rhydithon C.P. School teaches children in two classes of mixed aged groups. With such low pupil numbers the teacher-pupil ratio is notably different to many other schools in the area, and due to the Council's funding formula, the school's funding per pupil is higher than the Council's average. This does not provide equity across the education system – teachers in larger schools are required to provide the same education as smaller schools for less funding per pupil. Powys' Strategy is intended to improve equity across the education system and to ensure an improvement for every pupil's learning entitlement and experience.</p>
1.9.2	Dolau School is classified as a small school and typical of rural schools in Powys. But it is operating at high capacity with growing pupil numbers.	As above.
1.9.3	How can the Council justify closing a school that is at its capacity?	As above.

1.9.4	Pupil numbers are likely to increase from 37 to 43 by 2024.	As above.
1.9.5	Projected pupil numbers for Dolau school show an increase over the next three years, not a decrease.	As above.
1.9.6	Llanfihangel Rhydithon C.P. School has no current year 6 pupils and therefore no leavers this academic year. Our numbers are set to increase in the next few years.	As above.
1.9.7	There is extra room available to expand when the school is full to capacity.	Comment noted.
1.9.8	I do not understand why you propose for Llanfihangel Rhydithon CP School to shut when it currently has healthy numbers in comparison to other schools which you have not recommended to close.	Following approval of the Council's Strategy for Transforming Education in April 2020, the Council has been reviewing all of its smallest schools. At the time, Llanfihangel Rhydithon C.P. School was the 6th smallest school in Powys, and the smallest school in the Calon Cymru catchment area.
1.9.9	Pupil numbers are no lower than other small schools in Powys.	It is true that there are a number of other small schools in Powys which have similar pupil numbers to Llanfihangel Rhydithon C.P. School. Following approval of the Council's Strategy for Transforming Education in April 2020, the Council has been reviewing all of its smallest schools.
1.9.10	The school's size is not untypical of many schools in Powys.	As above.

1.10 Comments about leadership at the school

1.10.1	Our head has been a shared head with Llanelwedd for six years and it has worked very well for both schools.	The Council notes these positive comments about the shared headteacher arrangement with Llanelwedd C. in W. School.
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		<p>The Council acknowledges that there are benefits to closer collaboration between schools and shared headship arrangements can work well. The Council also notes that, due to the shared arrangement, the Headteacher of Llanfihangel Rhydithon C.P. School has only a small teaching commitment in both schools which would be greater if he was only leading a single school.</p> <p>The Council has no concerns about the quality of leadership at Llanfihangel Rhydithon C.P. School. However, it remains the case that headteachers in smaller schools have a higher teaching commitment than in larger schools, and therefore have less time available to focus on leadership. In addition, as there are less staff in the school, there are less opportunities to develop leadership across the school.</p> <p>It also remains the case that the shared headteacher arrangements at Llanfihangel Rhydithon C.P. School is not a permanent arrangement. Some schools with temporary shared arrangements have formal agreements in place. However, these are not legally binding, and therefore the arrangement continues to be a temporary arrangement, with the headteacher employed by one school. This means that the school is at risk of instability should either of the governing bodies decide to end the shared arrangement or if the headteacher decides to leave. Therefore, it remains the case that the Council's preferred model for headships is for permanent heads – either for standalone schools or more than one school – as this provides the school with</p>
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		stability and enables the headteacher to plan for the long-term.
1.10.2	We have a wonderful shared Headteacher who although is not based on site, runs the school efficiently and effectively. He is available to answer queries by phone / email quickly. He has been an asset to the school since he joined us, and we feel the arrangement works beneficially for both Llanelwedd and Dolau. Surely our Headteacher replying to emails / phone calls rather than face to face, is no different to that of Powys County Council staff working from home?	As above.
1.10.3	The Executive Headteacher works collaboratively with staff, governors and parents to establish a clear vision that is strongly focussed on promoting well-being, happiness and achievement of all pupils.	As above.
1.10.4	Regardless of whether the long-term leadership is deemed "temporary", the leadership is of a very high standard and the headteacher has shown devotion and skill which has led to Dolau school's continuing success.	As above.
1.10.5	The Headteacher is brilliant, and even though he isn't on site all of the time, he is fully aware of everything happening within the school and community, and very quick to respond if we need anything. Even though he's not on site, the service he provides is no different.	As above.
1.10.6	The school has continuous communication from the headteacher daily and he is always at the forefront of decisions made. Staff are constantly updated on any changes or any matters they need to be aware of.	As above.
1.10.7	The executive head model works well and supports the budget effectively.	As above.
1.10.8	Shared leadership with the Head Teacher of Llanelwedd for six years has obviously worked and Estyn are quoted as	As above.

	saying that the Headteacher provides effective leadership for the school.	The Council notes Estyn's comments about the leadership of Llanfihangel Rhydithon C.P. School.
1.10.9	There has been a shared headship arrangement in place for several years, it works well and Estyn's view was that this arrangement "provides effective leadership".	As above. The Council notes Estyn's comments about the leadership of Llanfihangel Rhydithon C.P. School.
1.10.10	Estyn stated that 'The executive headteacher provides effective and supportive leadership for the school. He works collaboratively with staff, governors, and parents to establish a clear vision that is strongly focused on promoting the wellbeing, happiness, and achievement of all pupils. He has high expectations of all and promotes a caring and stimulating learning environment.' Estyn is an external verification, and they could see the positives of an executive head in place, how can the council go against what Estyn have said when they believe it is a great positive for the school?	As above. The Council notes Estyn's comments about the leadership of Llanfihangel Rhydithon C.P. School.
1.10.11	How does the shared headship arrangement at Dolau differ in terms of the availability from a headteacher of a large school having to spread their time across many classes and staff?	The shared headship is a temporary agreement between the two schools. This does not provide sustainable leadership at Llanfihangel Rhydithon. The headteacher spends part of the week in both schools. Therefore for part of the week they are not on site at the school. A headteacher at a larger school would be in a permanent leadership position and be able to dedicate their time to one school site.
1.10.12	You comment that the shared leadership 'limits the time available to focus on leadership of Llanfihangel Rhydithon	The Council acknowledges that it is possible for headteachers to effectively lead and manage across

	<p>C.P. School' but if this is the case, then why do you allow shared leadership to happen in many other Powys schools?</p>	<p>two or more sites and there are other examples of such arrangements in other schools in Powys.</p> <p>Generally, in Powys, shared headships are arranged when individual schools are unable to recruit a headteacher or need to address an urgent situation with leadership at a school. In other cases, headteachers have managed schools on more than one site as they transition to a new arrangement e.g. a new building (Welshpool C.in. W Primary school is an example of this) or as a result of a formal proposal e.g Newtown & John Beddoes, Ysgol Calon Cymru.</p> <p>In addition, there are three formal federations in the county – Carno, Llanbrynmair and Glantwymyn, Ffederasiwn Dwy Afon (Llangedwyn and Llanfechain) and the Llanidloes Schools Federation. These proposals were put forward and agreed by the schools themselves and not by the Council, under the Federation of Maintained Schools (Wales) Act, although the Council was supportive.</p> <p>In addition, as part of improving education across Powys, the Council encourages headteachers with experience in specific areas to work with the Schools Service so that best practice can be shared across the county.</p> <p>Whilst the Council acknowledges that there are benefits associated with the shared headteacher arrangement at Llanfihangel Rhydithon C.P. School, it remains the case that this is not a permanent arrangement. The Council's</p>
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		preferred model for headships is for permanent heads – either for standalone schools or more than one school – as this provides the school with stability and enables the headteacher to plan for the long-term.
1.10.13	The leadership arrangements at Dolau have provided an invaluable for the experienced teacher at Dolau to act as teacher in charge and gain skills and understanding of leadership to enhance their future career opportunities.	The Council acknowledges that the shared headteacher arrangement at Llanfihangel Rhydithon C.P. School have provided additional opportunities for staff to gain leadership experience.
1.10.14	The leadership arrangements make sound financial sense and offers leadership opportunities to the school's highly experienced and proficient staff.	The Council acknowledges that the shared headteacher arrangement at Llanfihangel Rhydithon C.P. School have provided additional opportunities for staff to gain leadership experience and has provided financial benefit to the two schools.
1.10.15	The shared / federated arrangements with Llanelwedd are already delivering savings against the budget for both Dolau and Llanelwedd schools.	The Council acknowledges that the shared headteacher arrangement at Llanfihangel Rhydithon C.P. School has provided financial benefits to the two schools.
1.10.16	The current headteacher has been in place for 6 years and it is my understanding that the governing body have requested a formal agreement regarding the headship, and this was agreed by your team via email, but has yet to be actioned by you.	Paragraph 23 of the Cabinet report of 27 th September 2016 states: <i>'It is recommended that a new report is brought to Cabinet with draft recommendations for Llanbister C.P. School and Llanfihangel Rhydithon C.P. School in accordance with the Schools Reorganisation Policy 2015, which considers the circumstances of the two schools alongside the Authority's aspiration for primary education, which is to have 'headteachers with no classroom responsibilities.'</i>

		<p>However, following the Cabinet decision, a discussion took place with the governing body of Llanelwedd C.i.W School and other in 2016 about the possibility of a formal merger between both schools, as federations are not permissible between Church and community schools. Llanelwedd C.in.W School felt that the current shared headship arrangement was working well and wished to continue with that.</p> <p>The outcome of this discussion was that officers suggested that a formal partnership agreement was the most appropriate way forward, verified in an email sent from an officer to the Head and Chair on the 21st September 2018, as follows:</p> <p><i>‘As you know, we met with you earlier this year to consider options for Llanfihangel Rhydithon CP School, and this included further discussions with other schools that may be willing to formally partner or federate/merge with the school – the premise of the discussions was PCC’s Cabinet’s wish to maintain primary provision in Dolau to serve the local community.</i></p> <p><i>This stage has now been completed, and, following consideration of all information received, it would appear that the most appropriate way forward for the school is to formalise the current partnership with Llanelwedd, supported by the rural schools grant.</i></p> <p><i>I understand that you have a governors meeting tonight, therefore it would be good to know the views of your governing body – I am sure that there are many</i></p>
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		<p><i>questions about what a ‘formal partnership’ looks like! We would then be happy to attend a meeting with both chairs and the head to discuss this further.’</i></p> <p>This was clarified in a further email on the 28th February 2018 from an officer to the Chair of Governors which stated the following:</p> <p><i>‘We have no plans currently to federate or merge Llanfihangel Rhydithon and Llanelwedd – the outcome of discussions was that the partnership should continue as it is. However, we are in the process of finalising a Collaborative Partnership Agreement for schools in your position i.e. with shared arrangements. This isn’t a legal document, but it does set out the roles and responsibilities of each party, and helps ‘formalise’ the arrangement to some extent. If this is something both schools would wish to see in place, then I’m sure we could arrange this.’</i></p> <p>However, no further action was taken by either the Council or the two governing bodies in relation to this.</p> <p>Some schools with temporary shared arrangements do have formal agreements in place. However, these are not legally binding, and therefore the arrangement continues to be a temporary arrangement, with the headteacher employed by one school. This means that the school is at risk of instability should either of the governing bodies decide to end the shared arrangement or if the headteacher decides to leave. Therefore, it remains the case that the Council’s preferred model for</p>
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		headships is for permanent heads – either for standalone schools or more than one school – as this provides the school with stability and enables the headteacher to plan for the long-term.
1.10.17	The Governing Body of Dolau requested a formal agreement of the appointment of the headmaster, this was agreed via email by the Transformation Team but has never been carried out, it is disappointing that the appointment of an executive head was approved by Powys previously but now is a negative?	As above.
1.10.18	We understand that the Headteacher position is not a temporary arrangement but a permanent post as part of the Federation of Schools in accordance with agreements made with the Welsh Government, Governors and Diocese Education. One principal of a federated school is that Headteacher's role is shared between campuses giving economies of scale. We believe this has proved very successful over the past four years of federation.	<p>Whilst the Headteacher of Llanelwedd C. in W. School has been undertaking the role of Headteacher at Llanfihangel Rhydithon C. P. School for several years now, the two schools are not federated.</p> <p>It is not possible to federate a community primary school with a Church in Wales primary school, therefore it would not be possible for the two schools to federate.</p>

1.11 Comments about school staff

1.11.1	The staff work extremely hard to create such a wonderful atmosphere of learning, positive wellbeing and support for all within the school and community.	The Council notes these positive comments about the staff at Llanfihangel Rhydithon C.P. School.
1.11.2	The staff are amazing, positive and passionate ensuring the children are given every chance to maximise their potential.	As above.
1.11.3	I cannot commend the teachers and staff at Dolau School enough – they have brought structure and stability to the children's lives throughout the past 18 months without fail.	As above.

1.11.4	The one-to-one attention provided by the teachers is outstanding, this has been shown in the high standards the school has achieved for years now.	As above.
1.11.5	Teachers at Dolau School have to teach a wide age range, however this never phases them, they always teach to a very high standard.	As above.
1.11.6	The teachers are caring and fair to all children. They challenge everyone to do well and make sure all children understand the work they are given. If someone is stuck on a question, the teacher is always there to offer their help whereas in bigger schools the teacher may not be able to help everyone who was struggling.	As above.
1.11.7	The teachers have a fantastic way of choosing term topics that spark the children's interest, all lessons including maths, English, science, humanities, sport, movement and outdoor education are all tailored to this topic. My children are enthralled by these and their teachers.	As above.

1.12 Parents travel past other schools for their children to attend the school

1.12.1	Some parents drive pasts three other schools just so their children can attend this school.	<p>The Council fully acknowledges that parents choose for their children to attend Llanfihangel Rhydithon C.P. School instead of their closest school. As indicated in the Consultation Report produced in respect of this proposal, the nearest school for pupils attending Llanfihangel Rhydithon C.P. School in September 2021 was as follows:</p> <ul style="list-style-type: none"> • Llanfihangel Rhydithon C.P. School – 53% • Crossgates C.P. School – 28% • Ysgol Cefnlllys – 11%
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		<ul style="list-style-type: none"> • Knighton C. in W. School – 5% • Rhayader C. in W. School – 3% <p>Should the Council proceed with the proposal to close Llanfihangel Rhydithon C.P. School, parents would continue to be able to choose which school they wish their children to attend – they would be able to choose for their child(ren) to attend a school other than their closest school should that be their preference. However, home to school transport would only be provided in accordance with the Council’s Home to School Transport Policy.</p>
1.12.2	Many parents choose to drive past their neighbouring schools to bring their children to Dolau.	As above.
1.12.3	Parents drive past 3 schools every day to ensure their parental choice is being met with what we consider to be the best school.	As above.
1.12.4	According to your documentation, 53% of Dolau school pupils pass the potential receiving schools to get to the school, indicating parental choice in where they want their children educated.	As above.
1.12.5	Many parents bring their children from out of the area to Dolau, because it is such a lovely, friendly school.	As above.
1.12.6	Parents have spent time and money to transport their children to Dolau even though it isn’t their closest school to ensure they have the best.	As above.
1.12.7	The nearest alternative school has excess space because conscientious caring parents are driving past that school to take their children to Dolau because they see it as a better alternative.	As above.

	Perhaps you should investigate why parents are driving past other schools to bring their children to Dolau?	The Council recognises that parents can choose which school they wish their children to attend, and that there are many reasons why parents choose for their children to attend schools other than their closest school, both in respect of the pupils currently attending Llanfihangel Rhydithon C.P. School and pupils attending other schools across Powys.
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1.13 Links between the school and the community

1.13.1	This is a good community school which functions brilliantly within the Dolau Community.	<p>The Council fully acknowledges the links between Llanfihangel Rhydithon C.P. School and the community, and the important role the school plays in the community.</p> <p>The potential impact of closure of the school on the community has been recognised in the Consultation Document, the draft Community Impact Assessment, the Consultation Report and the updated Impact Assessment document.</p> <p>The impact assessment document has been further updated to reflect comments raised in the Objections received, and the updated document will be considered again by the Council's Cabinet when determining whether or not to proceed with the proposal.</p>
1.13.2	The school has strong links within the community.	As above.
1.13.3	Llanfihangel Rhydithon CP School is supported to the utmost level by the community it serves.	As above.

1.13.4	The school works with other groups in the village, like the Church, WI, Youth club, bowls, YFC and Hall committee, helping to bring people together in a rural area.	As above.
1.13.5	All events held in the village are focused on the school children to ensure that everyone's able to attend and enjoy.	As above.
1.13.6	The pupils support local groups in the community, especially the church, by attending and participating in numerous local events throughout each year.	As above.
1.13.7	Dolau School and its grounds are part of the hub of village and rural life. They facilitate many clubs and groups, a breakfast club and after school club.	As above.
1.13.8	The school is at the heart of a vibrant community. People of all ages facilitate clubs and groups in and around the school. This nurturing community spirit is reflected in the enjoyment of the pupils and their high rate of attendance at school.	As above.
1.13.9	The community is engaged with the school, staff and activities that surround the school, e.g. Church, Young Farmers Club, Friends of the School, the Early Year setting for Cylch Meithrin. This enables a social life for the whole family and a sense of purpose for the community. Parents and grandparents meet outside the school gates and chat. There is time for all to communicate without rushing off to catch a bus.	As above.
1.13.10	The community of families at this school is very supportive and help each other's wellbeing in difficult times such as bereavement or illness. In my experience the community helps give bereaved children normality and joy.	As above.
1.13.11	The school is exceptionally well supported by the local community. This support does not automatically transfer to the receiving school, leaving parents and pupils alienated and disaffected.	Comment noted.

1.14 Reference to Friends of Dolau School (FODS)

1.14.1	The school also has an extremely supportive PTA which tirelessly fundraises to provide the school with extras, including IT equipment, an outside learning shelter, playtime toys and funding trips and experiences to support the children's educational needs.	The Council recognises that the Friends of Dolau School fundraising committee are very active and raise a significant amount of money to support the school.
1.14.2	We also have a very active Friends of Dolau School (FODS) fundraising committee who work tirelessly to support the school. In the last 5 yrs they have raised nearly £40,000 pounds through fundraising and grants to help with items and projects to enhance our children's education in Dolau . This is how we are able to have things like IT equipment and 1:1 provision.	As above.
1.14.3	Dolau school has an excellent PTA known as 'Friends of Dolau School'. This group raises thousands in providing additional items for the school and the children. This fundraising will be lost if Dolau school closes and children will lose the benefit of such a strong support group.	As above.
1.14.4	Anything that the school need is provided by the Friends of Dolau School (FODS), who along with the community have raised £8000 in the last month! This just shows the depth of feeling for this school in the community.	As above.
1.14.5	FODS and other local community groups have recently paid for new playground markings and furniture.	As above.
1.14.6	Dolau schools fundraising is superb compared to other receiving school. Parents that work within Friends of Dolau School, will not raise funds like this for other schools should their children be moved. This is a fact.	As above.
1.14.7	Vast amounts of money are raised each year by the hugely successful Friends of Dolau School committee. Their fund raising provides many extras in addition to the budget you	As above.

	offer. The Friends of Dolau School pay for the buses used to take our children to their weekly swimming sessions and trips away from the village, all of which benefit the pupils enormously. Does the same happen at the nearest alternative schools?	
1.14.8	Llanfihangel Rhydithon CP School has a very strong charity fund raising group called FODS - Friends of Dolau School. This group do a lot for our school and community. They raise a huge amount of money each year which is used to buy new equipment and class room resources - they also pay for many of our school trips and outings. Does the equivalent group do that in say Crossgates?	As above.
1.14.9	Look at the charity commissions for details of Dolau's fundraising activities in comparison to other schools. All other schools listed as nearest, have no profit.	As above.

2. IMPACT ON PUPILS

2.1 Concern about the impact of the process on pupil well-being

2.1.1	The hidden costs for the county with the impact on these children's mental health cannot be disregarded. The well-being of children should be at the heart of any decision in P.C.C.	<p>The Council recognises that any school reorganisation process creates a period of uncertainty for all involved, including children. This was recognised in the Consultation Documentation published in respect of this proposal, and in the Consultation Report which was prepared summarising the comments received during the consultation.</p> <p>The Council is committed to supporting schools and learners, including through periods of change. An experienced member of staff from the Council is</p>
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		<p>supporting school leaders effectively to help them manage possible changes for their learners. It is also expected that school governors, staff and parents support the children to ensure that there isn't a detrimental impact on their wellbeing.</p> <p>Should the Council proceed with the proposal, arrangements would be put in place to ensure effective transition for pupils from Llanfihangel Rhydithon C.P. School to their alternative schools, to minimize the impact on their well-being and ensure their successful transition to their new school.</p>
2.1.2	The Council has failed to acknowledge the detrimental impact closure would have on the pupils' mental wellbeing and academic achievement.	As above.
2.1.3	The decision is having a negative impact on pupils' ability to have a positive childhood. The pupils are experiencing much uncertainty and heightened anxiety.	As above.
2.1.4	The mental health of our children is already starting to decline, and will be scarred for many years to come.	As above.
2.1.5	Children's mental health has not been considered once throughout this process	As above.
2.1.6	I urge you to rethink and keep this wonderful high achieving school open and protect the future of our children's education and mental health.	As above.
2.1.7	The process is having a very bad effect on pupils, they are all very upset and some are having nightmares.	As above.
2.1.8	The Council has not addressed the effects of this process on the wellbeing of our children.	As above.
2.1.9	In one of Powys County Council's documents it talks of the UN Convention on the Rights of the Child. Article 3 part 1	As above.

	<p>states 'in all actions concerning children, whether undertaken by public or private social welfare institutions, courts of law, administrative authorities or legislative bodies, the best interests of the child shall be a primary consideration'. Currently under this consultation, that is not what Powys County Council is doing. The state of my children proves that. We are not alone in this; many other children from the school are having the same if not worse problems.</p>	
2.1.10	<p>I'm concerned about the impact the proposed closure is having on the mental health of many of these young children. Parents have tried to shield their children as much as possible, however notices on the school gates are hard for them to ignore.</p>	<p>As above.</p> <p>The School Organisation Code includes a requirement to display a Statutory Notice at the school entrance, therefore whilst acknowledging that this part of the process would have been more visible to pupils, the Council was required to carry out this step in order to conform with Welsh Government requirements as outlined in the Code.</p>
2.1.11	<p>Powys has not given the children any support at all, the headteacher has got support for them – does the welfare of these children not mean anything?</p>	<p>The Council recognises that any school reorganisation process creates a period of uncertainty for all involved, including children. The Council is committed to supporting schools and learners, including through periods of change. An experienced member of staff from the Council is supporting school leaders effectively to help them manage possible changes for their learners. It is also expected that school governors, staff and parents support the children to ensure that there isn't a detrimental impact on their wellbeing.</p> <p>Because the school staff know the pupils very well, they are best placed to provide support to pupils and have</p>

		<p>been doing so throughout the process, arranging activities to support pupil well-being.</p> <p>In addition, the headteacher, at the suggestion of Council staff, has made referrals for support for those very few pupils who have been most affected by the proposed closure, to the Education Psychology service.</p>
2.1.12	Where has the support been for pupils?	As above.
2.1.13	At no point during or since the consultation have Powys actively supported the pupils with the emotional and mental strain this has burdened them with.	<p>The Council recognises that any school reorganisation process creates a period of uncertainty for all involved, including children.</p> <p>The Council is committed to supporting schools and learners, including through periods of change. An ex headteacher who works for Powys and has experience of receiving pupils from a school that closed has visited the school to talk to the pupils about the process and answer their questions. In addition, school staff and other staff from the schools service are available to support pupils as required, including members of the Education Psychology service.</p> <p>It is also expected that school governors, staff and parents support the children to ensure that there isn't a detrimental impact on their well-being. Because the school staff know the pupils very well, they are best placed to provide support to pupils and have been doing so throughout the process, arranging activities to support pupil well-being.</p>

2.1.14	Is there anybody employed by Powys to support our children? They need it now, and if you go ahead with this closure they're going to need it even more.	As above.
2.1.15	In the consultation response from Powys, they promised to help the children through the transition period of school closure and settling the children into their new school, however we have heard nothing from Powys.	<p>Should the Council proceed with the proposal, arrangements would be put in place to ensure effective transition for pupils from Llanfihangel Rhydithon C.P. School to their alternative schools, to minimize the impact on their well-being and ensure their successful transition to their new school.</p> <p>The Council has not yet made a final decision on whether or not to proceed with implementation of this proposal, therefore it would not be appropriate to commence transition arrangements at this stage.</p>
2.1.16	Earlier in the year the Council put ways to help with children's mental health on social media, not long after this the Council announced plans to shut four small schools.	Comment noted.
2.1.17	Concern that there is no 'receiving school' if Dolau was to shut – this isn't putting children's well-being first.	<p>The Council notes this concern.</p> <p>Whilst the Council's proposal is that pupils attend their 'nearest alternative school', parents can apply for a place for their child(ren) at any school they choose. Should parents wish their child(ren) to transfer to a school that isn't their closest school so that they can still be with their friends, they would be able to do so, and any applications would be processed in accordance with the Council's Admissions Policy.</p> <p>Should the Council proceed with the proposal, arrangements would be put in place to ensure effective transition for pupils from Llanfihangel Rhydithon C.P.</p>

		School to their alternative schools, to minimize the impact on their well-being and ensure their successful transition to their new school.
2.1.18	Some families have been through this process three times.	The Council previously carried out consultation on a proposal to close the school in 2016, and acknowledges that some of the older pupils currently attending the school and their parents would have been affected at that time.
2.1.19	Children have been inflicted with three consultation processes whilst at Dolau School. This is having a devastating impact on families and the community.	As above.
2.1.20	Children love their learning time spent at Llanfihangel Rhydithon CP School, yet for the second time in their primary school life, they are facing another consultation regarding the same school.	As above.
2.1.21	I invite you to visit the school to talk to the children about why you are shutting their school.	<p>The Council has a duty to consult with children during any reorganisation process, and children's consultation documents were distributed to the school to share with pupils when the consultation started. In agreement with the school, officers held a virtual consultation meeting with the School Council which also had the Headteacher and the LEA governor in attendance.</p> <p>An experienced member of staff who is working for the Council has also attended the school to speak with pupils.</p>

2.2 Concern about consultation taking place during the Covid pandemic

2.2.1	Pupils have already had a torrid time over the last couple of years due to the pandemic.	<p>The Council recognises that the last couple of years have been difficult for all, including pupils and their families, due to the Covid pandemic. The Council also recognises that any school reorganisation proposal creates a period of uncertainty and concern for all involved, including children, and that this has been exacerbated due to the process taking place whilst the Covid pandemic has been ongoing.</p> <p>Following Estyn’s inspection of Powys Education Services in 2019, the Council started to develop a new Strategy for Transforming Education in Powys, which was approved in April 2020. In order to address the issues raised by Estyn regarding the organisation of its schools, it was necessary for the Council to continue with the development and consultation on proposals during the current pandemic.</p> <p>The Council is committed to supporting schools and learners, including through periods of change. An experienced member of staff from the Council is supporting school leaders effectively to help them manage possible changes for their learners. It is also expected that school governors, staff and parents support the children to ensure that there isn’t a detrimental impact on their wellbeing.</p> <p>Should the Council proceed with the proposal, arrangements would be put in place to ensure effective transition for pupils from Llanfihangel Rhydithon C.P. School to their alternative schools, to minimize the</p>
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		impact on their well-being and ensure their successful transition to their new school.
2.2.2	The past 2 years have been difficult enough for pupils without throwing this into the equation.	As above.
2.2.3	The children have been suffering for a time now – Covid has played a big part in our children’s lives, with the lack of school, seeing their friends, now they have closure to contend with too.	As above.
2.2.4	2020 has been a difficult year for children with the pandemic affecting children’s education. Children have suffered emotionally due to worry through the pandemic, and now they are faced with having to change school.	As above.
2.2.5	The threat of closure has had an impact on pupils’ mental health, on top of Covid lockdowns etc. This has just added to the rollercoaster that should have been evening out with the lockdowns easing – the timing is terrible.	As above.
2.2.6	School and being with their friends was the main thing children missed throughout the pandemic. No sooner had they been able to return to relative “normality”, than the proposal to close their safe bubble was put forward – absolutely dreadful timing for these children and their families!	As above.
2.2.7	Closing Llanfihangel Rhydithon C.P would affect children’s mental health and well-being. It has been unsettling enough the last year or so due to the COVID pandemic, this would not help at all. It would also destroy the security these children feel in being able to attend a school close to home where they are familiar with their surroundings and people in the environment.	As above.
2.2.8	When considering the impact of coronavirus on children’s education, without this new level of stress, I wonder why this time has been selected for major upheaval to small children?	As above.

2.2.9	Parents are having to support the children through both a pandemic and a school closure process – this is not fair.	As above.
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2.3 Concern that pupils would be separated from their friends

2.3.1	Concern about the huge upheaval for children of having to move to a new school and make new friends.	<p>Should the Council proceed with the proposal to close Llanfihangel Rhydithon C.P. School, it is acknowledged that children and families would need to go through a period of change. The Council fully understands that this is a real concern for children, especially if friendship groups go to different schools.</p> <p>Should the Council proceed with the proposal, arrangements would be put in place to ensure effective transition for pupils from Llanfihangel Rhydithon C.P. School to their alternative schools, to minimize the impact on their well-being and ensure their successful transition to their new school, and to ensure that they make new friends in their new school.</p> <p>Should the school close, the majority of pupils currently attending Llanfihangel Rhydithon C.P. School would be closer to Crossgates C.P. Schools and therefore would be able to transfer together. Parents are also able to choose any school for their child(ren) and if there are places available, the child(ren) can attend that school. There are enough places available at Crossgates C.P. School for all the pupils at Llanfihangel Rhydithon C.P. School should parents wish for pupils to transfer together.</p>
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		However, free home-to-school transport is only provided to a pupils' nearest school, therefore if a parent was to choose for their child(ren) to attend a school that isn't their nearest school, then the parent is responsible for getting the child(ren) to and from school.
2.3.2	Concern that pupils would have to make new friends in a different school.	As above.
2.3.3	The children at Llanfihangel Rhydithon CP School are great friends. It would be very sad if the school was closed as strong friendships would be broken by the Council's decision to send its pupils off in many different directions.	As above.
2.3.4	Concern that implementation of the proposal would split friendship groups, and that pupils would have to leave a school where they know each pupil by their first name.	As above.
2.3.5	Concern that friendship groups would be broken if children attended different schools.	As above.
2.3.6	Concern that children may be attending a new school alone.	As above.
2.3.7	Concern that friends and family could be split up – is there a guarantee that siblings following on will be able to go to the same school as their older brothers / sisters?	<p>Any future applications for admission by siblings wishing to attend the same school as their older brothers / sisters would be considered in accordance with the Council's Admissions Policy.</p> <p>As outlined in the Council's 'Admissions Information and Arrangements 2022-23' which is available on the Council's website at http://en.powys.gov.uk/article/1158/Applying-for-a-School-Place, the first criteria used when allocating places in a primary school which is over-subscribed is as follows:</p>

		‘a. The presence of an elder sibling residing at the same household, with the household being the nearest primary school, when the pupil commences at the school. To qualify, primary siblings must be in Reception to Year 6 and, in the case of an All-Through school, secondary siblings must be in Year 7-13.’
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2.4 Concern about the impact on pupils of having to move to a different school

2.4.1	Concern that pupils would struggle at larger schools.	<p>The Council notes these concerns about pupils transferring to larger schools should the Council proceed with the proposal to close Llanfihangel Rhydithon C.P. School. However, all schools, regardless of size, are able to provide for the needs of their pupils.</p> <p>Schools receiving pupils as a result of a school closure would be expected to work with the closing school to provide full support to pupils to ensure a smooth transition.</p>
2.4.2	How does the Council plan to help with the transitioning of pupils changing schools?	<p>Should the Council proceed with the proposal, arrangements would be put in place to ensure effective transition for pupils from Llanfihangel Rhydithon C.P. School to their alternative schools, to minimize the impact on their well-being and ensure their successful transition to their new school. This would involve the schools receiving pupils as a result of closure of the school working with the closing school to ensure a smooth transition for pupils.</p>

2.4.3	<p>The impact of closure of a school and having to move and be accepted by another group can leave a scar for pupils – previous school closures of having to move to a different school has affected the pupils that were attending when the school closed.</p>	<p>The Council notes these concerns about the impact of school closure on pupils.</p> <p>Should the Council proceed with the proposal, arrangements would be put in place to ensure effective transition for pupils from Llanfihangel Rhydithon C.P. School to their alternative schools, to minimize the impact on their well-being and ensure their successful transition to their new school. This would involve the schools receiving pupils as a result of closure of the school working with the closing school to ensure a smooth transition for pupils.</p>
2.4.4	<p>An FOI request was put forward to Powys County Council asking: “With regards to schools that have previously been closed by Powys CC in recent years (i.e. Whitton; Nantmel; Beguildy), can you confirm any follow up activities / consultations with the ex-pupils that have been carried out, to assess the emotional impact that the closure has had on the children?”. The response received was: “There have been no follow up activities / consultations with ex-pupils from closed schools to assess emotional impact. however, transition arrangements were in place to support pupils transferring from their original school to their new school.” My mind was not put at ease.</p>	<p>Comment noted.</p>
2.4.5	<p>When the children from Nantmel moved into their new schools, I was not aware of any support provided once they had walked through the door of their new school, they were just placed into their respective classes in the morning and had to get on with it. Yet in your document you state that ‘the receiving school(s) would provide full support to the pupils during the transition period, to minimise any negative impact</p>	<p>Once a parent has made an application to another school following a school closure proposal, that school will be notified, and arrangements would be put in place for the families to visit the new school and for pupils to take part in transitioning activities.</p>

	on them.' I would like to see a breakdown of the support you are willing to offer the children and what mental health counselling would be available to the children as there are no doubts in my mind that their mental health would be affected during this process.	
2.4.6	In respect of 'Wellbeing and attitudes to learning', you state that 'In the short term, it is possible that there would be an impact on pupils' wellbeing, as they would need to transfer from Llanfihangel Rhydithon C.P. School to alternative schools. However, the receiving school(s) would provide full support to the pupils during the transition period, to minimise any negative impact on them.' Knighton did not support Beguildy or Whitton's children well enough. Powys County Council has no data on this – no proof that this was carried out. Can you guarantee this will happen?	As above.

2.5 Concern about the impact on the quality of education

2.5.1	Parents are very concerned about the quality of education and support children will receive should the school close.	<p>The Council does not have any concerns over the quality of education provided at any of the alternative schools and believe that pupils will not be disadvantaged.</p> <p>All the alternative schools are regarded as 'self-improving' schools, according to the latest National Categorisation in 2019.</p> <p>Estyn, in its response to this consultation, has concluded that 'It is Estyn's opinion that the proposal is likely to at least maintain the current standards of education in the area.'</p>
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2.5.2	Concern that pupils would have education of a lesser standard at alternative schools.	As above.
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2.6 Concern about the impact on pupils that have additional learning needs

2.6.1	<p>Would the children with ALN needs have the same opportunities they get in Llanfihangel Rhydithon CP School? There is a specialist ALN teacher at Llanfihangel Rhydithon C.P. School who comes in once a week to work one to one with the children who need it without them feeling singled out. Also, teacher assistants also work individual with these children from time to time. This is vital that these children get this support within another school. How are you going to guarantee that these children will get this support within another school?</p>	<p>The Council notes these concern about the impact of the proposal on pupils with additional learning needs that currently attend Llanfihangel Rhydithon C.P. School.</p> <p>Although Llanfihangel Rhydithon C.P have the support of a specialist teacher, they are only able to support a limited amount of pupils as they only work part-time at the school. In larger schools, there may be a designated ALNCo and learning support assistants.</p> <p>There is very good support across the cluster schools in the Ysgol Calon Cymru area for the support of pupils with SEN/ALN. Nearly all schools in the cluster have a designated full time ALNCo who can provide support and guidance to pupils and staff in relation to SEN/ALN. Two schools in the cluster have specialist centres for pupils with SEN/ALN and one hosts a Powys nurture cluster provision. Another school has been hosting a satellite for pupils with complex needs since September 2021. One school in the Calon Cymru cluster provides support for pupils with SEN/ALN through the medium of Welsh.</p> <p>While larger schools may have a greater of number of pupils with SEN/ALN, these larger schools also have more staff that can support their needs. In addition, they</p>
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		may have specialist teaching facilities for pupils with SEN/ALN.
2.6.2	Concern that pupils who need extra help in school won't get this in a larger school.	As above.
2.6.3	The Additional Learning Needs Code for Wales 2021 has been introduced to completely transform the provision for children and young people with ALN. 'It places the learners' views, wishes and feelings at the heart of the process of planning the support required to enable them to learn effectively and achieve their full potential'. One of the key changes outlined in this Code is that schools have to meet three key requirements. There is going to be decisions about whether a child or young person has ALN, the preparation, content, form, review and revision of individual development plans ("IDPs") and to maintain IDPs. I am unsure how Powys County Council can justify closing small schools as an attempt to improve the provision for children and young people with ALN. Small classes and close-knit communities are what are at the heart of supporting children and young people with ALN. By removing small schools to fit the model of 150 children as proposed by yourself as the necessary number has no educational benefit to the learners in our care. By creating big schools and big classes, children with ALN will undoubtedly get lost in this new environment.	As above.
2.6.4	Concern that pupils that have dyslexia wouldn't have as much support in a larger school.	Powys County Council employs a specialist teacher for dyslexia who can provide guidance and support for pupils with language and communication difficulties. In addition, all schools have access to the Powys dyslexia pathway, and this is part of the universal learning provision for all schools. Other schools in the cluster

		have trained specialist dyslexia teachers, for example Cefnlllys CP School.
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3. TRAVEL IMPLICATIONS

3.1 The Council would need to provide transport for more pupils

Tudalen 78

3.1.1	<p>Only 7 pupils are currently transported by the Council, however if the school closes, the Council will have to transport over 30 pupils.</p>	<p>The Council fully acknowledges that should the Council proceed with the proposal, there would be a need to provide transport for more pupils.</p> <p>Should the school close, free home-to-school transport would be provided to eligible pupils (i.e. pupils living 2 miles or more from their nearest alternative school) to their nearest alternative school. An assessment of pupils attending the school in September 21 shows that 29 pupils would be eligible for free home-to-school transport.</p> <p>There are two home-to-school transport routes that transport pupils to Llanfihangel Rhydithon C.P. School – the LW14 and LW15. The LW14 is a 16 seat minibus and the LW15 is a 16 seat minibus, but could also be a 21 seat minibus. However, it is not anticipated that there would be additional transport costs, based on the analysis of pupils’ postcodes (PLASC Jan 2020), as pupils can be accommodated on existing transport routes to their nearest alternative school. There may be a situation in the future where additional transport routes may be required for additional children (i.e. children</p>
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		starting school for the first time or children who move into the area) which would depend on where they lived. At this point in time, it is not possible to know the exact cost of this, however it is anticipated that it would be a minimal cost.
3.1.2	Currently 37 pupils attend Llanfihangel, only 7 are transported to the school by Powys funded transport, 30 either walk or are transported by parents/guardians. If the school closes, only 6 pupils are within walking distance to their nearest alternative receiving school, leaving 31 pupils left to transport by Powys funded transport.	As above.

3.2 Concern about additional travel time for pupils

3.2.1	Long journeys to and from school for young children will affect their concentration if they are to be schooled further from home.	<p>The Council notes these concerns about the additional time pupils would spend travelling to and from school.</p> <p>Due to the geographic nature of Powys, many pupils of primary age are transported to school with no detrimental impact, and the Council does not consider that the distance or travel times for pupils at Llanfihangel Rhydithon C.P. School is excessive.</p> <p>Llanfihangel Rhydithon C.P. School is not the closest school for many of the pupils currently attending the school. Should these pupils transfer to their nearest schools, there would be a reduction in journey time to and from school.</p>
3.2.2	Some of the children are young, it's unreasonable to expect children to put many extra hours onto their time at school.	As above.

3.2.3	The average school day for each pupil will be longer, particularly when you factor in the time spent on homework or preparation when they reach home.	As above.
3.2.4	Many children currently walk to school, their travel time will be increased if they have to travel on a bus.	As above.
3.2.5	Our vulnerable children would have to spend longer away from their homes having to catch transport to bring them to and from.	As above.
3.2.6	When you talk about the next nearest school, you're not talking a few kms away, you're talking about many miles away in an already very rural area.	As above.
3.2.7	It's unfair to expect young children to go on bus journeys to and from school throughout their school years, this could be journeys of 45 minutes plus.	As above.
3.2.8	Concern about the negative impact on pupils who may be on a school bus for up to 2 hours a day.	As above.
3.2.9	The next nearest school is 20 minutes away (even longer for some pupils).	As above.
3.2.10	The legal time for a child to travel via bus is 45 minutes, however some pupils will travel longer than that, this is unfair and illegal.	<p>There is no legal maximum time for a child to travel to school. As stated on page of the Welsh Government's 'Learner Travel: Statutory Provision and Operational Guidance – June 2014':</p> <p>'The Measure does not specify a time limit for journeys, however, local authorities are required to assess the individual needs of learners when considering if a journey time is reasonable.'</p> <p>Should the Council proceed with the proposal to close Llanfihangel Rhydithon C.P. School, the maximum distance for a current pupil to their nearest alternative school would be 6.4 miles. Whilst it is not yet possible to</p>

		say how long this journey would take as this would be dependent on the actual bus route, the Council would not expect the journey time to be excessive.
3.2.11	Currently the longest a child is on the bus is just under half an hour. If the school was to close, you would have to transport 31 pupils to school. How long will they be on the buses for?	Should the Council proceed with the proposal, the furthest travel distance for a pupil currently attending Llanfihangel Rhydithon C.P. School to their nearest alternative school would be 6.4 miles. It is not yet possible to say how long this journey would take as this would be dependent on the actual bus route, however the Council would not expect the journey time to be excessive.
3.2.12	Sending children to a distant school deprives them of full integration into the community.	<p>Whilst the Council notes this concern, due to the geographic nature of Powys, many pupils of primary age are transported to a school which is not located in the village where they live.</p> <p>Llanfihangel Rhydithon C.P. School is not the closest school for many of the pupils currently attending the school, therefore these pupils are already choosing to attend a school which is further away from where they live.</p>

3.3 Concern that pupils would be unable to access after school activities

3.3.1	It would be difficult for pupils to take full advantage of any extra-curricular activities available due to having to catch buses.	The Council has recognised within the draft Impact Assessments that it may be challenging for pupils to attend after-school activities if they are reliant on home-to-school transport. However, schools are able to offer extra-curricular activities during the school day as well as after school. It would be an expectation of the new
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		<p>curriculum that schools provide additional experiences for their pupils.</p> <p>Many schools in Powys have pupils who are using home-to-school transport and these schools are experienced in ensuring that all pupils are able to participate in extra-curricular activities. Schools are able to work with families to provide an appropriate level of extra-curricular activities for pupils, including clubs within the school day, shared transport with other parents etc.</p> <p>Llanfihangel Rhydithon C.P. School is not the closest school for a high proportion of the pupils that currently attend. Should these pupils transfer to their nearest school, it should be easier for them to access activities held after school.</p>
3.3.2	The children will have less opportunity to access after school activities – journeys home on transport would compromise any opportunity for this important additional development.	As above.
3.3.3	Pupils would not be able to attend extra-curricular clubs as they would be reliant on transport, therefore they would be at a disadvantage compared to other children.	As above.
3.3.4	Pupils won't be able to access after-school activities as they would be travelling, so they would miss out on educational and social skills.	As above.
3.3.5	You state that pupils would attend larger schools which would be able to offer a wider variety of extra-curricular activities. However the free transport offered does not include transport to enable access to any after school clubs, so this will limit their choice of extra-curricular activities rather than enhancing it.	As above.

3.3.6	Considerable parental support would be required to enable pupils to attend after-school activities if they were dependent on transport – this would be detrimental to children who have parents that are working or unable to facilitate “pick up”.	As above.
3.3.7	Many families cannot afford the extra travel to collect their children from school at 4:30 following after-school clubs such as hockey, netball, cooking club etc. This has a huge impact on these children when they see the clubs promoted within school and have to hear their friends all talk about how much satisfaction they provide.	As above.
3.3.8	This would put an additional burden on parents / families to transport pupils to and from after school activities.	As above.
3.3.9	Closing a school makes it very difficult for the children to take part in after school activities, as many activities are often based around the school itself. For example: plays, choirs, sports, birthday gatherings, as they are often based around their class friends. It will cause an immense sacrifice on the parents behalf to taxi their children not only to school but to school activities in a different area, with a lot of milage.	As above.
3.3.10	Neighbouring schools not only have a very limited range of after school clubs, and usually these a waiting list to attend them but, if Llanfihangel Rhydithon school were to close and the children travelled to school on the bus, they would not be able to take part in these anyway as at the end of the school day they would be on the bus to go home!!	As above.

3.4 Pupils that currently walk to school would be unable to do so

3.4.1	Children that can currently walk to Dolau School would be unable to do so.	Comment noted. The Council recognises that pupils who currently walk to school would not be able to do so should the school close.
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3.4.2	Many pupils live within walking distance to school currently.	As above.
3.4.3	Children can walk to Dolau school which is 5 minutes down the road, it's unfair to make these children travel miles on a bus.	As above.
3.4.4	Only 6 pupils would be within walking distance of their closest school.	As above.

3.5 Concern about the environmental impact of additional travel

3.5.1	The Council should be considering ways to reduce all unnecessary travel and not adding to it – there is an environmental cost to shipping pupils around the county.	<p>The Council recognises that should the Council proceed with the proposal, additional travel would be required for pupils attending Llanfihangel Rhydithon C.P. School for whom this is currently their closest school, and that there would be an environmental impact to this. As stated in the impact assessment:</p> <p><i>'Implementation of the proposal would require additional travel for pupils currently attending Llanfihangel Rhydithon C.P. School for whom this is their closest school. This would have a negative environmental impact as more home to school transport would need to be provided to transport pupils to their nearest alternative school. However, the number of pupils requiring additional transport would be relatively small, and it is possible that they could be accommodated on transport which is already operating.'</i></p> <p>However, Llanfihangel Rhydithon C.P. School is not currently the closest school for a number of pupils attending the school, therefore it could be argued that the environmental impact of the transport required following</p>
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		<p>implementation of a proposal to close the school would be fairly similar to the current situation at the school, as there are already a number of pupils currently being transported to the school in private cars, along with 7 on two home-to-school transport routes.</p> <p>Currently, at least 24 of the 36 attending the school in September 2021 are transported to school but only 7 of these are on free home-to-school transport. 17 pupils are not eligible for free home-to-school transport as they live closer to other schools therefore are transported in by private arrangement. The remaining pupils either walk to, or are transported, to school.</p> <p>Should Llanfihangel Rhydithon C.P. School close, then free home-to-school transport would be provided to eligible pupils to their nearest alternative school i.e if pupils live 2 miles or more from their nearest alternative school.</p> <p>The closest schools for pupils attending the school in September 2021 is as follows:</p> <ul style="list-style-type: none">• Llanfihangel Rhydithon C.P. School – 53%• Crossgates C.P. School – 28%• Ysgol Cefnlllys – 11%• Knighton C. in W. School – 5%• Rhayader C. in W. School – 3% <p>If there was no school in Llanfihangel Rhydithon, the nearest alternative schools for pupils would be as follows:</p>
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		<ul style="list-style-type: none"> • Crossgates C.P. School – 67% • Llanbister C.P. School – 14% • Ysgol Cefnlllys – 11% • Knighton C. in W. School – 5% • Rhayader C. in W. School – 3% <p>Of these children, 7 would not be eligible for free home-to-school transport as they live 2 miles or less from their closest school. 29 pupils would be eligible for free home-to-school transport if they chose to attend their closest alternative school. This compares with at least 24 pupils who are transported to school currently, either on free transport or by private arrangement.</p>
3.5.2	When we are being asked to buy locally to cut down on 'carbon miles' to protect against climate change, surely we should not be putting children on buses and driving them around the county.	As above.
3.5.3	Climate change is a huge issue and you are proposing to add to this by transporting children.	As above.
3.5.4	Requiring the pupils to attend a different school will add to the Council's carbon footprint and the kg/tonne of carbon dioxide and greenhouse gases released.	As above.
3.5.5	The proposal is in direct opposition to Government policy to reduce CO2 emissions.	As above.
3.5.6	This doesn't seem very environmentally friendly, what about COP26?	As above.
3.5.7	After the COP26 conference we are being told to be eco efficient, however this proposal would mean that more pupils would need transport.	As above.

3.5.8	My understanding was that Powys as a Council wanted to reduce carbon footprint and help improve the environment. This clearly isn't the case as children from Dolau would be forced to travel longer journeys to school.	As above.
3.5.9	Transporting children has an impact on the environment, and the government are trying to encourage people to be more aware of what we do, for example walking/cycling rather than using a car. Can you guarantee the transportation that will be used to take my child to the nearest school will be more environmentally friendly than walking to school?	As above.

3.6 Comments about additional transport costs

3.6.1	Have you factored in the cost of the coaches to take them back and forth?	<p>Additional transport costs have been considered when calculating the estimated savings which would be achieved should the proposal be implemented, however as indicated in the Consultation Document, it is not anticipated that there would be additional transport costs.</p> <p>Should Llanfihangel Rhydithon C.P. School close, free home-to-school transport would be provided to eligible pupils to their nearest alternative school i.e if pupils live 2 miles or more from their nearest alternative school. An assessment of pupils currently attending the school in September 21 shows that 29 pupils would be eligible for free home-to-school transport.</p> <p>There are two home-to-school transport routes that transport pupils to Llanfihangel Rhydithon C.P. School – the LW14 and LW15. The LW14 is a 16 seat minibus and the LW15 is a 16 seat minibus, but could also be a 21 seat minibus. However, it is not anticipated that there</p>
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		would be additional transport costs, based on the analysis of pupils' postcodes (PLASC Jan 2020), as pupils can be accommodated on existing transport routes to their nearest alternative school. There may be a situation in the future where additional transport routes may be required for additional children (i.e. children starting school for the first time or children who move into the area) which would depend on where they lived. At this point in time, it is not possible to know the exact cost of this, however it is anticipated that it would be a minimal cost.
3.6.2	The extra transport costs of Powys County Council transporting children to Crossgates would far outweigh the savings you propose to make.	As above.
3.6.3	My children have always walked to school without transport costs to PCC as do most children at Dolau. The cost of transporting these children will then offset the financial saving you are projecting.	As above.
3.6.4	You do not anticipate that additional transport costs would be incurred as a result of the change, it is assumed that the current bus would be used at no additional cost to the Authority. This statement is yet again completely false – there will be a cost but it seems this has not been worked out, why?	As above.
3.6.5	One document stated that it is “assumed” there will be no additional costs. How is this possible? When now only seven children travel on a bus. Can you confirm that there will genuinely no additional costs?	As above.
3.6.6	Future travel costs need to be looked at in great detail for pupils currently attending the mother and toddler group.	It is not possible to estimate future transport costs because at this stage, the Council does not know which school the children currently attending the mother and toddler group will choose to attend.

3.6.7	I urge you to look into the costs of how much transport is going to be costing in the future years.	As above.

3.7 Other comments about travel arrangements

3.7.1	How will transporting 30 additional children affect bus routes? How will it affect the high school bus timetables?	It is not anticipated that there would be a need to revise high school bus timetables.
3.7.2	The children in Llanfihangel Rhydithon CP School come with the same bus driver every day, and the children, parents and staff have got to know and trust them. The children would have to be on buses a lot longer, maybe with different bus drivers every day.	The Council notes this concern. However, the Council's home to school transport provision is provided by a number of different transport contractors. Staffing of the various routes is the responsibility of the contractors.
3.7.3	Longer commuting distances for school children can be more disruptive for them and reduce their feeling of belonging to their home community.	<p>Whilst the Council notes this concern, due to the geographic nature of Powys, many pupils of primary age are transported to a school which is not located in the village where they live.</p> <p>Llanfihangel Rhydithon C.P. School is not the closest school for many of the pupils currently attending the school, therefore these pupils are already choosing to attend a school which is further away from where they live.</p>

4. IMPACT ON STAFF

4.1	The school employs a lot of staff who will all face redundancy.	<p>The Council recognises that any school reorganisation proposal creates a period of uncertainty for staff that would be affected by the proposal.</p> <p>Should the school close, Staff currently employed at Llanfihangel Rhydithon C.P. School would be subject to a management of change process and be supported fully throughout the process.</p> <p>The Council's HR team have met with staff, and would continue to meet with the staff as the process moves forward, should the Council proceed with implementation of the proposal.</p>
4.2	Staff have felt unsupported during this process, during what has already been a demanding time due to Covid-19.	As above.
4.3	The proposal is already having an impact on staff.	As above.
4.4	Is support being provided to staff?	As above.
4.5	Staff have had only one HR meeting during the consultation, however staff are concerned that time will be against them when making important decisions for their families and livelihood.	Should the process continue a specific management of change procedure will commence during which staff will have several opportunities to meet with HR and discuss options.
4.6	Have they received any help, support or counselling since closure was proposed? The 2 teachers on maternity leave must feel particularly vulnerable and "out of the loop".	<p>All staff have access to Carefirst, an employee assistance programme through which they could access counselling.</p> <p>Those staff on maternity were included in the informal support offered by HR earlier in the year.</p>

4.7	The staff have been left in the dark throughout the consultation.	Staff have not 'been left in the dark throughout the consultation'. Information has been shared with staff and other stakeholders at each stage of the process, as required by the School Organisation Code. In addition, a consultation meeting was held with staff which gave staff the opportunity to let the Council know their views on the proposal and ask any questions. The Council's HR team have met with staff, and would continue to meet with the staff as the process moves forward, should the Council proceed with implementation of the proposal.
4.8	Staff working in the school have been under a lot of extra stress due to constant reminders that they cannot be good teachers as they are in a small school.	The Council has not said that staff working in the school 'cannot be good teachers as they are in a small school.' The quality of education and the quality of teaching at the school is not one of the reasons for the proposal.

5. IMPACT ON THE COMMUNITY

5.1 General concerns about the impact on the Dolau community

5.1.1	Closing Llanfihangel Rhydithon CP School would be a disaster for our rural community.	<p>The Council acknowledges the school's central role in the community, and that there would be a negative impact on the community should Llanfihangel Rhydithon C.P. School close. This was recognised in the Consultation Document and the draft Community Impact Assessment.</p> <p>A number of comments were received during the consultation period which expressed concern about the proposal's impact on the Dolau community. These were</p>
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		<p>listed in the Consultation Report, along with the local authority's response. The impact assessments were also updated to reflect comments received during the consultation period. The Consultation Report and updated impact assessments were considered by the Council's Cabinet when determining whether or not to proceed with the proposal to close the school.</p> <p>Concern about the proposal's impact on the community has also been raised in the objections received, and these concerns are listed in this Objection Report. The impact assessment document has been further updated to reflect comments received in the Objections, and the Objection Report and updated impact assessment document will be considered by the Council's Cabinet when determining whether or not to proceed with the proposal to close the school.</p>
5.1.2	Closing the village school would have a devastating impact on the community of Dolau.	As above.
5.1.3	You may save some money by closing Llanfihangel Rhydithon CP School, but you destroy a community.	As above.
5.1.4	Throughout the consultation, questions were raised by the public about the impact this decision would have on the community. The damages to these communities should be considered during these consultations and not discarded.	As above.

5.2 The school is the heart of the village/community

5.2.1	Closing the school will take away the heart of the community.	The Council acknowledges the school's central role in the community, and that there would be a negative impact on the community should Llanfihangel Rhydithon
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		<p>C.P. School. This was recognised in the Consultation Document and the draft Community Impact Assessment. A number of comments were received during the consultation period which expressed concern about the proposal's impact on the Dolau community. These were listed in the Consultation Report, along with the local authority's response. The impact assessments were also updated to reflect comments received during the consultation period. The Consultation Report and updated impact assessments were considered by the Council's Cabinet when determining whether or not to proceed with the proposal to close the school. Concern about the proposal's impact on the community has also been raised in the objections received, and these concerns are listed in this Objection Report. The impact assessment document has been further updated to reflect comments received in the Objections, and the Objection Report and updated impact assessment document will be considered by the Council's Cabinet when determining whether or not to proceed with the proposal to close the school.</p>
5.2.2	The school is at the heart of the community and its closure would be a tragic blow to the village.	As above.
5.2.3	The school is the beating heart of the community. Without the heart the body cannot function, without the school the community will not be able to function.	As above.
5.2.4	The school is at the heart of Dolau and the surrounding area, closing the school would destroy yet another rural village community.	As above.

5.2.5	The school is the beating heart of the community. Without it will be fragmented, the damage caused will be irreversible but doubtful this has been considered by your cabinet.	As above.
5.2.6	The sustainability of the village as a lively and proactive community is reliant on the retention of Llanfihangel Rhydithon School which is at its heart.	As above.
5.2.7	Powys is a rural county, people who live in towns and cities have access to all kinds of amenities which aren't available to rural folk. Ripping the heart out of a community is unfair and discriminatory if it is purely down to money.	As above.
5.2.8	The school is the heart of the community. This is priceless and rural regeneration grants/support will never replace it!	As above.

5.3 Comments about the community hall

5.3.1	Closure of the school would have a catastrophic effect on the economic viability of the community hall which is collocated beside the school.	<p>The Council acknowledges the school's central role in the community, and that there would be a negative impact on the community should Llanfihangel Rhydithon C.P. School close. The Council also acknowledges that implementation of the proposal could impact on the community hall which is co-located with the school. This was recognised in the Consultation Document and the draft Community Impact Assessment.</p> <p>A number of comments were received during the consultation period which expressed concern about the proposal's impact on the Dolau community and on the community hall. These were listed in the Consultation Report, along with the local authority's response. The impact assessments were also updated to reflect comments received during the consultation period. The Consultation Report and updated impact assessments were considered by the Council's Cabinet when</p>
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		<p>determining whether or not to proceed with the proposal to close the school.</p> <p>Concern about the proposal's impact on the community and on the community hall has also been raised in the objections received, and these concerns are listed in this Objection Report. The impact assessment document has been further updated to reflect comments received in the Objections, and the Objection Report and updated impact assessment document will be considered by the Council's Cabinet when determining whether or not to proceed with the proposal to close the school.</p> <p>Should the Council proceed with the proposal to close the school, ensuring the viability of the community hall would be a matter for hall's management committee.</p>
5.3.2	If the school closure proposal goes ahead, the hall committee would lose the £3500.00 financial support we annually receive to compensate our inability to hire the hall out during the school day.	As above.
5.3.3	Without the school, other groups that use the hall such as the youth club, young farmers club, W.I., short mat bowls group, singing group would have to bear the brunt financially if the hall was to lose the funding received from the school.	As above.
5.3.4	The hall is used by a variety of community groups, it is vital for the survival of the parish church and the chapel as both have accessibility issues and lack facilities. These organisations use the hall for collective worship. Thus, the school is at the heart of a much larger community network which depends on the school remaining open.	As above.
5.3.5	Across the yard from the school is the community hall which has many user groups that make up the fabric of the	As above.

	community, including youth club, Young Farmers, a thriving Tl a FI (mother and Toddler) group, Cylch Meithrin (playgroup) which is a registered setting, WI, Bowls club, Choir group.	
5.3.6	In 1992/93, the people of Dolau and its surrounding area helped raise many thousands of pounds to build our village hall, which is situated right next to the school. This building has enhanced the school in many ways providing a superb lunch space, assembly hall and indoor area to perform drama or sport activity, to mention just a few. The hall committee and the school team work tirelessly together to ensure both groups benefit mutually from their shared commitment. Everyone here understands that the school and the community hall are the centre of our community.	As above.
5.3.7	The community hall has recently had a refurbishment to the kitchen through grants and fundraising efforts, as well as a new secure entrance for groups such as mothers and toddlers and the newly set up Cylch.	The Council notes this comment regarding the recent improvements to the community hall at Dolau.

5.4 Comments about impact on community activities

5.4.1	Concern about the impact on the youth club if there is no school in Dolau as there is no Youth Club in Crossgates – the nearest is in Llandrindod Wells ten miles away.	The Council notes this concern about the potential impact of the proposal on the Dolau Youth Club, however should Llanfihangel Rhydithon C.P. School close, there is no reason why the Dolau Youth Club would not be able to continue to meet and hold activities.
5.4.2	Children that go to school in Dolau move on to the Youth Club then on to other youth organisations in the village. Closure of the school would have a devastating and irreversible impact on the club.	As above.
5.4.3	Concern about the impact on the young farmers club – if there was no school in Dolau, the children would attend school	The Council notes this concern about the potential impact of the proposal on Dolau Young Farmers Club,

	elsewhere. They would make friends in those areas and would then go on to other young farmers clubs.	however should Llanfihangel Rhydithon C.P. School close, there is no reason why the Dolau Young Farmers Club would not be able to continue to meet and hold activities.
5.4.4	Concern about the impact on Dolau YFC as the majority of the club's members are past Dolau School pupils.	As above.
	Closing the school will affect Dolau Young Farmers Club in the long run as the children will make friends in different areas and wish to attend clubs in their new school areas with their friends.	As above.
5.4.5	The young farmers club have grave concerns for the future of their club if the closure of Dolau school goes ahead fearing the young people of the village and surrounding areas if forced to attend other schools, will also attend other young farmers clubs, with 70 years of a club's history also falling victim to this closure proposal.	As above.
5.4.6	Closure would cause an inevitable negative impact on the artistic, cultural and social life of the area and could lead to the loss of many sports, fitness and social activities – which appears to directly oppose the intentions of both Welsh and National Governments.	The Council notes this concern about the potential impact of the proposal on activities in Dolau, however should Llanfihangel Rhydithon C.P. School close, there is no reason why activities could not continue to be held in the village.
5.4.7	Closing the school would mean that there would be no YFC, play group, village fundraising events, parties etc.	As above.
5.4.8	Concern that groups such as the Youth Club, YFC, Choir, W.I. would be dispersed if the school was closed.	As above.

5.5 Closure of the school would mean that people would not want to live in Dolau

5.5.1	Without a school in the village, young families are less likely to move to the area as there will be nothing in Dolau to draw them to the local community.	<p>The Council acknowledges the school's central role in the community, and that there would be a negative impact on the community should Llanfihangel Rhydithon C.P. School close.</p> <p>Comments were received during the consultation period which expressed concern that closure of the school would mean that people would not want to live in Dolau. These were listed in the Consultation Report. The impact assessments were also updated to reflect comments received during the consultation period. The Consultation Report and updated impact assessments were considered by the Council's Cabinet when determining whether or not to proceed with the proposal to close the school.</p> <p>Concern that the proposal would mean that people would not want to live in Dolau in the future has also been raised in the objections received, and these concerns are listed in this Objection Report. The impact assessment document has been further updated to reflect comments received in the Objections, and the Objection Report and updated impact assessment document will be considered by the Council's Cabinet when determining whether or not to proceed with the proposal to close the school.</p>
5.5.2	Decreased incentive for young families to locate to, or remain in the area.	As above.
5.5.3	If the school closes the village will die and people will move away to go somewhere else for their children to learn.	As above.
5.5.4	An excellent, small school like Dolau attracts families to the area, encourages them to stay and grow these communities.	As above.
5.5.5	The demographic profile of the local area shows a large proportion of middle aged to elderly people. The school and	As above.

	the hall are both vital resources for the community and because of its excellent Estyn reputation the School attracts families to move into the area.	
5.5.6	If you take the school away from Dolau, you will be taking away the young families, therefore only leaving an elderly generation, effectively killing off the village in the long term.	As above.
5.5.7	With no school in the community, those with children are likely to move out of the village, leaving fewer young people to become members. As homes become available in the area, they are more likely to be occupied by older people who will not be of an age to attend either.	As above.
5.5.8	The current Covid pandemic has made provision to enable home and remote working, which could attract families to our area. But these families moving into the area still require a local school to send their children to. Without it, we fear that the area is in danger of becoming a retirement zone.	As above.
5.5.9	Does Powys CC want flourishing local communities which are attractive to young families, or do we continue the rural decline where facilities and services are dwindling, and where retirement and second homes are the norm?	As above.

5.6 Queries about what would happen to the school building should the school close

5.6.1	If closed what is your plan for the building after closure?	Should Llanfihangel Rhydithon C.P. School be closed, the Council's Corporate Asset Policy would be followed to determine the future use of the school building. This would include consideration of a community asset transfer or a sale on the open market via different methods. The Council's policy is to dispose of any surplus assets.
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5.6.2	The eyesore of a boarded up building rotting away in the heart of the neighbourhood will negatively affect the overall impression of a beautiful Welsh village visited by royalty numerous times, and surely impact on house prices.	As above. The Council notes the concern about there being an empty school building in the village. Should the Council proceed with the proposal, it would be required to ensure that the building was maintained to be in safe condition.
5.6.3	My understanding is that PCC can not put the building to any other use with the community centre on site with its remaining 75-year lease, so it would be resigning this well-kept building to squalor and decay.	The Council is aware that the site surrounding Llanfihangel Rhydithon C.P. School includes the community hall which has a lease to use the school playground as a car park, which creates a practical and legal challenge to the disposal of the school. However, the Council's Corporate Asset Policy would be followed, should the school close. This would include consideration of a community asset transfer or a sale on the open market via different methods. The Council's policy is to dispose of any surplus assets.
5.6.4	When the Hall was opened in 1998 a ninety nine year lease was granted by PCC to the Hall for use of all the playground area as a car park when the school was not in use. This would limit the sale of the School buildings for development, leaving a derelict building, which would be a burden on PCC.	As above.
5.6.5	The building to the Council if they close it as a school, who would want to buy it when the car park is used by the community hall and I believe can be used for the next 75 years.	As above.
5.6.6	The school playground is subject to a 75 year lease precluding sale of the building or land to raise funds for the County and so will become derelict and a depressing outlook for the community into the future.	As above.

5.6.7	The building stands in grounds with restrictions on them (Car parking for the community hall etc) so that once empty there will be limited scope for the building.	As above.
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5.7 Comments about the role of the community during the Covid pandemic

5.7.1	In the recent Covid Pandemic communities realised the importance of traditional values, such as knowing, and relying on your neighbour. This unique value of belonging and being appreciated is a skill learnt by children at an early age in a family orientated Primary School such as Dolau.	Comment noted.
5.7.2	What the pandemic has demonstrated is that the local Dolau community is strong and supportive and the school is the heart of the community.	Comment noted.

5.8 Comments about the impact of previous school closures on communities

5.8.1	When schools in neighbouring villages have closed, the community closes with it, villages are left like ghost towns.	<p>The Council, like all other local authorities, has a duty to plan effective school organisation and to manage its schools infrastructure effectively, and, as a result, schools have been closed over the years. However, the Council acknowledges that these closures have impacted on the communities in which these schools were located.</p> <p>The Council fully acknowledges the potential negative impact of the proposal to close Llanfihangel Rhydithon C.P. School on the community. This has been acknowledged in the documentation considered by Cabinet as part of the process, and will also be included in the Objection Report and updated impact assessment</p>
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		<p>which are considered by Cabinet when making a final decision on whether or not to proceed with implementation of the proposal.</p> <p>In terms of leaving schools to become derelict, the Council's Policy is to dispose of any surplus assets in accordance with the Council's Asset Management Policy. Once the asset has been transferred to a third party, then the Council has no control over it or what happens to that asset in future.</p>
5.8.2	Look at the damage which has been done to surrounding rural schools which have been closed in the past, the schools look dreadful as have not been touched since the closure and the communities are now non-existent.	As above.
5.8.3	In other areas where this has happened, there has been no upkeep to the building and grounds and it looks a complete disgrace.	As above.
5.8.4	If you speak to people from areas that have been through this, it has had a massive impact on their areas.	As above.
5.8.5	The closure of Nantmel school has had a very significant and long lasting detrimental effect on the community as a whole from which it has not recovered.	As above.
5.8.6	Nantmel has almost ceased to exist as a discrete entity since the glue holding it together, the school, has gone and it is very sad. The community has no focus as everything which happened was related to the school or met at the school. Nantmel is no longer the place it was and had been for the previous century and a half.	As above.
5.8.7	Look at Nantmel and the like for all the evidence you need on how a small community school closing can affect the community. This is backed up in the Council's own community	As above.

	impact assessment. All points in this seem to have been ignored.	
5.8.8	I was shocked and saddened to see the state the Nantmel building had been left in. I assumed that the building had been sold for redevelopment, rather than simply closing the doors and leaving it to the wrath of vandals and nature – what a dreadful waste!	As above.
5.8.9	Beguildy school is now semi derelict which I anticipate will be the outcome for Dolau.	As above.
5.8.10	Closing village schools destroys the local community, as we have seen in Whitton where young families will not purchase properties, and the community reduces its diversity. The Elderly are left with a cold community hall and no transport via buses which were also withdrawn.	As above.
5.8.11	The effect on the community in Whitton has been huge. The community becomes one of old people with little or no interaction with younger individuals. The balance of activities is one-sided and duller without the children in its midst. The bus service ran in conjunction with the school and this facility was withdrawn - leaving us stranded 4 miles from public transport. It does not encourage young families to settle in the area and equally selling homes becomes difficult and restricted. The emotional and mental well-being of our community is affected.	As above.
5.8.12	The demographics in Llangunllo village have changed dramatically since closure of the school. This is a significantly aging community now.	As above.
5.8.13	The closure of Llangunllo School destroyed the community. Beguildy community is depleting. The impact on the local YFC has been massive. Lower numbers, children who attended different primary schools following closure moving to different clubs outside of their catchment area. Community	As above.

	breakdown was not instant in Llangunllo, but happened approximately 10 years following closure, with us all having to find new communities to be a part of.	
5.8.14	A prime example of what happens to a village when it loses its school can be seen in the village of Bleddfa. Today, the local Hundred House Inn is closed, the school house along with six other properties along the adjoining lane are holiday lets and the 13th century Church of St Mary Magdalene is facing closure. This is a prime example of what happens when the heart of a village is torn out.	As above.

5.9 Comments about the wider impact of school closure on rural communities

5.9.1	Concern about the wider losses which would inevitably follow closure of the school.	<p>The Council acknowledges the school's central role in the community, and that there would be a negative impact on the community should Llanfihangel Rhydithon C.P. School, and notes these concerns about the wider impact of closure of the school on the community. Concern about the proposal's impact on the community has been raised throughout the process and considered by Cabinet when determining whether or not to proceed.</p> <p>The proposal's potential impact on the local economy has also been considered in the impact assessment, where the Council acknowledges that 'It is also possible that there would be an impact on local businesses in Dolau and the surrounding area, should there be less people in the area.'</p> <p>The impact assessment document has been further updated to reflect feedback received in the Objections, and the updated impact assessment document and this</p>
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		Objection Report will be considered by the Council's Cabinet when making a final decision on whether or not to proceed with implementation of the proposal.
5.9.2	Closure impacts not only schools but also shops, post offices, pubs and other businesses in rural communities.	As above.
5.9.3	Rural communities already face many challenges with the closure of local facilities e.g. banks, post offices, shops etc.	As above.
5.9.4	The closure of yet another rural school will add to the decline of rural communities and reduce the opportunities and life-choices of our young people.	As above.
5.9.5	Closing down small local schools is the beginning of closing down and breaking up local small communities at a time when Powys and Wales should want to preserve Welsh traditions and ways of life and thinking of societies 'well being'.	As above.
5.9.6	Loss of a school has a significant impact on community life. Schools along with shops, post offices and village pubs are the heart of communities.	As above.
5.9.7	If PCC does not support rural communities to retain their schools, post offices and licensed premises, the cohesion within the communities of Powys will fragment just to fields and businesses, and communities of young adults will only be found south of the M4.	As above.
5.9.8	With Rural Regeneration being a very important factor, I cannot emphasise enough the damage closing Dolau School will have on the Community.	As above.
5.9.9	I expect a detailed plan from Powys County Council on how they plan to increase local trade, investment and funding to communities and livelihoods as the decision to close Dolau school will be felt for generations.	The Council has a number of initiatives to support communities and the economy, e.g. the Mid Wales Growth Deal, and all communities in Powys will be supported. The Council will not be developing a detailed

		plan to improve the local economy of Dolau separately to the Council's wider developments.
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5.10 Other comments

5.10.1	It is not just ONE village which will be affected by the closure of Dolau School. Llanfihangel Rhydithon School is an important part of the community for many other local villages: Bleddfa, Llangunllo, Llandegley, Penybont and us, here in Llanddewi.	It is recognised that Llanfihangel Rhydithon C.P. School serves an area wider than the village of Dolau and that implementation of the proposal would also impact on people living in neighbouring villages.
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6. COMMENTS ABOUT HOUSING DEVELOPMENTS IN THE AREA

6.1	There are properties being built in the area which will attract newcomers, some who will bring or have children.	The Council is aware of current and planned housing developments in the area, although it is not anticipated that these would lead to a significant increase in pupil numbers at the school.
6.2	There are houses being built for families across the road from the school.	As above.
6.3	Two houses are being built by the school, and both will hold young children, also a development of 14 plots in planning, all within walking distance of the school.	As above.
6.4	A development of 14 plots is being planned, all within walking distance of the school.	As above.
6.5	With planning permissions in Llandrindod wells, Crossgates, Llanddewi, Dolau and Penybont all at significantly high levels, where do you propose that all of the additional children moving to the area be educated?	As above.

6.6	Within walking distance of the school are Planning Applications for 15 properties at varying stages of development. Their Application/Ref no.s are P/2017/1389 (3 Plot), 20/1693/NMA, P2012/0336, P/2017/0266. Within one mile are another 3 properties with Planning/Ref no's P/2018/0556, P/2018/0464, 19/0262/FUL. Within this same area are 3 more buildings being converted into residential properties.	As above.
6.7	Our neighbouring village Llanddewi has 20 houses being built.	As above.
6.8	Local villages within Llanfihangel Rhydithon CP School's catchment also have a number of new developments under construction which are likely to attract young families. In Llanddewi 20 new family homes with ref P/2011/0208 are in the process of construction and in Llanddegeley and Penybont 29 new family homes are planned with ref. P/2017/0497, 20/0962/FUL, P/2017/0815 and 17/1368/NMA	As above.
6.9	At Crossgates, where the nearest receiving school is situated, 64 new homes have received planning approval in the last 10 years, most have been built.	As above. The objector states that 'most have been built', therefore it is unlikely that this would result in a significant number of additional pupils.
6.10	Using the PCC Planning Portal I have noted the following Planning Applications in the Llandrindod Wells area. P/2013/0444. Phase 2 Development at Crabtree Green – 50 dwellings; Ref 21/1343/FUL. The Gate Farm – 6 Developments; Ref 19/0021/FUL Land East of Ithon Road – 55 units; P/2017/0767. Pentrosfa – 4 detached properties; P/2017/0198. Pentrosfa – 4 detached properties.	As above. These applications are located in Llandrindod Wells, therefore would impact on provision in Llandrindod Wells. Should this result in a need for additional places in Llandrindod Wells, the Council would need to consider ways to provide these places in Llandrindod Wells.
6.11	PCC is committed to build 250 new homes for rent by 2025, being Part of the Powys Local Development Plan (2011 >	This commitment is to develop new homes for rent across Powys. So far, schemes have been developing in

<p>2026) adopted by PCC on 17/04/18. The recognised Formula for calculating number of children/residential development is 0.4 children per house, which would be $250 \times 0.4 = 100$ children. The report indicates Rented Accommodation, which usually has a higher number of children per house than Owner/Occupied Properties. Therefore we can assume there will be a minimum of 100 children seeking Primary School places!! Where are these children going to be educated?</p>	<p>Sarn, Brecon, Clyro, Newtown, Llanidloes and Bronllys, none of which are located in the area served by Llanfihangel Rhydithon C.P. School. It is therefore unlikely that this would result in 100 additional children in the area served by Llanfihangel Rhydithon C.P. School.</p>
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7. COMMENTS ABOUT THE CURRICULUM FOR WALES

7.1 The Welsh Government has said that small schools are well placed to deliver the Curriculum for Wales

7.1.1	<p>You say that closure of the school would 'enable pupils to attend larger schools which would be better equipped to meet the requirements of the new curriculum'. This is a false statement. Minister for Education Jeremy Miles has said 'Small schools are ideally placed the deliver the new curriculum'.</p>	<p>The Welsh Government defines a small school as a school that has less than 91 pupils. Llanfihangel Rhydithon C.P. School has significantly less than 91 pupils.</p> <p>The new Curriculum for Wales is pupil led, all schools design their own curriculum to suit their learners based on the four purposes and the 6 Areas of Learning and Experience. There is a change in this curriculum to learning and experience. Learners' views about their experiences and about what, how and where they learn should be taken seriously when a curriculum is being designed. The school's curriculum needs to be co-constructed, encouraging learners, parents, carers and the local community to understand and contribute to curriculum development. It should also draw on a wider range of experts and stakeholders who can contribute to learning. The Curriculum needs to be innovative and creative. Teachers, with pupils, select content, no</p>
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		prescription, schools to decide on specific experiences, choosing topics etc Need to have learning experiences that challenge the pupils in new circumstances. It may be difficult for one teacher to be able to plan and deliver the curriculum for all areas of learning and experience effectively. Mixed age classes, especially four age ranges, provides a challenge to teachers where they must constantly adapt their approach. High level of flexibility and organisation is needed in lesson planning to ensure that teaching caters for both age groups and all abilities within the class. Additional workload given the additional roles and responsibilities in a small school.
7.1.2	Jeremy Miles, minister for Education said on BBC Radio that small schools are ideally placed to deliver the New Curriculum. Are the PCC aware of this I wonder?	As above.
7.1.3	You have said that the new curriculum can't be delivered in small schools but recently on BBC Radio Wales Jeremy Miles Minister of Education quoted 'Small schools are ideally placed to deliver the new curriculum'.	As above.
7.1.4	Within the education profession it is recognised that small school schools are ideally placed to deliver the new curriculum. In fact, Jeremy Miles MS, Minister for Education is quoted on BBC Radio Wales as saying that small schools are ideally placed to deliver the New Curriculum, however according to Powys they are not. However, Powys have not given any explanation as to why they believe small schools are unable to carry out NC.	As above.
7.1.5	You have utilised the new curriculum as a reason for closure and stated without any evidence based research that small schools will be unable to deliver this due to planning	As above.

	pressures although our own education minister on the contrary, publicly stated that small schools are ideally placed.	
7.1.6	Within an interview with Jeremy Miles (Education Minister for Wales) with BBC radio Wales he stated that the new curriculum is not to discriminate the size of the school, but to enable the school to thrive. Also within the hwb.gov.wales website it states 'A school's curriculum is everything a learner experiences, it is not simply what we teach, but how we teach and crucially why we teach', this shouldn't come down to money or how many children there are within one school.	As above.

7.2 There is no evidence that larger schools are better equipped to teach the Curriculum for Wales

7.2.1	There is no evidence whatsoever that larger schools are better equipped to teach the new curriculum. The new curriculum has been designed for all pupils whether they are in a class of 30 pupils or 18. We have attended the same courses as other schools in the area therefore have received the exact same training.	Small schools have fewer qualified teachers in a school to design the curriculum and have the disciplinary-specific expertise for the learners in that school. Therefore, the expertise for all six areas of learning and experience may not be as strong as a team of teachers in a larger school who will lead on a specific area. As learners progress, effective teaching and learning around disciplinary-specific expertise will become increasingly relevant in developing a curriculum. Although the guidance on the new curriculum promotes interchanging approaches between AoLEs, it also recognises the importance that disciplinary-specific expertise plays. Teachers in small schools would need to plan for a mixed age range for all Areas of learning and experience – can be up to four year groups! To ensure equity for learners, leaders and teachers (across Wales) need to have a shared understanding of learner progression, including expectations around what progression may
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		look like and the pace at which learners progress. This shared understanding is developed through professional learning and as an ongoing process both within and across schools, of which professional dialogue is a fundamental aspect. Practitioners can share and learn from each other's understanding of progression. This can be challenging in a small school with only two teachers, for example.
7.2.2	We do not accept your rationale that larger schools are better equipped for the new curriculum. With larger classes brought about by this merger/closure it will result in greater number of pupils for limited number of resources. Whereas, retaining smaller class sizes will require fewer resources shared between less pupils thus resulting in better educational results.	As above.
7.2.3	At recent training for LEA Governors, it was suggested that smaller schools would be able to deliver the new curriculum easier due to class sizes and the mixed ages in the class.	As above.
7.2.4	The new curriculum is actually more suited to a smaller school environment.	As above.
7.2.5	The new curriculum was designed to cater for all schools, no matter their size.	As above.
7.2.6	The new curriculum has been designed for ALL schools, to enable the children, teachers, governors and most importantly the community to be included. It is about making the pupils aware of their community and the area in which they live.	As above.
7.2.7	Research and discussion amongst professionals indicates that smaller schools are actually BETTER equipped to offer the new curriculum, especially with the community involvement with the children. What a silly idea it would have been to create a curriculum that excludes smaller schools	As above.

	around the whole country. Are you actually saying that the new curriculum is a Nationwide cull of small schools?? This is totally wrong!	
7.2.8	The Council claims that the new School's Curriculum will be more challenging to deliver for small schools but has not produced any evidence in support of their claims. Prof. Donaldson, who created the programme said that the New Curriculum moving forward must be shaped to represent the community of the children and where they live and has not indicated that it cannot be delivered by a small school.	As above.
7.2.9	Education in Wales is going through an incredibly exciting period at the moment with the move to the curriculum for Wales (CFW) where the aim is to move from key stages, levels and discrete subjects into a more holistic approach to learning through areas of learning and experience and progression steps. At no point can we say that the introduction of the CFW is too much work for a small school. Many of the small schools have been following this basic model long before the release of Donaldson's findings. Through teaching mixed ability mixed year group classes and whole school projects have been providing evidence for the success of the CFW. Due to the pressures on small school, they are leading the way on the inventiveness in teaching. The benefit that this has on learners is profound. Learners are being taught in a variety of ways trailing the new curriculum. Learners are integrating across their key stage due to being educated in classes with multiple year groups. Also, outside learning plays a big role in their schemes of work. These are not opportunities that are available to learners in town schools who do not have the access to the outside space. These experiences are invaluable and contributes to creating well rounded learners as they grow	As above.

	into adulthood. This also encourages children to become lifelong learners gaining the skills to question the world we live in.	
7.2.10	The Curriculum and Assessment (Wales) Act: Explanatory memorandum does not state anywhere that there is a disadvantage in implementing the curriculum in a rural school. I would argue that rural schools are better placed to deliver the curriculum having smaller and mixed classes only benefits the children in the school in understanding the community in which they live. Making it more likely for them to live and support these communities into the future.	As above.

7.3 Other comments

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7.3.1	How are the local authority measuring which schools are most equipped to meet the requirements of the new curriculum? Is this an evidenced-based claim? I expected your decision and consultation report to provide a clear explanation as to how this is being measured and recorded for individual learning organisations, and how Dolau School compares to their “nearest schools”, but was disappointed with your “points noted” response.	All schools are working towards delivering the new curriculum by September 2022. The Council is monitoring how schools are developing on their ‘Journey to 2022’ through termly reporting by Challenge Advisors. Most schools are equipped to meet the requirements of the new curriculum.
7.3.2	You have constantly mentioned that the new curriculum couldn’t possibly be supported and taught well in small schools, as the workload would be too much for teachers to cope with. How do other counties manage this when there are small schools up and down Wales, are they also on a mission to destroy the hearts of their communities or is it only Powys?	Delivering the new curriculum in a small school will be challenging. Small schools have fewer qualified teachers in a school to design the curriculum and have the disciplinary-specific expertise for the learners in that school. Therefore, the expertise for all six areas of learning and experience may not be as strong as a team of teachers in a larger school who will lead on a specific area. As learners progress, effective teaching and learning around

		<p>disciplinary-specific expertise will become increasingly relevant in developing a curriculum.</p> <p>Teachers in small schools would need to plan for a mixed age range for all Areas of learning and experience – can be up to four year groups! To ensure equity for learners, leaders and teachers (across Wales) need to have a shared understanding of learner progression, including expectations around what progression may look like and the pace at which learners progress. This shared understanding is developed through professional learning and as an ongoing process both within and across schools, of which professional dialogue is a fundamental aspect. Practitioners can share and learn from each other’s understanding of progression. This can be challenging in a small school with only two teachers, for example.</p>
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8. COMMENTS ABOUT EARLY YEARS PROVISION

8.1 Comments about the early years provision at Dolau

8.1.1	There is a successful Cylch Meithrin that runs independently in Dolau, next to the school, which is full with a waiting list.	The Council notes these comments about Cylch Meithrin Dolau.
8.1.2	There is a brilliant pre school facility and numbers are expected to rise significantly	As above.
8.1.3	Cylch Meithrin Dolau meets on the site of Llanfihangel Rhydithon. Funded provision is available at the site – the	As above.

	statement made in the Consultation Document is incorrect, Cylch Meithrin Dolau is funded.	
8.1.4	Cylch Meithrin Dolau offers fun and learning for pre-school children from two and half all through the medium of Welsh. They have 14 children booked in within the next year and 24 children within the next four years.	As above.
8.1.5	Cylch Meithrin is a real asset to Dolau school which already has a large waiting list – this shows how popular the setting is and a great way to encourage learning Welsh at a young age.	As above.
8.1.6	The setting will be at capacity in September, with a waiting list, making a profit. We could expand the setting with additional staff.	As above.
8.1.7	The Cylch Meithrin is located on the school yard, this is perfect to help ensure an easy transition into Dolau School.	As above.
8.1.8	Powys County Council have just given a grant of £10,000 to set up the Cylch at Dolau.	This is correct – the Council provided £10,000 of funding through the Welsh Government’s Childcare Offer ‘small grants’ scheme to refurbish the Cylch Meithrin. The allocation of funding is based on the needs of individual settings.

8.2 Concern that closure of the school would threaten the future of Cylch Meithrin / Ti a Fi Dolau

8.2.1	A decision to close the school would put Cylch Meithrin Dolau at risk.	<p>The Council notes these concerns about the potential impact of a proposal to close the school on the Cylch Meithrin / Ti a Fi which currently meet in Dolau.</p> <p>Should Llanfihangel Rhydithon C.P. School close, it is likely that there would be an impact on Cylch Meithrin Dolau if parents decided to choose other early years providers that are co-located with any of the alternative schools, which would reduce the number of pupils</p>
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		<p>attending the Cylch and would impact on its viability. However, this is not a given, as the Cylch could potentially continue to operate if there was sufficient demand.</p> <p>Should there be no early years provision in Dolau, there are places available at Little Acorns, a funded early years provider located at Crossgates C.P. School. Welsh-medium early years provision is also available at Cylch Meithrin Llandrindod located at Ysgol Trefonnen C. in W. Community School.</p>
8.2.2	The Cylch Meithrin would not be able to survive if the school were to close. Many of those that attend are siblings of those that already come to the school. If their siblings are no longer going to the school, they won't attend the Cylch.	As above.
8.2.3	Closure of the school would threaten the survival of the Cylch and the basic Welsh the Cylch children have started to learn would be lost.	As above.
8.2.4	Whilst the rest of the county is trying to improve access to Welsh language facilitates and settings you are directly threatening the future of Cylch Meithrin Dolau.	As above.
8.2.5	Without the school there would be no Ti a Fi group in Dolau.	As above.

8.3 Comments about alternative early years provision

8.3.1	Where would our preschool children go if Dolau school closed?	The Council is not proposing any change in respect of pre-school provision at Dolau. However, it is acknowledged that closure of the school could impact on Cylch Meithrin Dolau if parents decided to choose other early years providers that are co-located with any of the alternative schools, which would reduce the number of
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		<p>pupils attending the Cylch and would impact on its viability. This is not a given though, as the Cylch could potentially continue to operate if there was sufficient demand.</p> <p>Should there be no early years provision in Dolau, there are places available at Little Acorns, a funded early years provider located at Crossgates C.P. School. Welsh-medium early years provision is also available at Cylch Meithrin Llandrindod located at Ysgol Trefonnen C. in W. Community School.</p>
8.3.2	Crossgates setting is not affiliated to the school and should the school acquire its porta cabin back to cope with additional numbers enrolled at the school, what happens then?	<p>Little Acorns, the early years provision which operates on the grounds of Crossgates C.P. School, was funded partly by the childcare offer grant. They are a voluntary managed setting that have a tender with Powys up until 2023.</p> <p>The Council has a separate lease agreement with Little Acorns for use of the mobile, therefore the school would not be able to 'acquire the porta cabin back to cope with additional numbers'.</p>
8.3.3	Little Acorns (Crossgates) Little Acorns is a non-maintained community run setting which operates from the site of Crossgates C.P. School. Does this facility have places for 14 additional children should Cylch Meithrin Dolau close in 12 months' time? There is already a lack of child care provision in Llandrindod Wells. Can you guarantee places are available?	<p>The Council manages the admission of children aged 3 and 4 for funded pre-school provision. Parents would have to apply for these places and, if settings are full, then an over-subscription criteria is applied. This is as follows:</p> <ul style="list-style-type: none"> • Pupils with a statement of special education needs, which names a specific pre-school setting which the child should attend because their needs can be best met by that particular pre-school

		<p>setting and its facilities, will be automatically allocated a place.</p> <ul style="list-style-type: none"> • Looked after or previously looked after children (Evidence of a previously looked after child will be required to accompany the application form) • The nearest setting to child's normal place of residence, with a sibling attending the setting at the time the child will commence at the setting. If a setting is sited within a school campus, consideration will be given, if possible, if a sibling is attending the school when the child commences at the setting, provided the normal place or residence is in the catchment area of the school. • The nearest setting to the child's normal place of residence. • Residing outside the catchment area of the setting with a sibling attending the setting at the time the child will commence at the setting. If a setting is sited within a school campus, consideration will be given, if possible, if a sibling is attending the school when the child commences at the setting. • Residing outside the catchment area of the setting
8.3.4	There is no other parent and toddler groups in Penybont, Crossgates, Bleddfa the nearest groups would be some miles away, in the last 18 months Llanddewi group closed. These groups are vital to new parents especially mothers they need that contact especially during the pandemic.	Comment noted. There is a Cylch Ti a Fi at Llanbister C.P. School and at Ysgol Trefonnen.
8.3.5	Dolau has a Ti a Fi parent and toddler group and a Cylch Meithrin pre-school. The next nearest school does not.	Comment noted.

8.3.6	There is no alternative Welsh-medium pre school provision other than in Llandrindod which is 8 miles away, making it out of reach for the current pre-school children who currently use it.	The Council notes that should there be no Cylch / Ti a Fi in Dolau, the nearest alternative Welsh-medium pre-school provision would be located several miles away.
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9. COMMENTS ABOUT SMALL AND RURAL SCHOOLS

9.1 Positive comments about small schools

9.1.1	I do not believe that 'bigger is better' when it comes to schools as children are given more one-to-one time in a smaller school and work can be tailored to each child's interests and specific needs as teachers know the children on a more personal level.	<p>The Council notes these comments about small schools. However, as stated in the Council's Strategy for Transforming Education in Powys 2020-30, the Council faces a challenge due to the high proportion of small schools in the county and the lack of equity amongst schools. Llanfihangel Rhydithon C.P. School teaches children in two classes of mixed aged groups. With such low pupil numbers the teacher-pupil ratio is notably different to many other schools in the area, and due to the Council's funding formula, the school the funding per pupil is higher than the Council's average. This does not provide equity across the education system – teachers in larger schools are required to provide the same education as smaller schools for less funding per pupil. Powys' Strategy is intended to improve equity across the education system and to ensure an improvement for every pupil's learning entitlement and experience.</p> <p>The Council's primary specialists have been exploring how the authority can best support schools to deliver the new curriculum for 2022. These education professionals</p>
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		<p>are of the view that this will be significantly more challenging, and will place significantly greater demands on teachers in very small two-class schools. This does not mean that it would be impossible to deliver the new curriculum in these schools but it is clear that the skills required by teachers will need to be very wide ranging to support the full and effective fulfilment of the curriculum's high ambitions.</p> <p>The new Curriculum for Wales is locally influenced and often pupil-led. All schools will design the detail of their own curriculum to suit their learners based on the four purposes and the six Areas of Learning and Experience (AoLE). Learners' views about their experiences and about what, how and where they learn should be taken seriously when a curriculum is being designed. The school's curriculum needs to be co-constructed, encouraging learners, parents, carers and the local community to understand and contribute to its development. It should also draw on a wider range of experts and stakeholders who can contribute to learning.</p> <p>The curriculum needs to be innovative and creative. Teachers, with pupils, will select the content, with no prescription on how areas should be taught, but with guidance provided nationally on a wide range of widely recognised pedagogical principles. Additionally, planning and designing the curriculum in schools is a teacher responsibility, not one for support staff.</p>
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		<p>Teachers in two class schools would need to plan for a mixed age range for all Areas of Learning and Experience. In some cases this could involve preparing for and delivering for up to four different year groups for all six AoLEs. To ensure equity for learners, leaders and teachers across Wales, there needs to be a shared understanding of learner progression, including expectations around what progression may look like and the pace at which learners progress. This shared understanding is being developed through professional learning and dialogue, as an ongoing process both within and across schools. Practitioners can share and learn from each other's understanding of progression and adapt their teaching in the light of what is learned. This will be particularly challenging in a very small school with only two teachers, for example. If a member of staff is linking up with practitioners from other schools for all 6 AoLEs and across a wide age range they would need to be away from their class for a far greater amount of time than a teacher teaching a single year group or two year groups in a class, and who also leads on behalf of the whole school on a single AoLE such as Humanities.</p> <p>High levels of flexibility and organisation are needed in lesson planning to ensure that teaching caters for both age groups and all abilities within the class. This additional workload is a risk that the education profession needs to manage together, given the limited numbers of teachers to carry the additional roles and responsibilities in a very small school. Two-class schools not only have fewer qualified teachers in school to</p>
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		<p>design the curriculum, but generally the limited numbers of staff will in all probability between them have a narrower range of disciplinary-specific expertise for the learners in that school than would probably be the case in a large school. In a larger school, each member of staff can lead on a specified area where they may have an appropriate background and in which they can continue to gain growing levels of expertise. Effective learning and teaching requires disciplinary-specific expertise which will become increasingly relevant in developing a curriculum as learners progress. Although the guidance promotes inter-disciplinary approaches, it also recognises the importance that disciplinary-specific expertise plays in such approaches.</p> <p>A significant responsibility for the Council, and others, over the coming years will be to ensure that every learner in Powys benefits from the step change that is anticipated through the changing curriculum. The Council will work with all the schools in our care, of whatever size, and will provide significant support, whilst also encouraging collaboration. However, it would be inappropriate if officers of the authority did not stress the additional demands on staff in very small schools, whilst doing all we can to facilitate the lightening of the load.</p> <p>Additionally, it is only fair that professional primary experts within the Council comment on the balance of potential risks and benefits to a child when being taught by the same person over 3 or 4 years of their primary education.</p>
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9.1.2	The small school provides good all round education and life experiences.	As above.
9.1.3	You should be championing smaller schools, not discriminating against them.	As above.
9.1.4	Every child is treated fairly in a small school - they all get the chance to compete in every aspect of school life. They don't have to excel to have a chance as in bigger schools.	As above. It is acknowledged that there would be more opportunity for pupils in a smaller school to be part of all activities due the pupil ratio within the school. However, all schools, regardless of size, have a range of activities and schools are expected to ensure that all pupils can participate fully with these.
9.1.5	Smaller schools are better placed to ensure each pupil receives the best provision of the new curriculum, particularly where any difficulties being experienced can be more quickly identified within a small class environment.	As above.
9.1.6	There are more opportunities for children to learn in a smaller school as there has to be more opportunities for one to one assistance, and for teachers to realise where this is required?	As above. All schools, regardless of size, are required to support, challenge and nurture all pupils to achieve their full potential, and are able to provide for the needs of their pupils. Smaller class sizes would not necessarily mean that pupils receive a more individual education as there are a number of year groups and a wider age range of pupils in the class.
9.1.7	In small country schools the attention each pupil receives is heightened and of greater value for their understanding in the long term.	As above.

9.1.8	In a small school teachers are able to give extra support to children with varying needs, they are able to spend the necessary time with children who need extra support.	As above.
9.1.9	Due to the many pressures on small primary schools, the staff provide inventive and varied teaching styles. This is proving to be of great benefit to the learners and the results speak for themselves.	As above.
9.1.10	Small schools have small classes which enables a teacher to build relationships with all learners and their families leading to a complete understanding of their abilities and needs.	As above. All schools, regardless of size, are expected to treat each pupil as an individual and provide a pupil-centred teaching and learning experience.
9.1.11	Small schools know each child really well and can cater for their individual needs in ways denied to those in large classes.	As above. All schools, regardless of size, are expected to treat each pupil as an individual and provide a pupil-centred teaching and learning experience.
9.1.12	The benefit of small classes on the education of the individual cannot and should not be ignored when evaluating the level of education in a small rural school.	As above. All schools, regardless of size, are expected to treat each pupil as an individual and provide a pupil-centred teaching and learning experience.
9.1.13	Smaller Schools means smaller class sizes. This means teachers can work one to one with children, get to know every individual child inside and out. Children who may struggle, can get more one on one time with teachers and teacher assistants. The mixed classes work well, older children can help younger children.	As above. All schools, regardless of size, are expected to treat each pupil as an individual and provide a pupil-centred teaching and learning experience.

9.1.14	<p>The standard of education in small rural schools are leading the way. In Powys all the schools who have less than 80 pupils are categorised between Green and Yellow. The school categorisation system allows the authority to recognise the high performing schools. The categorisation of these small rural schools in Powys speaks for itself. No small rural school is failing however this statement cannot be made for the schools with over 80 pupils. The schools that are categorised as red all have over 100 pupils. So, I ask the question, is bigger always better? Why are we not looking further into the learning styles that are being developed in a small rural school?</p>	<p>National Categorisation identifies the amount of support a school will receive on an annual basis. The last categorisation took place in the autumn term 2019. Since that period, Welsh Government have suspended categorisation. There are four colours for categorisation (Green and Yellow are seen as self-improving schools; Amber and Red are schools in need of significant support).</p> <p>Although there has been no National Categorisation for schools for the last two years, the local authority has continued to work closely to support all of Powys's schools. The schools mentioned have all responded well to the challenges of providing education over the pandemic period. This has reinforced the view of the local authority that the schools are self-improving schools and provide education that is equitable.</p> <p>Effective teaching is the most important lever schools have to improve outcomes for their pupils. This is not dependent on the size of a school.</p>
9.1.15	<p>Smaller schools in Powys are renowned for the best quality – that is what matters. As tax payers, do we not have a right to the best quality available?</p>	<p>As a local authority we have a duty to provide the best quality of education for all pupils in all schools. Effective teaching is the most important lever schools have to improve outcomes for their pupils.</p>
9.1.16	<p>I would be interested to know if Powys have figures that show that children from smaller schools reach year 11 with poorer educational standards than those from larger schools?</p>	<p>As above.</p>

9.1.17	<p>In a small school, children can thrive under the protective arm of teachers who know their siblings and families well. Reports from Finland back up some of the concerns, please see below: https://www.sciencedirect.com/science/article/pii/S0743016721000115 and https://jrre.psu.edu/sites/default/files/2019-08/29-1.pdf</p>	As comment 9.1.1.
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9.3 Positive comments about rural schools

9.3.1	<p>We need these rural schools to keep our county thriving and affluent we need these rural schools.</p>	<p>The Council notes these positive comments about rural schools.</p> <p>The Council has recognised the importance of Llanfihangel Rhydithon C.P. School to the local community in the community impact assessment was updated to take account of information gathered during consultation.</p> <p>It must be noted that all schools, regardless of size, or whether rural or urban, are part of their own unique community.</p>
9.3.2	<p>Rural schools have been embedded in their communities for generations and have provided the glue that enables small communities in Powys to flourish. Losing this vital link would see the beginnings of a disconnection between people living in villages, people living in more isolated situations nearby and the local history and culture of the area.</p>	As above.
9.3.3	<p>A rural small school is beneficial to all the rural community, not just the pupils.</p>	As above.

9.3.4	A rural community is different than that of an urban one because everybody is known to everybody and are always very supportive of each other.	As above.
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9.4 Comments about the Covid-19 pandemic

9.4.1	If the Covid-19 pandemic has taught us anything, clearly it is the need for more local, small scale connections and institutions, not fewer?	The Council does not agree that maintaining a large number of small schools would help stem the spread of a pandemic as there need to be many interventions to address public health matters such as this.
9.4.2	Another major issue which I don't believe has been taken into account is Covid. Surely in a stand against future infections smaller community schools will play a major role in slowing down the spread, continuing education for some and protecting the vulnerable.	As above.
9.4.3	The school is an important hub for the community as a whole and in these difficult times of Covid, smaller schools have played an invaluable role in keeping everyone united.	As above.

9.5 Parents should be able to choose a small / rural school

9.5.1	Where is the choice for parents who seek a smaller school for their child to attend because they know he/she would thrive more so in a more nurturing environment?	<p>The Council recognises that parents are able to choose any school for their child(ren) to attend but there is no requirement to provide a range of schools according to size.</p> <p>In terms of the choice of a small school, the Welsh Government's definition of a small school is a school that has fewer than 91 pupils. In Powys, there are 33 schools with fewer than 91 pupils. However, the Council has a</p>
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		<p>duty to maintain an equitable schools infrastructure across a large and sparsely populated county.</p> <p>The Council's Strategy for Transforming Education in Powys 2020-30 was developed following an extensive engagement exercise with schools and other stakeholders. One of the challenges facing Powys, as identified in that engagement exercise, was the fact that the county has too many small schools.</p> <p>Should the Council proceed with the proposal to close the school, parents could apply for a place for their child(ren) at any alternative school they choose. There are a wide range of schools of all sizes within the Calon Cymru catchment area, therefore parents could apply for a place in one of the smaller schools should that be their preference.</p>
9.5.2	Its discrimination targeting the smaller schools and you are taking away our freedom of choice and our rights as human beings to choose.	As above.
9.5.3	Choices are made by parents in an area not to use the local larger school because they want their child to attend a smaller school. Those parents will choose alternative ways of teaching, sometimes that will be home schooling and I urge you to be cautious in pushing more parents into this as a choice for their child's education. The increase in the numbers being home schooled is I believe a cause for concern for the safeguarding of our young people and the standards of their education. It has to be acknowledged that not all parents will want to send their child to a larger school. You remove the	As above.

	choice and they will make alternative choices which overall can be gravely concerning in some instances.	
9.5.4	It would take away the option of a rural school, which is unfair.	Of the alternative schools named within the Consultation Document, both Crossgates C.P. School and Llanbister C.P. School are identified in the School Organisation Code as 'rural schools'. There are other schools within the Ysgol Calon Cymru catchment which are also identified as 'rural schools'.
9.5.5	There is no other rural school to choose – Crossgates is no longer a rural school and has no community feel at all. What happened to our right to a choice?	As above.
9.5.6	We chose a rural school for our children. We have no other rural school choice, New Radnor is 12 miles away, Franksbridge is further.	As above.

9.6 Criticism of the Council's treatment of small / rural schools

9.6.1	Beguildy and Whitton schools are both closed, it seems inevitable that the rest will follow as this seems to be the Council's intention – to systematically rid Powys of all its small schools.	The engagement exercise carried out when developing the Council's new Strategy for Transforming Education clearly identified that there were too many small schools in Powys. The aim of the proposal is to provide greater equity across Powys, in terms of the learner offer and in terms of the funding provided per pupil.
9.6.2	The proposal is a blunt attempt to fix the LEAs own shortfalls in management by trying to 'pick off' smaller schools.	As above.
9.6.3	The Council have their own agenda in closing schools, this isn't what's best for the pupils, the parents and the community.	As above.
9.6.4	No-one apart from the Council wants to see rural schools closing.	Comment noted.

9.6.5	If Powys continues to ravage its small schools, it will find that Powys isn't a place where young people and families want to be.	Comment noted. The aim of the Council's Strategy is to transform education in Powys to ensure that the best possible opportunities are available to learners across Powys, helping to ensure that families to want to live in Powys so that they can access these opportunities for their children.
9.6.6	If the Council continues to close all our rural schools thus killing our rural communities, there will be no amenities to attract young families and Powys will fasts become a retirement home.	As above.
9.6.7	Across the border in Shropshire there are many far smaller rural schools and currently very little threat of closure, but costs have been saved by federating these schools with others in the area etc. Surely Powys Council would be better placed to consider less disruptive options such as these? If only there were any rural schools left in Powys to federate them with perhaps?	Comment noted. Whilst some schools in Powys are operating as part of formal federations and others are operating as part of informal shared headteacher arrangements which has realised some benefits, it is clear that there are too many small schools in Powys, which creates a lack of equity amongst schools.

9.7 Reference to the presumption against closure of rural schools

9.7.1	The Welsh Government's School Organisation Code sets a "presumption against closure" of listed rural schools and states that the case for closing a rural school must be "strong" and all viable alternatives must be "conscientiously considered".	<p>The Welsh Government's School Organisation Policy 2018 includes a section entitled: '1.8 Presumption against the closure of rural schools'.</p> <p>This outlines the additional considerations that local authorities/proposers need to carry out when formulating and consulting on proposals related to rural schools.</p> <p>The Code states: <i>'This does not mean that a rural school will never close but the case for closure must be strong and all viable alternatives to closure must have been</i></p>
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		<p><i>conscientiously considered by the proposer, including federation’.</i></p> <p>The Council has carried out the additional steps outlined in the School Organisation Code in respect of the proposal to close Llanfihangel Rhydithon C.P. School.</p>
9.7.2	The Welsh Government have made clear in their revisions to the Schools Organisation Code that small rural schools should be kept open unless there is no other viable option and in this case, there are many other options that have not been considered and evaluated fully.	As above.
9.7.3	The 'Rural Schools policy' has in no way been followed. This was a policy put in place in 2018 by Kirsty Williams on behalf of the Welsh Government to protect rural schools in order to ensure that closure was the last thing that a council would do to a highly performing small rural school...which is what this is.	As above.
9.7.4	When Kirsty Williams was introducing protection to rural schools Dolau school was given as an example of a school that should be protected under the school organisation code, due to the high educational standards and the rural community it serves.	As above.
9.7.5	Llanfihangel Rhydithon CP School is a small rural school protected by the rural school policy, which is designed for a rural community.	As above.
9.7.6	We are mindful that Mark Drakeford, First Minister at the Senedd, has said “there is presumption schools stay open... and unless good reasons can be introduced for schools not to be continued they will continue”	The comments made by the First Minister are noted. In respect of the ‘Presumption against closure of Rural Schools’, the Code states that this ‘ <i>does not mean that a rural school will never close but the case for closure must be strong and all viable alternatives to closure must have</i>

		<i>been conscientiously considered by the proposer, including federation’.</i>
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10. COMMENTS ABOUT OTHER SCHOOLS PUPILS MIGHT TRANSFER TO

10.1 Concern about the quality of education in the alternative schools

Tudalen 132	<p>10.1.1 Llanfihangel Rhydithon School is in the green category while all the receiving schools are in the yellow category.</p>	<p>The Council does not have any concerns over the quality of education provided at the alternative schools and believe that pupils would not be disadvantaged by attending these schools.</p> <p>National Categorisation identifies the amount of support a school will receive on an annual basis. The last categorisation took place in the autumn term 2019. Since that period, Welsh Government have suspended categorisation. There are four colours for categorisation (Green and Yellow are seen as self-improving schools; Amber and Red are schools in need of significant support).</p> <p>Although there has been no National Categorisation for schools for the last two years, the local authority has continued to work closely to support all of Powys’s schools. The schools mentioned have all responded well to the challenges of providing education over the pandemic period. This has reinforced the view of the local authority that the schools are self-improving schools and provide education that is equitable.</p>
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		Estyn, in its response to this consultation, has concluded that 'It is Estyn's opinion that the proposal is likely to at least maintain the current standards of education in the area.'
10.1.2	The support category for the potential alternative receiving schools Crossgates, Knighton, Llanbister, Cefnlllys are all yellow and Llanfihangel is green. Why should pupils attend a lesser school?	As above.
10.1.3	Concern that the educational standards in the other neighbouring schools are not as good as they are at Dolau.	As above.
10.1.4	Closing a school and sending its pupils from a safe, good (Estyn) and Green school to schools deemed as merely adequate or Amber is an abhorrent suggestion and goes against the Schools Organisation Code.	As above.
10.1.5	Can you guarantee that the local schools named in your document offer a BETTER standard of education and a SAFER environment for the pupils of Llanfihangel Rhydithon CP School? I don't think they can!	As above.
10.1.6	Dolau school is currently 'Green' which is the highest educational standard in Wales so pupils should be able to attend an alternative school of the same standard.	As above.
10.1.7	I have taken the time to research the other local schools in the area, and I am shocked to realise that the local authority plan to send the majority of Dolau pupils to schools which are of a lesser standard. In your consultation document you state that you have "no concerns" about the standard of education at particular local schools but I do not believe that Powys can direct families to move their children to schools which provide a poorer standard of education.	As above.
10.1.8	The receiving schools within the catchment area have no improved benefit for Dolau children, in fact they could be	As above.

	considered as lowering the current high standards and expectation for these children.	
10.1.9	The Schools Organisational Code states that pupils should not be moved to a school with a lower standard of education. Powys County Council cannot just comment that they have no concerns about the quality of teaching at the other schools and disregard the concerns raised during the consultation period. Such reviews and standards are decided by Estyn and through rigorous LA challenge. The lower standard of education offered at other local schools, alongside the lack of available places in others, is a major reason to keep the school open.	As above.

10.2 Concern that there are no places available in the surrounding schools

10.2.1	Schools in the area are already full or close to capacity and the Satellite class for Ysgol Penmaes in Crossgates CP School is reducing the places available at that school. There are several housing development programmes in ALL areas, and there is a danger the local authority will run out of spaces for the area even for siblings of existing pupils.	<p>Should Llanfihangel Rhydithon C.P. School close, the Council is confident that there are sufficient places for pupils at alternative schools in the area which were named in the Consultation Document and in the Statutory Notice.</p> <p>The capacity of Crossgates C.P.School is 210. This does not include the mobile located on the school site as it is not used as a class-base. The number on roll (September 2021) is 126 which means there are 84 places available. The Council will be using one classroom at the school for satellite ALN provision from September 2021 but there would still be a significant amount of surplus places available.</p> <p>Whilst Ysgol Trefonnen and Llanbister C.P. School are currently over-subscribed, an additional classroom has</p>
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		recently been created at Llanbister C.P. School, which has increased the school's capacity to 74. There are places available at Cefnlllys C.P. School.
10.2.2	There is only one other school for Dolau children, the two schools in Llandrindod are full. Franskbridge, New Radnor, Knighton and Newbridge are too far.	As above.
10.2.3	It looks as though parents wouldn't have many options other than Crossgates, as Llanbister CP School is at full capacity and so is Ysgol Trefonnen. Parents and children should have a choice where they should go, should they not?	As above.
10.2.4	Llandrindod Wells' schools are full, so much so that they are transporting children from Llandrindod to Crossgates daily. If there were capacity in Trefonnen and Cefnlllys, then surely Crossgates would be well under capacity and its price per head well over what Dolau schools' is.	Ysgol Trefonnen is currently over-subscribed but there are places available places at Cefnlllys C.P. School. The Council is aware that 36% of pupils attending Crossgates C.P. School (PLASC 2020 data) live nearer to either Cefnlllys C.P. School or Ysgol Trefonnen.
10.2.5	Trefonnen School, which opened only nine years ago, was cut back on its original assessed development size and now cannot accommodate all the pupils within its catchment area. Together with Cefnlllys they are both 10% over their allocated capacities. Overspill from these schools are filling spaces in Newbridge and Crossgates.	As above.

10.3 Comments about Crossgates C.P. School

10.3.1	Crossgates will never have the small class sizes of Dolau, they can't have the empathy that Dolau children have and they do not have the same values that can't be taught in a large school.	Whilst acknowledging that Crossgates C.P. School is a larger school than Llanfihangel Rhydithon C.P. School, the Council does not have any concerns over the quality of education provided at Crossgates, and believes that
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		<p>pupils will not be disadvantaged by attending this school.</p> <p>The Consultation Document includes the latest Estyn judgements and the 2019 National Categorisations for both Llanfihangel Rhydithon C.P. School and also the alternative schools that pupils may transfer to, in the event that the school closes. It must be noted that there is a difference between Estyn inspections and National Categorisation - Estyn evaluate by judgements, National Categorisation uses colours to identify the support that a school needs.</p> <p>In the last Estyn inspection for Llanfihangel Rhydithon in 2019, the school were judged to be 'good' for standards, provision and leadership.</p> <p>Crossgates School were inspected in 2016, and were placed in Estyn review. However, within a year they had addressed the recommendations and were removed from any form of follow up.</p> <p>National Categorisation identifies the amount of support a school will receive on an annual basis. The last categorisation took place in the autumn term 2019. Since that period, Welsh Government have suspended categorisation. There are four colours for categorisation (Green and Yellow are seen as self-improving schools; Amber and Red are schools in need of significant support).</p>
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		<p>Llanfihangel Rhydithon was classified as Green and Crossgates were categorised as Yellow in 2019. Both schools are self-improving schools.</p> <p>Although there is no National Categorisation for schools, the Council has continued to work closely to support these schools. Both schools are strong schools for standards, provision and leadership and have responded well to the challenges of providing education over the pandemic period. This has reinforced the view of the local authority that the schools are self-improving schools and provide education to a standard that is equitable.</p> <p>Estyn's response to this consultation also confirms the Council's view: <i>'It is Estyn's opinion that the proposal is likely to at least maintain the current standards of education in the area.'</i></p>
10.3.2	Moving pupils to Crossgates C.P. school would mean they would be going to a lower achieving school with a worse standard of education and a school which has a major problem with discipline.	As above.
10.3.3	You have no concerns in relation to quality and standards (of education) offered at Crossgates C.P. School – how do you know? What unbiased information have you seen since the last period of school categorisation to prove Crossgates no longer needs your support?	As above.
10.3.4	You say that you have no concerns about the quality of teaching at Crossgates C.P. School or the other schools, therefore it is not anticipated that implementation of the preferred option would have a negative impact on the quality	As above.

	of teaching experienced by pupils currently attending Llanfihangel Rhydithon C.P. School. If this is the case, why do they not have an 'good' Estyn inspection and 'green Erw' support standard?	
10.3.5	There are no concerns in relation to quality and standards at Crossgates C.P. School. Yet there were, so how can you be confident to say you have no concerns? What data has that school been able to share since their last categorisation to demonstrate they no longer need your support, especially given that no LA staff have physically entered these schools since the Covid pandemic began?	As above.
10.3.6	In your document you state that 'However, there are no concerns in relation to quality and standards at Crossgates C.P. School, and it is not anticipated that implementation of the preferred option would have a negative impact on standards and progress overall.' How can you claim this when in every category Dolau outperforms nearly all the closest schools to it and especially Crossgates in the areas concerned? What criteria have you based this on? I would personally like a full break down of the criteria you used and how you came to this conclusion that there are no concerns in relation to the quality and standards in comparison to Dolau.	As above.
10.3.7	I am extremely concerned about the 'quality' at Crossgates school – our next nearest school. This is not on par with Dolau.	As above.
10.3.8	If Crossgates were a better school than Dolau, there wouldn't be spare capacity in Crossgates, there also wouldn't be massive over subscription at Llanbister.	As above.
10.3.9	If Crossgates were also running in Estyn's green category, pupils in their catchment wouldn't be travelling to Dolau.	As above. Estyn does not have a 'green' category – the reference to green categorisation refers to the Welsh

		Government's National Categorisation. No categorisation has taken place since 2019.
10.3.10	The extracurricular activities and links with the community in Crossgates are just in no way positively comparable with those in Dolau.	The Council notes these concerns. Whilst the activities available at Crossgates C.P. School are different to those available at Llanfihangel Rhydithon C.P. School, the school does offer a wide range of extra-curricular activities and a breakfast club. It is an expectation of the new curriculum that schools provide additional experiences for their pupils.
10.3.11	Crossgates do not provide the same breadth of activities as Dolau, for example Eisteddfod, Eco school club, sports club etc.	As above.
10.3.12	Concern about the standard of behaviour at Crossgates – I have seen the safeguarding issues, having raised these with the school. We know that there is a need for a special classroom for the troubled and challenging children to go to for biscuits and treats to help them feel secure when they misbehave. Disruption and a lack of respect for teachers is unacceptable. We do not have these problems in Dolau.	All schools have different approaches to managing behaviour including nurture provision. Many schools across Powys have developed wellbeing spaces or nurture classes for pupils to attend when they need support, especially since the Covid pandemic. This in line with the advice in the Powys County Council wellbeing strategy and supports the delivery of the Welsh Government's whole school approach to emotional wellbeing.
10.3.13	If capacity and cost per head is a reason for the Dolau proposal, why then is Crossgates not in consultation?	Crossgates C.P. School is larger than Llanfihangel Rhydithon C.P. School. In order to carry out consultation on a proposal to close a school, the Council would need to have sufficient places available in the local area to accommodate the pupils at the closing school. There are not sufficient places available at other schools in the area to accommodate all pupils currently attending Crossgates C.P. School.

10.3.14	Assuming that the majority of pupils from Dolau transfer to Crossgates, this will then make them at full capacity and do they have infrastructure in place to cope with the additional numbers?	The capacity of Crossgates C.P.School is 210 and this does not include the mobile as it is not used as a class-base. The number on roll (September 2021) is 126 which means there are 84 places available. The Council has been using one classroom for satellite ALN provision since September 2021, however there would still be a significant amount of surplus places available.
10.3.15	Crossgates, our nearest alternative school, will soon have less capacity due to the Satellite class for Ysgol Penmaes.	As above.
10.3.16	If plans to expand the special needs facility at Crossgates come to fruition there wont be any excess space at Crossgates as these pupils and staff will need a very significant amount of space.	As above.
10.3.17	PCC have not taken into account the reduction of capacity faced by the introduction of a “Penmaes Satellite” at Crossgates CP School (which now has an entire classroom dedicated to it).	As above.
10.3.18	Crossgates will be taking some Ysgol Penmaes pupils as a satellite which will reduce available space to accommodate Dolau pupils, as will projected housing development locally. Our children are likely to be taught in overcrowded class sizes.	As above.
10.3.19	Since September, we understand that one of the permanent classrooms at Crossgates is now being used by another PCC school. Thus, the capacity of the school will have been reduced – what is this new capacity figure? Can Crossgates really take in all current and projected Llanfihangel Rhydithon CP School pupils given their new capacity figure?	As above.

10.3.20	There is a porta cabin at Crossgates, which is used as a classroom – that is a poorer standard than our children currently receive at Dolau.	As above.
10.3.21	Temporary buildings are used to teach. You cannot move children from a fixed school building into temporary teaching units. This makes no sense and is unfair on the children.	As above.
10.3.22	Crossgates has a porta cabin, can we be assured that this will not house our children should they have to move schools?	As above.
10.3.23	Two temporary demountable classrooms still occupy the site of Crossgates School, yet it was a condition of the planning approval for the school's extensions that they be removed on completion of the new construction works. It would appear that there is a breach of a Planning Condition and now the County Council is using this breach as a contingency measure.	Comment noted. The Council will investigate this issue.
10.3.24	Are you aware of the issues with the new junior block when it was built at Crossgates school? Every time we have a large amount of rain, the water runs off the school playing field, onto the tarmac yard which then floods the junior block, the number of times that the pellet boiler has broken, the gas boiler has not ignited and therefore pipes have burst, this not only has had a huge financial impact on the school service, but was a serious disruption to the school children. Children sat with one heater in the classroom with their coats on. Not ideal for a 21st century built school.	The Council is aware of this. Remedial work has been undertaken work to address the flooding and drainage issues, and is continuing to monitor the situation.
10.3.25	Crossgates School has been affected by flooding in recent years, we have never had this problem in Dolau School. Powys school closures: Newtown High School and Crossgates Primary School on March 12 County Times	As above. This comment relates to a story published by the County Times in 2019 – remedial work has since been undertaken as outlined above.

10.3.26	<p>The Consultation document states that our children will have the benefit of single year groups – that isn't the case at Crossgates – year groups are mixed to ensure that they do not go over Welsh Government guidance – check your facts!</p>	<p>The Consultation Document does not state that children 'will have the benefit of single year groups'.</p> <p>The Council acknowledges that many schools of all sizes have mixed age classes to some extent. As indicated in the Consultation Report:</p> <p><i>'The majority of the alternative schools named in the Consultation Document have either single year groups or mixed age groups of no more than two years, with only Franksbridge as a two-class school with four year groups in each class. Llanbister is currently adding an additional classroom to become a three-class school.'</i></p> <p>The Council also states in the Consultation Report that: <i>'Larger schools have a greater level of staffing and single year group classes or a mixed year class of no more than usually 2 years.'</i></p>
10.3.27	<p>Crossgates has mixed year groups to ensure that their pupil numbers do not go over the Welsh Government guidance as do most of the receiving schools. How can we be sure that pupil numbers will not exceed the Welsh Government guidance should our children transfer?</p>	<p>As above.</p> <p>The management of class structures is a matter for the governors and headteacher of Crossgates C.P. School.</p> <p>The current structure of Crossgates C.P. School is as follows:</p> <ul style="list-style-type: none"> • Reception 1 Class 27 pupils • Yr 1/2 Class 22 pupils • Yr 3 Class 19 pupils • Year 4/5 Class 28 pupils • Year 5/6 Class 30 pupils

		Should the Council proceed with the current proposal to close Llanfihangel Rhydithon C.P. School, and should this lead to pupils transferring to Crossgates C.P. School, the school would need to review its class structure to ensure that suitable provision is provided for all learners, and that the provision is in-line with Welsh Government guidance.
10.3.28	The parents at Crossgates surely cannot be happy about this idea, class sizes of over 32? Is that not against Welsh government policy and against the National Union of Teachers policy?	As above.
10.3.29	What are the child to adult ratios and the level of support that my children will have if they have to move to Crossgates school, proposed room per child-the school just does not have enough room, the class rooms – moving from perfectly adequate classrooms in Dolau to porta cabins in Crossgates, against the Welsh Governments plans and expectations for primary schools in Wales.	<p>Based on PLASC 2021 information, as reported on My Local School, the Teacher : Pupil ratio at Crossgates C.P. School was 22.4, compared with 14.6 at Llanfihangel Rhydithon C.P. School.</p> <p>Should the Council proceed with the current proposal to close Llanfihangel Rhydithon C.P. School, and should this lead to pupils transferring to Crossgates C.P. School, the school would need to review its class structure to ensure that suitable provision is provided for all learners, and that the provision is in-line with Welsh Government guidance.</p> <p>The capacity of Crossgates C.P.School is 210 and this does not include the mobile as it is not used as a class-base. The number on roll (September 2021) is 126 which means there are 84 places available. The Council has been using one classroom for satellite ALN</p>

		provision since September 2021, however there would still be a significant amount of surplus places available.
10.3.30	Children that attend Dolau school always 'do' better in later years than those attending Crossgates, this is historical, if you were able to see the numbers going on to sixth form, to be head boy or girl and those going on to University, you would see that this is correct.	Whilst the Council notes this comment, the Council has no concerns about the quality of provision at Crossgates C.P. School. There is no reason to believe that pupils would not continue to 'do well' should they attend Crossgates C.P. School.
10.3.31	Crossgates C.P School is a big school, it is unfair for parents if they wish for their children to go to a smaller rural school.	Whilst acknowledging that Crossgates C.P. School is larger than Llanfihangel Rhydithon C.P. School, Crossgates is also categorised as a rural school according to the Welsh Government. Should the Council proceed with the proposal in respect of Llanfihangel Rhydithon C.P. School, pupils / parents could apply for a place in any school they choose, and could apply for a place in an alternative school should they not wish their children to transfer to Crossgates.
10.3.32	Crossgates School used to be a rural school, now it is not. The school now is vastly different to Crossgates School in the past.	Crossgates C.P. School is also categorised as a rural school according to the Welsh Government.

10.4 Comments about other schools

10.4.1	Llanbister C.P School is oversubscribed.	The current capacity of Llanbister C.P. School is 45 and the school is over-subscribed. However, an additional classroom has been added, meaning that the school's capacity has increased to 74. If Llanfihangel Rhydithon C.P. School closed, 5 of the current intake of pupils (September 2021) would be closer to Llanbister C.P. School.
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10.4.2	Why was Llanbister School, in particular, chosen to receive a third classroom to increase their overall capacity? Why are they not being closed to fill excess spaces? Why could a third classroom not have been offered as a potential option for Dolau School to absorb Llanbister pupils?	Pupil numbers at Llanbister C.P. School have increased and were above the school's capacity, therefore there was a need to reconfigure the school to add a third classroom. Pupil numbers at Llanfihangel Rhydithon C.P. School have remained below / near their capacity figure, therefore there has been no need to provide additional capacity here.
10.4.3	I'm interested in when the proposal for the additional classroom was put forward, and when it was approved. To my knowledge the increased capacity was not mentioned in the original proposal document. Was this something that has been rushed through over the Summer?? I shall continue my FOI quest on this subject...	Discussions started with the school in Summer 2019. The project was included in the Council's Schools Major Improvements Programme for 21/22 financial year which was approved by the Council in February 2021. The increased capacity was not included in the original consultation document as the work had not started at that time.
10.4.4	Both Llanbister and Dolau schools were up for closure in the last round of proposals, that saw Nantmel close – why has that school been given special treatment and ours is being put forward for closure? Interesting!	Llanbister C.P. School hasn't been given special treatment. In January 2022, there are 58 pupils at Llanbister C.P. School, which is higher than the number of pupils at Llanfihangel Rhydithon C.P. School, therefore Llanbister C.P. School has not been reviewed at this time. However, all schools in the Ysgol Calon Cymru catchment will be reviewed as part of Stage 2 of the Ysgol Calon Cymru Transformation Programme. This will include Llanbister C.P. School.
10.4.5	Some of the pupils that attend Knighton School are unable to use the after school clubs as there aren't enough spare	The Council notes this concern about access to after school clubs at Knighton C. in W. School.

	places, so pupils here don't have the same opportunities as Dolau pupils to attend after school clubs.	It is acknowledged that there could be more opportunity for pupils in a smaller school to participate in different activities due to the pupil ratio within the school. However, all schools, regardless of size, have a range of activities and are expected to ensure that pupils can participate fully with these.
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10.5 Other comments

10.5.1	We have to question why there are surplus places in other schools – poor management, poor quality, poor discipline? Small school preference?	There are many reasons why parents choose a particular school for their children. Parents are entitled to apply for a place in any school they wish, and applications are dealt with in accordance with the Council's Admissions Policy.
10.5.2	Pupils would attend schools with permanent leadership arrangements – is it not true that many of the surrounding schools (nearest schools) also do not have fixed leadership arrangements?	<p>The leadership arrangements in the alternative schools named in the Consultation Document / Statutory Notice are summarised below:</p> <p>Crossgates C.P. School – Permanent Headteacher Llanbister C.P. School – Permanent Headteacher Ysgol Cefnlllys – Permanent Headteacher Ysgol Trefonnen C. in W. Community School – Permanent Headteacher Knighton C. in W. School – Acting Headteacher</p> <p>Whilst it is correct that Knighton C. in W. School doesn't currently have permanent leadership arrangements, this is because the headteacher is currently on a one year secondment with the local authority and is due to return</p>

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		to her substantive post in September 2022. All other schools have permanent leadership arrangements.
10.5.3	Pupils currently attending Dolau School would have less opportunities to develop their Welsh language skills in other nearby school.	<p>Should the Council proceed with the proposal to close Llanfihangel Rhydithon C.P. School, pupils would continue to learn Welsh at the alternative schools. All the alternative schools named in the Consultation Document have signed up to the Siarter Iaith, and are working towards the Bronze Award.</p> <p>One of the key characteristics of the four purposes in the Curriculum for Wales is to develop ambitious, capable learners who can communicate effectively in different forms and settings, using both Welsh and English. All learners should have appropriate pathways for learning Welsh and English to enable them to develop the confidence to use both languages in everyday life. All Powys schools are well supported with excellent resources from the Athrawon Bro Team to enable teachers to teach Welsh. Staff from nearby schools have attended the sabbatical Welsh language course with further staff attending the sabbatical course in Newtown in September 2021. Opportunities to use Welsh within and beyond the classroom (including on digital platforms) support learners to use Welsh confidently and appreciate its usefulness to communication in a bilingual Wales and again all Powys schools are effectively supported with rich resources from the Athrawon Bro Team. Schools, through effective pupil voice forums, known as the 'Cryw Cymraeg' plan a range of activities to increase the use of Welsh outside the classroom. Facilitating the use of Welsh, through planned linguistic</p>

		progression in every phase of education from ages 3 to 16, and as part of a whole-school approach, offers opportunities for all learners to develop bilingually and this is a key priority for all schools in Wales.
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11. IMPACT ON LLANELWEDD C. IN W. SCHOOL

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11.1	The impact closure would have on Llanelwedd School has not been taken into consideration.	<p>The Council is not proposing any changes to Llanelwedd C. in W. School. Should the Council proceed with the proposal to close Llanfihangel Rhydithon C.P. School, Llanelwedd C. in W. School would continue to be funded as a standalone school as it is currently funded (ie fully funded for a headteacher post), and the Headteacher would return to his substantive post at Llanelwedd C. in W. School.</p> <p>Llanelwedd C. in W. School would need to meet the full costs of the Headteacher post from within their budget. This would add approximately £40,000 per annum to their expenditure. There is sufficient capacity within their existing budget to accommodate this extra cost in the short term, allowing time for the school, supported by officers, to consider options to increase income or reduce costs.</p>
11.2	The fact that Llanelwedd school has not been included in this process makes me think that you have no idea how closely the two schools are linked or you are just wanting to ignore the fact.	As above.

11.3	What's the knock-on effect for Llanelwedd if Llanfihangel closes? Will the shared head teacher become a teaching post? I thought this wasn't what Estyn nor PCC want?	As above.
11.4	If Dolau School closed, this would have a detrimental effect on Llanelwedd school also, and would affect the budgeting and teaching structure of the school.	As above.
11.5	Should Dolau close then it would place Llanelwedd in a difficult position – would they be able to solely fund the headteacher?	As above.
11.6	The school has been sharing a headteacher with Llanelwedd C. in W. School for the last 6 and a half years, so there will be an impact on their budget / cost per pupil.	As above.
11.7	Closure of Dolau School would put a shadow of doubt over the finances of Llanelwedd C. in W. School.	As above.
11.8	Should the school close the Headteacher would return to his former post as full time headteacher of Llanelwedd School. Surely this would have an impact on Llanelwedd's budget? Has any costing been presented regarding this?	As above.
11.9	Should the school close, the whole Headteacher costs would transfer to Llanelwedd, putting this school at risk. Could this be an attempt to resolve the flooding issues at Llanelwedd?	As above. Llanelwedd C. in W. School is not being reviewed at this stage, but all schools in the Ysgol Calon Cymru catchment will be reviewed as part of Stage 2 of the Ysgol Calon Cymru Transformation Programme.
11.10	At no point in the consultation does it mention Llanelwedd School.	As above. Comments relating to Llanelwedd C. in W. School were received during the consultation period, these are listed in the consultation report as well as the Council's response to the issues raised.

12. FINANCIAL IMPACT

12.1 Comments about the estimated savings

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12.1.1	<p>Why does 4.1 of the report give an annual saving of £59,000.00 while in the Draft Impact Assessment, page 3, profile of savings delivery the savings are quoted as: - 2022/23 = £34,416.67, 2023/24 = £24,583.33. Total of savings over two years = £59,000.00. Why? No savings are indicated for 2024/25.</p>	<p>The figure quoted is an annual saving which would be achieved per academic year. In the impact assessment document, the total saving estimated during the 2022/23 academic year is split over two financial years.</p> <p>Should the school close in August 2022, £44,000 of the annual savings would be achieved during September – March of the 2022/23 financial year, and £32,000 of the annual savings would be achieved during April – August of the 2023/24 financial year.</p> <p>No savings are indicated for 2024/25 and onwards as there would be no <u>new</u> savings during this period, however the estimated savings are recurring savings that the Council would benefit from each year.</p> <p>Following the revision of the school funding formula for primary phase schools, the estimated saving is now approximately £76,000 each year.</p>
12.1.2	<p>It's claimed that closure of the school would lead to savings of £59k a year. Looking at PCCs own figures, the saving is only after two years, £35k one year and £24k the next, and no savings in year 3. Please clarify.</p>	<p>As above.</p>
12.1.3	<p>The Council's own documentation seems not to know what the projected saving would be. Projected annual savings of £59,000 are given in one paper whilst another paper</p>	<p>As above.</p>

	informed members that the saving over a period of two years would be £59,000 – a 50% decrease, so which is right?	
12.1.4	An annual saving of £59k to PCC is a questionable figure. The cost per pupil in Dolau school, will still be a cost per pupil in another school. Therefore, where is the saving?	<p>The potential increase in the allocated budget for other schools has been considered when calculating the estimated saving.</p> <p>While the budget allocated to other schools will increase as a result of having increased pupil numbers, the pupils can be accommodated without the need to allocate the full funding currently allocated to Llanfihangel Rhydithon school, hence the estimated saving.</p>
12.1.5	The proposed saving if the school was closed is minimal. It would just account for one wage earner at Powys County Council.	Comment noted.
12.1.6	The reported saving of £59,000, would be totally wiped out by the salary of the Head of Education post which has recently been advertised by Powys County Council.	Comment noted.
12.1.7	How can the Council justify the closure with the reported saving of £59,000 when they have probably spend that trying to justify their action and yet they have no problem in employing 6? / 8? consultants for the last 3 years in the education department?	<p>The £59,000 estimated saving is a recurring saving that the Council will benefit from each year.</p> <p>Following the revision of the school funding formula for primary phase schools, the estimated saving is now approximately £76,000 each year.</p>
12.1.8	The decision does not realise a proportionate saving to council tax payers of Powys, which again contravenes the Powys County Council Vision 2025. The annual saving of £59,000 represents 0.022% of total budget. This is miniscule and taking into account that Powys Council Council have agreed to fund two directors in Education is a total disregard	<p>Strong leadership within the Education department is key to the delivery of the Strategy for Transforming Education in Powys and the principle of a world class rural education system that has learner entitlement at its core.</p> <p>One of the key drivers for the Strategy is equity of educational provision for all learners in Powys, which</p>

	for best value economy in children's education and well being.	this proposal in respect of Llanfihangel Rhydithon C.P. School will contribute to. It is not solely based on saving money.
12.1.9	The saving made by closing this school is minimal compared to some of the amounts written off by the same council to shore up other failing projects (ie Ysgol Calon Cymru).	The Council fully acknowledges the challenges in respect of Ysgol Calon Cymru, and is currently carrying out an engagement exercise on future plans for the school, which would result in a new building in Llandrindod Wells.
12.1.10	Even if the council were to save £59k in closing the school this measly amount is a drop in the ocean when you consider the debt PCC have written off. See the PCC statement of account 2020/2021, page 116.	Comment noted. The Council is fully committed to pursuing all debts and income due to it and has robust procedures in place for this. The writing off of bad debt is an action of last resort but is sometimes necessary.
12.1.11	I question the Council's calculations as to the savings they propose to make. Having followed the consultation with stakeholders over the closure of Nantmel C in W School a number of years ago, it became apparent that the figures put forward by the Council concerning the cost of transportation and the proposed savings made differed every time they were announced at meetings. I question the amount the Council has actually saved from that closure when the actual cost of transportation to other schools has been taken into account as well as the additional resources the receiving schools have had to have in order to accommodate them. The Council does not appear to have a transparent and fair method of calculating these costs.	<p>In preparing the estimated savings figures, a detailed assessment of potential additional transport requirements was undertaken by officers.</p> <p>There are many unknowns at the time that savings estimates are calculated, and they are based on the best information available at the time. They are subject to change for example due to changes in pupil numbers, parental choice, staff changes etc. Estimated savings are updated as new information becomes available. The calculations are reviewed by a range of officers and sensitivity analysis is also carried out.</p> <p>Councillors can hold Cabinet and officers to account by scrutinising the methodology and robustness of the estimates.</p>

		The estimated savings for Nantmel was £68,000 per annum and the authority achieved the savings by reducing budgets accordingly, at the time the school closed.
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12.2 Comments about additional travel costs

12.2.1	It is likely that that the savings made from the closure would barely cover the costs of the transporting of children from Dolau to another school.	<p>A detailed assessment of potential additional transport requirements was undertaken by officers.</p> <p>There are two home-to-school transport routes that transport pupils to Llanfihangel Rhydithon C.P. School – the LW14 and LW15. The LW14 is a 16 seat minibus and the LW15 is a 16 seat minibus, but could also be a 21 seat minibus. It is not anticipated that there would be additional transport costs, based on the analysis of pupils' postcodes (PLASC Jan 2020), as pupils can be accommodated on existing transport routes to their nearest alternative school. There may be a situation in the future where additional transport routes may be required for additional children (i.e. children starting school for the first time or children who move into the area) which would depend on where they lived. However, at this point in time, it is not possible to know the exact cost of this but it is anticipated that it would be a minimal cost.</p>
12.2.2	Has the annual financial cost of busing an extra 22 young pupils to potentially diversely scattered other schools been built into the costs advised to the decision makers?	As above.

12.2.3	Transport cost: Extra buses to transport children to nearest alternative school – no costing presented; Extra buses to transport all children to go to Crossgates School – no costing presented.	As above.
12.2.4	When looked at in the round much of the expected savings are lost to the transport costs of bussing children to schools further away. The only beneficiaries of the policy would be bus companies.	As above.
12.2.5	The supposed savings will have to be spent on transportation costs, as the majority of pupils who attend Llanfihangel presently will have to be transported.	As above.
12.2.6	Officers anticipate the current school bus service will transport the 29 pupils who would qualify for home to school transport should the school close, without incurring extra costs, to possibly as many as 5 different destinations. Currently only 7 pupils receive home to school transport.	As above.
12.2.7	The costs of additional transportation needed are not clear - has this been adequately researched? Will there truly be annual savings by closing Dolau School?	As above.
12.2.8	In 7.1.1 of the Consultation Report it states that 22 more children will need free home-to school transport. A local transport provider has told me that it will cost an average of £15 per child per day...hence...£15 (cost per child per day) x 191 (number of school days in a year) = £2865... x 22 (number of children) = £63030 a year extra that the council will have to pay.	As above.
12.2.9	It would cost over £60,000 a year to transport the 29 children to their next nearest school.	As above.
12.2.10	With many of the receiving schools mentioned in the consultation document already full, there will be a number of children that will require transport, not necessary to their	Should Llanfihangel Rhydithon C.P. School close, the Council is confident that there are sufficient places for pupils at alternative schools in the area which were

	<p>nearest school and this WILL outweigh the saving of this proposal.</p>	<p>named in the Consultation Document and in the Statutory Notice.</p> <p>The capacity of Crossgates C.P. School is 210. This does not include the mobile located on the school site as it is not used as a class-base. The number on roll (September 2021) is 126 which means there are 84 places available. The Council will be using one classroom at the school for satellite ALN provision from September 2021 but there would still be a significant amount of surplus places available.</p> <p>Whilst Ysgol Trefonnen and Llanbister C.P. School are currently over-subscribed, an additional classroom has recently been created at Llanbister C.P. School, which has increased the school's capacity to 74. There are places available at Cefnlllys C.P. School.</p> <p>The response to comment 12.2.1 above addresses the comments relating to transport costs.</p>
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12.3 Comments about possible costs / receipts associated with the school building in the future

12.3.1	<p>With the school's ties to the local community hall, and the lease on the car park and playground, I would not expect to see the sale of the building being an easy or lucrative one.</p>	<p>The Council is aware that the site surrounding Llanfihangel Rhydithon C.P. School includes the community hall which has a lease to use the school playground as a car park, which creates a practical and legal challenge to the disposal of the school. However, the Council's Corporate Asset Policy would be followed, should the school close. This would include consideration of a community asset transfer or a sale on</p>
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		the open market via different methods. The Council's policy is to dispose of any surplus assets.
12.3.2	The school building is unsuited for residential conversion being a large property with high conversion costs and I understand that the Community Centre has legal rights to use the playground to the fore of the building as a car park for something like the next 60 years. Third party rights such as this will make any sale very difficult and render it unsuitable as mortgage security as no mortgagee would want to risk being left with a property surrounded by a car park for public use in the event of a repossession. This has a severely detrimental effect on capital value.	As above.
12.3.3	Another issue which appears not to have been considered at all is the cost of maintaining the empty school building which is currently in good repair. This would not be an insignificant sum.	The Council is aware of its responsibility to maintain the empty school building until such a time that ownership was transferred. It is not possible to estimate any costs that may arise in order to maintain the school building, however this would be paid for from the Council's corporate budget.
12.3.4	If the building is not to be left empty, what does the Council consider its proposed use will be and what costs and income may be anticipated? What plans do you have and does the plan involve a proposed sale or letting? Has the Estates Department been consulted? If so, what was their advice and financial projections?	Should Llanfihangel Rhydithon C.P. School be closed, the Council's Corporate Asset Policy would be followed to determine the future use of the school building. This would include consideration of a community asset transfer or a sale on the open market via different methods. The Council's policy is to dispose of any surplus assets. Discussion has taken place with officers from the Estates Department, however no indication has been given of the possible sale value.

12.3.5	<p>What factors, if any, have been built into your cost analysis for the future of the building and how do they affect the overall picture? Have these even been considered and taken into account in arriving at the purported but unclear cost savings? Is it possible there would be no saving but a worse financial situation funded by the Council and its tax payers than if the school were to remain open?</p>	<p>No cost analysis for the future of the building has been carried out. Should the Council proceed with the proposal to close Llanfihangel Rhydithon C.P. School, the Council's Corporate Asset Policy would be followed to determine the future use of the school building. This would include consideration of a community asset transfer or a sale on the open market via different methods. The Council's policy is to dispose of any surplus assets.</p> <p>It is not currently possible to estimate the costs or receipts that may arise in respect of the building in the future.</p>
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12.4 Comments about the budget share per pupil / funding formula

12.4.1	<p>The reason that the cost per pupil is so high is due to the fair funding formula – using the old formula our price per pupil was within the Powys average.</p>	<p>The development of the current funding formula was overseen by the Formula Working Group which included several representatives from across schools in Powys, including headteachers and governors.</p> <p>Prior to the change in formula the school budget was in a deficit position. The 2016-17 actual outturn £18,356 and the 2017-18 budgeted position was a deficit of £32,375. The 2017-18 actual outturn was a cumulative deficit of £47,043.</p> <p>The Council has recently carried out consultation on a new funding formula which will be introduced from April 2022.</p>
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12.4.2	The fair funding formula is flawed. If the old system was used Dolau's price per pupil would be in line with the Powys average costs per pupil.	As above.
12.4.3	The funding formula puts the savings figure higher than what will actually happen and do not reflect the true costs of transporting children the extra distance.	As above.
12.4.4	The funding formula can be tweaked to create a more equitable distribution of funding so that this would not be a saving at all.	As above.
12.4.5	I have previously challenged the published cost per pupil quoted as £6304. When the Governing body challenged this with the Education Department, they were informed that the actual cost per pupil was £4939 which throws into question the validity of the above quoted savings.	<p>£6,304 is the budgeted spend per pupil for Llanfihangel Rhydithon CP school for the financial year 2020-21, based on the cost to the Council's budget. The actual per pupil cost is based on the total actual spend for the school in that same financial year.</p> <p>The difference from the budgeted figure to the actual cost per pupil results from the long-term temporary management structure put in place by the governing body (a shared headship) which results in an annual saving for the school compared to its budget allocation.</p>
12.4.6	Members were advised that the annual cost to the authority per pupil is £6,304 whilst the Education Department state it is £4,939 per pupil – a 22% difference, so which is right? 22% is not an insignificant sum.	As above.
12.4.7	It is not true that the school has a budget share per pupil of £6304 – the correct figure is £4939.	As above.
12.4.8	How does the cost per pupil (when someone finds out which figure is correct) compare with that of other schools – there is no information provided on this and yet this decision is advised to be based on a cost savings?	Based on the Council's Section 52 Budget Statement for 2020-21, the school's budget share per pupil was the 8 th highest of Powys schools. The 7 schools that have a higher cost per pupil than Llanfihangel Rhydithon C.P. School are Llangedwyn C. in W. School, Churchstoke

		C.P. School, Ysgol Bro Cynllaith, Llandinam C.P. School, Castle Caereinion C. in W. School, Irfon Valley V.P. School and Ysgol Cwm Banwy.
12.4.9	Llanfihangel Rhydithon is currently ranked 8th highest school in Powys by budget share meaning seven other schools have higher costs. With the projected pupil numbers increasing over the next few years budget share per pupil will reduce and therefore this is not a good reason to recommend closure.	<p>The 7 schools that had a higher budget share per pupil than Llanfihangel Rhydithon C.P. School were: Llangedwyn C. in W. School, Churchstoke C.P. School, Ysgol Bro Cynllaith, Llandinam C.P. School, Castle Caereinion C. in W. School, Irfon Valley C.P. School and Ysgol Cwm Banwy.</p> <p>The Council has reviewed all of these schools since the approval of its Strategy for Transforming Education in Powys in April 2020. Proposals have already been taken forward for Churchstoke C.P. School and Castle Caereinion C. in W. School, and papers have been considered by Cabinet in respect of Llangedwyn C. in W. School and Ysgol Bro Cynllaith. The Council will be reviewing all its schools over time.</p>
12.4.10	Dolau school have openly said they have surplus money and do not require all the money allocated. Why have Powys not clawed this surplus money back?!!	The circumstances in which the Council can require repayment of a school's surplus are strictly governed by the School Funding (Wales) Regulations 2010.
12.4.11	Additional finance allocated to Dolau through the funding formula has not been spent. The school has asked the Council to accept repayment of these funds, but the Council has declined the offer, presumably so that they can continue their agenda on false figures.	As above.

12.5 Comments about funding for small and rural schools

12.5.1	Do Welsh Government not give extra money to Powys County Council for rural schools?	Powys County Council is in receipt of a time limited Small and Rural Schools grant which ends on 31 March 2022.
12.5.2	The high budget share per pupil is always going to be a factor for small schools. In recognition of this we understand the Welsh Government provided Powys with extra funding to support small schools.	As above.

12.6 Comments about the financial impact on other schools

12.6.1	The cost of accommodating pupils in other school will have financial implications which do not appear to have been factored in (e.g. extra classroom provision).	The potential increase in the allocated budget for other schools has been considered when calculating the estimated saving.
12.6.2	Impact on budget/cost per pupil for Crossgates School – the possibility of more than 30 children means an extra teacher and teaching assistant, however no costing is presented for this	As above.
12.6.3	If 37 pupils are going to be moving into Crossgates then more staff will be needed. Another erosion into these supposed savings.	As above.

12.7 Other ways in which the Council could save money

12.7.1	There are plenty of savings you can make elsewhere in order to keep the school open	Comment noted. The Council always strives to provide value for money in the delivery of its services, constantly seeking out cost savings and efficiencies, including service transformation across all service areas.
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12.7.2	Look at cost savings within the council offices instead and consider more efficient ways of working.	As above.
12.7.3	What happens when there are no longer any of these excellent small schools left to close? Will PCC have to accept that miss management of funds and resources will have to be overhauled instead of mindless closures of small schools. Most financial problems are caused by mismanagement at the top.	As above.
12.7.4	How much did the recent bus pass system for children in Powys cost? What an absolute waste of resources and an utterly ill thought out plan...	<p>The Council does not agree that the new bus pass system introduced recently was 'a waste of resources and an utterly ill thought out plan'.</p> <p>This is a live contract and therefore commercially sensitive information. However, the cost to develop the new system was less than £50k, with a similar sum of money spent on infrastructure. These sums of money are very similar to the average cost of a school bus operating for one school year.</p>
12.7.5	Please look at yourselves and calculate how much was spent on the bus pass scheme and ask yourself about your management of finances... totally wasteful ... as far as us on the ground are concerned and a totally impractical plan for young children especially and may I also suggest has the potential for a breach of a child's identity that could easily lead to a safeguarding issue.	<p>As above.</p> <p>Whilst the Council notes your comments, feedback from bus operators and users has generally been very positive. In addition to being able to clearly identify who has travelled on a bus, it gives the council very good data on the exact number of learners travelling so that we may adjust the provision to match the demand. To date the data is identifying routes which can be rationalised, which will save the council money, possibly more money than the system cost to develop and therefore this represents a good return on the initial investment.</p>

		<p>There is no more personally identifiable data on the new bus pass than was previously on the old style bus pass – in fact there is less personally identifiable data. The Council does not agree that the new system has more potential to lead to a safeguarding issue than the previous system.</p>
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13. COMMENTS ABOUT THE PROCESS

13.1 Comments about the process taking place during the Covid pandemic

13.1.1	<p>I'm disgusted that the Council is even thinking of closing the school during the worst pandemic the country has seen for 100 years.</p>	<p>The Council recognises that the last couple of years have been difficult for all due to the Covid pandemic. The Council also recognises that any school reorganisation proposal creates a period of uncertainty and concern for all involved, including children, and that this has been exacerbated due to the process taking place whilst the Covid pandemic has been ongoing.</p> <p>Following Estyn's inspection of Powys Education Services in 2019, the Council started to develop a new Strategy for Transforming Education in Powys, which was approved in April 2020. In order to address the issues raised by Estyn regarding the organisation of its schools, it was necessary for the Council to continue with the development and consultation on proposals during the current pandemic.</p>
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		The Welsh Government provided non-statutory guidance for local authorities to manage consultations during periods of lockdown. The level and detail of responses received to all recent consultations outlines that stakeholders have engaged fully in the consultations, even though there have been restrictions in place.
13.1.2	We've been through such a difficult almost two years of Covid-19 when life has changed for us all so much, I think this is an unreasonable and unnecessary extra burden on this beautiful little community.	As above.
13.1.3	The Council has cynically and opportunistically taken advantage of restrictions imposed by Coronavirus by undertaking this process now. This has adversely affected the local community's ability to protect the interests of its young.	As above.
13.1.4	The Council's timing for this process is absolutely appalling, cruel and cowardly, with them appearing to take full advantage of the fact that people are still cautious about meeting up to reduce the ease for the community to fight this proposal.	As above.
13.1.5	Families have been through the mill in the last twelve months due to the Covid 19 pandemic. Home school have been an incredible challenge, whilst trying to run our businesses and keep afloat, trying to keep older family members safe, having a lack of childcare and our support network. The pressure has been immense. Now we have to deal with this consultation. I feel that the timing is completely inappropriate.	As above.
13.1.6	Closing this school at this time when the children that attend have just been through isolation due to covid has given no thought to their well being, and to put this decision through	As above.

	when parents and governors couldn't not even meet face to face was extremely unfair.	
13.1.7	The whole community is upset about the inappropriate timing of this proposal. We are in a global pandemic which has brought its own difficulties. PCC seem to have used this to their advantage – 'We cannot meet with the community because of Covid', 'We cannot meet with school staff and governors due to Covid', 'We cannot talk to, and see the school children in their safe and nurturing environment because of Covid.' Do you think this is a fair and legal way to make and proceed with such a huge decision regarding the children's and the community's future?	As above.
13.1.8	We know consultations need to be carried out but is this really the right time? Welsh Government suggested IF a consultation needed to go ahead, local authorities needed to give communities more time due to Covid.	As above. Local authorities are required to provide at least 6 weeks for consultation periods. The consultation period in respect of the proposal to close Llanfihangel Rhydithon C.P. School was for 7 weeks, therefore it is not true that 'the bare minimum' was provided.
13.1.9	On this same subject, I believe there was a directive from Welsh Government that due to the pandemic, extra time could be given to consultation processes. We have been given the bare minimum at all stages.	As above. Local authorities are required to provide at least 6 weeks for consultation periods. The consultation period in respect of the proposal to close Llanfihangel Rhydithon C.P. School was for 7 weeks, therefore it is not true that 'the bare minimum' was provided.
13.1.10	Holding the consultation during a global pandemic, whilst some members of the community remained at home shielding, with no access to the internet, meant that we were only notified of the proposal by word of mouth. There are many fancy videos, websites and "posts" regarding the	The guidance produced by the Welsh Government was non-statutory guidance. The Council took account of the guidance in respect of the processes carried out, however it is acknowledged that the Council did not follow all suggestions made in the guidance.

	<p>proposal but how have you ensured ALL members of the school community, those with little or no technological skills for instance, are adequately informed? I have been made aware that the Welsh Government produced guidance for local authorities outlining the expectations if they were to carry out this type of process during COVID-19. Amongst other guidance it promotes the use of posters outside local shops, on local notice boards and well-advertised “drop-in sessions” or “telephone lines” for drop in calls. I question whether Powys have used this guidance during the Dolau consultation and objection period at all, and how that has impacted on the ability of some members of the community to respond.</p>	<p>Information about the consultation was distributed to stakeholders in accordance with the requirements of the School Organisation Code. In addition, information was shared on the Council’s social media channels, and in the local press. A notice to inform local residents of the consultation was also displayed in Dolau, and a telephone number was provided in all correspondence related to the proposal, so stakeholders could have contacted the Council by telephone.</p> <p>The level and detail of responses received to all recent consultations outlines that stakeholders have engaged fully in the consultations, even though there have been restrictions in place.</p>
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13.2 Suggestions that the process has not been carried out correctly

13.2.1	<p>The Council has failed to adequately consult with parents, staff, pupils and the community at large. The online consultation carried out during the coronavirus pandemic was not adequate, unfair and unsatisfactory.</p>	<p>Over 400 responses were received as part of the consultation on the proposal to close Llanfihangel Rhydithon C.P. School. In addition, consultation meetings were held with staff, governors and pupils as part of the consultation. The level of responses received shows that the community have engaged with the consultation process.</p>
13.2.2	<p>I did not feel that the consultation period was thorough and robust, as it was supposed to be, especially during a time when people couldn't meet easily. Yes, it was announced in the paper and on social media, but where were the notices on local notice boards around the communities to inform them of</p>	<p>As above.</p>

	what was happening? There were none. None in Dolau; None in Penybont, None in any other surrounding areas - how is this robust? It is not, and you have failed to provide us with a fair consultation.	
13.2.3	The online consultation carried out by the Cabinet of Powys County Council during the coronavirus pandemic was insufficient, unfair and unsatisfactory. Parents and other local residents deserve more than just a Zoom meeting to decide the future of a school that is at the heart of their community.	As above.
13.2.4	During the cabinet meeting where it was agreed to put Dolau school into consultation, Cllr Harris assured the schools that there would be fair engagement. How have the council achieved this please? You have not engaged with me or my family at all. Fair engagement requires physical and verbal engagement – we have not received this.	As above.
13.2.5	I do not believe the community in Llanbadarn Fynydd was consulted in this matter adequately.	As above. Stakeholders were informed about the consultation in accordance with the requirements of the School Organisation Code. Llanbadarn Fynydd community council was informed of the consultation.
13.2.6	The Council, its Cabinet members and your team should be held accountable for this poorly delivered transformation process!	The process in respect of Llanfihangel Rhydithon C.P. School has been carried out in accordance with the requirements of the School Organisation Code.
13.2.7	The whole process has been handled extremely badly and is completely discredited and needs to be dismantled and stopped immediately.	As above.
13.2.8	I believe that nowhere near enough work was done in the Consultation, nowhere near enough evidence was produced and not enough valid reasons were given.	The Consultation Document was prepared in accordance with the requirements of the School Organisation Code.

13.2.9	PCC have failed to adequately evaluate the impact closure would have on the community.	<p>The Council does not agree with this statement. The Council acknowledges the school's central role in the community, and that there would be a negative impact on the community should Llanfihangel Rhydithon C.P. School. This was recognised in the Consultation Document and the draft Community Impact Assessment.</p> <p>A number of comments were received during the consultation period which expressed concern about the proposal's impact on the Dolau community. These were listed in the Consultation Report, along with the local authority's response. The impact assessments were also updated to reflect comments received during the consultation period. The Consultation Report and updated impact assessments were considered by the Council's Cabinet when determining whether or not to proceed with the proposal to close the school.</p> <p>Concern about the proposal's impact on the community has also been raised in the objections received, and these concerns are listed in this Objection Report. The impact assessment document has been further updated to reflect comments received in the Objections, and the Objection Report and updated impact assessment document will be considered by the Council's Cabinet when determining whether or not to proceed with the proposal to close the school.</p>
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13.3 The Council has not listened to the issues raised in the consultation period

13.3.1	You don't seem to have listened to any of the 420+ responses you've received in the first part of your consultation.	The Council produced an extensive 372 page consultation report which outlines the comments received during the consultation period. This report, and the issues outlined in the report, were considered by the Council's Cabinet when determining whether or not to proceed with the proposal to close the school, as well as updated versions of the impact assessments which reflected feedback received during the consultation period.
13.3.2	You have not taken any notice of our consultation responses.	As above.
13.3.3	The Council received its biggest public response to a consultation ever with the proposal to close Dolau school, with the vast majority in support of the school remaining open. However the points raised in the responses have either been dismissed or ignored.	As above.
13.3.4	Throughout the consultation the view and points raised by the public have been disregarded and no work has been done to provide evidence for the matters raised.	As above.
13.3.5	The decision has just been pushed through, parents and communities views and concerns have not been looked at or considered.	As above.
13.3.6	The council and cabinet have ignored every statement made throughout the consultation period when it suits them and have highlighted the ones they agree with.	As above.
13.3.7	So far the Council has not shown that they are listening – I get the feeling they will press on no matter what points are raised.	As above.
13.3.8	We are not being listened to, and our democratic right from a Council that is supposed to serve its people is not being allowed. This is a dictatorship rather than a democracy.	As above.

13.3.9	Whilst we can see that the Council has ticked the boxes, the communities voice has not been fairly considered.	As above.
13.3.10	I'm very disappointed that the Cabinet have chosen to ignore over 400 responses from the community and the scrutiny committee's recommendation that disagreed with this proposal. I'm beginning to think that I'm wasting my time responding.	As above. The recommendations provided by the Scrutiny committee was also considered by Cabinet when determining whether or not to proceed with the proposal.
13.3.11	Even with over 400 responses from the community, and recommendations from Powys scrutiny, appeals from Senedd members, advice and appeals from MPs and other councillors, the Cabinet have not listened to anything that has been said by anyone. Not one voice has been heard.	As above.
13.3.12	The Council has not taken into consideration what this may do the community despite all the responses received to the consultation.	The Council has considered the potential impact of the proposal on the community throughout the process, in particular in the Consultation Document and the draft Community Impact Assessment. A number of comments were received during the consultation period which expressed concern about the proposal's impact on the Dolau community. These were listed in the Consultation Report, along with the local authority's response. The impact assessments were also updated to reflect comments received during the consultation period. The Consultation Report and updated impact assessments were considered by the Council's Cabinet when determining whether or not to proceed with the proposal to close the school. Concern about the proposal's impact on the community has also been raised in the objections received, and these concerns are listed in this Objection Report. The

		<p>impact assessment document has been further updated to reflect comments received in the Objections, and the Objection Report and updated impact assessment document will be considered by the Council's Cabinet when determining whether or not to proceed with the proposal to close the school.</p>
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13.4 Suggestion that the outcome of the process has been pre-determined

Tudalen 170

13.4.1	<p>You have already made your decision on whether to close the school and this opportunity to e-mail you is merely process driven.</p>	<p>The Council has not already made a decision on whether to close the school.</p> <p>Following the consultation, the Cabinet considered the consultation report which outlines the issues raised in the consultation period when determining whether or not to proceed with the publication of a statutory notice.</p> <p>The Cabinet will consider this Objection Report which summarises the Objections received following publication of a statutory notice when determining whether or not to proceed with implementation of the proposal.</p> <p>Whilst it is possible that the Cabinet will decide to proceed with implementation of the proposal, the Cabinet can also decide to abandon the proposal, as happened recently following consultation on the proposal to close Churchstoke C.P. School.</p>
13.4.2	<p>There are numerous reasons why the school should continue but it feels as if the decision has already been made.</p>	<p>As above.</p>

13.4.3	The whole process has been a farce and PCC seems to have a pre-determined decision to close the school.	As above.
13.4.4	Despite opposition to the closure and very convincing arguments against the reasons stated for closure it appears that Powys had already decided to close the school regardless.	As above.
13.4.5	The Council has forced through a predetermined plan of closure based on a bed of mistruths, misinformation and lies.	As above.
13.4.6	It is so disappointing that our previous concerns seemed to have been lost in what feels like a pre-determined consultation period.	As above.

13.5 Comments about the presumption against closing rural schools

Tudalen 171

13.5.1	The proposal to close this school is in breach of Welsh Government Policy on small rural schools, which states that there should be a presumption that small rural schools will stay open.	<p>Section 1.8 of the Welsh Government's School Organisation Code outlines the steps that proposers need to take when bringing forward proposals for rural schools.</p> <p>It also states that this:</p> <p><i>'does not mean that a rural school will never close but the case for closure must be strong and all viable alternatives to closure must have been conscientiously considered by the proposer, including federation'.</i></p> <p>The Council has carried out these steps during the formation of the Proposal Paper that was considered by Cabinet in February, and carried out the additional steps required in the preparation of the Consultation Report which was considered by the Council's Cabinet in September 2021.</p>
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13.5.2	The Council is breaking the Welsh Government's Rural Schools Code by ploughing on with this closure.	As above.
13.5.3	The Council has not adhered to the Welsh Government's rural schools code.	As above.
13.5.4	The Council has totally ignored the Rural Schools Policy that Kirsty Williams brought in whilst she was education minister in the Senedd. The Rural Schools Policy stated that no school should be closed without viable alternatives.	As above.
13.5.5	The decision contravenes the Welsh Governments small school policy	As above.
13.5.6	Having carried out some research into the school closure policy, it seems what you are trying to achieve is illegal!	As above.
13.5.7	It is claimed by the Council that the review into its closure has been carried out in accordance with the Rural Schools Code which asserts a presumption against closure until all viable alternatives to closure have been considered but I have seen no evidence of this.	As above.
13.5.8	The School Organisation Code states in paragraph 1.8 'presumption against the closure of rural schools. The case for closure must be strong and all viable alternatives to closure must have been conscientiously considered by the proposer including federation'.	As above.
13.5.9	Not all avenues have been explored to avoid the closure of our small rural school.	As above.
13.5.10	None of the other alternatives listed on the original consultation seem have being given proper consideration, given the points only have one or two sentences to address them in the consultation document. Unfortunately, PCC seem to deem this as addressing these. Closing rural schools should only happen after all viable alternatives have	As above. A range of options were considered when developing this proposal – these are outlined in the Consultation Document. In addition, options were considered again in the Consultation Report, as required by the Presumption against Closure of Rural Schools.

	been explored and dismissed. The claim that this has been done is completely false!	
13.5.11	Powys Schools Transformation policy discriminates against the rural smaller school, with Officers insisting there is a need for critical mass to deliver the policy. The closure of Llanfihangel Rhydithon a highly rated school with Estyn and other inspecting bodies is purely to negate surplus places in other schools and give financial gain to the Authority. All of which is breaching the Welsh Government Policy for Rural Schools.	The Council's Strategy for Transforming Education in Powys, which was developed following engagement with stakeholders, identified a number of challenges relating to education in Powys, which include 'High proportion of small schools' and 'High number of surplus places'. The currently proposal in respect of Llanfihangel Rhydithon C.P. School aims to address these issues. The Council has complied with the requirements of the Presumption against Closure of Rural Schools when developing this proposal.

13.6 Suggestion that the Council should visit the school as part of the process

13.6.1	The Cabinet should have visited the school when making such an important decision. I'm aware an offer of a visit was made but this was at extremely short notice when staff had other prior commitments which could not be rearranged.	A visit is being arranged before the Cabinet make their final decision on the proposal to close Llanfihangel Rhydithon C.P. School.
13.6.2	It's a shame that no members of the Cabinet would come out and visit the school despite numerous invitations.	As above. Cllr Phyl Davies and Cllr Aled Davies have both visited the school.
13.6.3	Why has the new Director of Education not been to visit the school?	The new Director of Education will visit the school along with Cabinet.

13.7 Comments about timescales

13.7.1	This process has been hanging over us all since February. And there's every possibility it won't be resolved before February 2022. A whole year!	The Council fully acknowledges that any school reorganisation process leads to a period of uncertainty for the schools and communities involved, and is committed to concluding the process as swiftly as possible in order to minimise this period of uncertainty for those affected.
13.7.2	The process has been delayed by Powys however there has been no delay in the proposed closure date – it seems like there is one rule for one and one rule for another.	<p>All dates provided in the Consultation Document were indicative. Due to the extensive number of consultation responses received, it took longer than expected to complete the Consultation Report, which resulted in a delay.</p> <p>The Council aims to provide a least a term's notice of any proposal to close a school. The Council aims to conclude this process in February 2022, which would still provide more than a term's notice before the proposed closure date of September 2022.</p>
13.7.3	When issuing the Statutory Notice, an extra 2 weeks were taken, and there was no courteous explanation as to what the delay was.	It is correct that the Council originally planned to publish the Statutory Notice on the 7 th October 2021. It was eventually not possible to publish the Notice on that date due to internal issues, however the Notice was published two weeks later, on the 21 st October 2021.

13.8 Comments about potential legal challenge

13.8.1	The school is fully committed to fighting this proposed closure, including undertaking a legal challenge. As a Powys council tax payer I don't want any of my hard earned wages	Comment noted.
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	going to fund a legal battle which Powys has no chance in winning.	
13.8.2	If the closure goes ahead and the school takes up a legal challenge against Powys CC, I'm assuming that the cost of defending this case would be far greater than the savings of the original decision.	Comment noted.
13.8.3	It seems beyond doubt that incorrect and partial financial information has been put to members who made requests to officers for explanation and clarification of the patently incorrect figures before the decision to close the school was made, but has been withheld. This appears to be a matter of maladministration which if this closure proceeds, would be open to judicial review.	<p>It is not true that 'incorrect and partial financial information' has been provided.</p> <p>Responses to specific queries regarding the financial information provided which were received in the consultation responses received were provided in the Consultation Report, and responses to specific financial queries received in the Objections are provided in section 12 of this Objection Report.</p>

13.9 Other queries relating to the process

13.9.1	Is there a reason that you did not name a receiving school?	<p>The Council's home to school transport provides free home to school transport to a pupil's closest school. Had the Council named a receiving school, it would have been required to transport pupils to either the receiving school or their closest school, which would have a cost implication.</p> <p>In the past, the Council has named receiving schools in respect of proposals to close schools, however parents have chosen for their pupils to transfer to a range of alternative schools.</p>
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13.9.2	Why has no support been given to staff and pupils during this time and why has there been no community engagement? Whilst it's recognised that face to face meetings have not been allowable, virtual meeting have.	The School Organisation Code does not require local authorities to carry out consultation meetings as part of school reorganisation proposals. However, virtual consultation meetings with staff, governors and pupils were held as part of the process. Whilst no meeting was held for the community, the high level of responses received to the consultation suggests that the community were able to engage with the process.
13.9.3	Have the governors and parents of Crossgates School been involved at all in this consultation?	Information about the consultation was provided to stakeholders associated with Crossgates C.P. School.

14. COMMENTS ABOUT MEETINGS WHICH HAVE TAKEN PLACE AS PART OF THIS PROCESS

14.1 Comments about Cabinet meetings which have taken place as part of this process

14.1.1	Out of the 73 elected members, only 6 were involved in the decision to proceed with closure. A far impacting decision such as a school closure surely deserves a more democratic approach - this is a cause for major public concern!	The constitution of Powys County Council outlines the democratic structures of the Council, which includes a Cabinet. The Cabinet has the authority to make decisions on a number of matters, including school reorganisation proposals.
14.1.2	The second decision was made by a Cabinet of 7 people, 2 of whom abstained. So 5 people made this decision. These people know nothing – or very little – of the strong community that is Dolau and the heartbeat of that community which is Llanfihangel Rhydithon Primary School.	As above. Local members for the affected schools have the opportunity to speak at Cabinet meetings, which ensures that Cabinet members hear the views of people in the local area. In addition, the Consultation Report in respect of Llanfihangel Rhydithon C.P. School was considered by the Learning and Skills Scrutiny

		Committee, who made recommendations for consideration by Cabinet, ensuring that a wider cross-section of councillors were part of the decision making process.
14.1.3	How can such life changing decisions, not only for the children's future education but also for those employed in the schools, be made and passed only through the cabinet? Surely such influential decisions need to be discussed with councillors from across the county so all viewpoints of the county and the constituents can be heard.	The decision was made in accordance with the Council's structures. The Cabinet members considered the Consultation Report and Impact Assessments when making the decision to proceed with the proposal.
14.1.4	Could you confirm the knowledge base and area of expertise from an educational background that the 6 councillors making the decisions have to enable them to make such major life changes for the children and the community of Dolau.	Cabinet members are not required to have an educational background. As well as the Cabinet members, education officers were in attendance at the Cabinet meeting to provide specialist information relating to the proposal.
14.1.5	Having two Cabinet members abstaining from the discussion and both being representatives for our area means that we were not fairly represented.	It is true that two Cabinet members declared an interest in the proposal in respect of Llanfihangel Rhydithon C.P. School, therefore were not part of the meeting. This was their choice. Whilst these are two members that represent wards in Radnorshire, their role is not to represent the ward in which Llanfihangel Rhydithon C.P. School is located. The local member for Llangunllo spoke at the Cabinet meeting, ensuring that Cabinet members hear the views of people in the local area.
14.1.6	The action of the six cabinet members of Powys County Council to close the school is an act of discrimination. The six cabinet members represent wards in the counties of Breconshire and Montgomeryshire and they have therefore	The members of Cabinet are required to consider proposals and make decisions for the benefit of all Powys residents, regardless of the area of Powys in which they live.

	acted in a discriminate way against children of the county of Radnorshire.	They have not acted 'in a discriminate way' against children of the county of Radnorshire. The Cabinet have also agreed to proceed with proposal to close schools located in both Montgomeryshire and Breconshire.
14.1.7	Cabinet totally disregarded the Scrutiny committee's recommendation, although the Scrutiny Chair spoke to the meeting.	The Cabinet received a copy of Scrutiny's recommendations in respect of this proposal and listened to the Scrutiny chair at the meeting. Having considered the points made, they decided to proceed with the proposal.
14.1.8	The Cabinet had already made up their mind before the Scrutiny panel and this was clear to see when it went to Cabinet. It was astonishing to watch the speed of which the decision was made in the Cabinet meeting, the main areas were not looked at, the Cabinet simply focused on the Welsh aspect rather than looking at federation which has been working well for over 6 years now.	Cabinet had received the Consultation Report and associated papers well in advance of the meeting as per the usual requirements, and their decision to proceed with the proposal was made having considered these papers and the comments made in the meeting by the Scrutiny Chair and the Local Member. The 'Welsh aspect' was raised by the Chair of Scrutiny, and Cabinet members voiced their views in response to this.
14.1.9	Following the Cabinet meeting, it feels as though the whole process was merely a tick box exercise where the well-argued objections of consultees and questions and comments of the local member were totally disregarded or merely brushed aside as of no consequence.	Cabinet had received the Consultation Report and associated papers well in advance of the meeting as per the usual requirements, and their decision to proceed with the proposal was made having considered these papers and the comments made in the meeting by the Scrutiny Chair and the Local Member.
14.1.10	The meeting when you publicly discussed the closure was obviously a foregone conclusion, as there was no debate about the reasons to keep it open.	As above.

14.1.11	<p>During the Cabinet meeting of 28th October, the local member asked for an explanation as to why there were discrepancies between the reported savings at different parts of the consultation documentation, no explanation was given.</p>	<p>There are no discrepancies in the reported savings at different parts of the consultation documentation.</p> <p>The estimated annual saving following closure of the school which was reported in the consultation document was £59,000. However, given that the proposal is to close the school in September 2022, the annual saving would be realised over two financial years, 2022/23 and 2023/24. The impact assessment which was published with the consultation documentation breaks the annual saving down by financial year, stating that £34,416.67 would be realised during the 2022/23 financial year, and £24,583.33 would be realised during the 2023/24 financial year, however the total estimated savings remains the same, £59,000.</p>
14.1.12	<p>It was disheartening to hear the comments made by the Director of Education and other members of Cabinet about small schools during the meeting on the 28th September 2021. To question the capabilities of teachers in small schools openly, in a public forum, came across as an attack on all small school teachers. The query from Aled Davies, finance department I believe, regarding Year 6's preparation and readiness for high school was particularly hard to stomach. I felt thoroughly dejected and deeply saddened as a professional after reading the consultation report and listening to the comments of the cabinet. I can only begin to imagine how hopeless the current teachers and support staff of Dolau feel.</p>	<p>The comments made during the Cabinet meeting were not a criticism of teachers in small schools. The comments were made to outline the challenges of delivering the Curriculum for Wales in a school with only 2 teachers.</p> <p>The comments made regarding the transition of year 6 pupils from small schools to high school were a general observation which was not specific to Llanfihangel Rhydithon C.P. School. This is not one of the reasons for the proposal.</p>

14.2 Comments about the meeting of the Learning and Skills Scrutiny Committee which considered the Consultation Report in respect of this proposal

14.2.1	Powys scrutiny committee said that they were not happy that every option had been investigated by cabinet.	Written responses to Scrutiny's recommendations were included with the papers considered by Cabinet on the 28 th September.
14.2.2	Why did the Cabinet not listen to the Scrutiny panel?	The Cabinet received a copy of Scrutiny's recommendations in respect of this proposal and listened to the Scrutiny chair at the meeting. Having considered the points made, they decided to proceed with the proposal. Decisions are taken by Cabinet, having considered all the information they received.
14.2.3	The Scrutiny Committee are opposed to the closure and are not happy with the procedures carried out. Has the Council taken any notice of this?	As above.
14.2.4	Why have a Scrutiny committee if you do not follow their recommendations?	As above.
14.2.5	I am extremely disappointed that the cabinet chose to ignore the advice of the scrutiny committee.	As above.
14.2.6	The report by the Scrutiny Committee made a strong recommendation to withdraw the proposal, but the Cabinet disregarded the recommendations and totally disrespected the Scrutiny committee.	As above.
14.2.7	It's concerning how quickly the Scrutiny Committee's comments were disregarded regarding federation and becoming a Welsh Medium School.	As above.
14.2.8	The council has seemingly ignored the recommendation of the Learning and Skills Scrutiny Committee that there should be a delay in going ahead with closure while consideration is	As above.

	given to making Dolau School integral to the Council's own Welsh Language policy.	
14.2.9	The scrutiny committee posed many questions and reported back to the cabinet with serious concerns and areas they felt had not been explored to the full, including federation and Welsh language provision. To have a clear process in place, but to ignore the findings of that process is not following it correctly or legally.	As above.
14.2.10	The Scrutiny Committee recommended a delay to discuss formalising the federation between Dolau and Llanelwedd Church in Wales School, and this was also dismissed without further consultation despite the arrangement having been in place for over six years and ignoring an expressed willingness by the Diocese of Swansea for Dolau to become a Church in Wales school which would make the federation easy and quick.	<p>As above.</p> <p>The process to federate the two schools would not be 'easy and quick'. To become a Church in Wales school, a new statutory process would need to take place to close Llanfihangel Rhydithon C.P. School and reopen the school as a new Church in Wales school. The change in the school's category alone would not address the issues outlined in the Consultation Document, and it would not be a good use of officer time to carry out the process solely to enable the school to become a Church in Wales school so that it could federate with Llanelwedd C. in W. School.</p> <p>If the Council did carry out this process, a further process would then be required to establish a formal federation between the two schools.</p>
14.2.11	The Cabinet rejected the Learning and Skills Scrutiny Committee's recommendation to further investigate the potential to introduce Welsh-medium provision without any additional research.	The option to develop Welsh-medium provision at Dolau was suggested during the consultation period. Therefore, an assessment was carried out on options for establishing a Welsh-medium and dual-stream school in Dolau, and this is included in the Consultation Report. This assessment complies with the

		<p>requirements of the School Organisation Code in terms of assessing ‘alternative reasonable options’, which considers the impact on the quality and standards of education, impact on the community and impact on travel.</p> <p>Developing Welsh-medium provision in Dolau was also discussed extensively at the meeting of the Learning and Skills Scrutiny Committee held on the 22nd September 2021, and at the Cabinet meeting held on the 28th September 2021.</p> <p>The Council is fully committed to developing Welsh-medium provision in Powys and to the actions outlined in its Welsh in Education Strategic Plan. However, the Council’s view is that developing Welsh-medium provision in Dolau would not meet the Council’s aspirations, as it would not be a location that is easily accessible compared to developing provision in areas where there is a larger population e.g. Llandrindod Wells.</p>
14.2.12	<p>It was recommended by Scrutiny, that there should be a delay in Cabinet taking a decision to close the school as Llanfihangel Rhydithon School as it is the only school in East Radnorshire that has a Cylch (Welsh Language Pre-School Setting.) There is a defined need for further examination of the proposal that Llanfihangel Rhydithon School could be considered as the dual language or Welsh medium school for the area in line with the emerging PCC Schools Welsh Language policy.</p>	<p>As above.</p>

14.2.13	<p>In my opinion, the meeting of the scrutiny committee on 22nd September was a box ticking exercise for your team. The significant concerns raised by Pete Roberts and the committee were not addressed adequately.</p>	<p>The Cabinet received a copy of Scrutiny's recommendations in respect of this proposal and listened to the Scrutiny chair at the meeting. Having considered the points made, they decided to proceed with the proposal.</p>
14.2.14	<p>Critical mass was repeatedly stated by the Senior Manager at the Education Scrutiny meeting and Cabinet when discussing Dolau School and was the basis of her argument to close our School. However within the Churchstoke report, there is no reference to the fact that there are mixed age classes or the need for critical mass to deliver the Council's Schools Transformation Policy. Transport costs and incorrect financial savings to Powys County Council do not appear to have been considered or deemed relevant, ignoring all the factually correct evidence given by Dolau governors, residents and parents. Surely this needs to be given the proper consideration it deserves or be deemed irrelevant as it has been with the Churchstoke proposal and stop the process to close of Dolau School as well.</p>	<p>References to needing a 'critical mass' were linked to the suggested option to develop Welsh-medium provision at Dolau and not as a reason for closing the school.</p> <p>In the consultation document issued in respect of the proposal to close Churchstoke C.P. School, 'Combined age classes' is listed as one of the reasons why change is needed in Churchstoke, this is in-line with the consultation document issued in respect of the proposal to close Llanfihangel Rhydithon C.P. School.</p> <p>The content of a consultation report is based on the consultation responses received. If respondents do not comment on mixed age classes in their consultation response, this would not be considered in a consultation report.</p> <p>The Council has not 'ignored all the factually correct evidence given by Dolau governors, residents and parents.' The issues raised in the consultation responses are listed in the consultation report, which was considered by Cabinet when determining whether or not to proceed with the proposal. All costs are estimated and the financial information is correct based on the latest position at the time.</p>

14.2.15	I like many other members of the community watched the Zoom meeting that took place on 28th September and could not believe that the portfolio holder for education could clearly be seen wearing a seatbelt and bobbing up and down in a vehicle whilst chairing a meeting that was going to be life changing for so many people in our community. I do not want to enter into the debate about whether he was or wasn't driving...but I just thought it showed a total disregard and quite frankly absolute disrespect to all of the people in Dolau that have over the years worked so hard to support their little school.	This allegation has been investigated by the police and no evidence was found that the Portfolio Holder was driving at the time.
14.2.16	Mr Davies appeared in the Zoom meeting to be wearing his seatbelt and bouncing along, I have since read that there was an investigation carried out and there was no case to answer. I look forward to being sent the full documentation of that investigation as I understand Mr Davies is involved with a company transporting school children. I am looking for the proof that he wasn't guilty!	As above.
14.2.17	Cllr Phyl Davies didn't even see fit to be in attendance at the Learning and Skills Committee Meeting (apart from a fleeting "cameo"). This shows his nonchalant attitude to our community – this was a really big deal for our community.	Cllr Phyl Davies was in attendance at the meeting, however he did not appear on the screen all the time. The role of Cabinet members in these Scrutiny meetings is to listen rather than contribute.

15. COMMENTS ABOUT DOCUMENTATION

15.1 Comments about the consultation documentation

15.1.1	There is no new data in the consultation document compared with the 2016 document. I feel that you have used data from 2019 to base your assumptions for the future. No business would ever use historical data, why would the leaders of our county?	The data sources within the Consultation Document are referenced and this was the most up-to-date information available at the time of writing. The Welsh Government's School Organisation Code states the information that needs to be published in a consultation document – this includes both historical and forecasted pupil numbers.
15.1.2	In the SWOT analysis, there is not a single threat in the preferred option, yet there is at least one in every single other option, I would say there are many threats that you have missed out, including, the mental health of the children.	The Council has recognised the potential impact on pupils' wellbeing from the closure of Llanfihangel Rhydithon C.P. School within the draft Impact Assessment.
15.1.3	Risks and impacts – your documents do not adequately address all risks of this process if it is continued.	The Consultation Document and impact assessment document outline the risks identified in respect of the proposal from the Council's perspective at the time of writing. Any additional risks / impacts outlined during the consultation period were included in the Consultation Report which was considered by the Council's Cabinet when determining whether or not to proceed with the proposal.

15.2 Comments about the consultation report

15.2.1	Many of the comments were only responded to with comment noted. This was proof that it didn't matter what points we all made as they were just being ignored once again.	All comments received during the consultation were considered by the Council's Cabinet when determining whether or not to proceed with the proposal.
15.2.2	There were several comments which were not addressed fully an instead were left with a 'as above' comment. These questions and queries by the public were not given a full response.	A number of similar comments were made, for which the local authority's response was the same. Instead of repeating the same response each time, the Council used 'as above' to refer to an earlier response.

15.2.3	To say the consultation responses were fully addressed is a complete lie given the number of points that were left unanswered.	As above. No points in the consultation report were left unanswered.
15.2.4	Throughout the document the words 'as above' appear just under 700 times, the council clearly could not be bothered to respond to the comments made by the people of Dolau and just wrote this instead. How does this show the people of Dolau and the county that the council care what the people have to say?	As above. It is not true that the council 'could not be bothered to respond to the comments made by the people of Dolau.' The Council produced an extensive 372 page consultation report which outlines the comments received during the consultation period. This report, and the issues outlined in the report, were considered by the Council's Cabinet when determining whether or not to proceed with the proposal to close the school, as well as updated versions of the impact assessments which reflected feedback received during the consultation period.
15.2.5	The consultation report failed to respond to many of the concerns raised. Writing "comments noted" or providing a short response based purely on personal opinion, with no evidence base or relevant reference, is not an adequate response. Surely responses to concerns raised in consultation must be based on evidence, investigation, or research?	Where a comment is noted, the comment does not require a response. The responses to many of the concerns raised were provided by the Council's primary education experts, who responded based on their extensive experience of primary education in Wales and elsewhere, along with their expert knowledge of the new Curriculum for Wales.
15.2.6	Your consultation report responses very simply to major concerns raised by myself, and other members of the school	As above.

	community; the responses provided do not seem to be backed by any research, evidence or rational argument.	
15.2.7	Valid concerns over factual discrepancies have been side stepped or answered with sweeping remarks about transforming the learner experience.	The Council does not agree with this statement.
15.2.8	I submitted a lengthy consultation response and having read the Consultation Report it seems the Council have used a bog standard response to all the objections and issues raised regarding the closure.	It is not true that the Council 'have used a bog standard response to all the objections and issues raised regarding the closure.' The Council produced an extensive 372 page consultation report which outlines the comments received during the consultation period. This report, and the issues outlined in the report, were considered by the Council's Cabinet when determining whether or not to proceed with the proposal to close the school, as well as updated versions of the impact assessments which reflected feedback received during the consultation period.
15.2.9	When looking at the responses to all the points raised by the public in the consultation document PCC have 'comment noted' 44% of the responses. Surely if closure is the only outcome the Council should have a response to all of these concerns raised by the public and cannot proceed when just under half of the points raised remain unaddressed. 56% of public comments were given a response by the council, however not all of these were addressed individually, only 27% were given an individual response. A further 27% were a response of 'as above'. This is a cop out and hasn't fully addressed the point raised.	<p>Where a comment is noted, the comment does need a response.</p> <p>A number of similar comments were made, for which the local authority's response was the same. Instead of repeating the same response each time, the Council used 'as above' to refer to an earlier response.</p> <p>The Council does not believe that the responses provided were 'a cop out' – The Council produced an extensive 372 page consultation report which outlines the comments received during the consultation period. This report, and the issues outlined in the report, were considered by the Council's Cabinet when determining whether or not to proceed with the proposal to close the</p>

		school, as well as updated versions of the impact assessments which reflected feedback received during the consultation period.
15.2.10	The report on the Consultation that took place over Llanfihangel Rhydithon C.P. School seems to have simply acknowledged concerns raised over the potential closure of the school and then gone on to restate Powys County Council Policy.	<p>The Council does not agree with this statement.</p> <p>The Council produced an extensive 372 page consultation report which outlines the comments received during the consultation period. This report, and the issues outlined in the report, were considered by the Council's Cabinet when determining whether or not to proceed with the proposal to close the school, as well as updated versions of the impact assessments which reflected feedback received during the consultation period.</p>
15.2.11	A response given by PCC to concerns on the impact of the children's mental wellbeing was 'The council recognises that any school reorganisation process creates a period of uncertainty for all involved, including children. The council is committed to supporting schools and learners effectively to help them through periods of change. An experienced member of council staff is supporting school learners effectively to help them manage possible changes for learners'. This is a lie. My child has received no support from PCC and the teachers and governors have received no support from PCC. To put this in the document is an absolute mockery – do PCC think we as parents along with teachers and governors are stupid!? Just because you put down in words what you should be doing, doesn't mean you are. There were 77 responses about the concerns of children's mental health. Only 2 of these were noted. The others were	<p>The response provided in the Consultation Report is not 'a lie'.</p> <p>The Council has recognised throughout the process that any school reorganisation process creates a period of uncertainty for all involved, including children.</p> <p>As indicated in the Consultation Report, the Council is committed to supporting schools and learners, including through periods of change. An ex headteacher who works for Powys and has experience of receiving pupils from a school that closed has visited the school to talk to the pupils about the process and answer their questions. In addition, school staff and other staff from the schools service are available to support pupils as</p>

	<p>simply palmed off with the above statement. PCC has failed to address the concerns, given what a change and the impact the closure will have on the children and their families.</p>	<p>required, including members of the Education Psychology service.</p> <p>It is also expected that school governors, staff and parents support the children to ensure that there isn't a detrimental impact on their well-being. Because the school staff know the pupils very well, they are best placed to provide support to pupils and have been doing so throughout the process, arranging activities to support pupil well-being.</p>
15.2.12	<p>The consultation response document has failed to recognise the strengths offered by our village school – the high-quality education it offers, the well-maintained site on which this is delivered, the amazing resources that fill each classroom and the wonderful links it holds with its community which firmly ensures our school breathes your council's vision of 'Strong communities in the green heart of Wales'.</p>	<p>In the 'Issues raised during the consultation period' tables from page 33 of the Consultation Report, the first section is entitled 'Comments about Llanfihangel Rhydithon C.P. School'. This section is over 50 pages long, and lists many strengths offered by the school which were included in the consultation responses received.</p>
15.2.13	<p>Many responses refer to the community impact assessment which clearly show a huge detriment to the local community. This should be enough to show that the school should remain open if closing can have such a huge negative impact.</p>	<p>The Council fully acknowledges the potential impact of the proposal on the community. The impact on the community was considered in the Consultation Document and the impact assessments. In addition, concerns about the proposal's impact on the community which were raised during the consultation period are outlined in the Consultation Report. The impact assessment document was updated to reflect these concerns, and the updated document was considered by Cabinet, along with the Consultation Report, when considering whether or not to proceed with the proposal.</p>

15.2.14	<p>In the consultation report, it states that Llanfihangel Rhydithon CP School would not be suitable to collaborate, federate or form an arrangement. Not once did the education team contact the governors to discuss forming one of the above partnerships with ANY of the neighbouring schools. This has been dismissed without any conversation and we have been classed as a stand-alone school!</p>	<p>Llanfihangel Rhydithon C.P. School is a 'stand-alone school', however it has been acknowledged throughout that the school is part of a long term shared headteacher arrangements with Llanelwedd C. in W. School.</p> <p>Following Cabinet's decision in 2016 not to proceed with the previous proposal to close the school, discussions about the school's future took place with a number of schools, to explore opportunities for further collaboration or a more permanent arrangement. The outcome of these discussions was for Llanfihangel Rhydithon C.P. School to continue as a standalone school, sharing a headteacher with Llanelwedd C. in W. School.</p> <p>Options to federate and merge Llanfihangel Rhydithon C.P. School with either Llanbister C.P. School or Crossgates C.P. School were considered when developing the current proposal, and the option to federate with Llanelwedd C. in W. School was considered in the Consultation Report.</p>
15.2.15	<p>As stated in many consultation responses, there are many inaccuracies within this consultation which should be addressed before even considering closure of this excellent, green and very enthusiastic school, at the heart of a this very vibrant young community, which would have its heart ripped out if our school were to close.</p>	<p>The Consultation Document was based on the most up-to-date information available at the time of writing, and was written in accordance with the requirements of the Welsh Government's School Organisation Code.</p>
15.2.16	<p>The consultation report had many inaccuracies and misleading information.</p>	<p>As above.</p>

15.3 Comments about Estyn's consultation response

15.3.1	Estyn's comments reflect concerns, only being prepared to say that the process has "considered appropriately a range of options".	The Council does not consider that Estyn's statement that 'the proposer considered appropriately a range of other options against the status quo' is a negative statement.
15.3.2	Estyn's report, which was commissioned by Powys County Council itself, clearly states that there are no benefits to the closure.	Estyn's response to the consultation was not 'commissioned by Powys County Council'. The School Organisation Code identifies Estyn as a stakeholder for all school reorganisation proposals, and requires all local authorities to provide information to Estyn in relation to all proposals. The School Organisation Code also requires local authorities to include Estyn's consultation response in their consultation report.
15.3.3	I don't believe that Estyn were informed of the updated information in respect of early years provision prior to being asked to respond to the consultation. They did not seem to be aware of our Cylch Meithrin or any pre-school on site, and seemed to be commenting on the original information, rather than factual information. Perhaps this suited your cause better to give them the information that you wanted them to comment on, rather than all the facts.	The Consultation Document, which was the basis of Estyn's consultation response, does state that Cylch Meithrin Dolau meets on the school site. During the consultation, it became apparent that this is funded provision and that the setting has been registered with CSSIW. This information was not shared with Estyn prior to receiving their response to the consultation. However, the information was included in the consultation report, a copy of which was sent to Estyn.

15.4 Comments about the Statutory Notice

15.4.1	The reasons for closure outlined in the Statutory Notice are either untrue, misleading or deceptive.	The reasons for the proposal which are listed in the Consultation Document and the Statutory Notice are the reasons for the proposal to close the school from the Council's perspective.
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		Whilst a number of comments were received in the Objections suggesting that the reasons for closure were incorrect, the Council's view is that the reasons for closure which are listed in the Statutory Notice are valid.
15.4.2	The points listed as reasons for closure are wrong.	As above.
15.4.3	The statutory notice states that the proposal will "enable pupils to attend larger schools which could provide a wider range of educational and extra-curricular opportunities." No evidence has been provided to validate this statement and it is notable that the local authority is unable to state that the proposal would enable pupils to attend larger schools which would provide a wider range of educational and extra-curricular opportunities which would suggest to me that the local authority does not have full confidence that the proposal will provide the increase in educational and extra-curricular opportunities it so describes.	<p>Llanfihangel Rhydithon C.P. School is the smallest school in the Ysgol Calon Cymru catchment area. All of the alternative schools pupils would be likely to transfer to should the school close are larger schools, therefore the statement that pupils would 'attend larger schools' is correct.</p> <p>Whilst acknowledging the range of opportunities available to pupils at Llanfihangel Rhydithon C.P. School and the comments received throughout this process suggesting that it is not always the case that all pupils in larger schools can access all activities available, larger schools have more staff and more pupils, therefore the expectation would be that larger schools would offer a wider range of academic activities that further embed the four purposes and include more age appropriate activities due to larger numbers to make the offer more viable and more staff expertise.</p>
15.4.4	The statement in the Statutory Notice that the proposal 'meets all of the Critical Success Factors' is incorrect – not all avenues have been explored suggesting that the proposal does not meet the Critical Success Factors – the Scrutiny	The statement that the proposal 'meets all of the Critical Success Factors' relates to the assessment of a number options against a number of 'Critical Success Factors' when developing the proposal. This assessment was included in the Consultation Document.

	<p>recommendation that Federation and Welsh language option is further explored has been ignored.</p>	<p>The Critical Success Factors were as follows:</p> <ol style="list-style-type: none"> 1 – Strategic fit and business needs 2 – Value for money 3 – Potential achievability 4 – Potential affordability <p>The option to close Llanfihangel Rhydithon C.P. School was identified as the Council's preferred option following this exercise.</p> <p>The Council has considered a number of options when developing this proposal. Federation options were considered in the Consultation Report, and the option to develop Welsh-medium provision at Llanfihangel Rhydithon C.P. School was considered in the 'Further Assessment and Conclusion' section in the Consultation Report prepared in respect of this proposal.</p>
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15.5 Other comments about documentation

15.5.1	<p>The use of the word 'could' appears a lot in your report on why you intend to close the school, no hard facts.</p>	<p>As the proposal has not been implemented, it is not possible to be completely certain of the outcome, therefore the word 'could' is used.</p>
15.5.2	<p>We need to see evidence of the plus sides of closure, you have not even provided evidence of financial savings, let alone evidence of better educational standards or accessible extra-curricular activities in schools with lesser attainment levels.</p>	<p>Estimated financial savings were included in the Consultation Document, as well information about the quality of education at the alternative schools.</p>

		<p>The Council has recognised within the draft Impact Assessments that it may be challenging for pupils to attend after-school activities if they are reliant on home-to-school transport. However, schools are able to offer extra-curricular activities during the school day as well as after school. It would be an expectation of the new curriculum that schools provide additional experiences for their pupils.</p> <p>Many schools in Powys have pupils who are using home-to-school transport and these schools are experienced in ensuring that all pupils are able to participate in extra-curricular activities. Schools are able to work with families to provide an appropriate level of extra-curricular activities for pupils, including clubs within the school day, shared transport with other parents etc.</p>
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16. COMMENTS ABOUT OTHER PROPOSALS

16.1 Comments about previous proposals in respect of Llanfihangel Rhydithon C.P. School

16.1.1	It is only a few years since Dolau was previously threatened with closure. Why is history repeating itself so soon?	The Council recognises that Llanfihangel Rhydithon C.P. School has been in a school reorganisation process previously in 2016 and recognises that this is an unusual situation. The Council also acknowledges that any school reorganisation creates a period of uncertainty for those affected by the proposal, and that this is exacerbated here as the school has faced two proposals to close within a few years.
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		Following approval of the Council's new Strategy for Transforming Education in April 2020, the Council has carried out a further review of Llanfihangel Rhydithon C.P. School, which has resulted in the current proposal to close the school.
16.1.2	This is the second time you have tried to close this wonderful school in a few years, why?	As above.
16.1.3	It's astonishing that less than 5 years after your last attack on our local rural schools the fantastic school in Dolau once again finds itself at the centre of your pursuit of closure of these wonderful educational facilities.	Comment noted.
16.1.4	This is the third time my family have been through this process whilst we have been involved with Dolau School. Consultations are all consuming, tiring and place a horrendous amount of stress on the community, staff, parents and pupils.	Comment noted.

16.2 Comments about the proposal to close Churchstoke C.P. School

16.2.1	Churchstoke School has been saved due to their closure resulting in Powys losing Welsh learners across the border to England. Why are the Council not concerned about losing the Welsh language from Dolau school?	Had the Council proceeded with the proposal to close Churchstoke C.P. School, the closest school for a large proportion of pupils would have been located in Shropshire. Should pupils have transferred to schools in Shropshire, they would no longer have access to the Welsh curriculum. This is not the case in respect of pupils currently attending Llanfihangel Rhydithon C.P. School – the closest alternative school for all pupils currently attending the school is located in Powys.
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16.2.2	Moving Dolau children to other schools in Powys will equally affect the Welsh Language and Culture of Dolau and East Radnor, as Churchstoke children going to schools across the border.	As above.
16.2.3	Given the concerns about the closure of Churchstoke around the Welsh Language and Culture, it is shameful that the only Welsh Language Pre-School Setting in East Radnorshire will close because of this process. Dolau School uses Welsh Language on a daily basis and possibly more than Churchstoke as a border village, Presteigne was highlighted in the Scrutiny meeting as being a border town and difficult to integrate Welsh Language.	<p>The proposal to close Llanfihangel Rhydithon C.P. School would not directly impact the Cylch Meithrin provision at Dolau, however it is acknowledged that closure of the school could impact on the viability of the Cylch Meithrin in the future.</p> <p>Pupils from Cylch Meithrin Dolau transfer to Llanfihangel Rhydithon C.P. School. This is not an English-medium school, so whilst pupils continue to learn Welsh throughout their time at school, generally they do not become fluent in Welsh following their time at the school. Should the school close, they could transfer to other English-medium schools, and would continue to learn Welsh in school/</p> <p>Had the Council proceeded with the proposal to close Churchstoke C.P. School, the closest school for a large proportion of pupils would have been located in Shropshire. Should pupils have transferred to schools in Shropshire, they would no longer have access to the Welsh curriculum, so would not have continued to learn Welsh in school.</p>
16.2.4	Churchstoke School was saved as there are a lot of houses being built there, and the worry was 'where would those children go to school'? There are lots of houses being built within a 10-mile radius of Dolau, but that fact was snubbed by Cabinet. Where will all those extra children be schooled?	The Council is aware that there are housing developments in the area surrounding Llanfihangel Rhydithon C.P. School, however this is on a much smaller scale than the housing developments in the Churchstoke area.

16.2.5	<p>Whilst dealing with the Churchstoke proposal, Cllr Phyl Davies said that “There are also a significant number of housing developments in Churchstoke and the wider area which have the potential to put pressure on school places, as well as a need to improve the condition of the schools’ estate in the area.” “We also received many comments about the potential impact on the Welsh language and culture should parents choose schools in Shropshire instead of a Powys school for their children.” In comparison when taking the decision on Dolau School, the concerns of the Governors, Parents and Community regarding the significant housing developments in Dolau, Llanddewi and Penybont and the increasing numbers of children to the school, incorrect budget figures being used and so on and so on were totally ignored and not given any consideration.</p>	<p>Housing developments in the Dolau area and other concerns raised in the consultation responses received during the consultation period are referenced in the Consultation Report which was considered by Cabinet when determining whether or not to proceed with the proposal to close Llanfihangel Rhydithon C.P. School. However, the housing developments in the Dolau area are on a much smaller scale than the housing developments in the Churchstoke area.</p>
16.2.6	<p>I am extremely pleased by the Cabinet decision to retain Churchstoke Primary School but am total dismayed that there appears to be no consistency, integrity or transparency in the process used by Powys County Council.</p>	<p>It is not true that there has been ‘no consistency, integrity or transparency in the process used by Powys County Council’ when comparing the Council’s decision not to proceed with the proposal to close Churchstoke C.P. School and the Council’s decision to proceed with the proposal to close Llanfihangel Rhydithon C.P. School. The same process was followed during both proposals, and the issues raised in the consultation responses received were considered when determining whether or not to proceed. The issues raised in the responses in respect of the proposal to close Churchstoke C.P. School raised significant concerns about certain aspects, therefore the Cabinet decided not to proceed with this proposal.</p>

16.2.7	It is also stated that there is a need to improve the school building at Churchstoke, but Powys County Council have rated Dolau School as a good building and there is no financial implication to Powys County Council to retain the building. Whereas it is suggested that funding will be spent on Churchstoke school. Again, there is no clear rationale for the differing approach?	<p>The Council has a duty to maintain its schools estate. All schools will be supported if there are repairs and maintenance issues.</p> <p>Having considered the Consultation Report in respect of Churchstoke C.P. School, the recommendations agreed by Cabinet were as follows:</p> <ul style="list-style-type: none"> • To receive the Consultation Report in respect of the proposal to close Churchstoke C.P. School • To end the current process in respect of closing Churchstoke C.P. School • To further consider options to address issues identified in respect of the school <p>There was no commitment to spend any money on Churchstoke School.</p>
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17. COMMENTS ABOUT THE COUNCIL'S STRATEGIES

17.1 Comments about the Council's Transforming Education Strategy

17.1.1	I applaud the Council in its ambition to transform learner experience, but in Dolau's case this will be levelling down, not levelling up or even just levelling, diminishing the learner experience.	The Council's Strategy for Transforming Education in Powys, which was developed following engagement with stakeholders, identifies a number of challenges relating to education in Powys, which include 'High proportion of small schools' and 'High number of surplus places'. The proposal in respect of Llanfihangel Rhydithon C.P. School aims to address these issues.
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		<p>The Council's aim is to ensure the best possible education for all Powys learners, and to increase equity across the county.</p> <p>The Council does not have any concerns over the quality of education provided at any of the alternative schools and believes that pupils will not be disadvantaged should the proposal be implemented. All the alternative schools are regarded as 'self-improving' schools, according to the latest National Categorisation in 2019.</p> <p>Estyn, in its response to this consultation, has concluded that 'It is Estyn's opinion that the proposal is likely to at least maintain the current standards of education in the area.'</p>
17.1.2	By all means transform the learner experience provided that transformation is an upgrade. I see no possibility that improvement can be achieved in this case.	As above.
17.1.3	A proposal to close a recognisably successful village school to "reduce the Councils overall surplus capacity in primary schools" seems at odds with PCC own policy statement - "We want the best for all our learners, and I believe that this strategy will see us deliver a legacy that will allow learners to thrive and reach their potential and compete with the rest of the world."	As above.
17.1.4	I read the 2020 Transforming Education in Powys, case for change document – were parents actually consulted? And past pupils of 'small rural schools'?	<p>During the autumn term 2019 and the spring term 2020, the Council carried out two phases of engagement as part of its Strategic Review of Education in Powys.</p> <p>During the autumn term 2019, the Council engaged with a number of stakeholders, including headteachers, governors, school staff, county councillors, Schools</p>

		<p>Service staff and town and community councils, to identify the challenges facing education in Powys. This engagement exercise included sharing data about the Powys schools infrastructure.</p> <p>Based on the findings of this exercise, the Council prepared a Case for Change document, which outlines the key challenges facing education in the county. The case for change and a draft document outlining the vision for education in Powys were considered and approved by the Council's Cabinet in January 2020. The Cabinet approved carrying out further engagement on the vision document.</p> <p>Between February and March 2020, the Council carried out a second period of engagement on its emerging vision and guiding principles for education in Powys. This was a public engagement period, during which a total of 478 individuals completed the engagement questionnaire and 124 written responses were received.</p> <p>The vision document was updated based on the feedback received during the engagement period, and evolved to become the 'Strategy for Transforming Education in Powys 2020-2030.'</p>
17.1.5	The County Council needs to finalise and instigate its Transforming Education Strategy in relation to the Secondary Schools in Powys, whilst in tandem completing and publishing phase 2 of this Strategy in relation to its review of Primary and Early Years provision. This will allow a more	Since the 'Strategy for Transforming Education in Powys 2020-2030' was agreed, the Council has been taken forward a number of proposals and other developments in order to implement the strategy. These have included proposals affecting primary provision, secondary provision, Welsh-medium provision and other

	joined up and comprehensive approach to the whole subject of Education in Powys.	<p>developments in respect of additional learning needs provision.</p> <p>This is a long term Strategy, and activity will continue over a number of years. However, the Strategy does provide a 'joined up' approach.</p>
17.1.6	You are showing Powys residents that school closures are an easy option to appear as though you are taking action to combat a larger problem with your finances. The decision to close schools should not solely come down to cost but also the standard of education.	<p>The Council does not believe that school closures 'are an easy option'. The Council's Strategy for Transforming Education 2020-2030 identifies a number of challenges relating to education in Powys, which include 'High proportion of small schools' and 'High number of surplus places'. The proposal in respect of Llanfihangel Rhydithon C.P. School aims to address these issues. The Council's aim is to ensure the best possible education for all Powys learners, and to increase equity across the county.</p> <p>Since the 'Strategy for Transforming Education in Powys 2020-2030' was agreed, the Council has been taken forward a number of proposals and other developments in order to implement the strategy. These have included proposals affecting primary provision, secondary provision, Welsh-medium provision and other developments in respect of additional learning needs provision.</p>
17.1.7	There are several schools with similar numbers to Llanfihangel Rhydithon C.P. School, however they are not being targeted – why?	The Council will be reviewing all its schools over time.

17.2 Vision 2025

17.2.1	The decision contravenes the Powys County Council Vision 2025, the strategic corporate improvement plan for Powys with clear objectives for; strengthen learning and skills, support our residents and communities and a vibrant economy. Under strengthen learning and skills, Vision 2025 states: "Ensuring that Powys children and young people have their learning fulfilled and have their voices heard, valued and acted upon".	The Transforming Education Programme is one of the Council's Vision 2025 programme, and is being taken forward in order to implement Vision 2025. Engagement with pupils took place when developing the Strategy for Transforming Education, and a consultation meeting with pupils was held as part of the proposal in respect of Llanfihangel Rhydithon C.P. School.
17.2.2	Cabinet members have totally disregarded the vision statement set out in Vision 2025, to ensure " that Powys children and young people have their learning fulfilled and have their voices heard, valued and acted upon".	As above.
17.2.3	This type of cost-saving exercise which overlooks the emotional wellbeing of a whole community is directly contradictory to the Council's improvement plan of Vision 2025.	The Council fully acknowledges that any school reorganisation proposals are difficult for the affected communities.

17.3 Towards 2040 – the Powys Wellbeing Plan

17.3.1	On pages 14 and 24 of your 'Towards 2040 – the Powys Wellbeing Plan', you note that more people will move to Powys 'recognising it as a great place to live and raise their families' and that 'Our environment will be valued by residents...for its beauty and the opportunities it offers'. This is wrong – who do you honestly think is going to move into our Powys villages and raise their families, if their communities have no schools?	Whilst the Council is proposing to close Llanfihangel Rhydithon C.P. School, it is not proposing to remove education from the area – provision would continue to be available within a few miles of the village of Dolau, and transport would be provided to enable any children living in Dolau to access this provision.
17.3.2	The future of agriculture depends on attracting young talent by making them realise what a modern, challenging career it can be. These are the skilled, educated farmers of the future.	As above.

	I cannot see how this objective of the 'Towards 2040, the Powys Well-being Plan' is being addressed if Llanfihangel Rhydithon is to close. How do you expect young families to stay in Powys if you close the small primaries schools that are the heart of many communities?	
17.3.3	Objective 1 of 'Towards 2040': People in Powys will experience a stable and thriving economy. It was noted in the report that a quarter of Powys residents have jobs outside the County. With young professionals now coming back to the area, with young children attending Llanfihangel Rhydithon, do we not want to retain this educated skill force within Powys? And retain the future generations of these professionals?	As above.
17.3.4	Objective 3 of 'Towards 2040, the Powys Well-being Plan' stated: People in Powys will be healthy, socially motivated and responsible. It was noted in the report that the Powys we want: <ul style="list-style-type: none"> • More people will move to Powys recognising it as a great place to live and raise their families boosting our school pupil numbers and community capacity • Schools will offer pupils, of all abilities, a more flexible teaching approach ensuring everyone has the best possible school experience, achieves their potential and can move forward with their lives. How do you expect young families to stay in Powys if you close the small primaries schools that are the heart of many communities?	The Council does want to retain young professionals in Powys. As above, should the Council proceed with the proposal, provision would continue to be available within a few miles of the village of Dolau, and transport would be provided to enable any children living in Dolau to access this provision.

17.4 Welsh in Education Strategic Plan (WESP)

17.4.1	Cabinet has only recently approved the Welsh in Education Strategic Plan, and as the option to develop Welsh-medium provision at Dolau was not conscientiously and diligently considered it would seem the Council is undermining its own	The option to develop Welsh-medium provision at Dolau was suggested during the consultation period. Therefore, an assessment was carried out on options for establishing a Welsh-medium and dual-stream school in
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	<p>strategy. Paying lip service to a policy while dismissing opportunities to implement that policy is unacceptable.</p>	<p>Dolau, and this is included in the Consultation Report. This assessment complies with the requirements of the School Organisation Code in terms of assessing 'alternative reasonable options', which considers the impact on the quality and standards of education, impact on the community and impact on travel.</p> <p>Developing Welsh-medium provision in Dolau was also discussed extensively at the meeting of the Learning and Skills Scrutiny Committee held on the 22nd September 2021, and at the Cabinet meeting held on the 28th September 2021.</p> <p>The Council is fully committed to developing Welsh-medium provision in Powys and to the actions outlined in its Welsh in Education Strategic Plan. However, the Council's view is that developing Welsh-medium provision in Dolau would not meet the Council's aspirations, as it would not be a location that is easily accessible compared to developing provision in areas where there is a larger population e.g. Llandrindod Wells.</p>
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17.5 Reference to 'Strong Communities in the Green Heart of Wales'.

17.5.1	I am astonished to learn that you are continuing with the proposal to close Llanfihangel Rhydithon CP School, especially given the vision you promote – strong communities in the green heart of Wales.	Comment noted.
17.5.2	Was Powys' old strap line not 'strong communities in the green heart of Wales'? Well, that is exactly what you will not	Comment noted.

	have if you continue on this path, no communities and a less 'green' county.	
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17.6 One Powys Plan

17.6.1	The One Powys Plan talked about protecting and promoting sustainable communities, you don't need to do that in Dolau, we already have that and need to ensure that is not in any way jeopardised.	Comment noted.
17.6.2	If you close this school, the Dolau community will breakdown, putting further pressure on PCCs resources by having to have help from the One Powys Plan and your community champions.	Comment noted.

18. CRITICISM OF THE COUNCIL

18.1 Criticism of county councillors

18.1.1	How can the portfolio holder be independent regarding education in the county when his bus company directly benefits from taking pupils to school. Perhaps this is the sole reason for being a councillor?	All councillors are required to declare an interest if they would benefit financially from the proposal. The portfolio holder for education would not benefit financially from this proposal, therefore he was not required to declare an interest.
18.1.2	The biggest winners financially in school closures are the transport contractors – this caused the Portfolio Holder for Education a real conflict of interest.	The Portfolio Holder for Education does not have a conflict of interest in respect of this proposal.
18.1.3	If you are a director of a bus company which will benefit from a proposed school closure such as Dolau you wouldn't hesitate in closing the school. I have written a letter to the ombudsman wanting an explanation about Councillor Phyl Davies and his conflict of interest in Celtic Travel.	The Portfolio Holder for Education would not benefit financially from this proposal.

18.1.4	Being portfolio holder for property and for education is a conflict of interest.	Being portfolio holder for property and for education is not a conflict of interest.
18.1.5	Cllr Phyl Davies publicly states that he is not an expert about education and this is the man leading you to close these valuable smaller schools.	The proposal to close Llanfihangel Rhydithon C.P. School has been developed by officers in accordance with the requirements of the School Organisation Code.
18.1.6	Why are there no schools in the Cabinet members areas up for closure?	<p>The proposals that have been taken forward over the last 18 months have been developed by officers based on the priorities outlined in the Transforming Education Strategy.</p> <p>Consultation took place on proposals to merge three schools in the Brecon area, one of which was in the ward of a Cabinet member.</p> <p>In addition, Cabinet approved for consultation to start on proposals in the Llanfyllin area, which would affect the ward of a Cabinet member. However, due to complexities with building works required in order to facilitate the proposal, it was not possible for these consultations to take place.</p> <p>Other proposals to change the language category of a school and to establish an all-age school have been taken forward which have been in the areas of two other Cabinet members.</p>
18.1.7	I am saddened to learn that my local councillor for my area, Llanbadarn Fynydd has not represented the community in her decision to vote to close the Dolau school.	In the Cabinet meeting held on the 28 th September 2021, the local member for Llanbadarn Fynydd declared a personal and prejudicial interest in the item relating to

		Llanfihangel Rhydithon C.P. School, therefore she did not take part in this item.
18.1.8	I am disappointed at the way our councillors for Radnorshire have acted in this matter. The Councillor for Llanbister was I believe involved in adding a further classroom to increase the capacity at Llanbister in the summer holidays then abstained when it came to the crunch for Dolau. I understand that one of her main reasons for standing for the Council was to fight for rural schools when Llanbister was under threat. Do her reasons for Keeping Llanbister open not apply to Dolau. Our Councillor for Presteigne also abstained. If you are not prepared to stand up and be counted for whatever reason don't accept a place on the panel.	In the Cabinet meeting held on the 28 th September 2021, the local member for Llanbister and the local member for Presteigne declared personal and prejudicial interests in the item relating to Llanfihangel Rhydithon C.P. School, therefore they did not take part in this item.

18.2 Criticism of Council officers

18.2.1	I am led to believe that when the new Chief Executive took over the role, she was openly surprised at the amount of Primary Schools in the County. It had apparently seemed that her own personal experiences of small schools decades ago, were that small clusters of children going up to Secondary School, were not blessed with skills and experiences that the larger schoolchildren had. This feels to me as if the culture has been dictated by this previous experience, and others are following her ill-informed directives to further themselves.	<p>The current proposal in respect of Llanfihangel Rhydithon C.P. School has been developed in order to implement the Council's Strategy for Transforming Education, which aims to address the current inequity facing Powys schools.</p> <p>The process has been carried out in accordance with the requirements of the School Organisation Code, and the issues raised during the consultation period were taken into consideration by the Cabinet when determining whether or not to proceed with the proposal.</p>
18.2.2	Throughout the entire consultation process the team has shown an arrogance and contempt towards the School and the community which even for Powys is an all time low.	The consultation process has been carried out in accordance with the requirements of the School Organisation Code.

18.2.3	For Education Officers to even consider closure says more about their incompetence in their roles, than I can ever express in this correspondence.	<p>The Council has a duty to ensure an efficient schools infrastructure.</p> <p>In response to the findings of Estyn's inspection of Powys Education Services in 2019, the Council started to develop a new Strategy for Transforming Education in Powys, which included engagement with stakeholders. This engagement clearly identified that there are too many schools in Powys, resulting in a lack of equity amongst Powys schools. The current proposal in respect of Llanfihangel Rhydithon C.P. School aims to address this inequity.</p>
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18.3 Reference to Estyn's inspection of Powys Education Services

18.3.1	Powys County Council's education department has been inspected by Estyn and has received a very poor special measures report.	<p>It is true that Estyn's inspection of Powys Education Services which was carried out in 2019 found that the service was 'causing significant concern'. However, a monitoring visit held in October 2021 resulted in the following outcome:</p> <p>'Powys County Council is judged to have made sufficient progress in relation to the recommendations following the most recent core inspection. As a result, Her Majesty's Chief Inspector is removing the authority from the category of local authorities causing significant concern.'</p>
18.3.2	Estyn have told PCC that your issues lie within the secondary sector so why so much emphasis on hard working primary	Estyn's inspection of Powys Education Services included a recommendation to 'Ensure that the organisation of provision for non-maintained, post 16, Welsh-medium

	<p>schools? The Council is ignoring the big problem and choosing the easier routes of targeting small schools.</p>	<p>education and secondary education meets the needs of the children and young people of Powys', as well as a recommendation to 'Improve standards in secondary schools, and especially the performance of more able learners.'</p> <p>In response to the findings of the inspection, the Council started to develop a new Strategy for Transforming Education in Powys, which included engagement with stakeholders. This engagement clearly identified that there are too many schools in Powys, resulting in a lack of equity amongst Powys schools.</p> <p>Since the new Strategy was agreed, the Council has taken forward a number of activities in order to implement the Strategy. Whilst some of these, such as the current proposal in respect of Llanfihangel Rhydithon C.P. School, relate to primary provision, others relate to secondary provision and Welsh-medium provision.</p>
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18.4 Criticism of the Council's use of money

18.4.1	<p>Why is the Council recruiting a Head of Education when they already have a Director of Education? This is insulting to the performance of the Director of Education and the cost would be better spent developing the skills and learning of the children of Llanfihangel Rhydithon School.</p>	<p>In 2021, the Council agreed to create two senior education posts, a Director of Education and Head of Education, following a review of the organisation's senior management structure.</p> <p>The Head of Education will assist the Director of Education and work with the Council's senior leadership team to provide strategic leadership across the Council.</p>
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18.4.2	I have read that Powys County Council are recruiting to the post of Head of Education. This post is not needed when there is already a Director of Education in post. The costs of this superfluous post could be used to offset the £59,000 running costs of Llanfihangel Rhydithon School.	As above. Alongside the Director of Education, the Head of Education will work to improve the provision across all Powys schools. The salaries for these posts are funded centrally, therefore would not impact on the schools delegated budget.
18.4.3	The Council is short sighted, wasteful and dangerous in its use of finances, as shown by the bus pass fiasco.	The Council always strives to provide value for money in the delivery of its services, constantly seeking out cost savings and efficiencies, including service transformation across all service areas. The Council notes the reference to the new bus pass system which has been introduced recently. Feedback from bus operators and users on the new system has generally been very positive.

18.5 Other criticisms

18.5.1	The Council is proposing closure of schools providing the highest of educational standards, but are more than happy to send our secondary school children to a less an adequate educational facility at Ysgol Calon Cymru in Llandrindod Wells. Buildings not fit for purpose, consistent use of supply teachers (even before covid this was a problem) and very vaguely following the curriculum.	The Council fully acknowledges the challenges in respect of Ysgol Calon Cymru, and is currently carrying out an engagement exercise on future plans for the school, which would result in a new building in Llandrindod Wells.
18.5.2	Do you have any idea of the shambles that is Ysgol Calon Cymru, we now have two children who are attending, both absolutely bored stiff as they had a better education and more knowledge transfer in Dolau than in High School. How	As above.

	can you possible write off so much debt in one school, but plan to close a high performing school like Dolau?	
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19. ALTERNATIVE OPTIONS

19.1 Formalise the arrangement with Llanelwedd C. in W. School

19.1.1	Why has the Council not considered an option of a formal arrangements with Llanelwedd C. in W. School? There have been no discussions since 2016.	<p>It is not legally possible to federate a community school with a faith school. The only option would be to close the two schools and reopen as a new school on two sites. During discussions with the governing bodies of the two schools in 2016, there was no appetite to proceed with a formal merger of the two schools.</p> <p>Generally, when considering federating schools, the Council tends to consider schools that are located within the same geographic locality.</p>
19.1.2	Dolau school have been working closely with Llanelwedd CiW school for the last 6 and a half years and have a shared head. Dolau have repeatedly asked for this arrangement to be formalised and the Church in Wales is supportive of the move. Why has Powys not supported this?	<p>Following the previous consultation process in respect of Llanfihangel Rhydithon C.P. School carried out in 2016, paragraph 23 of the paper considered by Cabinet on the 27th September 2016 states:</p> <p><i>'It is recommended that a new report is brought to Cabinet with draft recommendations for Llanbister C.P. School and Llanfihangel Rhydithon C.P. School in accordance with the Schools Reorganisation Policy 2015, which considers the circumstances of the two schools alongside the Authority's aspiration for primary education, which is to have 'headteachers with no classroom responsibilities.'</i></p>

		<p>Following the Cabinet decision, a discussion took place with the governing body of Llanelwedd C.i.W School and other in 2016 about the possibility of a formal merger between both schools, as federations are not permissible between Church and community schools. Llanelwedd C.in.W School felt that the current shared headship arrangement was working well and wished to continue with that.</p> <p>The outcome of this discussion was that officers suggested that a formal partnership agreement was the most appropriate way forward, verified in an email sent from an officer to the Head and Chair on the 21st September 2018, as follows:</p> <p><i>'As you know, we met with you earlier this year to consider options for Llanfihangel Rhydithon CP School, and this included further discussions with other schools that may be willing to formally partner or federate/ merge with the school – the premise of the discussions was PCC's Cabinet's wish to maintain primary provision in Dolau to serve the local community.</i></p> <p><i>This stage has now been completed, and, following consideration of all information received, it would appear that the most appropriate way forward for the school is to formalise the current partnership with Llanelwedd, supported by the rural schools grant.</i></p> <p><i>I understand that you have a governors meeting tonight, therefore it would be good to know the views of your</i></p>
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		<p><i>governing body – I am sure that there are many questions about what a ‘formal partnership’ looks like! We would then be happy to attend a meeting with both chairs and the head to discuss this further.’</i></p> <p>This was clarified in a further email on the 28th February 2018 from an officer to the Chair of Governors which stated the following:</p> <p><i>‘We have no plans currently to federate or merge Llanfihangel Rhydithon and Llanelwedd – the outcome of discussions was that the partnership should continue as it is. However, we are in the process of finalising a Collaborative Partnership Agreement for schools in your position i.e. with shared arrangements. This isn’t a legal document, but it does set out the roles and responsibilities of each party, and helps ‘formalise’ the arrangement to some extent. If this is something both schools would wish to see in place, then I’m sure we could arrange this.’</i></p> <p>However, no further action was taken by either the Council or the two governing bodies in relation to this.</p> <p>Some schools with temporary shared arrangements do have formal agreements in place. However, these are not legally binding, and therefore the arrangement continues to be a temporary arrangement, with the headteacher employed by one school. This means that the school is at risk of instability should either of the governing bodies decide to end the shared arrangement or if the headteacher decides to leave. Therefore, it</p>
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		remains the case that the Council's preferred model for headships is for permanent heads – either for standalone schools or more than one school – as this provides the school with stability and enables the headteacher to plan for the long-term.
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19.2 Federation with Llanelwedd C. in W. School

19.2.1	Federation with Llanelwedd CiW School has not been properly investigated or financially evaluated.	It is not legally possible to federate a community school with a faith school. Generally, when considering federating schools, the Council tends to consider schools that are located within the same geographic locality.
19.2.2	The permanent federation of the school with Llanelwedd C. in W. School has not been explored at all.	As above.
19.2.3	The Council should support the school in a federation with Llanelwedd C. in W. School.	As above.
19.2.4	The Council should be looking to federate Llanfihangel Rhydithon School with Llanelwedd.	As above.
19.2.5	The option of federation with Llanelwedd C. in W. School has been dismissed despite a successful unofficial federation which the Council has supported for the past 6 years.	As above.
19.2.6	The school has been successfully working with Llanelwedd Church in Wales School for over six years. An obvious solution would be to formally federate the two schools to become one school over two sites which would therefore address the issue of low pupil numbers. The partnership between the two schools works well – why change it?	As above.
19.2.7	Federation was encouraged during our last closure process and Llanelwedd School is within our cluster, why try to mend something that is not broken? Governors were open for	As above.

	discussion regarding a formal agreement in 2019 for federating with Llanelwedd but this was not followed through by the Transformation Team after acknowledging they would put this in place.	
19.2.8	I don't believe that you can say with evidence backing this that you have looked federation fully, it was noted during the scrutiny meeting that the council do not see it as a good fit, the main reason being the distance, when in fact there are schools with further millage between them that have been federated all over the country. Both Dolau and Llanelwedd are in the same cluster, and we have often attended training sessions with our fellow members of staff at Llanelwedd throughout my time at Dolau. How can something that has worked so well for the last 6 years now not be seen as an option?	As above.
19.2.9	The school has been working closely with Llanelwedd CofW school for the past six and a half years, according to Estyn "The executive Headteacher provides effective leadership for the school". Governors of both Llanelwedd and Llanfhiangel Rhydithon have put forward plans to federate over this time, only to be ignored by Powys.	As above.

19.3 Federation with another school

19.3.1	Please allow us to federate with another school – not Crossgates. We by-passed Crossgates for many reasons.	Federation with both Llanbister C.P. School and Crossgates C.P. School were considered when developing the current proposal to close the school, however these options did not address the issues identified.
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19.3.2	Llanfihangel Rhydithon was not able to federate with Llanelwedd CW School but there are other local schools that this option could be looked at.	As above.
19.3.3	Federation with other neighbouring schools in the area has not been researched fully.	As above.

19.4 Llanfihangel Rhydithon C.P. School to become a Church in Wales school

19.4.1	The first thing that needs to be done is for Llanfihangel Rhydithon to become a Church in Wales School. Powys have to give permission for this, but for some reason despite being asked many times the Council have not cooperated with this request. So can I politely request that this is done so that a formal federation between the two schools can take place.	In order to become a Church in Wales school, a new statutory process would need to take place to close Llanfihangel Rhydithon C.P. School and reopen the school as a new Church in Wales school. The change in the school's category alone would not address the issues outlined in the Consultation Document, and it would not be a good use of officer time to carry out the process solely to enable the school to become a Church in Wales school so that it could federate with Llanelwedd C. in W. School. If the Council did carry out this process, a further process would then be required to establish a formal federation between the two schools.
19.4.2	The Diocese of Swansea has confirmed they would be willing to move Dolau to a Church of Wales school, enabling official federation with Llanelwedd School. Stating that the two schools could not federate officially now due to Dolau not being a CofW school is a nonsense.	The responsibility for changing a school's religious category lies with local authorities, not the Diocesan authority. The two schools are currently unable to federate as one is a community primary and the other is a church in Wales primary. As outlined point 19.4.1 above, an extensive process would be required to change the category of Llanfihangel Rhydithon C.P. School, and a further process would then be required to federate the two schools.

19.4.3	The Director of Education for the Diocese of Swansea has confirmed that communication with Powys County Council Education Department regarding Llanfihangel Rhydithon CP School becoming a Church in Wales School in order to facilitate Federation, have taken place, yet despite this, the Council are implying that it was unaware that the school was interested in becoming a Church in Wales School.	The Council isn't aware that any communication has taken place with the Diocese of Swansea with regard to Llanfihangel Rhydithon C.P. School becoming a Church in Wales school.
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19.5 Develop Welsh-medium provision

19.5.1	The Parents and Governors of Llanfihangel Rhydithon CP School have always shown their willingness to embrace new opportunities and are now showing a preparedness to progress down the Welsh language continuum to deliver on the Council's Welsh in Education Strategy.	The alternative option to develop Welsh-medium provision at Llanfihangel Rhydithon C.P. School was considered in the 'Further Assessment and Conclusion' section in the Consultation Report prepared in respect of this proposal. The Council's view is that this option would not address the challenges facing Llanfihangel Rhydithon C.P. School.
19.5.2	A Welsh medium school on site would be a viable idea.	As above.
19.5.3	The school could become a Welsh-medium School: We currently have 2 teachers who are fluent Welsh speakers along with 3 members of staff who have completed the Welsh sabbatical. We are also in a prime location for siting. Using our excellent team of staff and school building, we could deliver what the WESP code is asking – for a Welsh Medium School in the east quartile of Radnor, and not sat on the border where pupils may stray to England.	As above.

19.5.4	The possibility of changing the school's language classification has not been fully and correctly evaluated.	As above.
19.5.5	Two teachers at the school are fluent in the Welsh language and three members of staff have gone through the Welsh Sabbatical Scheme. However Education staff were unclear whether staff at the school had the appropriate language skills to deliver the curriculum in Welsh – this shows that the option has not been conscientiously considered.	As above.
19.5.6	Dolau is the only school in east Radnorshire with a Cylch, further investigation should take place into the possibility of converting the school to a Welsh language primary over time, to support the recently approved WESP. Cabinet, which met only days later, did not conscientiously consider this viable option and in doing so, probably undermined the Council's own Strategy.	As above.
19.5.7	The Powys County Council WESP includes a commitment to developing the new Welsh language in the Ysgol Calon Cymru catchment area, but the Closure Consultation Document made no reference to the potential of Llanfihangel Rhydithon School's potential to drive forward the development of the Welsh language in the East Radnorshire area, and ultimately become a Welsh medium school. This, in my view, demonstrates a failure of the Council to fully consider all alternatives to closure and thus a failure of the Council to adhere to the Rural Schools Code.	As above.
19.5.8	Early years Welsh language provision in the catchment area is strong. Both a 'Ti a Fi' and 'Cylch Meithrin' groups exist on the Llanfihangel Rhydithon site. In contrast, Presteigne - which is identified as a potential site for Welsh language education in the emerging WESP - does not have any existing Welsh medium early years provision, nor does Knighton or new Radnor. It is, therefore, my view that	As above.

	<p>Llanfihangel Rhydithon School site offers the greatest potential for successfully establishing a Welsh medium school to meet the entitlement of Welsh speaking parents in this area.</p>	
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Proposal to close Llanfihangel Rhydithon C.P. School

Final Impact Assessments

January 2022

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Proposal to close Llanfihangel Rhydithon C.P. School

Final Impact Assessments

1. Introduction

Powys County Council has consulted on a proposal to close Llanfihangel Rhydithon C.P. School. The proposal is as follows:

- To close Llanfihangel Rhydithon C.P. School from the 31st August 2022, with pupils to transfer to their nearest alternative schools

In line with the Council's policy, an Integrated Impact Assessment has been carried out which incorporates the Welsh Language, Equalities, Well-being of Future Generations Act, Sustainable Development Principles, Communication and Engagement, Safeguarding, Corporate Parenting, Community Cohesion and Risk Management.

In addition, the Welsh Government's School Organisation Code (2018) requires local authorities to carry out an Equality Impact Assessment and Community Impact Assessment in relation to all school reorganisation proposals. For proposals which affect teaching through the medium of Welsh, local authorities are also required to carry out a Welsh Language Impact Assessment.

These impact assessments were provided in draft form during the consultation period and have been updated following the consultation, and again following the objection period. The Equality Impact Assessment has been carried out based on the latest PLASC information available. The Community Impact Assessment has been carried out with input from the affected school.

2. Integrated Impact Assessment

The Impact Assessment (IA) below incorporates Welsh Language, Equalities, Well-being of Future Generations Act, Sustainable Development Principles, Communication and Engagement, Safeguarding, Corporate Parenting, Community Cohesion and Risk Management, supporting effective decision making and ensuring compliance with respective legislation.

Service Area	Schools Service	Head of Service	Emma Palmer/Lynette Lovell	Portfolio Holder	Cllr Phyl Davies
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Proposal
To close Llanfihangel Rhydithon C.P. School from the 31st August 2022, with pupils to transfer to their nearest alternative schools

Outline Summary / Description of Proposal
In February 2021, the Council's Cabinet approved carrying out consultation on the following proposal: <ul style="list-style-type: none"> To close Llanfihangel Rhydithon C.P. School from the 31st August 2022, with pupils to transfer to their nearest alternative schools

1. Version Control (services should consider the impact assessment early in the development process and continually evaluate)

Version	Author	Date
1	RW – Transforming Education Programme Officer	January 2021
2	ME – Senior Manager Schools Transformation	January 2021
3	SA / ME – Amended following consultation	August 2021
4	SA – Amended following objection period	January 2022

2. Profile of savings delivery (if applicable)

2020-21	2021-22	2022-23	2023-24	2024-25	TOTAL

£	£	£44,000	£32,000	£	£76,000
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3. Consultation requirements

Consultation Requirement	Consultation deadline/or justification for no consultation
Public consultation required	Consultation in accordance with the School Organisation Code was carried out between 14 th April 2021 and 2 nd June 2021.

4. Impact on Other Service Areas

Does the proposal have potential to impact on another service area? (Have you considered the implications on Health & Safety and Corporate Parenting?) PLEASE ENSURE YOU INFORM / ENGAGE ANY AFFECTED SERVICE AREAS AT THE EARLIEST OPPORTUNITY	
Adult Services	<input type="checkbox"/>
Children's Services	<input checked="" type="checkbox"/>
Commissioning	<input type="checkbox"/>
Digital Services	<input checked="" type="checkbox"/>
Education	<input checked="" type="checkbox"/>
Finance	<input checked="" type="checkbox"/>
Highways, Transportation and Recycling	<input checked="" type="checkbox"/>
Housing and Community Development	<input checked="" type="checkbox"/>
Legal and Democratic Services	<input checked="" type="checkbox"/>
Property, Planning and Public Protection	<input checked="" type="checkbox"/>
Transformation and Communications	<input checked="" type="checkbox"/>
Workforce and OD	<input checked="" type="checkbox"/>
Data Protection Impact Assessment	

Tudalen 224

Will the proposal involve processing the personal details of individuals? Yes ✓ No

Is Powys County Council the data controller? Yes ✓ No

If you have answered yes to either of the above you will be required to complete, as a minimum, the screening questions on the data protection impact assessment.

For further advice please contact the Data Compliance Team.

4a Geographical Locations

What geographical area(s) will be impacted by the proposal? (Chose all those applicable)

Powys

North

Mid

South

Brecon

Builth and Llanwrtyd

Crickhowell

Hay and Talgarth

Knighton and Presteigne

Llandrindod and Rhayader ✓

Llanfair Caereinion

Llanfyllin

Llanidloes

Machynlleth

Tudalen 225

Newtown	<input type="checkbox"/>
Welshpool and Montgomery	<input type="checkbox"/>
Ystradgynlais	<input type="checkbox"/>

5. How does your proposal impact on Vision 2025?

Council's Well-being Objective	How does the proposal impact on this Well-being Objective?	<u>IMPACT</u> Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from drop down box below
<p>The Economy</p> <p>We will develop a vibrant economy</p>	<p>Implementation of the proposal would have an impact on employment opportunities in the village of Dolau as there would no longer be a school in the area. It is also possible that there would be an impact on local businesses in Dolau and the surrounding area, should there be less people in the area.</p> <p>Comments received during the consultation period and objection period expressed concern that the proposal would mean that Dolau would be less attractive to new / young families which would impact on the economy. However, pupil numbers at Llanfihangel Rhydithon have been low for a number of years, which does not suggest that significant numbers of families have moved to the area in recent years, even though the school has been in existence.</p> <p>Comments were also made which suggested that the Mid Wales Growth Deal would increase the</p>	Poor		Poor

	number of families in the area. The Mid Wales Growth Deal is intended to boost the Mid Wales economy, and whilst all communities in Powys will benefit from the Mid Wales Growth Deal, it is unlikely that this would directly increase the number of young families in the Dolau area.			
Health and Care We will lead the way in providing effective, integrated health and care in a rural environment	No impact	Neutral		
Learning and skills We will strengthen learning and skills	<p>As stated in the Council's Strategy for Transforming Education in Powys 2020-30, the Council faces a challenge due to the high proportion of small schools in the county and the lack of equity amongst schools. Llanfihangel Rhydithon C.P. School teaches children in two classes of mixed aged groups. With such low pupil numbers the teacher-pupil ratio is notably different to many other schools in the area, and due to the Council's funding formula, the school's funding per pupil is higher than the Council's average. This does not provide equity across the education system - teachers in larger schools are required to provide the same education as smaller schools for less funding per pupil. Powys' Strategy is intended to improve equity across the education system and to ensure an improvement for every pupil's learning entitlement and experience.</p> <p>It is the Council's view, as confirmed by its education specialists, that delivering the new curriculum will be significantly more challenging and place greater demands on teachers in very</p>	Good		

	<p>small 2 class schools. This does not mean that it would be impossible to deliver the curriculum in these schools, but it is clear that the skills required by teachers will need to be very wide ranging to support the full and effective fulfilment of the curriculum's high ambitions.</p> <p>Implementation of this option would mean that pupils currently attending Llanfihangel Rhydithon C.P. School would transfer to their nearest alternative schools. For the majority of pupils currently attending Llanfihangel Rhydithon C.P. School, the closest alternative school would be Crossgates C.P. School, however some pupils would live closer to other schools, including Llanbister C.P. School, Ysgol Trefonnen, Cefnlllys, Rhayader C. in W. School and Knighton C. in W. School.</p> <p>Llanfihangel Rhydithon C.P School was in the green support category based on the 2019 categorisations whilst Crossgates C.P. School was in the yellow support category. No categorisations have been carried out since 2019 therefore. However, there are no concerns in relation to quality and standards at Crossgates C.P. School, and the Council's view is that provision for pupils would be at least equivalent to the current provision. The overall aim of the proposal is to improve learning opportunities for pupils.</p> <p>In addition, Crossgates C.P. School is a larger school, with a larger number of pupils and a larger team of staff, which could have a positive</p>			
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	<p>impact on the opportunities available for pupils and staff.</p> <p>Should Llanfihangel Rhydithon C.P. School close, a small number of pupils would live closer to other schools, in particular Llanbister C.P. School, Knighton C. in W. School, Llandrindod C.P. School and Rhayader C. in W. School. These schools were all in the yellow support category based on the 2019 categorisations, therefore there are no concerns about the provision pupils would receive should they transfer to these schools.</p> <p>Concerns were raised during the consultation period and the objection period that the quality of provision in the alternative schools would not be as good as the quality of provision at Llanfihangel Rhydithon C.P. School. The Council is of the view that all the alternative schools are self-improving schools and provide education to a standard that is equitable. Estyn's response to the consultation stated that 'The proposal is likely to at least maintain the current standards of education in the area.'</p>			
<p>Residents and Communities</p> <p>We will support our residents and communities</p>	<p>There would be a significant impact on the community of Dolau as there would be no provision in the area, and therefore potential loss of any community facilities associated with the school.</p> <p>Additional travel would be required for pupils currently attending Llanfihangel Rhydithon C.P. School. Whilst free home to school transport would be provided to eligible pupils in accordance</p>	<p>Very Poor</p>		

	<p>with the Council's Home to School Transport Policy, there would also be an additional travel requirement for some parents in order to access school activities / events. However, a number of pupils currently attending Llanfihangel Rhydithon C.P. School already rely on private/parental transport to the school, as they do not qualify for free home-to-school transport because they live closer to other schools.</p> <p>Llanfihangel Rhydithon C.P. School is co-located with a community hall. Should the school close, the community hall would continue to be available for community activities. Whilst the proposal would not impact on the community hall, it is acknowledged that the potential loss of income to the hall from school activities no longer needing to take place could impact on the community hall.</p> <p>Numerous concerns about the proposal's impact on the community were raised during the consultation and during the objection period, these included the following:</p> <ul style="list-style-type: none"> - General concern about the impact on the community / village - The school is the heart of the village - Comments about impact on the community centre / community hall - Reference to other community activities/organisations - Closure of the school would mean that pupil would not want to live in Dolau 			
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	<ul style="list-style-type: none"> - Reference to previous generations of families that have attended the school - Queries about what would happen to the school building should the school close - Comments about the impact of previous school closures on communities - Comments about the wider impact of school closure on rural communities - Comments about community well-being - Comments about community impact beyond the village of Dolau - Comments about the role of the community during the Covid pandemic <p>Concerns were also raised during the consultation period and the objection period about the additional travel that would be required should the proposal be implemented.</p> <p>A separate draft community impact assessment has been carried out and published as part of the consultation documentation. This was initially prepared with input from the school, and has been updated throughout the process to reflect comments made at each stage.</p>			
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Source of Outline Evidence to support judgements
Consultation report, Objection report

6. How does your proposal impact on the Welsh Government’s well-being goals?

Well-being Goal	How does proposal contribute to this goal?	<u>IMPACT</u> Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from drop down box below
<p>A prosperous Wales:</p> <p>An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.</p>	<p>The aim of the proposal to close the school is to ensure the best possible opportunities for learners in the area now and in the future, to ensure that resources are used efficiently and proportionately across Powys schools, ensuring better strategic management of the Powys schools estate.</p> <p>Should Llanfihangel Rhydithon C.P. School close, all the alternative schools are prepared to deliver the new, innovative curriculum for Wales from September 2022. This should lead to developing a skilled and well-educated population.</p>	Good		
<p>A resilient Wales:</p> <p>A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).</p>	<p>Implementation of the proposal would require additional travel for pupils currently attending Llanfihangel Rhydithon C.P. School for whom this is their closest school. However, pupils could be accommodated on current transport routes, therefore is not anticipated that any additional transport would be required.</p> <p>Currently, a high proportion of pupils attending Llanfihangel Rhydithon C.P. School are transported by private arrangement as the school is not their closest school. This means that additional transport is currently being used to transport pupils to the school, which would not</p>	Neutral		

	<p>be required if pupils transferred to their nearest alternative schools.</p> <p>Concerns were raised during the consultation period and the objection period about the additional travel that would be required should the proposal be implemented, including concern about the environmental impact of any additional travel required. These concerns are listed and responded to in the consultation report and objection report.</p>			
<p>A healthier Wales:</p> <p>A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.</p> <p>Public Health (Wales) Act, 2017:</p> <p>Part 6 of the Act requires for public bodies to undertake a health impact assessment to assess the likely effect of a proposed action or decision on the physical or mental health of the people of Wales.</p>	<p>Implementation of the proposal would result in closure of Llanfihangel Rhydithon C.P. School, with pupils transferring to alternative schools. It is acknowledged that this could have a negative impact on the mental well-being of pupils, staff and other stakeholders associated with the school during the transition period, however the long term aim is to provide improved learning opportunities for all learners.</p> <p>A significant number of comments were received during the consultation period and the objection period about the impact on pupil well-being due to the consultation taking place during the current pandemic, creating an additional pressure on their well-being during a difficult time. Some of the current pupils at Llanfihangel Rhydithon C.P. School were also pupils at the school during the previous consultation process on closure of Llanfihangel Rhydithon C.P. School in 2016.</p> <p>Some comments were received by people who had experienced school closures in Radnorshire in</p>	Poor	<p>An experienced member of staff from the Council is supporting school leaders effectively to help them manage possible changes for pupils. The Council would also expect pupils to be fully supported by their teachers and other staff at the school during any period of uncertainty, to minimise the impact on their well-being.</p> <p>Support will be provided to pupils during the transition period to enable them to transfer effectively to their new schools. The receiving school would work closely with the closing school during the transition to identify and address areas of concern amongst pupils and families. The headteacher of the receiving school would be able to meet with families to discuss concerns, and there would be opportunities for families to visit the receiving schools and meet teachers and other pupils.</p> <p>Process to be concluded as quickly as possible to minimise the period of uncertainty for pupils, staff and other stakeholders.</p>	Poor

	the past, stating that they had not been supported through the change.			
<p>A Wales of cohesive communities:</p> <p>Attractive, viable, safe and well-connected Communities.</p>	<p>There would be a significant impact on the community of Dolau as there would be no provision in the area, and therefore potential loss of any community facilities associated with the school.</p> <p>Additional travel would be required for pupils currently attending Llanfihangel Rhydithon C.P. School. Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirement for parents in order to access school activities / events.</p> <p>Llanfihangel Rhydithon C.P. School is co-located with a community hall. Should the school close, the community hall would continue to be available for community activities. Whilst the proposal would not impact on the community hall, it is acknowledged that the potential loss of income to the hall from school activities no longer needing to take place could impact on the community hall.</p> <p>Numerous concerns about the proposal's impact on the community were raised during the consultation and during the objection period, these included the following:</p> <ul style="list-style-type: none"> - General concern about the impact on the community / village - The school is the heart of the village 	Very Poor		Very Poor

	<ul style="list-style-type: none"> - Comments about impact on the community centre / community hall - Reference to other community activities/organisations - Closure of the school would mean that pupil would not want to live in Dolau - Reference to previous generations of families that have attended the school - Queries about what would happen to the school building should the school close - Comments about the impact of previous school closures on communities - Comments about the wider impact of school closure on rural communities - Comments about community well-being - Comments about community impact beyond the village of Dolau - Comments about the role of the community during the Covid pandemic <p>Concerns were also raised during the consultation period and the objection period about the additional travel that would be required should the proposal be implemented.</p> <p>A separate draft community impact assessment has been carried out and published as part of the consultation documentation. This was initially prepared with input from the school, and has been updated throughout the process to reflect comments made at each stage.</p>			
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<p>A globally responsible Wales: A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.</p> <p>Human Rights - is about being proactive (see guidance)</p> <p>UN Convention on the Rights of the Child: The Convention gives rights to everyone under the age of 18, which include the right to be treated fairly and to be protected from discrimination; that organisations act for the best interest of the child; the right to life, survival and development; and the right to be heard.</p>	<p>The aim of implementing the proposal is to provide the best possible opportunities to learners, enabling them to reach their full potential.</p> <p>The Council has carried out consultation on the proposal, which included consultation with pupils, ensuring that all affected by the plans have had the opportunity to give their views.</p>	<p>Neutral</p>		
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A Wales of vibrant culture and thriving Welsh language: A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.

Incorporating requirements under the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards

<p>Well-being Goal</p>	<p>How does proposal contribute to this goal?</p>	<p><u>IMPACT</u> Please select from drop down box below</p>	<p>What will be done to better contribute to a more positive impact or to mitigate any negative impacts?</p>	<p><u>IMPACT AFTER MITIGATION</u> Please select from drop down box below</p>
<p><i>Opportunities for persons to use the Welsh language, and treating the Welsh language no less favourable than the English language</i></p>	<p>Llanfihangel Rhydithon C.P. School is an English-medium school, therefore it is not anticipated that implementation of the proposal would impact on opportunities for persons to use the Welsh language, or on treating the Welsh</p>	<p>Neutral</p>		

	<p>language no less favourably than the English language.</p> <p>Comments were received during the consultation period and the objection period which suggested that pupils would not have access to the same opportunities to use Welsh in the alternative schools compared with their current experience at Llanfihangel Rhydithon C.P. School. However, pupils would continue to learn Welsh at the alternative schools. Llanfihangel Rhydithon C.P. School and all the other alternative schools are taking part in the Siarter Iaith initiative, and all schools are currently working towards the bronze award.</p> <p>Comments were also received which expressed concern about that closure of the school would lead to closure of the Cylch Meithrin / Ti a Fi which operates from the school site, and that this would impact on the opportunity for pupils to access Welsh-medium pre-school provision. Whilst acknowledging that there could be an impact on the Cylch Meithrin if parents decided to choose other early years providers that are co-located with any of the alternative schools should the school close, this is not a given, as the Cylch could potentially continue to operate if there was sufficient demand.</p>			
<i>Opportunities to promote the Welsh language</i>	Llanfihangel Rhydithon C.P. School is an English-medium school, therefore it is not anticipated that implementation of the proposal would	Neutral		

	<p>impact on opportunities to promote the Welsh language.</p> <p>See additional comments above.</p>			
<p><i>People are encouraged to do sport, art and recreation.</i></p>	<p>Implementation of the proposal would lead to the closure of Llanfihangel Rhydithon C.P. School, with pupils transferring to their nearest alternative schools. It is likely that pupils would transfer to larger schools, and it is anticipated that being part of a larger school would result in additional opportunities for pupils to take part in sport, art and other extra-curricular activities.</p> <p>The comments received during the consultation period and the objection period suggest that there a number of extra-curricular activities happening at Llanfihangel Rhydithon C.P. School, including after school clubs. The comments received also suggest that due to the size of the school, pupils have more opportunities to take part in extra-curricular activities and whole school activities than in larger schools. However, all the other alternative schools provide a range of extra-curricular activities that are teacher-led. There is also the availability of extra-curricular activities within the Llandrindod catchment area which are delivered by other organisations.</p> <p>The Council has acknowledged that it may be difficult for some pupils to access after school activities due to reliance on home to school transport, however the alternative schools also have pupils that rely on home to school transport,</p>	Good		

	<p>and they are experienced in ensuring that all pupils are able to take part in activities.</p> <p>It must also be noted that just under half of the pupils currently attending the school live closer to other schools and are therefore reliant on private transport arrangements to access after school activities and are able to manage.</p>			
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A more equal Wales: A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio economic background and circumstances).

Incorporating requirements under the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011 and the Social Economic duty (2020).

Well-being Goal	How does proposal contribute to this goal?	<u>IMPACT</u> Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from drop down box below
Age	<p>The proposal would impact on primary aged pupils currently attending Llanfihangel Rhydithon C.P. School. Should the Council proceed with implementation of the proposal, pupils would transfer to alternative schools. Whilst acknowledging that this could have a negative impact on the mental well-being of pupils during the transition period, the long term aim is to provide improved learning opportunities for all learners.</p> <p>The Council does not have any concerns over the quality of education provided at the alternative</p>	Neutral		

	schools, and believes that pupils would not be disadvantaged by attending these schools.			
<i>Disability</i>	<p>The proposal would impact on any pupils with disabilities currently attending Llanfihangel Rhydithon C.P. School. Should the Council proceed with implementation of the proposal, pupils would transfer to alternative schools. Whilst acknowledging that this could have a negative impact on the mental well-being of pupils during the transition period, the long term aim is to provide improved learning opportunities for all learners, including any pupils with disabilities.</p> <p>Comments received during the consultation and the objection period expressed concern about the impact on pupil with ALN if they had to be taught in larger cohorts, with the view that small schools / classes enable more 1:1 support. The Council's view is that pupils with additional learning needs would be fully supported at any of the alternative schools. There is very good support across the Calon Cymru cluster for pupils with ALN.</p>	Neutral		
<i>Gender reassignment</i>	No impact.	Neutral		
<i>Marriage or civil partnership</i>	No impact.	Neutral		
<i>Race</i>	The proposal would impact on any pupils currently attending Llanfihangel Rhydithon C.P. School, including pupils belonging to protected characteristic groups due to their race. Should the Council proceed with implementation of the proposal, pupils would transfer to alternative	Neutral		

	schools. Whilst acknowledging that this could have a negative impact on the mental well-being of pupils during the transition period, the long term aim is to provide improved learning opportunities for all learners, including any pupils belonging to protected characteristic groups due to their race.			
<i>Religion or belief</i>	<p>The proposal would impact on primary aged pupils currently attending Llanfihangel Rhydithon C.P. School, regardless of their religion or belief. Should the Council proceed with implementation of the proposal, pupils would transfer to alternative schools. Whilst acknowledging that this could have a negative impact on the mental well-being of pupils during the transition period, the long term aim is to provide improved learning opportunities for all learners.</p> <p>Llanfihangel Rhydithon C.P. School is a community primary school. Most of the closest alternative schools are also community primary schools, however it is acknowledged that some of the alternative schools which pupils may transfer to should the Council proceed with implementation of the proposal are Church in Wales schools. A comment was received during the consultation which suggested that attending a faith-based provision would be detrimental to children. However, it is the view of the Council that there would be no impact.</p>	Neutral		
<i>Sex</i>	The proposal would impact on primary aged pupils currently attending Llanfihangel Rhydithon C.P. School regardless of their sex. Should the	Neutral		

	Council proceed with implementation of the proposal, pupils would transfer to alternative schools. Whilst acknowledging that this could have a negative impact on the mental well-being of pupils during the transition period, the long term aim is to provide improved learning opportunities for all learners.			
<i>Sexual Orientation</i>	The proposal would impact on primary aged pupils currently attending Llanfihangel Rhydithon C.P. School, including any pupils belonging to a protected characteristic group due to their sexual orientation. Should the Council proceed with implementation of the proposal, pupils would transfer to alternative schools. Whilst acknowledging that this could have a negative impact on the mental well-being of pupils during the transition period, the long term aim is to provide improved learning opportunities for all learners.	Neutral		
<i>Pregnancy and Maternity</i>	No impact.	Neutral		
<i>Socio-economic duty</i>	The proposal would impact on primary aged pupils currently attending Llanfihangel Rhydithon C.P. School, including any pupils from low income households. Should the Council proceed with implementation of the proposal, pupils would transfer to alternative schools. Whilst acknowledging that this could have a negative impact on the mental well-being of pupils during the transition period, the long term aim is to provide improved learning opportunities for all learners, including any pupils from low income households / pupils eligible for Free School Meals.	Neutral		

	<p>Based on PLASC 2020 and PLASC 2021 information, no pupils at Llanfihangel Rhydithon C.P. School were eligible for Free School Meals.</p> <p>Should the proposal be implemented, there would be no school in Llanfihangel Rhydithon. This would mean that pupils currently attending Llanfihangel Rhydithon C.P. School would need to travel to their nearest alternative provision. Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, it is acknowledged that there would also be an additional travel requirement for parents to access school activities / events. However, the school is not the closest school for a number of pupils that currently attend, therefore transferring to their nearest alternative school would reduce the transport requirements for these pupils and their families.</p>			
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Source of Outline Evidence to support judgements
Consultation report, Objection report

7. How does your proposal impact on the council's other key guiding principles?

Sustainable Development Principle (5 ways of working)

Principle	How does the proposal impact on this principle?	<u>IMPACT</u> Please select from	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from
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		drop down box below		drop down box below
<p>Long Term: <i>Looking to the long term so that we do not compromise the ability of future generations to meet their own needs.</i></p>	<p>Pupil numbers at Llanfihangel Rhydithon C.P. School are low and although comments received during the consultation / objection periods suggest there will be a small increase in pupil numbers, they are not expected to increase significantly over the coming years.</p> <p>The aim of the proposal to close the school is to ensure the best possible opportunities for learners in the area now and in the future, to ensure that resources are used efficiently and proportionately across Powys schools, ensuring better strategic management of the Powys schools estate.</p>	Good		
<p>Collaboration: <i>Working with others in a collaborative way to find shared sustainable solutions.</i></p>	<p>Consultation has been carried out in accordance with the requirements of the School Organisation Code, which has enabled all interested parties to give their views. This included an opportunity to suggest any alternative solutions for the catchment. In addition, there has been a 28 day Objection Period, when people could submit written objections to the proposal.</p>	Neutral		
<p>Involvement (including Communication and Engagement): <i>Involving a diversity of the population in the decisions that affect them including:</i></p> <p>Unpaid Carers:</p>	<p>Full consultation has been carried out in accordance with the School Organisation Code. This provided an opportunity for all interested parties to give their views on the proposal. A Consultation Report was prepared which outlines the issues raised in the consultation responses, and this was considered by Cabinet when determining whether or not to proceed.</p>	Good		

<p><i>Ensuring that unpaid carers views are sought and taken into account</i></p>	<p>In addition, there has been a 28 day Objection Period, when people could submit written objections to the proposal. An Objection Report has been prepared which summarises the issues raised in the objections, and this will be considered by Cabinet when determining whether or not to proceed with implementation of the proposal.</p> <p>Concerns were raised during the consultation period and the objection period about the consultation taking place during the pandemic, and that this meant that some members of the community were unable to give their views. However, the large number of consultation responses and objections received does not support this view.</p>			
<p>Prevention: <i>Understanding the root causes of issues to prevent them from occurring including:</i></p> <p>Safeguarding:</p> <p><i>Preventing and responding to abuse and neglect of children, young people and adults with health and social care needs who can't protect themselves.</i></p>	<p>The aim of the proposal to close the school is to ensure the best possible opportunities for learners in the area now and in the future, to ensure that resources are used efficiently and proportionately across Powys schools, ensuring better strategic management of the Powys schools estate.</p> <p>All schools are required to have appropriate safeguarding arrangements in place.</p>	Good		
<p>Integration: <i>Taking an integrated approach so that public bodies look at all the well-being goals in deciding on their well-being objectives.</i></p>	No impact.	Neutral		

<p>Powys County Council Workforce:</p> <p>What Impact will this change have on the Workforce?</p>	<p>Implementation of the proposal would impact on all current staff at Llanfihangel Rhydithon C.P. School as there would no longer be a school in Llanfihangel Rhydithon, therefore staff would be subject to a Management of Change process.</p> <p>Full consultation has been carried out in accordance with the School Organisation Code. This process was supported by relevant LA teams (e.g. HR), and included a consultation meeting with staff, which ensured that they had an opportunity to give their views.</p> <p>A member of the HR team met with the staff informally at the start of the process.</p> <p>Should the Council proceed with implementation of the proposal, there would be an impact on staffing at Llanelwedd C.i.W Primary School as the current arrangement of a shared headteacher would come to an end. Llanelwedd C.i.W Primary School would need to review its staffing structure as the headteacher would return to his substantive role.</p>	Poor		
<p>Payroll: How will this impact salary, any overtime/enhanced payments etc? Does this affect any particular group of employees? E.g. Male/Female dominated workforce. Does this proposal comply with the Councils Single Status Terms and Conditions?</p>	<p>Implementation of the preferred way forward could impact on salary arrangements for current staff at Llanfihangel Rhydithon C.P. School and Llanelwedd C. in W. School.</p>	Neutral		

<p>Welsh Language impact on staff</p>	<p>Llanfihangel Rhydithon C.P. School is an English-medium school, therefore it is not anticipated that there would be a Welsh language impact on staff.</p> <p>Some of the staff at Llanfihangel Rhydithon C.P. School have attended Welsh language Sabbatical courses in order to improve their Welsh language skills. There would be opportunities for these staff to continue to use their Welsh language skills in any other future employment opportunities.</p>	<p>Neutral</p>		
<p>Apprenticeships:</p> <p>Has consideration been given to whether this change impacts negatively, or positively on Apprenticeships within the service?</p>	<p>No impact.</p>	<p>Neutral</p>		

<p>Source of Outline Evidence to support judgements</p>
<p>Consultation report, Objection report</p>

8. What is the impact of this proposal on our communities?

Communities	How does the proposal impact on residents and community?	<u>IMPACT</u> See impact definitions in guidance document	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> See impact definitions in guidance document	Source of Outline Evidence to support judgement
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<p>Dolau</p>	<p>There would be a significant impact on the community of Dolau as there would be no provision in the area, and therefore potential loss of any community facilities associated with the school.</p> <p>Additional travel would be required for pupils currently attending Llanfihangel Rhydithon C.P. School. Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirement for parents in order to access school activities / events.</p> <p>Llanfihangel Rhydithon C.P. School is co-located with a community hall. Should the school close, the community hall would continue to be available for community activities. Whilst the proposal would not impact on the community hall, it is acknowledged that the potential loss of income to the hall from school activities no longer needing to take place could impact on the community hall.</p> <p>Numerous concerns about the proposal's impact on the community were raised during the consultation and during the objection period, these included the following:</p>	<p>Major</p>		<p>Major</p>	
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	<ul style="list-style-type: none"> - General concern about the impact on the community / village - The school is the heart of the village - Comments about impact on the community centre / community hall - Reference to other community activities/organisations - Closure of the school would mean that pupil would not want to live in Dolau - Reference to previous generations of families that have attended the school - Queries about what would happen to the school building should the school close - Comments about the impact of previous school closures on communities - Comments about the wider impact of school closure on rural communities - Comments about community well-being - Comments about community impact beyond the village of Dolau - Comments about the role of the community during the Covid pandemic 				
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	<p>Concerns were also raised during the consultation period and the objection period about the additional travel that would be required should the proposal be implemented.</p> <p>A separate draft community impact assessment has been carried out and published as part of the consultation documentation. This was initially prepared with input from the school, and has been updated throughout the process to reflect comments made at each stage.</p>				
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9. What are the risks to service delivery or the council following implementation of this proposal?

Risk Identified	Inherent Risk Rating Impact X Likelihood (See Risk Matrix in guidance document)	Mitigation	Residual Risk Rating Impact X Likelihood (See Risk Matrix in guidance document)
Period of uncertainty for Llanfihangel Rhydithon C.P. School if a statutory process is carried out and implemented which might have a negative effect on standards at the school	Medium	The Council to provide advice and support to the school and governing body to ensure that standards and performance do not deteriorate during the transition period	Medium
Uncertainty for staff whilst the process is ongoing	Medium	Engagement with staff to take place throughout the process and staff to be kept informed of developments	Medium
Negative impact on pupil wellbeing which has already been affected due to the pandemic.	High	An experienced member of staff from the Council is supporting school leaders effectively to help them manage possible changes for pupils. The Council would also expect pupils to be fully supported by their teachers and other	Medium

		staff at the school during any period of uncertainty, to minimise the impact on their well-being.	
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10. Overall Summary and Judgement of this Impact Assessment?

The aim of the proposal is to improve the educational provision for learners. However, whilst this impact assessment has identified some positive aspects, in particular relating to learning and skills and ensuring the best strategic management of the Powys schools estate, the assessment has also identified some negative aspects. These primarily relate to the impact on the community of Dolau due to loss of educational provision from the area, and the associated additional travel requirements for pupils, and the impact on general well-being, particularly due to the consultation having taken place during the pandemic. These concerns have also been raised during the objection period.

11. Is there additional evidence to support the Impact Assessment (IA)?

What additional evidence and data has informed the development of your proposal?

Full consultation has been carried out on the proposal. In addition, there has been a 28 day Objection Period, when people could submit written objections to the proposal. The impact assessment has been updated to reflect the feedback received at each stage of the process.

12. On-going monitoring arrangements?

What arrangements will be put in place to monitor the impact over time?

The Transforming Education Programme Board will continue to monitor impact over time.

Please state when this Impact Assessment will be reviewed.

This impact assessment has been reviewed at each stage of the process

13. Sign Off

Position	Name	Signature	Date
Impact Assessment Lead:	Sarah Astley		
Head of Service:	Lynette Lovell		
Portfolio Holder:	Cllr Phyl Davies		

14. Governance

Decision to be made by	Cabinet	Date required	8 th February 2022
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3. Equality Impact Assessment

Powys County Council

Equality Impact Assessment (EqIA)



Proposal	To close Llanfihangel Rhydithon C.P. School from the 31st August 2022, with pupils to transfer to their nearest alternative schools
Service Area	Schools Service
Date of Assessment	February 2021 Updated September 2021 Updated January 2022
Lead Person undertaking the assessment	RW / SA / ME
Relevant Head of Service who has agreed this assessment	Lynette Lovell

The Equality Act 2010, requires that public sector organisations in the exercise of their functions, pay due regard to the following 'general duty':

- (a) Eliminating discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;**
- (b) Advancing equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;**
- (c) Fostering good relations between persons who share a relevant protected characteristic and persons who do not share it.**

The protected characteristics include: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, marriage and civil partnership, sex and sexual orientation. This assessment also includes a consideration of impact upon people and communities whose language of choice is Welsh.

The specific regulations for Wales [Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011] require public sector bodies to monitor relevant policy and practises and then assess and report on the impact based upon an analysis of relevant data and evidence.

1. AIM or PURPOSE

The Council has carried out the statutory process on a proposal to close Llanfihangel Rhydithon C.P. School.

The proposal is as follows:

- To close Llanfihangel Rhydithon C.P. School from the 31st August 2022, with pupils to transfer to their nearest alternative schools

2. OBJECTIVES

Please state the current business objectives of the change proposal.

The Council is proposing to close Llanfihangel Rhydithon C.P. School for the following reasons:

- Would address the issue of low pupil numbers at Llanfihangel Rhydithon C.P. School
- Would reduce the Council's overall surplus capacity in primary schools
- Revenue saving to the Council
- Pupils would attend larger schools, which would be better equipped to meet the requirements of the new curriculum
- Pupils would attend larger schools, which could provide a wider range of educational and extra-curricular opportunities
- Pupils would attend schools with permanent leadership arrangements
- Meets all of the critical success factors

3. BENEFITS and OUTCOMES

i) What are the intended benefits or outcomes from the change proposal?

The benefits of the proposal are:

- Would address the issue of low pupil numbers at Llanfihangel Rhydithon C.P. School
- Would reduce the Council's overall surplus capacity in primary schools
- Revenue saving to the Council
- Pupils would attend larger schools, which would be better equipped to meet the requirements of the new curriculum
- Pupils would attend larger schools, which could provide a wider range of educational and extra-curricular opportunities

- Pupils would attend schools with permanent leadership arrangements

4. CORPORATE RELEVANCE

How does this change proposal relate to Vision 2025?

Learning and Skills is one of the four priorities outlined in Corporate Improvement Plan 2020-25: Vision 2025. Within this priority, the Plan includes a commitment to 'Improve our schools infrastructure'.

5. DATA USED

5.1. What data has been used to conduct this assessment?

Tick/shade boxes as appropriate.

Profiling of service users, providing a breakdown of who uses the service by the protected characteristics.	✓
Service user satisfaction rates, broken down by the protected characteristics.	
Qualitative data (analysed against the protected characteristics) which provides evidence about current services users experience accessing the service.	
Qualitative data gathered from those that are not currently using the service.	
Complaints monitoring against the protected characteristics.	
Wider research reports and findings.	
Relevant service based Equality Impact Assessment.	

5.2. Are there any gaps in the data?

Yes

Please state the gaps: N/A

How will the gaps be addressed going forward?

No ✓

6. DATA ANALYSIS

<p>6.1 Quantitative Summarise the key quantitative data analysis results, providing key headline statistics. Include data that relates to existing provision and also data relating to proposal. E.g. statistics generated from a consultation questionnaire.</p> <p>Key questions:</p> <p>i) Are certain groups currently underrepresented in service user figures? Will a change affect this?</p> <p>ii) How do satisfaction levels compare across the protected characteristic groups? How will a change affect this?</p>	<p><u>PLASC January 2020</u></p> <p>Based on the information provided in Llanfihangel Rhydithon C.P. School's PLASC return in January 2020, the following pupils belonged to the protected characteristic groups:</p> <ul style="list-style-type: none"> - Free school meals: 0.0% of pupils are eligible for Free School Meals - ALN: 6.1% of pupils have special educational needs. Of these, 3.0% of pupils are on School Action, 3.0% of pupils are on School Action Plus and 0.0% of pupils have statements. - Disabilities: 6.1% of pupils have additional learning needs - English as an Additional Language: 0.0% of pupils are identified as EAL pupils. - Ethnicity: The ethnic group of 72.7% of pupils in the school is White British. 0.0% of pupils belong to ethnic groups other than White British. - Looked after Children: 0.0% of pupils are looked after. <p>This information shows that a proportion of pupils that belong to the protected characteristic groups will be affected by this proposal. In particular:</p> <ul style="list-style-type: none"> - 6.1% of pupils at Llanfihangel Rhydithon C.P. School have additional learning needs. However, this is lower than the Powys average for primary schools (18.8%) <p>There are no FSM pupils, no pupils belonging to ethnic groups other than White British, no EAL pupils and no Looked After Children at the school.</p> <p><u>PLASC January 2021</u></p> <p>Based on the information provided in Llanfihangel Rhydithon C.P. School's PLASC return in January 2021, the following pupils belonged to the protected characteristic groups:</p>
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	<ul style="list-style-type: none"> - Free school meals: 0.0% of pupils are eligible for Free School Meals - ALN: 5.4% of pupils have special educational needs. Of these, 2.7% of pupils are on School Action, 2.7% of pupils are on School Action Plus and 0.0% of pupils have statements. - Disabilities: 5.4% of pupils have additional learning needs - English as an Additional Language: 0.0% of pupils are identified as EAL pupils. - Ethnicity: The ethnic group of 100.0% of pupils in the school is White British. 0.0% of pupils belong to ethnic groups other than White British. - Looked after Children: 0.0% of pupils are looked after. <p>This information shows that a proportion of pupils that belong to the protected characteristic groups will be affected by this proposal. In particular:</p> <ul style="list-style-type: none"> - 5.4% of pupils at Llanfihangel Rhydithon C.P. School have additional learning needs. This is lower than the Powys average for primary schools (19.2%) <p>There are no FSM pupils, no pupils belonging to ethnic groups other than White British, no EAL pupils and no Looked After Children at the school.</p> <p>The proposal to close Llanfihangel Rhydithon C.P. School would impact on all pupils currently attending the school, including any pupils belonging to protected characteristic groups.</p>
<p>6.2 Qualitative Summarise the key qualitative data analysis, providing key themes or patterns. Include data that relates to existing provision and also data relating to proposal. E.g. protected characteristics focus group on the proposal.</p> <p>Key questions:</p>	<p>Full consultation has been carried out on the proposal relating to Llanfihangel Rhydithon C.P. School, which will include consultation with pupils at the school. In addition, there has been a 28 day objection period when people could submit written objections if they did not agree with the proposal. This has provided qualitative data in respect of the proposal, and any additional impact on pupils that belong to protected characteristic groups.</p> <p>During the consultation period, the following comments were received about the proposal's impact on the protected characteristic groups:</p>

<p>i) Do certain groups have a different service user experience? How will a change affect this?</p> <p>ii) Have any areas for improvement been communicated by particular groups? Will a change have an impact upon these views?</p> <p>iii) What are the reasons behind some groups not using the service? How will a change affect this position?</p> <p>iv) What has consultation on your proposals revealed about impact on the protected characteristics?</p>	<ul style="list-style-type: none"> - Benefits of Llanfihangel Rhydithon / small schools for pupils belonging to protected characteristic groups - Concern that moving to larger schools would have a negative impact on pupils belonging to protected characteristic groups - The proposal wouldn't impact on pupils belonging to protected characteristic groups - Impact on pupils with additional learning needs - Impact on disabled pupils - Impact on other protected characteristic groups <ul style="list-style-type: none"> - Pregnant women / new mothers - Religion - Gender identity - Age <p>During the objection period, the following comments were received about the proposal's impact on the protected characteristic groups:</p> <ul style="list-style-type: none"> - Concern about the impact on pupils that have additional learning needs <p>Responses to the issues raised are provided in the consultation report and the objection report.</p>
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7. EqIA RESULT

Based on an analysis of the available qualitative and quantitative data, please tick/shade the appropriate box opposite to provide the EqIA assessment result.

<p>The proposal does not present any adverse impact on equality. [Proceed to question 10]</p>	✓
<p>The proposal presents some adverse impact on equality. [Proceed to question 8]</p>	

<p>The proposal presents significant impact on equality [Proceed to question 8]</p>	
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8. AREAS for IMPROVEMENT

<p>Please provide detail of weak or sensitive areas of the proposal identified by the assessment.</p> <p>i) Which protected characteristic groups are particularly affected? ii) Will people on low incomes be affected? iii) Will Welsh speakers be affected?</p>	<p>i) The protected characteristic group most affected by the proposal would be pupils with additional learning needs. However, the proportion of pupils with ALN at the school is lower than the Powys average. Comments received during the process expressed concern about the impact on pupils with ALN if they had to be taught in larger cohorts, with the view that small schools / classes enable more 1:1 support.</p> <p>ii) None of the pupils attending Llanfihangel Rhydithon C.P. School are eligible for Free School Meals. This is significantly lower than the Powys average.</p> <p>iii) Llanfihangel Rhydithon C.P. School is an English medium school - therefore the proposal will not directly affect Welsh speakers.</p>
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9. EQUALITY IMPROVEMENT

<p>9.1 Having identified problematic aspects to the proposal, how will this now be addressed?</p> <p><i>i.e. Are you able to involve (in some capacity) people from protected characteristic groups, Welsh Speakers, people on low incomes, to assist you in this process?</i></p> <p>i) Can the impact be mitigated, and how will this be done? ii) Does the proposal require modification to reduce or remove this impact?</p>	<p>Should the proposal be implemented, Llanfihangel Rhydithon C.P. School would close, and pupils would transfer to their nearest alternative school.</p> <p>This would have a significant impact on pupils currently attending Llanfihangel Rhydithon C.P. School, including any pupils belonging to the protected characteristic groups that attend that school, as some additional travel would be required in order to attend their nearest alternative school.</p> <p>Whilst it is acknowledged that the proposal would impact on pupils belonging to the protected characteristic groups that attend the school, there is no reason to believe that the nearest alternative schools would be unable to meet the needs of pupils belonging to the protected characteristic groups that would be affected, including pupils with Additional Learning Needs, pupils belonging to Ethnic Groups other than White British, pupils eligible for Free School Meals</p>
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<p>iii) Should the proposal be considered for removal, owing to the degree of impact it is likely to have?</p>	<p>and Looked After Children. The number of pupils belonging to the protected characteristic groups currently attending Llanfihangel Rhydithon C.P. School is small.</p> <p>The protected characteristic group most affected by the proposal would be pupils with ALN. However, the Council's view is that pupils with additional learning needs would be fully supported at any of the alternative schools. There is very good support across the Calon Cymru cluster for pupils with ALN.</p> <p>The proposal does not require modification to reduce or remove the impact on protected characteristic groups.</p>
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9.2 Will the management of the impact as outlined in 9.1, be included in the Service Improvement Plan?

<p>Yes <input type="checkbox"/></p> <p>Date added.....</p> <p>Reference.....</p>	<p>No <input checked="" type="checkbox"/></p> <p>If no, please explain why not: Need was not identified at time of writing Service Strategy</p>
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4. Draft Community Impact Assessment – Llanfihangel Rhydithon C.P. School

i) Information on the proportion of pupils from the catchment area that attend the school

January 2020

The closest provider for pupils attending Llanfihangel Rhydithon C.P. School in January 2020 was as follows:

School	% of Pupils
Crossgates C.P. School	36.4%
Knighton C. in W. School	6.1%
Ysgol Cefnlllys	9.1%
Llanfihangel Rhydithon C.P. School	48.5%

This suggests that 48.5% of pupils attending the school were attending their closest primary school, whilst 51.5% of pupils attending the school live closer to other primary schools.

Updated information – September 2021

This information has been updated for the pupils that were attending Llanfihangel Rhydithon C.P. School in September 2021. The closest provider for pupils attending the school in September 2021 was as follows:

School	% of Pupils
Crossgates C.P. School	28%
Knighton C. in W. School	5%
Ysgol Cefnlllys	11%
Rhayader C. in W. School	3%
Llanfihangel Rhydithon C.P. School	53%

This suggests that 53% of pupils attending the school were attending their closest primary school, whilst 47% of pupils attending the school live closer to other primary schools.

ii) After-school clubs and extra-curricular activities provided by the school

The school provides the following after-school clubs and extra-curricular activities including the following:

- Weekly Key Stage 2 club featuring ICT, Art and Cooking
- Weekly Welsh club
- Weekly Sports club
- Football Club
- Choir
- Weekly drop in sessions for reading and educational development
- Clwb Cymraeg
- Eco Club
- School Council
- Criw Cymraeg
- Music lessons

Whilst some of these clubs are run by staff and governors, some are run by community volunteers / parents and outside organisations.

iii) Any other facilities or services the school accommodates or services the school provides

The school accommodates or provides the following other facilities or services:

- Daily Breakfast Club
- Dolau Ti a Fi Club held on the site
- Cylch Meithrin which is held on the site and has good links with the Foundation Phase
- Community Library Bus
- Young Sports Ambassador Scheme
- Youth Club relies on pupils from the school

The school also provides a rural play space as the village has no communal play space other than the school.

iv) Other use by the community of the school building

The school building is used by the community to provide the following activities:

- Local YFC use the school grounds and community hall
- Community hall use the school grounds and car park
- Youth Club use the school grounds
- The community hall uses the school as a 'green room' for local shows and entertainment
- The school's conservation area is used by all user groups and members of the community. The local WI and YFC hold meetings and the Youth Club, Cylch Meithrin and Ti a Fi use the grounds to learn about wildlife and the environment

v) Other links between the school and the community

- Harvest festival is held every September in the community hall. This involves the local vicar, members of the community and the pupils and staff of the school
- Christmas Carols around the Christmas Tree is held every year in the school playground
- Dolau Christmas Fayre is held annually in the community hall. The pupils make items to sell at the event and pupils record songs and poems to sell
- Annual Christmas Concert is held by the school in the community hall. It is a very popular and well attended event
- Dolau Summer Fayre
- Annual Sport Day which is held in a local farm field. This is well attended by the community, parents and governors
- The school participates in DRA events throughout the year e.g. games evenings quizzes, cinema
- The school has close links to local businesses such as horse riding
- Links with the local church magazine
- Links with the local vicar who leads collective worship at the school
- Liaisons with Dyfed Powys Police through the School Community Police Officer
- Liaisons with Mid & West Wales Fire Service through visits from local firefighters
- Links with the local Eisteddfod in Llandrindod Wells
- Friends of Dolau School which work tirelessly to raise funds for the school to support buying resources to enable a full 21st Century curriculum
- Links with local concerts, singing, poetry, instrumental etc.
- Links with local History Group and arts projects
- Dolau YFC & Dolau Youth club rely heavily on Llanfihangel Rhydithon CP School for the vast majority of their new members, the majority of who go on to take up senior roles in the club, Chairman, Vice-Chair, Secretary etc

- Llandrindod Junior Silver Band consists of 14 members, a majority of those band members have been taught in Dolau School. The band attend and support lots of local events held within Llandrindod, Rhayader and Builth Wells.

vi) If accommodation, facilities or services are provided by a school, where would they be provided in the event of closure?

Should the proposal be implemented, Llanfihangel Rhydithon C.P. School would close and pupils transferring to their nearest alternative schools and there would no longer be a school in Dolau. It is acknowledged that this would mean that there would be no school in Dolau, meaning that any community facilities provided by the school would no longer be available.

There is a community hall in Dolau which is located next to school, and which provides facilities and services, which are complemented by the school. Should there be no school in Dolau, the community hall would continue to be available for community events and activities. However, the school has indicated that the loss of income provided by the school to the community hall could have a significant impact on the ability for the hall to continue to run.

vii) Distance and travelling time involved in attending an alternative school of the same language category

Should the proposal be implemented, Llanfihangel Rhydithon C.P. School would close and pupils would transfer to their nearest alternative schools. There would therefore be an impact on distance and travelling times for pupils currently attending Llanfihangel Rhydithon C.P. School for whom this is currently their closest school.

Home to school transport would be provided to eligible pupils in accordance with the home to school transport which is in operation at that time. Whilst free transport would be provided to eligible pupils, it is acknowledged that there could be an impact on some pupils' ability to access after school activities, and could impact on the ability of parents to take part in school events, meetings etc.

January 2020

The closest alternative school for the pupils that were attending Llanfihangel Rhydithon C.P. School in January 2020 was as follows:

	Pupils' closest school should there be no school in Dolau
--	--

Crossgates C.P. School	75.8%
Llanbister C.P. School	9.1%
Ysgol Cefnlllys	9.1%
Knighton C. in W. School	6.1%

An analysis of pupils attending Llanfihangel Rhydithon C.P. School in January 2020 suggests that the furthest distance to the nearest alternative school for pupils for whom Llanfihangel Rhydithon C.P. School is currently their closest school would be 6.4 miles.

Updated information – September 2021

The closest alternative school for the pupils that were attending Llanfihangel Rhydithon C.P. School in September 2021 is as follows:

	Pupils' closest school should there be no school in Dolau
Crossgates C.P. School	67%
Llanbister C.P. School	14%
Ysgol Cefnlllys	11%
Knighton C. in W. School	5%
Rhayader C. in W. School	3%

An analysis of pupils attending Llanfihangel Rhydithon C.P. School in September 2021 suggests that the furthest distance to the nearest alternative school for pupils for whom Llanfihangel Rhydithon C.P. School is currently their closest school would be 6.4 miles.

viii) How parents' and pupils' engagement with the alternative school and any facilities it may offer could be supported

Should the Council proceed with the statutory process and eventually implementation of the preferred option, support would be provided to pupils and their parents as part of the transition process, to ensure full engagement with their closest alternative schools.

ix) Any wider implications e.g. impact on public transport provision, wider community safety issues

- Concern about extended journeys for pupils to their closest alternative school, which would contribute to the environment and have a significant impact on daily traffic
- Concern that young pupils would be unsupervised on journeys to school
- Concern that the length of the journey to school would be too long and have a detrimental effect to their learning focus whilst at school
- There would be an impact on local employment as most staff at the school are local people
- School car park is used by local residents to park safely in the evenings limiting cars parked in the country lanes.
- A significant number of young families have moved back to the area and are preparing to make the area their home and have strong ties with the school & community. Many children from these young families that have returned to the area are 2nd & 3rd generations attending the school
- Being in a rural setting is safer for the children and staff. 1 in 3 of the schools in Powys not to be subjected to the COVID-19 virus.
- The hall committee and Community Council have installed a defibrillator on the outside wall of the community hall. If the community hall loses its users groups, social events not supported well, funding will not be available to maintain the defibrillator. Therefore, the community would lose the valuable lifesaving equipment.

x) Additional considerations for rural schools

The School Organisation Code includes a number of additional considerations that are likely to be relevant when carrying out a community impact assessment for a rural school closure. As Llanfihangel Rhydithon C.P. School is identified as a rural school, these factors are considered below:

- **Whether closure would encourage families with school-age children to leave the community or discourage young families from moving to the community**

Information received from the school suggests that a wide range of services and activities are provided by the school, including some facilities which could be attractive to families and which increase the attractiveness of the community to potential young families. Cylch Meithrin and Ti a Fi settings meet on the school site.

Should there be no school in Dolau, it is likely that there would be an impact on the other associated facilities available in the village, which could have an impact on families with school-age children, and which could encourage these

families to leave the community or discourage young families from moving to the community.

- **What impact closure might have on other services provided locally, for instance if the school is the only remaining public building in a community**

Information received from the school suggests that a wide range of services are provided in the school, and it is regularly used as a village meeting and performance place.

There is a community hall in Dolau which would continue to be available should there be no school in the village, therefore community activities, events and other services could be provided here. However, it is acknowledged that the Hall relies on the support of the school, and that closure of the school could have a significant impact on the viability of the hall in the longer term.

- **Whether, or not, the school is a real hub of community life, used for other purpose – such as public meetings, local events, fetes surgeries, and other get togethers – which would either cease or be diminished by being required to move elsewhere**

Information received from the school suggests that a wide range of events take place in the community events and activities take place in the school, as indicated in sections (iii), (iv) and (v) above. It is anticipated that that these events and activities would take place in the community hall should there be no school in Dolau. However, it is acknowledged that the Hall relies on the support of the school, and that closure of the school could have a significant impact on the viability of the hall in the longer term.

- **Whether or not the loss of the school, and potentially families, will have a detrimental effect on the wider economy of the community**

It is possible that the loss of the school, and potentially the loss of families from Dolau could have some impact on local business in Dolau and the surrounding area should there be less people in the area. Information received from the school suggests that the possible loss of the school would also have an impact on the rural lifestyle of the area. Implementation of the proposal could eventually lead to a reduction in employment opportunities in the village of Dolau.

- **How parents' and pupils' engagement with the alternative school and any facilities it may offer could be supported (e.g. how pupils, (particularly any less advantaged pupils) will be helped to participate in after school activities)**

As indicated in section (viii) above, should the Council proceed with the statutory process and eventually implementation of the preferred option, support would be provided to pupils and their parents as part of the transition process, to ensure full engagement with their closest alternative schools.

It is acknowledged that there would be an impact on pupils' ability to participate in after school activities as there would be an additional travel requirement for parents in order to access school activities / events.

- **The overall effect of closure on the local community (including the loss of school based facilities which are used by the local community)**

The information received from the school indicates that there is currently extensive use of the Dolau building, and significant links between the school and the local community. It is therefore likely that the proposal to remove school provision from the village of Dolau would have a significant effect on the local community.

Should the Council proceed with the proposal, it is anticipated that these services would be provided in the community hall should there be no school in Dolau. However, the school has indicated that the loss of income provided by the school to the community hall could have a significant impact on the ability for the hall to continue to run. Should the Council proceed with the proposal, it would endeavour to work with the community in Dolau to identify a suitable alternative.

xi) Issues raised during the consultation period

A number of comments were received during the consultation period which related to the proposal's impact on the community.

These comments are listed in full in the consultation report produced in respect of this proposal along with the Council's response to the points raised, and are also summarised below:

- **Travel implications**

- The proposal would lead to additional travel
- Concern about additional travel costs
- Concern about the impact on the environment
- Concern about impact on pupils' access to after school activities
- Other comments

- **Impact on the community**

- General concern about the impact on the community / village
- The school is the heart of the village
- Comments about the impact on the community centre
- Reference to other community activities / organisations
- Closure of the school would mean that people would not want to live in Dolau
- Reference to previous generations of families that have attended the school
- Queries about what would happen to the school building should the school close
- Comments about the impact of previous school closures on communities
- Comments relating to community well-being
- Comments about community impact beyond the village of Dolau
- Comments about the role of the community during the Covid pandemic

- **Comments about early years provision**

- Comments relating to the Cylch Meithrin at Dolau
- Concern about the future of the Cylch Meithrin at Dolau
- Comments about funding of the Cylch Meithrin
- Comments about registration
- Comments relating to Dolau Parent and Toddlers Group
- Comments about early years provision at other locations
- Other comments

xii) Issues raised during the objection period

A number of comments were received during the objection period which related to the proposal's impact on the community.

These comments are listed in full in the objection report produced in respect of this proposal along with the Council's response to the points raised, and are also summarised below:

- **Travel implications**

- The Council would need to provide transport for more pupils
- Concern about additional travel time for pupils
- Concern that pupils would be unable to access after school activities
- Pupils that currently walk to school would be unable to do so
- Concern about the environmental impact of additional travel
- Comments about additional transport costs

- Other comments about travel arrangements
- **Impact on the community**
 - General concern about the impact on the Dolau community
 - The school is the heart of the village/community
 - Comments about the community hall
 - Comments about impact on community activities
 - Closure of the school would mean that people would not want to live in Dolau
 - Queries about what would happen to the school building should the school close
 - Comments about the role of the community during the Covid pandemic
 - Comments about the impact of previous school closures on communities
 - Comments about the wider impact of school closure on rural communities
 - Other comments
- **Comments about housing developments in the area**
- **Comments about early years provision**
 - Comments about the early years provision at Dolau
 - Concern that closure of the school would threaten the future of Cylch Meithyrin / Ti a Fi Dolau
 - Comments about alternative early years provision

xiii) Conclusion

It is clear that a wide range of extra-curricular activities are available to pupils at Llanfihangel Rhydithon C.P. School. Should there be no school in Dolau, pupils would transfer to alternative schools. These would be larger schools, and the expectation is that at least a similar range of activities would be available for pupils. However, it is acknowledged that for pupils for whom Llanfihangel Rhydithon C.P. School is currently the closest school, additional travel would be required to enable pupils to access their closest school. This could impact on their ability to access activities, particularly where these take place after school. However the alternative schools also have pupils that rely on home to school transport, and they are experienced in ensuring that all pupils are able to take part in activities. It must also be noted that just under half of the pupils currently attending the school live closer to other schools and are therefore reliant on private transport arrangements to access after school activities and are able to manage.

Comments received during the process suggest that due to the size of Llanfihangel Rhydithon C.P. School, pupils have more opportunities to take part in extra-curricular activities and whole school activities than in larger schools. However, all the other alternative schools provide a range of extra-curricular activities that are teacher-led. There is also the availability of extra-curricular activities within the Llandrindod catchment area which are delivered by other organisations.

The information received by the school and during the consultation period and the objection period suggests that there are extensive links between the school and the local community, and that many community activities are arranged in the school which are accessed by the community. It is therefore acknowledged that closure of the school could have an impact on the community in terms of the services and activities available.

Should the Council proceed with the proposal, it is anticipated that facilities and services would be provided in the community centre should there be no school in Dolau. However, comments have been received which indicate that the loss of income provided by the school to the community centre could have a significant impact on the centre's ability to continue to run.

It is also acknowledged that implementation of the proposal would result in additional travel to school for pupils for whom Dolau is currently their closest school. Whilst free home to school transport would be provided to eligible pupils in accordance with the home to school transport policy which is in operation at that time, it is acknowledged that there could be an impact on some pupils' ability to access after school activities, and could impact on the ability of parents to take part in school events, meetings etc.

Concerns were raised during the consultation period and the objection period about what would happen to the school building should the school close, and references were made to other closed schools in Radnorshire which have been left derelict, and to the lease arrangement in respect of the community centre which could cause difficulty in respect of disposal of the school. Should the Council proceed with closure of the school, the Council's Corporate Asset Policy would be followed in respect of the future of use of the site. Should the asset be transferred to a third party, the Council would have no control over what happens to it. Some schools that have been closed have been transferred to other service areas, e.g. housing or to a community and should the school close, there would be an opportunity for the community council to discuss the future of the building with the Council.

Mae'r dudalen hon wedi'i gadael yn wag yn fwriadol

CYNGOR SIR POWYS COUNTY COUNCIL.

CABINET EXECUTIVE

Date: 8 February 2022

REPORT AUTHOR: County Councillor Phyl Davies

Portfolio Holder for Education

REPORT TITLE: Ysgol Cedewain Special School – Transforming Education Programme

REPORT FOR: Decision

1. Purpose

- 1.1 This report seeks Cabinet approval to submit a Full Business Case (FBC) to the Welsh Government for capital investment to replace the existing Ysgol Cedewain building in Newtown
- 1.2 The project is included within the Council's Strategic Outline Programme (SOP) for Band B, which was approved by Welsh Government and the Cabinet in July 2017
- 1.3 The Strategic Outline Case was approved by Cabinet in May 2020 and Welsh Government in July 2020.
- 1.4 The estimated required funding, is as follows:

Welsh Government contribution 75%	£14,788,252
PCC 25%	£4,929,418
Total	£19,717,670

- 1.5 The approved funding envelope at the previous Outline Business Case stage was £22m, therefore this now releases approximately £3m within the Council's Band B Programme, which will be re-directed to other projects.

2. Background**Strategy for Transforming Education in Powys**

- 2.1 On the 14th April 2020, a new Strategy for Transforming Education in Powys was approved by the Leader via a delegated decision.

2.2 The Strategy was developed following extensive engagement with a range of stakeholders during two separate periods between October 2019 and March 2020. The Strategy sets out a new vision education in Powys, as follows:

'All children and young people in Powys will experience a high quality, inspiring education to help develop the knowledge, skills and attributes that will enable them to become healthy, personally fulfilled, economically productive, socially responsible and globally engaged citizens of 21st century Wales.'

2.3 The new strategy also sets out a number of guiding principles which will underpin the transformation of education in Powys. These are as follows:

- *A world class rural education system that has learner entitlement at its core*
- *Schools that are fully inclusive, with a culture of deep collaboration in order to improve learner outcomes and experience*
- *A broad choice and high quality of provision for 14 – 19 year old learners, that includes both academic and vocational provision, meeting the needs of all learners, communities and the Powys economy*
- *Welsh-medium provision that is accessible and provides a full curriculum in Welsh from Meithrin to age 19 and beyond*
- *Provision for learners with Special Educational Needs (SEN)/Additional Learning Needs (ALN) that is accessible as near to home as is practicably possible, with the appropriate specialist teaching, support and facilities that enables every learner to meet their potential*
- *A digitally-rich schools' sector that enables all learners and staff to enhance their teaching and learning experience*
- *Community-focused schools that are the central point for multi-agency services to support children, young people, families and the community*
- *Early years provision that is designed to meet the needs of all children, mindful of their particular circumstances, language requirements or any special or additional learning needs*
- *Financially and environmentally sustainable schools*
- *The highest priority is given to staff wellbeing and professional development*

2.4 The new strategy sets out a number of Strategic Aims and Objectives, to shape the Council's work to transform the Powys education system over the coming years. One of the Strategic Aims of the Strategy is to *'improve learner entitlement and experience'*.

2.5 The strategy also includes an enabling action to implement *'a major capital investment programme that will ensure that schools in Powys*

have inspiring, environmentally sustainable buildings that can provide opportunities for wider community activity, including where possible childcare services, early years, ALN, multi-agency support and community and leisure facilities.'

Case for Change

2.6 Ysgol Cedewain is situated in the town of Newtown in the county of Powys and provides education for pupils from 2 and a half years old to 19 years old, with a wide range of complex educational, sensory and physical needs. All pupils have a statement of special educational needs (SEN), or education health and care plan (ECHCP).

2.7 **The case for change is based on the need to improve facilities for pupils at Ysgol Cedewain. The school is in a very poor condition and has significant site constraints:**

- The current building is in very poor condition, categorised as condition C. Most of the classrooms are ageing portable structures and, in some cases, are in need of urgent maintenance and repair, nearing end of usable lifespan. It is a sprawling site, spread over a large area. The distance and obstacles between classrooms mean that a lot of time and effort is spent safely escorting pupils with complex sensory and physical needs around the school site. This can be particularly challenging during bad weather. The buildings and layout also severely limit the provision of specialist equipment for pupils with significant additional needs. Specialist equipment is not available in all areas of the school therefore limiting access and mobility for some pupils.
- There are significant health and safety and safeguarding issues with the site, including a public right of way that runs across it, difficult access areas and poor parking facilities. The minibus parking area uses up part of the playground, which restricts use at peak times.

2.8 **The requested investment will deliver a brand new, purpose-built school with 108 places in age-appropriate environments. The new build will deliver the following:**

- Specialist support and provision to pupils with significant additional learning needs, in a modern and innovative learning environment and will better equip teachers to tailor lessons to meet the specific needs of the learners, improving accessibility to learners across the North of Powys;
- Appropriate learning spaces to deliver the new curriculum;

- Specialist equipment, including IT facilities, to support teaching and learning outcomes which will help to ensure all learners maximise their potential;
 - More effective use of the site - the school will no longer be dependent on demountable accommodation which is currently dispersed across the site;
 - A holistic integrated multi agency approach, with dedicated physiotherapy and medical rooms, and a hydrotherapy pool and sensory rooms and garden. The facilities will support the school's well-established relationships with the specialist services and will also further cement the Council's relationship with Powys Teaching Health Board;
 - A fully equipped early years class base, with breakout space, calming room, laundry and hygiene facilities, together with an individual outdoor learning area, which will enable the school to increase their early years provision. The facilities would also enable the school to consider providing after school care, holiday play schemes and wrap around childcare and to support the childcare offer for learners with additional needs;
 - A flagship community focused school, with community groups being able to access the facilities out of school hours. Safeguarding will be ensured as the school will be able to lock down the teaching areas while enabling community access to the community zone;
 - Therapeutic facilities available to hire, - these include a hydrotherapy pool and changing facilities, rebound room, touchtrust room, community kitchen and café, meeting room and hall. The hire of the facilities will be managed by the school and provide additional revenue income. There are very few therapeutic facilities within the locality and it is anticipated that there will be a strong demand.
- 2.9 The new school will be built on a part of the current site of Ysgol Cedewain and part of the adjoining primary school – Maesyrrhandir CP School. There will be a new grassed sports pitch and Multi Use Games Area for shared usage by Ysgol Cedewain & Maesyrrhandir CP School.

3. Advice

- 3.1 The advice of officers is to submit the FBC to Welsh Government for approval. This would enable construction to commence with the new school being opened to pupils in Summer Term 2023.
- 3.2 Actual costs are now confirmed – see Appendix A – Full Business Case.

- 3.3 Welsh Government intervention rate for special schools included within the Band B programme is 75%, which represents good value for money for the council.

4. **Resource Implications**

4.1 **Financial Capital:**

The project will be funded through the 21st C Schools Band B Programme. The total cost associated with the project is **£19,717,670**. The Council is requesting that Welsh Government provide 75% of the total cost of the project, with Powys County Council responsible for the remaining 25%. The project is funded from Powys 21st C Schools Band B programme- the overall Band B Programme will need to be adjusted to take account of the cost of this scheme to ensure that the overall funding envelope is not exceeded.

Capital funding from Powys County Council will be profiled as follows:

	2021/22	2022/23	2023/24	2024/25	Total
	£	£	£	£	£
Borrowing	961,681	0	3,967,737	0	4,929,418
Total PCC funding	961,681	0	3,967,737	0	4,929,418

The borrowing detailed above is included in the capital programme and therefore the costs of borrowing are included in the council's capital charges. The following capital from Welsh Government is requested:

	2021/22	2022/23	2023/24	2024/25	Total
Total Welsh Government funding	0	10,209,999	4,208,547	369,706	14,788,252

The capital costs include an allocation of £2m, as allocated provisional sums for risk, with a low likelihood of occurrence. A request to utilise this sum as contingency to cover off unforeseen costs as the scheme adapts to become Net Zero Carbon has been submitted. Welsh Government advise that funding would be separate from the main grant and would only be released if incurred. Evidence would need to be provided in the form of a compensation event.

4.2 **Financial Revenue:**

Based on the current accommodation schedule, the funding delivered to the school via the schools funding formula will increase by an estimated £37,586 taking into account the floor area and other premises factors. This figure will potentially change with the revised formula. This pressure will need to be considered by the Schools Service as it updates its Integrated Business Plan to include provision

for 2023/24 budget planning. There are no rates implications for the school as rates are not charged for special schools due to the exemption category for property used by people with disabilities.

4.3 Impact on balance sheet

The new school will remain on the public sector balance sheet.

4.4 Overall affordability and funding support

75% of the costs of the new school will be funded by Welsh Government, and 25% from PCC. Cabinet and Welsh Government approved the 21st C Schools Band B Strategic Outline Programme in July 2017.

The Council sets its Prudential Indicators, under the Prudential Code, based on making prudent and affordable decisions and the 21st Schools' project were included in these indicators. The annual cost for the project is £190,000 based on the spend profile above over a 50 year life.

If the new building was not to proceed, the Council would need to continue maintaining a poor condition building with an estimated backlog maintenance figure of £2.4m.

The existing infrastructure is included within the development boundary and will be demolished to make room for playing and sporting areas. The demolition costs are included within the funding envelope.

4.5 Procurement:

“The appointed contractor was procured under the new SEWSCAP3 framework. Appropriate bonds and collateral warranties will be obtained, and contract signed prior to commencement. The contractor will also be required to secure a Project Bank Account as a condition of the contract”.

4.6 Section 151 Officer comments.

4.7 Corporate Property comments:

“There are no implications to Corporate Property. The current Ysgol Cedewain estate will be demolished to make room for the new-build and playing areas. No assets will be declared surplus to Schools Service requirements as part of this scheme.”

4.8 Project delivery will require specialist PCC staff resourcing from various departments, including ICT, Schools Service, Finance and Catering and Cleaning. These service areas will be kept informed of the development of the proposal throughout the statutory process.

5. Legal implications

- 5.1 Legal: The recommendations can be accepted from a legal point of view.
- 5.2 The Head of Legal and Democratic Services (Monitoring Officer) has commented as follows: "I note the legal comment and have nothing to add to the report."

6. Data Protection

- 6.1 N/A

7. Comment from local member(s)

- 7.1 Comments received from Cllr David Selby:

1. The replacement of the buildings of Cedewain School is long overdue. The current physical structure is far from ideal and this new school is an essential investment.
2. Reference is made to community facilities being made available. It is key that this is written into the establishment of the new school. Unfortunately, there is a severe lack of community facilities in the surrounding area and the building of the new school reduces available open space. The school facilities should be available wherever possible to those living in the nearby estate.
3. The new school should have clear links with the neighbouring Maesyrrhandir school for the benefit of both schools.

- 7.2 Comments received from Cllr Daniel Rowlands:

Thank you for sharing this report. The current school is in a very poor condition, and in order to deliver a world class education where pupils can learn in a safe environment, a new building is required. I support this report.

8. Impact Assessment

- 8.1 An initial impact assessment of the preferred way forward is attached as Appendix B. The impact assessment considers the proposal's impact on the Welsh Government's well-being goals, as outlined in the Well-being of Future Generations Act.

The summary of the impact assessment is as follows:

The impact assessment suggests that the impact is generally positive with few negative aspects, such as the loss of Ysgol Maesyrrhandir sports field currently used as an area to exercise and walk dogs by the local community. The development of new age-appropriate innovative

facilities for additional learning needs pupils in the North Powys area would address many issues related to the poor condition of the buildings, improving their learner entitlement and experience for pupils aged 3 - 19. The proposed changes will meet the challenges of the anticipated rise in numbers of severely disabled or non - ambulant pupils in the area and may lead to less pupils needing to be placed in schools outside of the County.

9. Recommendation

- 9.1 To seek Cabinet approval to submit the Full Business Case (FBC), as set out in Appendix A, to Welsh Government's 21st Century Schools Programme for capital investment to replace the existing Ysgol Cedewain building in Newtown.
- 9.2 To note that the estimated cost of the overall project is **£19,717,670** with Welsh Government funding 75% of the costs, and the Council funding 25%.

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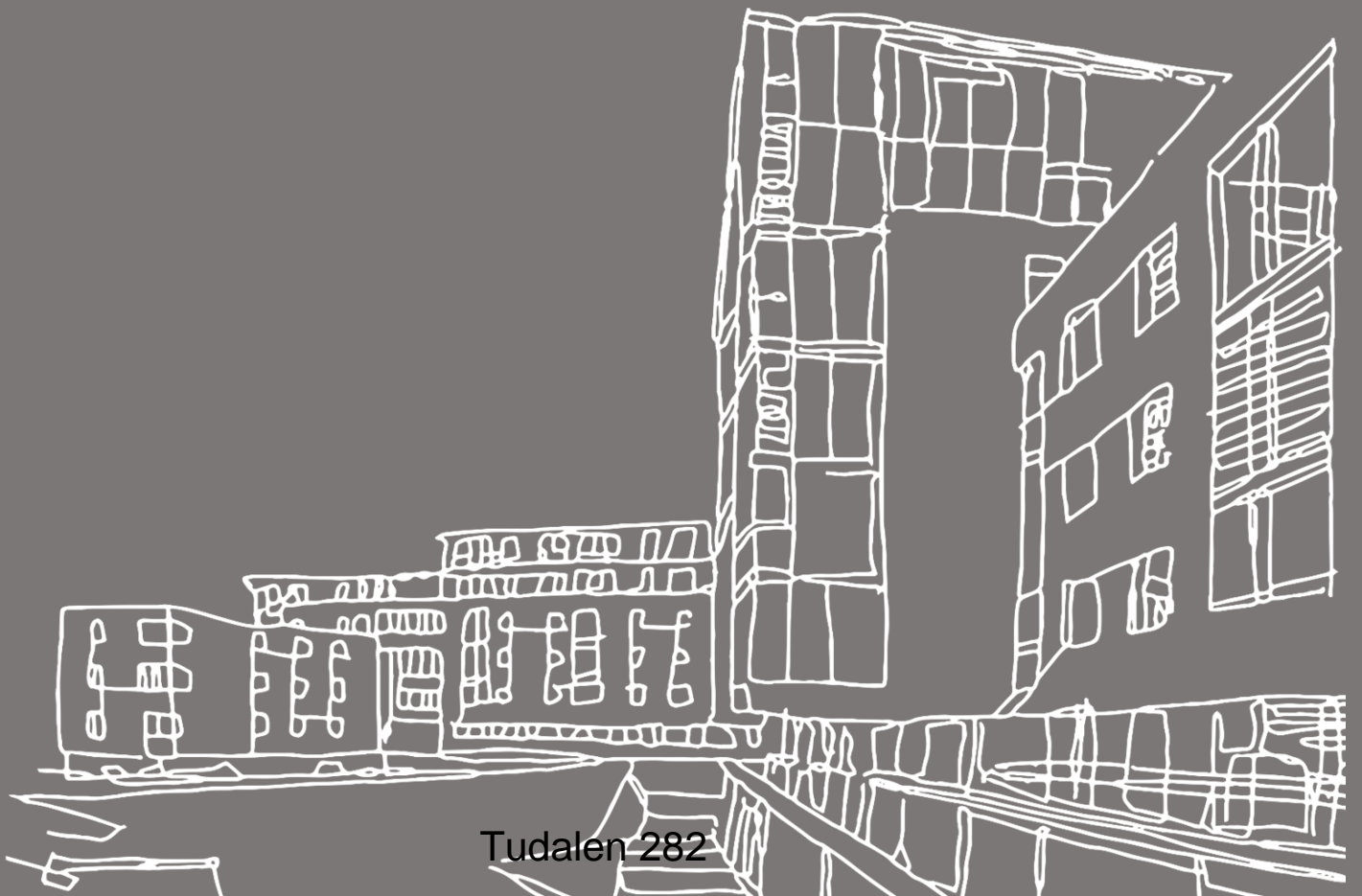
Powys County Council

Ysgol Cedewain FBC

December 2021

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1 Executive Summary

1.1 Strategic Case

The Strategic Case outlined in the Ysgol Cedewain Strategic Outline Case demonstrated the rationale for a new build at Ysgol Cedewain.

The current situation with the school estate being sprawled across 10 separate teaching blocks, the public right of way that currently splits the site in two, the lack of pupil pick up and drop off space, and the deteriorating state and condition of the buildings means that the school is in urgent need of significant investment.

DDA compliance in the school has also been graded as 'partial' and does not meet the needs of pupils and teachers in a special school setting.

1.1.2 Case for Change

The case for change is based on the need to improve facilities for pupils at Ysgol Cedewain. The school is in a very poor condition and has significant site constraints.

The current building is in very poor condition, categorised as condition C.

- There is outstanding backlog maintenance on the site, to the sum of £2.4M.
- Most of the classrooms are ageing portable structures and, in some cases, are in need of urgent maintenance and repair, nearing end of usable lifespan.
- It is a sprawling site, spread over a large area.
- The distance and obstacles between classrooms mean that a lot of time and effort is spent safely escorting pupils with complex sensory and physical needs around the school site. This can be particularly challenging during bad weather.
- The buildings and layout also severely limit the provision of specialist equipment for pupils with significant additional needs.
- Specialist equipment is not available in all areas of the school therefore limiting access and mobility for some pupils.
- There are significant health and safety and safeguarding issues with the site, including a public right of way that runs across it, difficult access areas and poor parking facilities.
- The minibus parking area uses up part of the playground, which restricts use at peak times.

1.1.3 Investment Objectives

The Investment Objectives underlying the case for change for this project are:

1. To deliver a fit for purpose building solution that delivers an improved learning environment for pupils with significant additional learning needs – minimum condition B and meeting BREEAM requirements;

2. To improve the building's efficiency / running costs;
3. To provide facilities that will accommodate a greater proportion of pupils with significant additional learning needs that are currently accessing provision out of Powys;
4. To provide improved opportunities for pupils with significant additional learning needs;
5. To provide holistic support for Powys children with significant additional needs, incorporating reliable specialised equipment and facilities;
6. Increase the capacity of teaching staff to deliver a 21st century curriculum that meets the needs of learners with significant additional learning needs.

1.2 Economic Case

1.2.1 Scope Appraisal

Options

- Minimum – 2 to 19 School for 102 children with additional learning needs(ALN);
- Intermediate – 2 to 19 School for 102 children with ALN and community facilities;
- Maximum – 2 to 19 School for 102 children with ALN, community and respite facilities.

1.2.2 Service Solution Appraisal

Options

- Option 1 – Do nothing business as usual;
- Option 2 - Refurbish existing blocks and conduct essential maintenance;
- Option 3 – Remodel and partly rebuild existing blocks;
- Option 4 – New build ALN school on existing site with communities facilities;
- Option 5 – New build ALN school on alternative site with communities facilities;
- Option 6 – New build ALN school on existing site with communities and respite facilities.

1.2.3 Shortlisted Options

The shortlisted options are therefore:

- Option 1: Do nothing business as usual;
- Option 4: New Build 2 to 19 Special School with community facilities on existing site;
- Option 5: New Build 2 to 19 Special School with community facilities on alternative site;
- Option 6: New Build 2 to 19 Special School with community and respite facilities on existing site.

1.2.4 Economic Appraisal

Net Present Cost

The following tables summarise the key results of the economic appraisals for each option. Values used for the economic analysis are expressed in base year terms. Options have been risk-adjusted to account for the 'risk retained' (in £s) by the organisation under each option.

Discounted Cash flow (DCF) Summary Sheet		Inc. Optimism Bias		Excl. Optimism Bias	
Option No.	Option Name/Description	NPC (£m)	EAC (£m)	NPC (£m)	EAC (£m)
Option 1:	Business As Usual	37.690	2.562	37.440	2.545
Option 4:	New Build 2 to 19 special school with community facilities on existing site	82.685	3.152	82.685	3.152
Option 5:	New Build 2 to 19 special school with community facilities on alternative site	85.465	3.258	84.560	3.224
Option 6:	New Build 2 to 19 special school with community and respite facilities on existing site	85.472	3.259	84.398	3.218

1.3 Commercial Case

1.3.1 Procurement Strategy

The overarching procurement route for the Ysgol Cedewain redevelopment was via the South East & Mid Wales Collaborative Construction Framework Agreement, known as SEWSCAP, Construction Framework.

The advantages of the SEWSCAP3 Construction Framework is that the OJEU process is undertaken when compiling the framework and contractors are assessed as competent in this sector. The disadvantage might be the opportunity to tender is limited to those contractors on the framework list.

To progress the project, the Council commissioned a design team, via Heart of Wales Property Services Ltd (HoWPS), a joint venture company set up by the Council and Kier to provide property design, construction and maintenance services for Band B of the C21st Schools Programme and other capital investments.

The Ysgol Cedewain design team is comprised of a core project management team within HoWPS, supported by Kier architects, structural, civil, mechanical and electrical engineers, and cost consultants. Further expertise is directly employed by the Council to provide landscape, acoustic, surveying and BREEAM services.

This approach is considered to provide the best balance of approach regarding quality of the final, bespoke building which must be constructed on an occupied school site, and the appropriate allocation of risk.

1.3.2 Procurement Method

The tender was run as a mini-competition under Lot 9 of the South East & Mid Wales Collaborative Construction Framework Agreement, known as SEWSCAP, seeking tenders from framework contractors to apply for a 2 stage Design and Build contract for the design and construction of a 108 place specialist ALN school with integrated 6th form (2-18 years) with full cooking kitchen, dining area, community café, hall, hydrotherapy pool and specialist teaching areas within the boundary of the existing Ysgol Cedewain and neighbouring Ysgol Maesyrrhandir.

1.3.3 Tender Evaluation

The evaluation process involved the individual assessment of tender responses by the Council's evaluators. Once assessed a consensus meeting of evaluators was held to decide on the final agreed score and feedback comments for each tender response received.

The evaluators were:

- Diane Rees, Project Manager, Schools Service
- Jim Swabey, Professional Lead, HOWPS
- Calvin Williams, Assistant Project Manager, HOWPS

The role of Lead Evaluator was carried out by:

- Garry Leatherland – Procurement Category Manager, Construction & Associated Works

1.3.4 Tender Results

The results of the overall appraisal process were as follows:

Contractor	Technical Score	Social Value Score	Commercial Score	Final Score	Rank
Bouygues UK Ltd	23.10	7.64	36.12	66.86	5
C Wynne & Sons Ltd T/A Wynne Construction	30.80	11.31	50.00	92.11	1
Galliford Try Construction Ltd	23.45	5.94	42.13	71.52	4
Morgan Sindall Ltd	29.40	15.00	38.85	83.25	2
Willmott Dixon Construction Ltd	25.90	12.98	41.66	80.55	3

On the basis of the above assessment results, it has been recommended to make an award to the most economically advantageous tenderer: C Wynne & Sons Ltd T/A Wynne Construction.

1.3.5 Contractual Arrangements

The form of contract proposed is in two distinct phases.

Phase 1 – the design element – will be in the form of a NEC4 Professional Services Contract.

Phase2 – the construction element – will be in the form of a NEC4 Engineering & Construction Contract - Option A:Priced Contract with Activity schedule.

1.4 Financial Case

1.4.1 Project Summary Costs

New Build % (Area)	100%
Description of work & any unusual constraints	New Build Special School to BREEAM Building Requirements
# Pupil Places	108
# SEN Places	108
Total # Places	108
# Storeys (including basement)	2
Delivered through Regional Framework?	SEWSCAP 3 Framework
Contract period in weeks	16 months
GFA (M2)	3,900
Anticipated Community Benefits	Community Café and Hall Hire, Hydrotherapy and Rebound Room Hire
# Trainee and apprenticeship opportunities	Commitment to 326 weeks
Use of local subcontractors as a % of total cost	30%

1.4.2 Breakdown of Capital Costs

Project Costs	
Capital Cost	£ 17,717,670
Optimism Bias	£0
Contingencies	£2,000,000
VAT (only to be included where non-recoverable by applicant)	£0

Total Project Cost (inclusive of optimism bias and contingencies)	£19,717,670
Total (excluding optimism bias but inclusive of contingencies)	£19,717,670
Welsh Government Contribution	£14,788,253 (75%)

1.4.3 Overall Affordability and Balance Sheet Impact

A balance sheet asset addition of £19,717,670 is made for the new school. Short term additional funding of £19,717,670 for years 0 through 3 is required, inclusive of contingency but excluding VAT and optimism bias. Additional ongoing revenue funding of £23,071 per annum will be required from the inception of the new school, this will be made available through the PCC schools' budget, partially offset by income raised through private hire of new facilities including the Community Café and Hall, Rebound Room and Hydrotherapy Pool.

The Band B submission has been scrutinised and assessed by the Council's Section 151 Officer for affordability in light of the 75% programme intervention rate.

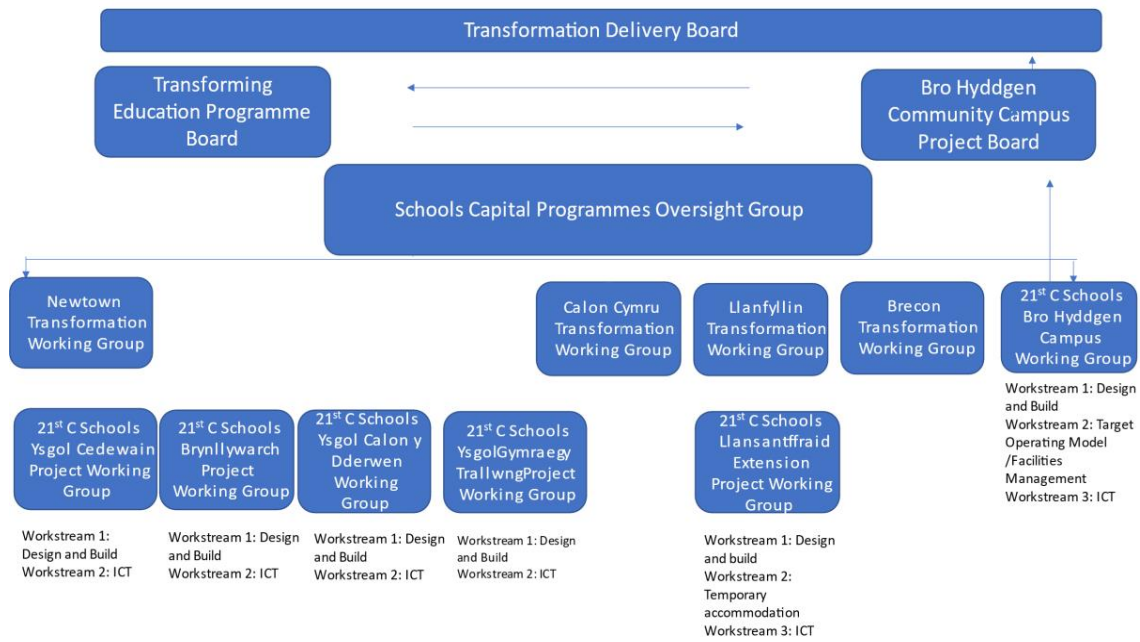
The Council will meet the 25% contribution required to support the overall programme in Band B through prudential borrowing.

1.5 Management Case

1.5.1 Programme Management Arrangements

This scheme is a constituent of the Powys 21 Century Schools Programme and has been identified within that Programme as a priority. It will be managed in accordance with best practice in programme and project management principles – MSP and PRINCE2 - to provide a systematic and effective delivery framework.

Overall corporate governance for this scheme is provided by the Transformation Delivery Board. The project structure described below is designed to ensure that the preferred option will have a robust project management function in place throughout the proposed timelines. This diagram demonstrates the lines of authority, support and responsibility.



1.5.2 Project Management Arrangements

The reporting and governance arrangements for this project are as follows:

Project Manager presents the highlight report to Programme Manager on a monthly basis. These meetings will be chaired by the representatives for each of the Project team areas;

The Programme manager will present summary reports from “Project Team” meetings to the Schools Transformation Programme Board meeting on a monthly basis.

On an exception basis only, the Project Board will report key strategic risks and issues to Programme Board for resolution.

1.5.3 Project Structure

The project will be managed in accordance with the general principles of MSP/PRINCE2 methodology. The project management team comprises the Project Board, “Project Team”, the Project Manager and the Team Managers. This “team” is responsible for the day-to-day management and implementation of the project.

The Project Delivery team will remain actively involved throughout the duration of the project fulfilling the intelligent client role once the project is passed over to the successful contractor, thus ensuring continuity of professional staff representing Powys CC during all stages of the project programme.

1.5.4 Outline Project Plan

Key dates for the remainder of the Project are as follows:

Date	Actions (commencement)
10/04/21	RIBA 4 – Contract awarded to successful contractor
01/11/21	Planning Application Submitted
08/02/22	FBC: Cabinet approval
17/02/22	FBC: WG approval
09/03/22	RIBA 5 – Construction phase commences
01/05/23	RIBA 5 – Commissioning commences
25/04/23	School Opens
01/09/23	Defects RIBA 6
01/09/24	Closure report

2 Strategic Case

2.1 Strategic Fit

The Strategic Case outlined in the Ysgol Cedewain Strategic Outline Case demonstrated the rationale for a new build at Ysgol Cedewain.

Since OBC submission and subsequent approval, no change in strategy or project direction has incurred, however, having undertaken further assessments and engagement with Powys CC specialist ALN team, some elements of the accommodation schedule have been redefined to reflect the high dependency nature of future pupils attending the school. The architects were unable to accommodate the design amendments within the designed building footprint, therefore the building has had to be expanded, and therefore incurring more capital costs than anticipated at OBC stage.

The strategic case to replace the existing school estate remains strong and is strengthened by Estyn's latest inspection report, which was issued on Estyn's website in April 2020, following SOC submission and approval. Within the report, Estyn highlights significant safeguarding concerns and the first recommendation within the report is for the school to address the shortcomings in the management of safeguarding identified during the inspection.

The current situation with the school estate being sprawled across 10 separate teaching blocks, the public right of way that currently splits the site in two, the lack of pupil pick up and drop off space, and the deteriorating state and condition of the buildings means that the school is in urgent need of significant investment.

DDA compliance in the school has also been graded as 'partial' and does not meet the needs of pupils and teachers in a special school setting.

The following National and Local Strategies will be addressed or met as a result of progressing this project.

2.1.1 National Strategies

The proposals contained within this business case contribute to the following national and international strategies and policies:

- United Nations Convention on the Rights of the Child;
- Wellbeing of Future Generations Act 2015;
- Prosperity for All: the national strategy (2017)
- Education in Wales – Our National Mission Action Plan 2117 – 2021
- Qualified for life: An education improvement plan for 3 to 19-year-olds in Wales (2014)
- A curriculum for Wales – a curriculum for life (2015)
- Taking Wales Forward 2016–2021 (2016)

- One Wales: One planet, a new sustainable development scheme for Wales May 2009 or ant successor strategy;
- Learner Travel Statutory Provision and Operational Guidance -; 2014
- Measuring the capacity of schools in Wales – Circular 021/2011;
- A Living Language: A language for Living: Welsh Language Strategy 2012-17;
- Building a Brighter Future: Early Years and Childcare Plan 2013;
- School Standards and Organisation (Wales) Act 2013;
- School Organisation Code 2013;
- School Organisation: Consultation with Children and Young People – Guidance Document 2013;

2.1.2 Local Strategies

- Vision 2025 sets out the Cabinet’s priorities for the council up to 2025. ‘Strengthening Learning and Skills’ is one of the four priorities outlined within this vision;
- Welsh in Education Strategic Plan 2017-20 sets out the council’s priorities for developing Welsh-medium provision within Powys;
- Strategy for Transforming Education in Powys, which sets out Powys’ approach to developing the school infrastructure and the planning of school places;
- Powys Community Focused Schools Strategy, which ensures that key services are sufficiently integrated and able to work collaboratively;
- Powys Carbon Reducing & Sustainability Strategies, which identifies that all new schools will be part of a new generation of energy efficient buildings;
- Powys Regenerations Strategy aims to deliver outcomes which will have a positive impact upon the physical, social, environmental, economic and cultural attributes of the county; and
- Powys ICT Strategy which aims at delivering learners’ entitlement to use technology to support their learning and to enable schools to become more innovative and effective in their teaching and learning.

2.2 Case for Change

The case for change is based on the need to improve facilities for pupils at Ysgol Cedewain. The school is in a very poor condition and has significant site constraints.

- The current building is in very poor condition, categorised as condition C.
- There is outstanding backlog maintenance on the site, to the sum of £2.4M.
- Most of the classrooms are ageing portable structures and, in some cases, are in need of urgent maintenance and repair, nearing end of usable lifespan.
- It is a sprawling site, spread over a large area.

- The distance and obstacles between classrooms mean that a lot of time and effort is spent safely escorting pupils with complex sensory and physical needs around the school site. This can be particularly challenging during bad weather.
- The buildings and layout also severely limit the provision of specialist equipment for pupils with significant additional needs.
- Specialist equipment is not available in all areas of the school therefore limiting access and mobility for some pupils.
- There are significant health and safety and safeguarding issues with the site, including a public right of way that runs across it, difficult access areas and poor parking facilities.
- The minibus parking area uses up part of the playground, which restricts use at peak times.

2.2.1 Investment Objectives

The Investment Objectives underlying the case for change for this project are:

1. To deliver a fit for purpose building solution that delivers an improved learning environment for pupils with significant additional learning needs – minimum condition B and meeting BREEAM requirements;
2. To improve the building's efficiency / running costs;
3. To provide facilities that will accommodate a greater proportion of pupils with significant additional learning needs that are currently accessing provision out of Powys;
4. To provide improved opportunities for pupils with significant additional learning needs;
5. To provide holistic support for Powys children with significant additional needs, incorporating reliable specialised equipment and facilities;
6. Increase the capacity of teaching staff to deliver a 21st century curriculum that meets the needs of learners with significant additional learning needs.

2.2.2 Existing Arrangements

Ysgol Cedewain is a special school for children with additional learning needs (ALN). It is situated in Newtown in North Powys and provides education for pupils from aged 2 to 19 years old, with wide range of complex educational, sensory and physical needs. Most pupils have a statement of special educational needs (SEN). Almost all pupils are local authority pupils drawn from a wide catchment area in the north of Powys.

The school is currently operating at about full capacity. The total full capacity is 120 pupils and, at September 2021, there are 116 pupils on the roll.

It is anticipated that the school will be at full capacity for at least the next 5 years; whilst there is a waiting list, it is very difficult to provide more accurate figures as the needs of each pupil are not known fully until they approach school age.

Because of the condition of and facilities at the school, some 7 learners choose to travel out of county to access fit for purpose facilities.

Key information about the existing arrangements is held within tables 1-3 below:

Table 1 – Present & forecast pupil numbers

School	Sep 2021	Jan 2022	Jan 2023	Jan 2024	Jan 2025
Ysgol Cedewain	116	120	120	120	120

Table 2 – Number of surplus places

School	Total places	Current places (Sep 2021)	Total surplus (Sep 2021)
Ysgol Cedewain	120	109	11

Table 3 – Latest condition assessments

School	Condition	Suitability	Sustainability
Ysgol Cedewain	C	C	C

2.2.3 Clarifications to the OBC

WG's Minister for Education has approved the OBC for progression to Full Business Case (FBC) stage without clarification.

2.2.4 The Proposal

The requested investment will deliver a brand new, purpose-built school with 108 places in age-appropriate environments. In general, the new build will deliver the following:

- Specialist support and provision to pupils with significant additional learning needs, in a modern and innovative learning environment, and will better equip teachers to tailor lessons to meet the specific needs, and improving accessibility to learners across the North of Powys;
- Appropriate learning spaces to deliver the new curriculum;
- Specialist equipment, including IT facilities, to support teaching and learning outcomes which will help to ensure all learners maximise their potential;
- More effective use of the site - the school will no longer be dependent on demountable accommodation, which is currently dispersed across the site;
- A holistic integrated multi agency approach, with dedicated physiotherapy and medical rooms, and also a hydrotherapy pool and sensory rooms and garden. The facilities will

support the school's well-established relationships with the specialist services and will also further cement the Council's relationship with Powys Teaching Health Board;

- A fully equipped early years class base, with breakout space, calming room, laundry and hygiene facilities, together with an individual outdoor learning area, which will enable the school to increase their early years provision. The facilities would also enable the school to consider providing after school care, holiday play schemes and wrap around childcare and to support the childcare offer for learners with additional needs;
- A flagship community focused school, with community groups being able to access the facilities out of school hours. Safeguarding will be ensured as the school will be able to lock down the teaching areas while enabling community access to the community zone;
- Therapeutic facilities available to hire, - these include a hydrotherapy pool and changing facilities, rebound room, touchtrust room, community kitchen and café, meeting room and hall. The hire of the facilities will be managed by the school and provide additional revenue income. There are very few therapeutic facilities within the locality, and it is anticipated that there will be a strong demand.

The new school will be built on a part of the current site of Ysgol Cedewain and part of the adjoining primary school – Maesyrrhandir CP School. There will be a new grassed sports pitch and Multi Use Games Area for shared usage by Ysgol Cedewain & Maesyrrhandir CP School.

The proposed completion timeframe for the project is Spring 2023 and a Benefits Realisation Plan will be included in the Management Case.

2.2.5 Other Changes to the Scheme Since the OBC

It has been agreed that the scope of the project will be extended slightly to include the following new items for construction, at an additional projected cost of £433,815.40

- Erection of an external canopy as a Taxi Drop-off area;
- Stair widths to be increased from ERD/tender to reflect SEN standards;
- Addition of half-leaf & associated ironmongery to internal doors;
- Allowance made for 2 passenger lift upgrades to full bed lifts;
- Allowance for additional fencing/segregation strategies.

Otherwise:

- The main benefits of the project are unchanged from OBC.
- The OBC carried the results of the Risk Appraisal from a workshop, where the risk scores were assigned on the basis of participants' judgment and assessment of previous procurements. The range of scales used to quantify risk followed the

corporate risk assessment process. Those results helped in the outcome of the tender process and, with a successful contractor being appointed, the Management Case of the FBC now contains updated details on the Risk Register, where the 34 risks identified at the Appraisal Workshop are now recorded and added to; and

- There have been no changes in the constraints of the project, nor to project dependencies.

3 Economic Case

3.1 Critical Success Factors

CSF1: Strategic Fit

- The option must satisfy all 5 investment objectives and business needs
- The option must optimise the benefits as presented in the Main Benefits Criteria
- The option must be aligned with and promote the national, regional and local strategies

CSF2: Potential Value for Money (VFM)

- The option must optimise the resources available for the delivery of learning
- The option must provide value for money in the delivery of learning

CSF3: Potential Achievability

- The option must be acceptable to learners, staff, governors and the wider community;
- The option must be politically acceptable at local, county and national level;
- The option must be achievable within current legislation;
- The options must be operationally achievable/physically achievable.

CSF4: Supply side Capacity and Capability

- The option must secure sufficient appropriate resources and expertise to be deployed within Powys to achieve the investment objectives.

CSF5: Potential Affordability

- The extent to which the option is affordable within the forecasted revenue of participating organisations;
- The extent to which the option is affordable within the forecasted capital finding of participating organisations.

3.2 Long List Options

The long list of options was generated by a cross departmental group of stakeholders at a workshop held on 19 March 2020. The following individuals were present at this workshop:

- Marianne Evans – Senior Manager Education Services;
- Betsan Ifan – Programme Manager;
- Diane Rees – Project Manager.

Each option was evaluated against the agreed investment objectives and critical success factors in order to determine whether they were to be discounted or carried forward to the short list for further consideration.

3.3 Scope Appraisal

3.3.1 Options

- Minimum – 2 to 19 School for 102 children with additional learning needs(ALN);
- Intermediate – 2 to 19 School for 102 children with ALN and community facilities;
- Maximum – 2 to 19 School for 102 children with ALN, community and respite facilities.

3.3.2 Advantages and Disadvantages

Table 4 - Scope advantages and disadvantages

Do Minimum: 2 to 19 School for 102 children with additional learning needs(ALN)	
Advantages	Disadvantages
<ul style="list-style-type: none"> • Minimises the capital investment required; • Simplifies design. 	<ul style="list-style-type: none"> • Does not enable wider integration of school within the community; • Does not offer any 'value add' to indirect stakeholders of the scheme; • Does not create new opportunities for additional income streams for the school.
Intermediate: 2 to 19 School for 102 children with ALN and community facilities	
Advantages	Disadvantages
<ul style="list-style-type: none"> • Increased opportunities for school and community cohesion; • Increased benefits for communities able to access specialist therapeutic facilities; • Fits with areas of learning in the new curriculum; • Creates opportunities for additional income streams for the school • Contributes towards positive perception of PCC within wider community 	<ul style="list-style-type: none"> • Increases capital investment required in the project; • Reduces the capital funding available for other projects in the Band B programme
Maximum: 2 to 19 School for 102 children with ALN, community and respite facilities	
Advantages	Disadvantages
<ul style="list-style-type: none"> • As above plus: • Allows for increased integration of services to parents of ALN children; • Supports the wellbeing of unpaid carers; • Increased integration between education and social care. 	<ul style="list-style-type: none"> • Maximises capital investment required in the project; • Further reduces the capital funding available for other projects in the Band B programme; • Likely unaffordable under the current PCC capital programme • Increases complexity of design.

3.3.3 Conclusion

Table 5 - Scope appraisal summary

Reference to:	Do Nothing	Intermediate Scope	Maximum Scope
1. To deliver a fit for purpose building solution that delivers an improved learning environment for pupils with significant additional learning needs – minimum condition B and meeting BREEAM requirements	✓	✓	✓
2. To improve the building's efficiency / running costs	✓	✓	✓
3. To provide facilities that will accommodate a greater proportion of pupils with significant additional learning needs that are currently accessing provision out of Powys	✓	✓	✓
4. To provide improved opportunities for pupils with significant additional learning needs	✓	✓	✓
5. To provide holistic support for Powys children with significant additional needs, incorporating reliable specialised equipment and facilities	✓	✓	✓
6. Increase the capacity of teaching staff to deliver a 21st century curriculum that meets the needs of learners with significant additional learning needs.	✓	✓	✓
Strategic Fit			
Strategic Fit	✗	✓	✓
Potential VFM	✗	✓	✓
Potential achievability	✓	✓	✓
Supply side capability	✓	✓	?
Affordability	✓	✓	?
Summary	Carry Forward for Comparison	Preferred	Possible

3.4 Service Solution Appraisal

3.4.1 Options

- Option 1 – Do nothing business as usual;
- Option 2 - Refurbish existing blocks and conduct essential maintenance;
- Option 3 – Remodel and partly rebuild existing blocks;
- Option 4 – New build ALN school on existing site with communities facilities;
- Option 5 – New build ALN school on alternative site with communities facilities;
- Option 6 – New build ALN school on existing site with communities and respite facilities.

3.4.2 Advantages and Disadvantages

Table 6 - Service solution advantages and disadvantages

Option 1: Do nothing business as usual	
Advantages	Disadvantages
<ul style="list-style-type: none"> • No capital spend required immediately; • Enables alternative use of capital funding within the programme envelope. 	<ul style="list-style-type: none"> • Inadequate school buildings that are in poor condition will continue in use; • Does not meet the requirement of Estyn recommendations; • Will not generate any lifecycle efficiencies; • Will not generate any property revenue efficiencies; • No new potential for additional revenue income streams; • School will not become financially viable; • Does not address safeguarding and access issues; • Current layouts are inappropriate; • Will not optimise the learning skills measure; • Will result in significant investment required in medium term; • Will not in result in a 21st Century standard school.
Option 2: Refurbish existing blocks and conduct essential maintenance	
Advantages	Disadvantages
<ul style="list-style-type: none"> • Extends the life of the building. • Addresses immediate issues easily; • Reduces the probability of disruption to service delivery; • Less immediate drain on Council's capital resources; • Continuity of education on sites; • Enables alternative use of capital funding within the programme envelope. 	<ul style="list-style-type: none"> • Inadequate school buildings continue with poor suitability and sustainability factors, R & M funding would not stop further deterioration; • Unlikely to generate any lifecycle efficiencies; • Unlikely to generate any property revenue efficiencies;

	<ul style="list-style-type: none"> • No new potential for additional revenue income streams; • Financially unviable as it will not attract 21st Century School funding; • Does not enhance current public perception of the condition of the specialist school facilities campus; • Some noise disruption to pupils; • Does not improve the learning environment and does not provide a suitable environment suitable for the needs of vulnerable pupils and staff; • Does not enhance current public perception of the condition of the specialist school facilities campus, may be viewed as a stop gap solution • The works required at Ysgol Cedewain could severely impact the Major Improvement Programme fund, which will decrease the amount of funding available for much needed improvements at other schools; • Will not in result in a 21st Century standard school.
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Option 3: Remodel and partly rebuild existing blocks

Advantages	Disadvantages
<ul style="list-style-type: none"> • Extends the life of some blocks; • Addresses immediate issues easily; • Less immediate drain on Council's capital resources in Band B; • Enables alternative use of capital funding within the programme envelope. 	<ul style="list-style-type: none"> • Disruption to pupils; • Inadequate school buildings continue with poor suitability and sustainability factors, R & M funding would not stop further deterioration on blocks not rebuilt; • Unlikely to generate substantial lifecycle efficiencies; • Unlikely to generate substantial property revenue efficiencies; • No new potential for additional revenue income streams; • Financially unviable as it will not attract 21st Century School funding • Does not enhance current public perception of the condition of the specialist school facilities campus, may be viewed as a stop gap solution • Does not improve the learning environment overall and does not provide a suitable environment suitable for the needs of vulnerable pupils and staff. • The works required at Ysgol Cedewain could severely impact the Major Improvement

	<p>Programme fund, which will decrease the amount of funding available for much needed improvements at other schools</p> <ul style="list-style-type: none"> • Will not in result in a 21st Century standard school.
<p>Option 4: New build ALN school on existing site with communities facilities;</p>	
<p>Advantages</p>	<p>Disadvantages</p>
<ul style="list-style-type: none"> • Will generate 21st Century standard school; • Improves access, egress and circulation on site; • Mitigates safeguarding issues with current arrangements; • Rebuilt premises will have a positive impact on teaching and learning experiences and educational outcomes; • Creates a carbon efficient building; • Optimises utility costs; • Reduces lifecycle costs; • New facilities will prove attractive to potential learners and employees; • New facilities offer the potential for increasing revenue raising opportunities; • New facilities will be viewed positively within the community. • Will provide greater opportunity for extra-curricular activities 	<ul style="list-style-type: none"> • Potential transport disruption within the locality during construction; • Larger capital requirement.
<p>Option 5: New build ALN school on alternative site with communities facilities;</p>	
<p>Advantages</p>	<p>Disadvantages</p>
<ul style="list-style-type: none"> • Will generate 21st Century standard school; • Improves access, egress and circulation on site; • Mitigates safeguarding issues with current arrangements; • Rebuilt premises will have a positive impact on teaching and learning experiences and educational outcomes; • Creates a carbon efficient building; • Optimises utility costs; • Reduces lifecycle costs; • New facilities will prove attractive to potential learners and employees; • New facilities offer the potential for increasing revenue raising opportunities; • New facilities will be viewed positively within the community. • Will provide greater opportunity for extra-curricular activities 	<ul style="list-style-type: none"> • Potential transport disruption within the locality during construction; • Most capital intense solution. • Larger capital requirement; • Alternative site complexities have the potential to delay the delivery of the scheme significantly; • Ground surveys for alternative site have not yet been conducted which increases the requirement for risk contingency within the scheme.

Option 6: New build ALN school on existing site with communities and respite facilities	
Advantages	Disadvantages
<ul style="list-style-type: none"> • Will generate 21st Century standard school; • Improves access, egress and circulation on site; • Mitigates safeguarding issues with current arrangements; • Rebuilt premises will have a positive impact on teaching and learning experiences and educational outcomes; • Creates a carbon efficient building; • Optimises utility costs; • Reduces lifecycle costs; • New facilities will prove attractive to potential learners and employees; • New facilities offer the potential for increasing revenue raising opportunities; • New facilities will be viewed positively within the community. • Will provide greater opportunity for extra-curricular activities 	<ul style="list-style-type: none"> • Potential transport disruption within the locality during construction; • Most capital intense solution.

3.4.3 Conclusion

Table 7 - Service Solution appraisal summary

Reference to:	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6
1. To deliver a fit for purpose building solution that delivers an improved learning environment for pupils with significant additional learning needs – minimum condition B and meeting BREEAM requirements	x	x	x	✓	✓	✓
2. To improve the building's efficiency / running costs	x	?	✓	✓	✓	✓
3. To provide facilities that will accommodate a greater proportion of pupils with significant additional learning needs that are currently accessing provision out of Powys	x	x	?	✓	✓	✓
4. To provide improved opportunities for pupils with significant additional learning needs	x	x	?	✓	✓	✓
5. To provide holistic support for Powys children with significant additional needs, incorporating reliable specialised equipment and facilities	x	?	?	✓	✓	✓
6. Increase the capacity of teaching staff to deliver a 21st century curriculum that meets the needs of learners with significant additional learning needs.	x	x	?	✓	✓	✓
Critical Success Factors						
Strategic Fit	x	x	x	✓	✓	✓
Potential VFM	x	x	x	✓	✓	✓
Potential achievability	x	x	x	✓	✓	✓
Supply side capability	✓	✓	✓	✓	✓	?
Affordability	✓	✓	✓	✓	?	?
Summary	Discount but Carry Forward	Discounted	Discounted	Preferred	Possible	Possible

3.5 Service Delivery Appraisal

3.5.1 Options

- Minimum – Local Authority delivery;
- Intermediate – Local Authority and Private Sector partner arrangements;
- Maximum – Private Sector partnership (PPP);

3.5.2 Advantages and Disadvantages

Table 8 - Service delivery advantages and disadvantages

Minimum: Local Authority	
Advantages	Disadvantages
<ul style="list-style-type: none"> • All requisite delivery structures are already in place; • Local Authority has extensive experience in delivering this service delivery model; • Cost effective model; • Strategic link to Councils School Transformation Programme; • Most expedient model for delivery; • Politically acceptable; • Limited risk due to specialist support within LA 	<ul style="list-style-type: none"> • May stifle innovation.
Intermediate: Local Authority and Private Sector Partner arrangements	
Advantages	Disadvantages
<ul style="list-style-type: none"> • All requisite delivery structures in place; • Local Authority has extensive experience in delivering this service delivery model; • Cost effective model; • Strategic link to Councils School Transformation Programme • Most expedient model for delivery; • Politically acceptable; • Limited risk due to specialist support within LA 	<ul style="list-style-type: none"> • Will prove more expensive for the Local Authority • Contractor may not be au fait with the workings and culture of Local Authority
Maximum: Private Sector partnership (PPP)	
Advantages	Disadvantages
<ul style="list-style-type: none"> • Private sector suppliers will provide specialisms and capacity that the Local Authority alone cannot provide • Services can be delivered relatively quickly 	<ul style="list-style-type: none"> • Private contractor is an unknown quantity • Contractor may not be au fait with the workings and culture of Local Authority • Any private sector partnership will be unlikely to include local contractors; • Profit element of partnership may impact on funds available for development

3.5.3 Conclusion

Table 9 - Service Delivery appraisal summary

Reference to:	LA	LA & PSP	PPP
1. To deliver a fit for purpose building solution that delivers an improved learning environment for pupils with significant additional learning needs – minimum condition B and meeting BREEAM requirements	✓	✓	✓
2. To improve the building's efficiency / running costs	✓	✓	✓
3. To provide facilities that will accommodate a greater proportion of pupils with significant additional learning needs that are currently accessing provision out of Powys	✓	✓	✓
4. To provide improved opportunities for pupils with significant additional learning needs	✓	✓	✓
5. To provide holistic support for Powys children with significant additional needs, incorporating reliable specialised equipment and facilities	✓	✓	✓
6. Increase the capacity of teaching staff to deliver a 21st century curriculum that meets the needs of learners with significant additional learning needs.	✓	✓	✓
Critical Success Factors			
Strategic Fit	x	✓	x
Potential VFM	?	✓	x
Potential achievability	x	✓	✓
Supply side capability	x	✓	✓
Affordability	x	✓	x
Summary	Discounted	Preferred	Discounted

3.6 Implementation Appraisal

3.6.1 Options

- Minimum – New School opens September 2023;
- Intermediate – New School opens Spring Term 2023;
- Maximum - New School opens September 2022;

3.6.2 Advantages and Disadvantages

Table 10 - implementation advantages and disadvantages

Minimum: New School opens September 2023	
Advantages	Disadvantages
<ul style="list-style-type: none"> • Lack of disruption to education in the short term 	<ul style="list-style-type: none"> • Local community disruption due to extended period of works; • Delayed to accrual of scheme benefits • Immediate cohorts of learns miss out unnecessarily on 21st Century school facilities
Intermediate: New School opens Spring Term 2023	
Advantages	Disadvantages
<ul style="list-style-type: none"> • Immediate cohorts of learns enjoy 21st Century school facilities within a reasonable period of time • Minimises disruption to learners once school becomes operational; • Ensures Local Authority funding allocation is spent within Welsh Government timescales • Allows time for innovation in design but ensures completion within a reasonable time scale; • Minimises local community disruption. 	<ul style="list-style-type: none"> • Partial delay to accrual of scheme benefits
Maximum: New School opens September 2022	
Advantages	Disadvantages
<ul style="list-style-type: none"> • Immediate cohorts of learns enjoy 21st Century school facilities within a reasonable period of time • Minimises disruption to learners once school becomes operational; • Ensures Local Authority funding allocation is spent within Welsh Government timescales • Ensures completion in a timely manner; • Minimises local community disruption. 	<ul style="list-style-type: none"> • Potential for rushed design (lack of innovation); • Timescales may be unrealistic due to lead in time for sourcing materials • Requires additional bespoke resource for project in order to deliver upon demanding timescale.

3.6.3 Conclusion

Table 11 - implementation appraisal summary

Reference to:	Sept 23	Spring 23	Sept 22
1. To deliver a fit for purpose building solution that delivers an improved learning environment for pupils with significant additional learning needs – minimum condition B and meeting BREEAM requirements	✓	✓	✓
2. To improve the building's efficiency / running costs	✓	✓	✓
3. To provide facilities that will accommodate a greater proportion of pupils with significant additional learning needs that are currently accessing provision out of Powys	✓	✓	✓
4. To provide improved opportunities for pupils with significant additional learning needs	✓	✓	✓
5. To provide holistic support for Powys children with significant additional needs, incorporating reliable specialised equipment and facilities	✓	✓	✓
6. Increase the capacity of teaching staff to deliver a 21st century curriculum that meets the needs of learners with significant additional learning needs.	✓	✓	✓
Critical Success Factors			
Strategic Fit	✓	✓	?
Potential VFM	x	✓	✓
Potential achievability	✓	✓	?
Supply side capability	✓	✓	✓
Affordability	✓	✓	✓
Summary	Discounted	Preferred	Discounted

3.7 Funding Appraisal

3.7.1 Options

- Minimum – Wholly Local Authority funded from capital programme;
- Intermediate - Mix of Local Authority borrowing and Welsh Government funding;
- Maximum - Wholly Welsh Government grant funded.
- Alternative – Mutual Investment Fund (MIM).

3.7.2 Advantages and Disadvantages

Table 12 - Funding advantages and disadvantages

Minimum: Wholly Local Authority funded from capital programme.	
Advantages	Disadvantages
<ul style="list-style-type: none"> • Wouldn't require any additional Local Authority borrowing; • Maximum control over scale and timescale of scheme. 	<ul style="list-style-type: none"> • Diverts capital from other community priorities such as Social Care and highways; • Cost prohibitive. • Affordability
Intermediate: Mix of Local Authority borrowing and Welsh Government funding.	
Advantages	Disadvantages
<ul style="list-style-type: none"> • Ensures affordability of scheme; • Provides certainty to Welsh Government i.e. the scheme fits strategically; • Allows for the direction of capital monies to other community priorities. 	<ul style="list-style-type: none"> • Repayment costs for Local Authority may impact on revenue budgets; • Welsh Government grant funding requirements may be onerous; • Application process may delay delivery.
Maximum: Wholly Welsh Government grant funded.	
Advantages	Disadvantages
<ul style="list-style-type: none"> • Enables major capital investment in other community priorities. 	<ul style="list-style-type: none"> • Welsh Government grant funding requirements may be prohibitive; • Application process may delay delivery. • May stifle innovation.
Alternative: Mutual Investment Model	
Advantages	Disadvantages
<ul style="list-style-type: none"> • No capital funding required up front; • Sponsorship from Welsh Government; • Cost certainty (capital and revenue); • Welsh Governments preferred model; 	<ul style="list-style-type: none"> • Development partners may not be interested; • Complex ownership and governance model; • Multifaceted governance may stifle innovation; •

3.7.3 Conclusion

Table 13 – Funding appraisal summary

Reference to:	WG 100%	Mix	LA 100%	MIM
1. To deliver a fit for purpose building solution that delivers an improved learning environment for pupils with significant additional learning needs – minimum condition B and meeting BREEAM requirements	✓	✓	✓	✓
2. To improve the building's efficiency / running costs	✓	✓	✓	✓
3. To provide facilities that will accommodate a greater proportion of pupils with significant additional learning needs that are currently accessing provision out of Powys	✓	✓	✓	✓
4. To provide improved opportunities for pupils with significant additional learning needs	✓	✓	✓	✓
5. To provide holistic support for Powys children with significant additional needs, incorporating reliable specialised equipment and facilities	✓	✓	✓	✓
6. Increase the capacity of teaching staff to deliver a 21st century curriculum that meets the needs of learners with significant additional learning needs.	✓	✓	✓	✓
Critical Success Factors				
Strategic Fit	✗	✓	✓	?
Potential VFM	✓	✓	✓	✓
Potential achievability	✓	✓	?	?
Supply side capability	?	✓	?	?
Affordability	✗	✓	✓	✓
Summary	Discounted	Preferred	Discounted	Discounted

3.8 Summary of appraisals

Table 14 – Long List Summary

Tudalen 315	Scope appraisal	Minimum: 2 to 19 Special School for pupils with ALN		Intermediate: 2 to 19 Special School for pupils with ALN and community facilities		Maximum: 2 to 19 Special School for pupils with ALN, community and respite facilities		
	Service solution (Long list appraisal)	Option 1: Do Nothing (BAU)	Option 2: Refurbish existing blocks and conduct essential maintenance;	Option 3: Remodel and partly rebuild existing blocks Remodelling	Option 4: New Build School existing site with community facilities	Option 5: New Build School alternative site with community facilities	Option 6: New Build School existing site with community & respite facilities	
	Service Delivery	Minimum: LA Delivery		Intermediate: LA and Private Sector Delivery		Maximum: Private Sector partnership (PPP)		
	Implementation	Minimum: New School opens September 2023		Intermediate: New School opens Spring Term 2022		Maximum: New School opens September 2022		
	Funding	Minimum: Wholly LA Funded		Intermediate: Mixed LA & WG Funded		Maximum: Wholly WG Funded		Alternative: Mutual Investment Fund

The shortlisted options are therefore:

- Option 1: Do nothing business as usual;
- Option 4: New Build 2 to 19 Special School with community facilities on existing site;
- Option 5: New Build 2 to 19 Special School with community facilities on alternative site;
- Option 6: New Build 2 to 19 Special School with community and respite facilities on existing site.

3.9 Economic Appraisal

3.9.1 Net Present Cost

The following tables summarise the key results of the economic appraisals for each option. Values used for the economic analysis are expressed in base year terms. Options have been risk-adjusted to account for the 'risk retained' (in £s) by the organisation under each option.

Table 15 – Summary of Economic Appraisals

Discounted Cash flow (DCF) Summary Sheet		Inc. Optimism Bias		Excl. Optimism Bias	
Option No.	Option Name/Description	NPC (£m)	EAC (£m)	NPC (£m)	EAC (£m)
Option 1:	Business As Usual	37.690	2.562	37.440	2.545
Option 4:	New Build 2 to 19 special school with community facilities on existing site	82.685	3.152	82.685	3.152
Option 5:	New Build 2 to 19 special school with community facilities on alternative site	85.465	3.258	84.560	3.224
Option 6:	New Build 2 to 19 special school with community and respite facilities on existing site	85.472	3.259	84.398	3.218

3.10 Qualitative Benefits Appraisal

All of the benefits from the OBC were grouped into four categories, and the benefit groups were then weighted by the project team in order to provide an assessment against the five options.

Table 16 – Benefit Group Weighting

Benefit Groups	Example of Benefits (<i>info in brackets = how achieved</i>)	Weight
Standards and Breadth of Education	<ul style="list-style-type: none"> Improved learning outcomes for learners and families (Achieved through better facilities and learning environments) Improved levels of recruitment, quality, retention and reputation of staff (New environments will assist this) Opportunities to benefit from a wider range of learning opportunities and skills. (Better learning facilities) Access to a wider range of teaching materials (state of the art ICT and other emerging technologies) (Better learning facilities) Produces a more skilled set of students, prepared for entry into Further Education or employment. (Better learning facilities) Enables holistic & integrated multi agency response further enhancing the Council's relationship with Powys Teaching Health Board (Through site facilities) 	20%
Standards of Estate and Facilities	<ul style="list-style-type: none"> Zoned and bespoke facilities for flexible community use (Design) Improved energy efficiency of estate (Through environmental initiatives) Increased flexibility of accommodation to meet demands and expectations of stakeholders (Flexibility through design) More efficient use of premises / estate (Efficiency through design) Improved accessibility to all areas of the site (school site disparate and layout poor) Improved access to specialist and therapeutic facilities (Through design) 	20%
Financial Sustainability	<ul style="list-style-type: none"> Creation of new opportunities for revenue generation (New community focussed facilities) Reduced building operating costs (Through environmental initiatives) Ensure the viability of educational provision (In the longer term, as other local school estate deteriorates) 	20%
Specialist, Enhanced Care & Wellbeing	<ul style="list-style-type: none"> Supporting established relationships with multi-agency partners (Through provision and access to specialist facilities) 	40%

Benefit Groups	Example of Benefits (<i>info in brackets = how achieved</i>)	Weight
	<ul style="list-style-type: none"> Extended access to specialist facilities (Achieved through after school care, holiday play schemes and wrap around childcare) Lessons increasingly tailored to the specific needs of individual learners (Modern and innovative learning environment) 	

Each of the benefit groups were scored on a range of 0-10 for each option. These scores were agreed by the workshop participants to confirm that the scores were fair and reasonable.

Table 17 – Benefits Appraisal

Benefit Group	Weight	Maximum Score	Raw				Weighted			
			Option 1	Option 4	Option 5	Option 6	Option 1	Option 4	Option 5	Option 6
Standards of Education	20	10	3	9	9	9	60	180	180	180
Estate and facilities	20	10	2	10	10	10	40	200	200	200
Financial Sustainability	20	10	3	9	7	9	60	180	140	180
Specialist, Enhanced Care & Wellbeing	40	10	3	8	9	8	120	320	360	320
Total	100	10	11	36	35	36	280	880	880	880
Rank			4	=1	3	=1	4	=1	=1	=1

3.11 Risk Appraisal

The workshop assigned the risk scores shown in the following table on the basis of participants' judgment and assessment of previous procurements. The range of scales used to quantify risk followed the corporate risk assessment process. The likelihood and impact scores are summarised below:

Probability:

- Low = 1 - Not likely to occur or may happen once every 20 years;
- Medium = 2 - Possible or may happen within 10 years;
- High = 3 - Likely or may happen once a year;
- Very High = 4 - Certain or happens several times a year.

Impact:

- Low = 1;
- Medium = 2;

- High = 3;
- Catastrophic = 4.

The likelihood is multiplied by the impact score to provide a “risk score”. The main risks fall into three categories namely Service Risk (SR), Business Risk (BR) and External environmental risk (EER).

Table 18 – Costed Risk Register

There are a number of Contractor’s risks remaining, which have been treated as ‘abnormals’ in the total cost. These risks are low likelihood, but high impact (cost):

Headline Description	Notes	Treatment	Client Provisional Sum
Planning - Re-route of Public Right of Way (PROW)	Included within the Contractor’s design and included within the tendered total of the Prices	Residual risk sits with client. Client (via their consultant) has chosen route of diversion	£100,000.00
Existing Water Mains affects design	The design has been developed following consultation with HD Cymru. HD Cymru feedback has been incorporated into the current design and included within tendered price.	Residual risk sits with client. Possible, high impact risk of HD Cymru requiring alternative strategy involving redesign of scheme and diversion of mains.	£1,500,000.00
Site Investigation - Unknown Service	Hand dig been carried out and consultation with Utility Companies has now lead to identification of service.	Residual risk sits with client. Confirmation of service not supplied in writing by utility provider.	£200,000.00
Design is affected by unknown ground conditions	Contractor has carried out further site investigation. All known and reasonably foreseeable requirements included in within the Contractor’s design and included within the tendered total of the Prices	Residual risk sits with client. Limitation to contractor’s reasonable allowance.	£200,000.00

4 Commercial Case

4.1 Procurement Strategy

The overarching procurement route for the Ysgol Cedewain redevelopment was via the South East & Mid Wales Collaborative Construction Framework Agreement, known as SEWSCAP, Construction Framework.

The advantages of the SEWSCAP3 Construction Framework is that the OJEU process is undertaken when compiling the framework and contractors are assessed as competent in this sector. The disadvantage might be the opportunity to tender is limited to those contractors on the framework list.

To progress the project, the Council commissioned a design team, via Heart of Wales Property Services Ltd (HoWPS), a joint venture company set up by the Council and Kier to provide property design, construction and maintenance services for Band B of the C21st Schools Programme and other capital investments.

The Ysgol Cedewain design team is comprised of a core project management team within HoWPS, supported by Kier architects, structural, civil, mechanical and electrical engineers, and cost consultants. Further expertise is directly employed by the Council to provide landscape, acoustic, surveying and BREEAM services.

This approach is considered to provide the best balance of approach regarding quality of the final, bespoke building which must be constructed on an occupied school site, and the appropriate allocation of risk.

4.1.1 Procurement Method

The tender was run as a mini-competition under Lot 9 of the South East & Mid Wales Collaborative Construction Framework Agreement, known as SEWSCAP (see Table 19 below), seeking tenders from framework contractors to apply for a 2 stage Design and Build contract for the design and construction of a 108 place specialist ALN school with integrated 6th form (2-18 years) with full cooking kitchen, dining area, community café, hall, hydrotherapy pool and specialist teaching areas within the boundary of the existing Ysgol Cedewain and neighbouring Ysgol Maesyrrhandir.

The council's overall combined budget for the 2-stage design and build and all associated works and services was £19.4m with anticipated tender values of circa £18m.

Table 19 - SEWSCAP Tiers of value

Tudalen 321

Lot Description		£0.25-	£1.5-	£3.0-	£5.0-	£10.0-	£25.0-	No. of Contractors	
		£1.5 M	£3.0 M	£5.0 M	£10.0 M	£25.0 M	£100 M		
Provision of Construction services to include new build, extensions and refurbishment under traditional or design and build with all associated works	PCC & others nearby	Lot 1						5	
	Torfaen CBC & others	Lot 2						5	
	Rhondda-Cynon-Taf	Lot 3						5	
	Vale of Glamorgan	Lot 4						5	
	PCC & others nearby		Lot 5					5	
	All Potential Employers			Lot 6					5
					Lot 7				5
						Lot 8			6
							Lot 9		6
								Lot 10	6
	Provision of Construction services for demountable, temporary building hire or purchase with associated	Lot 11							5
Total								58	

4.1.2 Procurement Outcome

The council sought early expressions of interest from the framework contractors to apply for a 2 stage Design and Build contract, with 6 contractors confirming their wish to apply for the tender. The tender was published to all 6 contractors on the council's eTendering portal on 26th February 2021.

5 contractors submitted tenders, which were received on the 12th March 2021, from the following contractors:

1. Bouygues UK Ltd
2. C Wynne & Sons Ltd T/A Wynne Construction
3. Galliford Try Construction Ltd
4. Morgan Sindall Ltd
5. Willmott Dixon Construction Ltd

The Contract Managers identified for this project are as follows:

- Diane Rees, Project Manager, Schools Service
- Calvin Williams, Assistant Project Manager, HOWPS

It should be noted that a previous tender process was conducted with the same contractors, which had to be set aside due to errors in the evaluation model and a lack of certainty that the council would achieve the most economically advantageous bid. A secondary re-tender was undertaken, with shorter timescales and amended evaluation model utilised, to rectify the issues identified.

Agreement has been forthcoming from the council's Finance Team to proceed to award the Stage 1 design contract, but to ensure that further financial analysis is considered prior to the award of the 2nd stage contract (anticipated December 2021).

Project Managers will need to ensure that the necessary collateral warranties, sub-contractor warranties and contracts are in place with 2nd tier designers. This is a contractual requirement within the Stage 1 contract to be provided by the successful contractor to ensure the council obtains license to utilise the designs, in the event that council does not proceed to Stage 2 with the successful contractor at stage 1.

4.1.3 Qualification Evaluation

The Qualification Envelope evaluation was undertaken by the PCC Commercial Services Team (CST).

No tenderers raised conflicts of interest and financial accounts were sought from all bidders and forwarded to the council's finance team for assessment. Once any clarifications were provided, all tendering contractors were accepted and proceeding to full tender evaluation.

4.1.4 Commercial Evaluation

The Commercial Envelope required tenderers to complete the Contract Sum Analysis document, which was then reviewed by a Senior Quantity Surveyor with HOWPS, to check for errors, omissions, or issues.

The total of the Contract Sum Analysis was provided as the Tender Sum which was assessed in accordance with the formula below:

$$\text{Commercial score} = \frac{\text{Lowest price bid}}{\text{Bidder's tendered price}} \times \text{Price weighting (50\%)}$$

The commercial assessment of the tender represented 50% of the overall assessment.

4.1.5 Quality (Technical) Evaluation

The quality, or technical, assessment of the tender represented 35% of the overall assessment. Tenderers were required to respond to questions in seven areas (summarised from the procedure) as follows:

Table 20 - Quality (Technical) Competence Areas

Question	Weighting %
Delivery Team, Challenges Risks & Opportunities	20
Detailed Design	20
Large / Complex Sub-Contract Packages	20
Approach to Quality Management	15
Programme	10
Risk Management	10
Covid-19	5

4.1.6 Social Value Evaluation

The social value assessment of the tender represented 35% of the overall assessment. Social Value has been assessed using the National TOM's (Themes, Outcomes and Measure) as developed by the Social Value Portal, which requires bidders to propose credible targets against which performance of the successful contractor will be monitored.

The TOMs within the tender process were adapted to reflect the specific needs of the council and commitments from the successful contractor will be contractualised and will be monitored and reported on periodically throughout the delivery of the contract.

Each measure has a financial value (proxy value) and these were used to calculate the overall 'value' of each commitment. The aggregate projected Social Value commitment from each contractor formed the basis of the quantitative Social Value evaluation and was subject to an

assessment of the credibility and robustness of the proposals, through the evaluation of Method Statements and Delivery Plans.

4.1.7 Total Score

Each contractor's weighted quality, price and social value scores were added together to produce a final percentage score (Quality Score x 35% + Financial score x 50% + Social Value Score x 15% = Overall Project Score). The highest scoring contractor - the most economically advantageous tenderer - was awarded the first stage of the contract.

4.1.8 Appraisal

The evaluation process involved the individual assessment of tender responses by the Council's evaluators. Once assessed a consensus meeting of evaluators was held to decide on the final agreed score and feedback comments for each tender response received.

The evaluators were:

- Diane Rees, Project Manager, Schools Service
- Jim Swabey, Professional Lead, HOWPS
- Calvin Williams, Assistant Project Manager, HOWPS

The role of Lead Evaluator was carried out by:

- Garry Leatherland – Procurement Category Manager, Construction & Associated Works

4.1.9 Results

The results of the overall appraisal process were as follows:

Table 21 - Appraisal Results

Contractor	Technical Score	Social Value Score	Commercial Score	Final Score	Rank
Bouygues UK Ltd	23.10	7.64	36.12	66.86	5
C Wynne & Sons Ltd T/A Wynne Construction	30.80	11.31	50.00	92.11	1
Galliford Try Construction Ltd	23.45	5.94	42.13	71.52	4
Morgan Sindall Ltd	29.40	15.00	38.85	83.25	2
Willmott Dixon Construction Ltd	25.90	12.98	41.66	80.55	3

On the basis of the above assessment results, it has been recommended to make an award to the most economically advantageous tenderer: C Wynne & Sons Ltd T/A Wynne Construction.

4.2 Contractual Arrangements

The form of contract proposed is in two distinct phases.

Phase 1 – the design element – will be in the form of a NEC4 Professional Services Contract.

Phase2 – the construction element – will be in the form of a NEC4 Engineering & Construction Contract - Option A:Priced Contract with Activity schedule.

4.3 Service and Outputs Required

The required output for the project is to design and construct a new special school in Newtown, Powys, to BREEAM building standards, replacing the current buildings of Ysgol Cedewain, which are in very poor condition and not fit-for-purpose.

The investment will deliver a brand new, purpose-built school with 108 places in age-appropriate environments, which will be built on a part of the current site of Ysgol Cedewain and part of the adjoining primary school – Maesyrrhandir CP School. The contractor will also provide a new grassed sports pitch and Multi Use Games Area for shared usage by Ysgol Cedewain & Maesyrrhandir CP School.

4.3.1 Required service streams

Under the first stage of the contract the preferred contractor is required to undertake the following:

- In consultation with the authority and all stakeholders develop the design to and including RIBA Stage 4 to achieve BREEAM. “Excellent” and “Secure by Design”;
- Obtain all BREEAM. “Secure by Design” assessments required to achieve a full design to the above standards;
- Obtain or carry out all negotiations, liaison and surveys to include but not exclusively the following: Site Investigations including contamination and Waste Assessment Criteria, Ecology and Protected Species Survey’s, Drainage Survey and Flood Consequence Assessment, negotiations and liaison with Public Authorities, Services companies and stakeholders, etc.). necessary to achieve a full design to the above standards;
- Obtain all statutory approvals (including Pre-Application Consultation, Planning and Building Regulations);
- Prepare and submit Tender Event Schedule;
- Prepare and submit the Priced Contract (priced Activity Schedule);
- Prepare and submit detailed works Programmes;
- Carry out all value and risk workshops (when necessary);
- Prepare and submit to the client monthly status reports commenting on status of the design development, services strategy, BREEAM. and Secure by design, status of; approvals and report on progress in line with the development programme and budgetary issues.
- Prepare and submit to the client reports at each RIBA Stage on the status of the design development, status of approvals and the development programme and provide detailed cost plans.

4.3.2 Specification of outputs required

The contractor is required to achieve BREEAM “Excellent” including carrying out a BREEAM Pre-Assessment and all other documentation to achieve this standard and shall take full responsibility for the discharge of the conditions required to be met by the Contractor and for the design and construction of the scheme.

Tetra Tec have been reappointed for RIBA Stages 3 - 7, however PCC are actively targeting low/zero carbon strategies wherever possible, in view of the recent change to Welsh Government expectations/

With this in mind, the Council has sought Welsh Government advice re the Cedewain Net Zero position, specifically the difficulties involved at this late project stage in revisiting the design and to take the scheme to a Net Zero standard. The conversation included the timing of this FBC submission, the contract situation with Wynne and sub-contractors, and how potential project delay could impact on our project costs and the pupils themselves as they are in desperate need for a new building.

Following this discussion, the following approach has been agreed:

- It is anticipated that the current designs will be heading towards Net Zero Carbon, and achieve/exceed BREEAM Excellent, but that there will be changes necessary to ensure that this happens. For example, double glazed windows may need to become triple glazed windows, to ensure the necessary outcome. To assist this process, further Carbon Modelling has been requested from the Contractor (Wynne), with a view to understanding how Net Zero Carbon can be achieved. This modelling is likely to take between 8-13 weeks and will likely result in small design changes to achieve the goal of Net Zero.

4.4 Potential for Risk Transfer

This section provides the assessment of how risk will be apportioned between the Public and Private sectors for this project.

Under the Framework Agreements for Capital Projects, risks will be passed to the party deemed most appropriate to manage the risk. The potential for risk transfer has been assessed and will be managed through the procurement of the contract utilising a Design and Build Contract.

Early contractor involvement will assist in bringing the project in within budget. Early contractor involvement will allow the contractor to have significant input into the detailed design and product specification, which should contribute to reducing the risk of abortive works at detailed design stage.

A comprehensive and robust Employers Requirements Document (ERD) will transfer much of the risk generally incurred at construction stage over to the Contractor, as the contractor’s will

employ their own architects to submit the planning application and provide them with a full package of production information.

The ERD will provide as much detailed information about the site that is practically possible. The ERD will provide the bidding contractors with a full topographical survey (including any statutory services) and detailed geotechnical surveys at tender stage, thus reducing and transferring the risk of any potential claim for delay due to ground conditions at construction stage.

One of the greatest risks to a client utilising a Design and Build contract is the changing of the brief. Through thorough preparation and consultation, a design brief, developed floor plan, and comprehensive set room data sheets, should result in minimal changes, thus minimising risk. However, it should be noted that as with all projects, changes to the brief may occur at any stage. In addition, the contract award for Stage 2, the Build, is contingent upon PCC reviewing the Contractor and their performance on Stage 1.

Table 22 – Risk category

Risk Category	Potential allocation		
	Public	Private	Shared
Design risk			✓
Construction and development risk		✓	
Transition and implementation risk	✓		
Availability and performance risk		✓	
Operating risk	✓		
Variability of revenue risks	✓		
Termination risks			✓
Technology and obsolescence risks	N/A	N/A	N/A
Control risks			✓
Residual value risks	✓		
Financing risks	✓		
Legislative risks			✓
Other project risks			✓

4.5 Project Bank Accounts (PBAs)

Powys County Council will adopt the Welsh Government policy on Project Bank Accounts (PBAs) in order to demonstrate compliance with the requirements of Principle 6 of the Wales

Procurement Policy Statement to 'use Project Bank Accounts where appropriate'. In practice this means for any projects with a capital value exceeding £2M.

Project Bank Accounts support ethical business practises through facilitating fair and prompt payments within the supply chain. Procurement can act as a lever for driving economic, social and environmental benefits in Wales and PBAs are a mechanism that supports this.

The process will involve Trustees (Powys County Council) and Beneficiaries (the lead contractor and any sub-contractors). The lead contractor will issue an invoice, at which time the invoice will be evaluated by Powys County Council and its technical advisors. The money will be transferred and held in a PBA until further authorised by the trustees. Contractors will align their supply chain payment cycles with the payment cycle agreed with Powys County Council.

Details around the Council's approach to PBAs are to be developed as this proposal moves through the various approval gates. This will include the following details:

- Who will approve the PBA documentation and how? For example, who will approve and sign the Deeds of Trust, Deeds of Adherence / Joining Deed, Bank Mandate.
- Who will agree payments due to the lead contractor and each of their named suppliers and how?
- Who will be responsible for paying money into the PBA and authorising payments out?
- Who will agree why certain supply chain members may not be paid directly from the PBA and the criteria this will be based upon?

It is important that the Council ensure the benefits of PBAs are understood, and that prospective tenderers understand that they should communicate these benefits down the supply chain, to maximise sub-contractor sign up to the PBA.

PBA money route

Lead Contractor/ Sub-Contractor(s) complete Valuations of work completed within payment cycle.
 Assessments are approved by the Client - Lead Contractor submits invoice.

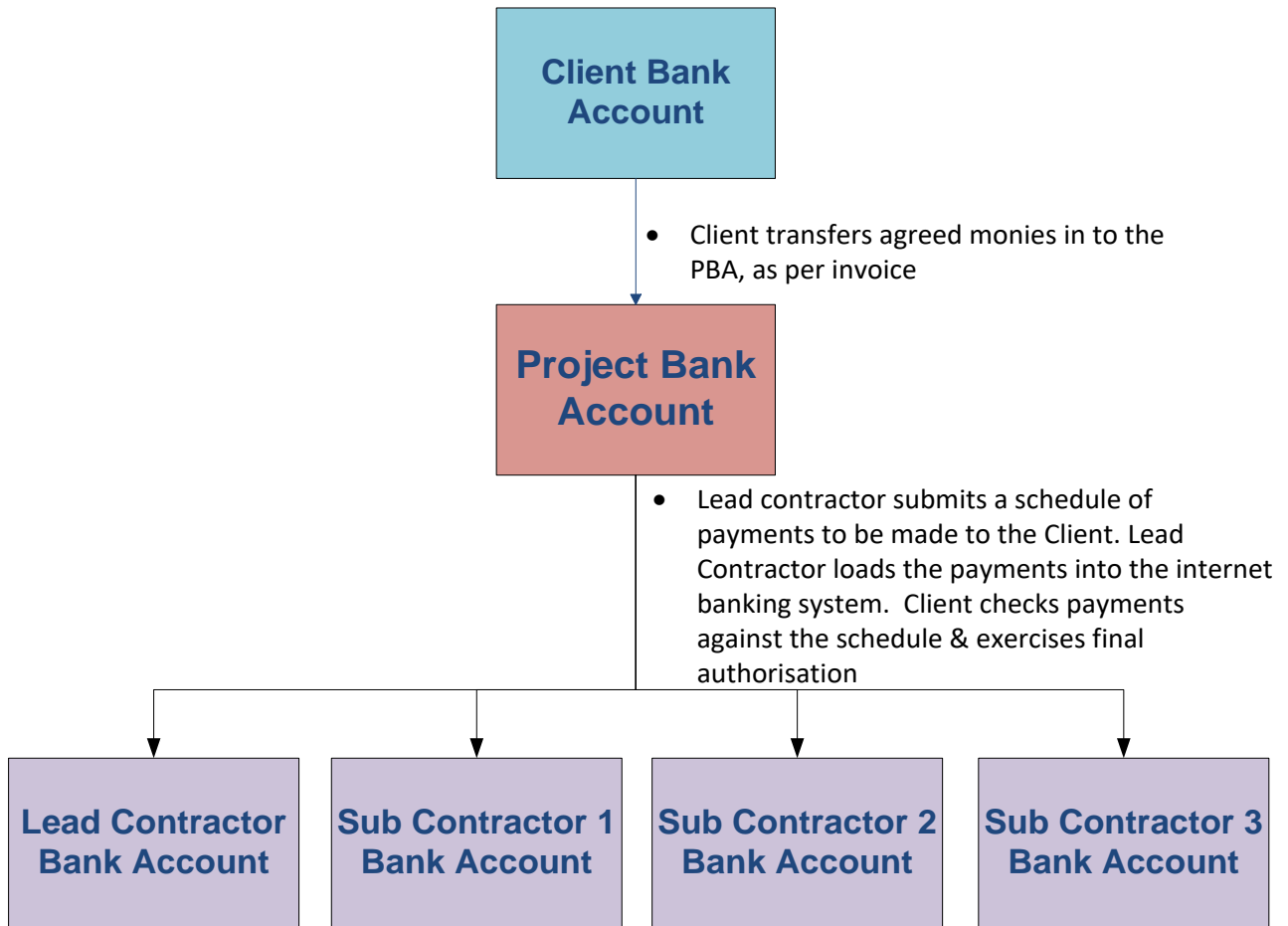


Figure 1: PBA money route

4.6 Community Benefits

Powys County Council is committed to providing sustainable employment and training to help people into work, sometimes referred to as Targeted Recruitment and Training (TR&T). The TR&T person week target for this contract is 52 weeks of employment for New Entrants, Apprentices or Other Trainees (recruited via the Council’s Employer Support Group).

Community Benefit clauses are integral to any future building contract as it is part of the Council’s strategic approach to procurement to drive the regeneration of the local economy.

Following the selection and appointment of the successful tenderer, a final Community Benefits Plan specific to the Cedewain project and its location has been agreed by PCC and relevant key stakeholders. This plan, which in addition to the general requirements of the SEWSCAP Framework, will highlight initiatives that benefit the Cedewain community.

PCC is seeking a range of community benefits to emerge from the proposed Ysgol Cedewain procurement including:

- Workforce initiatives – targeted recruitment and training and apprenticeship schemes
- Supply chain initiatives
- Community initiatives
- Educational initiatives
- Environmental initiatives
- Equality and diversity

Potential benefits arising from these programmes include:

- Encouraging people back to work
- Up-skilling to enhance employability
- Improving the local and regional skill pool
- Ensuring opportunities are visible to suppliers and sub-contractors within the locality of the project
- Providing opportunity for smaller and local suppliers
- Facilitating continuity and potential expansion for SMEs
- Enhancing community cohesion
- Practical use of the school curriculum
- Providing a lasting legacy

The Value Wales Community Benefits Toolkit will be adopted and utilised during the delivery of the Community Benefits Plan, to capture all relevant data and ensure that any lessons learned or long-term legacy issues are recorded.

In addition, all data required by SEWSCAP and PCC will be collated and issued in accordance with the agreed requirements for: Project Deliverable KPIs, Meet the Buyer, TR&T and the Skills Academy. The contractor will also be required to utilise a site biometrics system to log information.

The successful tenderer has committed to 76 Social and Local Economic Value Measures (SLEV), worth £1,321,947, as part of their tender submission.

5 Financial Case

5.1 Project Summary Costs

Table 23 – Key metrics

New Build % (Area)	100%
Description of work & any unusual constraints	New Build Special School to BREEAM Building Requirements
# Pupil Places	108
# SEN Places	108
Total # Places	108
# Storeys (including basement)	2
Delivered through Regional Framework?	SEWSCAP 3 Framework
Contract period in weeks	16 months
GFA (M2)	3,900
Anticipated Community Benefits	Community Café and Hall Hire, Hydrotherapy and Rebound Room Hire
# Trainee and apprenticeship opportunities	Commitment to 326 weeks
Use of local subcontractors as a % of total cost	30%

5.2 Breakdown of Capital Costs

Table 24 – Breakdown of capital costs

Project Costs	
Capital Cost	£ 17,717,670
Optimism Bias	£0
Contingencies	£2,000,000
VAT (only to be included where non-recoverable by applicant)	£0
Total Project Cost (inclusive of optimism bias and contingencies)	£19,717,670
Total (excluding optimism bias but inclusive of contingencies)	£19,717,670
Welsh Government Contribution	£14,788,253 (75%)

5.3 Cost Template

Table 25 – Elemental Breakdown

Element	2021/22	2022/23	2023/24	2024/25	Total	Cost/m2	Cost/Pupil
Development costs							
Site investigation (in Design Fees)					£0.00	£0.00	£0.00
Land acquisition (Not included)					£0.00	£0.00	£0.00
Construction cost					£16,017,014.68	£3,656.85	£148,305.69
Super structure		£3,600,431.06	£1,800,215.53	£82,243.35	£5,482,889.94	£1,251.80	£50,767.50
Substructure		£702,315.70		£10,695.16	£713,010.86	£162.79	£6,601.95
Abnormals		£1,000,000.00	£1,000,000.00		£2,000,000.00	£456.62	£18,518.52
Externals		£1,618,005.86	£809,002.93	£36,959.52	£2,463,968.31	£562.55	£22,814.52
Internal finishes		£521,790.58	£521,790.58	£15,892.10	£1,059,473.26	£241.89	£9,809.94
Services		£1,461,466.25	£1,461,466.25	£44,511.66	£2,967,444.17	£677.50	£27,476.33
Preliminaries		£639,152.67	£319,576.33		£958,729.00	£218.89	£8,877.12
Overhead/Profit (including Contract Fee)		£247,666.09	£123,833.04		£371,499.13	£84.82	£3,439.81
Client costs					£3,700,655.32	£844.90	£34,265.33
ICT			£300,000.00		£300,000.00	£68.49	£2,777.78
FFE			£1,427,980.01	£21,745.89	£1,449,725.90	£330.99	£13,423.39
Design Fees	£767,034.05	£88,065.00	£2,000.00	£2,000.00	£859,099.05	£196.14	£7,954.62
Professional fees	£194,646.73	£196,115.81	£151,454.97	£19,632.36	£561,849.86	£128.28	£5,202.31
Contingencies		£92,500.00	£92,500.00		£185,000.00	£42.24	£1,712.96
Client costs		£42,490.00	£302,490.51		£344,980.51	£78.76	£3,194.26
Inflation (Not included)						£0.00	£0.00
Total Project Cost					£19,717,670.00	£4,501.75	£182,571.02

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5.4 Impact on the Organisation’s income and expenditure account

Table 26 – Impact on the organisation’s income and expenditure account

£s	Total Cost	Years (years 8-60 same as year 7, with the exception of Lifecycle costs, which are shown from year 9, at 5-year periods)								
		0	1	2	3	4	5	6	7	8
		2021/22	2022/23	2023/24	2024/25	2026/27	2027/28	2028/29	2029/30	2031/32
Preferred way forward:										
New Build Capital	19.718	1.493	11.845	5.952	0.427	0.000	0.000	0.000	0.000	0.000
Other Capital Costs (inc. lifecycle)	15.952	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.227
Revenue/Current Cost	129.038	2.129	2.129	2.129	2.129	2.152	2.152	2.152	2.152	2.152
Cash Releasing Benefits	-1.458	0.000	0.000	0.000	0.000	-0.026	-0.026	-0.026	-0.026	-0.026
Total	163.250	3.622	13.975	8.081	2.556	2.126	2.126	2.126	2.126	2.353
Funded by:										
Existing Revenue	-127.746	-2.129	-2.129	-2.129	-2.129	-2.129	-2.129	-2.129	-2.129	-2.129
Total Existing	-127.746	-2.129	-2.129	-2.129	-2.129	-2.129	-2.129	-2.129	-2.129	-2.129
Additional Funding Required	35.504	1.493	11.845	5.952	0.427	-0.003	-0.003	-0.003	-0.003	0.224
Cumulative Funding		1.493	13.339	19.291	19.718	19.715	19.712	19.709	19.706	19.929

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5.5 Cost Build Up

Table 27 – Cost build up

£s	Total Cost	Years (years 9-59 same as year 7, with exception of Lifecycle costs, occurring at 5-year periods)									
		0	1	2	3	4	5	6	7	8	
		2021/22	2022/23	2023/24	2024/25	2026/27	2027/28	2028/29	2029/30	2031/32	
CAPITAL COSTS											
Initial Capital Costs	£19.718	£1.493	£11.845	£5.952	£0.427	£0.000	£0.000	£0.000	£0.000	£0.000	£0.000
Other Capital Costs	£0.000	£0.000	£0.000	£0.000	£0.000	£0.000	£0.000	£0.000	£0.000	£0.000	£0.000
Lifecycle Cost	£15.952	£0.000	£0.000	£0.000	£0.000	£0.000	£0.000	£0.000	£0.000	£0.000	£0.227
Capital Cost Total	£35.670	£1.493	£11.845	£5.952	£0.427	£0.000	£0.000	£0.000	£0.000	£0.000	£0.227
REVENUE COST											
Salaries	£120.640	£2.011	£2.011	£2.011	£2.011	£2.011	£2.011	£2.011	£2.011	£2.011	£2.011
Building Running Costs	£8.398	£0.118	£0.118	£0.118	£0.118	£0.142	£0.142	£0.142	£0.142	£0.142	£0.142
Revenue Costs Total	£129.038	£2.129	£2.129	£2.129	£2.129	£2.152	£2.152	£2.152	£2.152	£2.152	£2.152
Total Costs	£164.708	£3.622	£13.975	£8.081	£2.556	£2.152	£2.152	£2.152	£2.152	£2.152	£2.379
BENEFITS											
Capital Receipts	£0.000	£0.000	£0.000	£0.000	£0.000	£0.000	£0.000	£0.000	£0.000	£0.000	£0.000
Community Benefits	£-1.458	£0.000	£0.000	£0.000	£0.000	£-0.026	£-0.026	£-0.026	£-0.026	£-0.026	£-0.026
Cash Releasing Benefits Total	£0.000	£0.000	£0.000	£0.000	£0.000	£0.000	£0.000	£0.000	£0.000	£0.000	£0.000
Cost Net Cash Savings	£-1.458	£0.000	£0.000	£0.000	£0.000	£-0.026	£-0.026	£-0.026	£-0.026	£-0.026	£-0.026
Total	£163.250	£3.622	£13.975	£8.081	£2.556	£2.126	£2.126	£2.126	£2.126	£2.126	£2.353

Nb. Excluding contingencies and optimism bias

Lifecycle costs in years 13 - £333k, 18 - £2.98m, 23 - £1.186m, 28 - £574k, 33 - £2.194m, 38 - £227k, 43 - £4.345m, 48 - £2.98m, 53 - £680k, 58 - £227k

5.6 Overall Affordability and Balance Sheet Impact

A balance sheet asset addition of £19,717,670 is made for the new school. Short term additional funding of £19,717,670 for years 0 through 3 is required, inclusive of contingency but excluding VAT and optimism bias. Additional ongoing revenue funding of £23,071 per annum will be required from the inception of the new school, this will be made available through the PCC schools' budget, partially offset by income raised through private hire of new facilities including the Community Café and Hall, Rebound Room and Hydrotherapy Pool.

The Band B submission has been scrutinised and assessed by the Council's Section 151 Officer for affordability in light of the 75% programme intervention rate.

The Council will meet the 25% contribution required to support the overall programme in Band B through prudential borrowing.

6 Management Case

6.1 Programme Management Arrangements

This scheme is a constituent of the Powys 21 Century Schools Programme and has been identified within that Programme as a priority. It will be managed in accordance with best practice in programme and project management principles – MSP and PRINCE2 - to provide a systematic and effective delivery framework.

Overall corporate governance for this scheme is provided by the Transformation Delivery Board. The project structure described below is designed to ensure that the preferred option will have a robust project management function in place throughout the proposed timelines. This diagram demonstrates the lines of authority, support and responsibility.

Figure 2: Capital Programme Governance

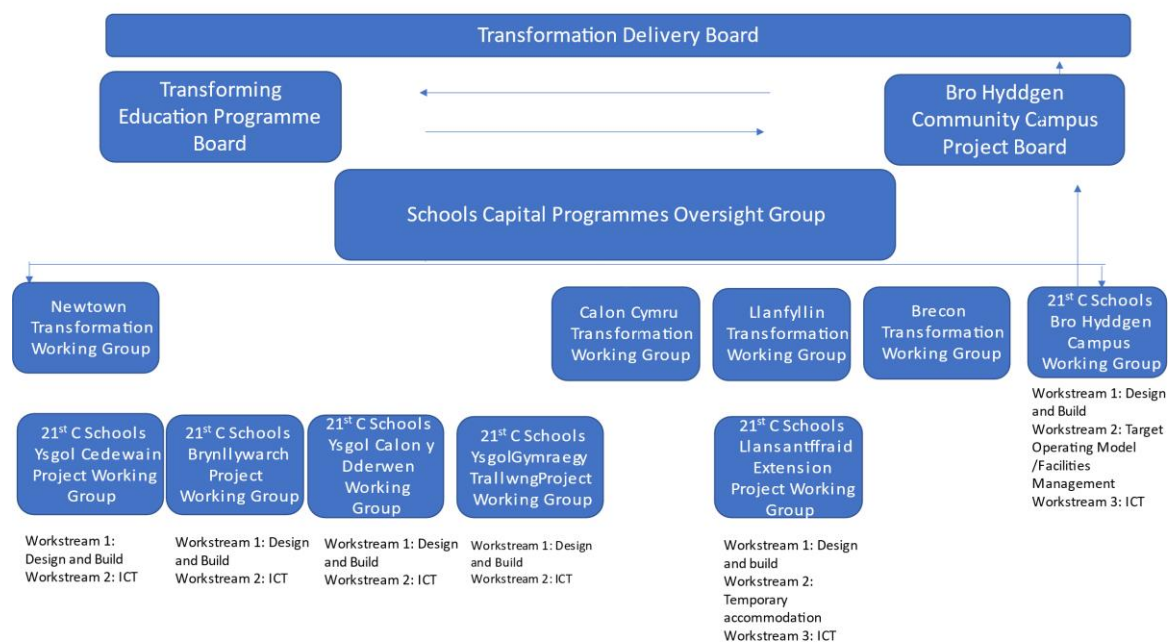


Table 28 – Programme Team

Name	Programme Role
Betsan Ifans	Strategic Programme Manager – 21 st Century Schools
Diane Rees	Project Manager 21 st Century Schools
Marianne Evans	Senior Manager, Education School Transformation

Name	Programme Role
Diane Reynolds	Digital Powys Workstream Lead
Paul Bradshaw	Workforce Futures Workstream Lead
Hugh Foster-Evans	Welsh-Medium Workstream Lead
Huw Griffiths	Post-16 Workstream Lead
Hayley Smith	ALN Workstream Lead

6.2 Project Management Arrangements

The reporting and governance arrangements for this project are as follows:

Project Manager presents the highlight report to Programme Manager on a monthly basis. These meetings will be chaired by the representatives for each of the Project team areas;

The Programme manager will present summary reports from “Project Team” meetings to the Schools Transformation Programme Board meeting on a monthly basis.

On an exception basis only, the Project Board will report key strategic risks and issues to Programme Board for resolution.

6.2.1 Project Structure

The project will be managed in accordance with the general principles of MSP/PRINCE2 methodology. The project management team comprises the Project Board, “Project Team”, the Project Manager and the Team Managers. This “team” is responsible for the day-to-day management and implementation of the project.

The Project Delivery team will remain actively involved throughout the duration of the project fulfilling the intelligent client role once the project is passed over to the successful contractor, thus ensuring continuity of professional staff representing Powys CC during all stages of the project programme.

Figure 3: Project Structure

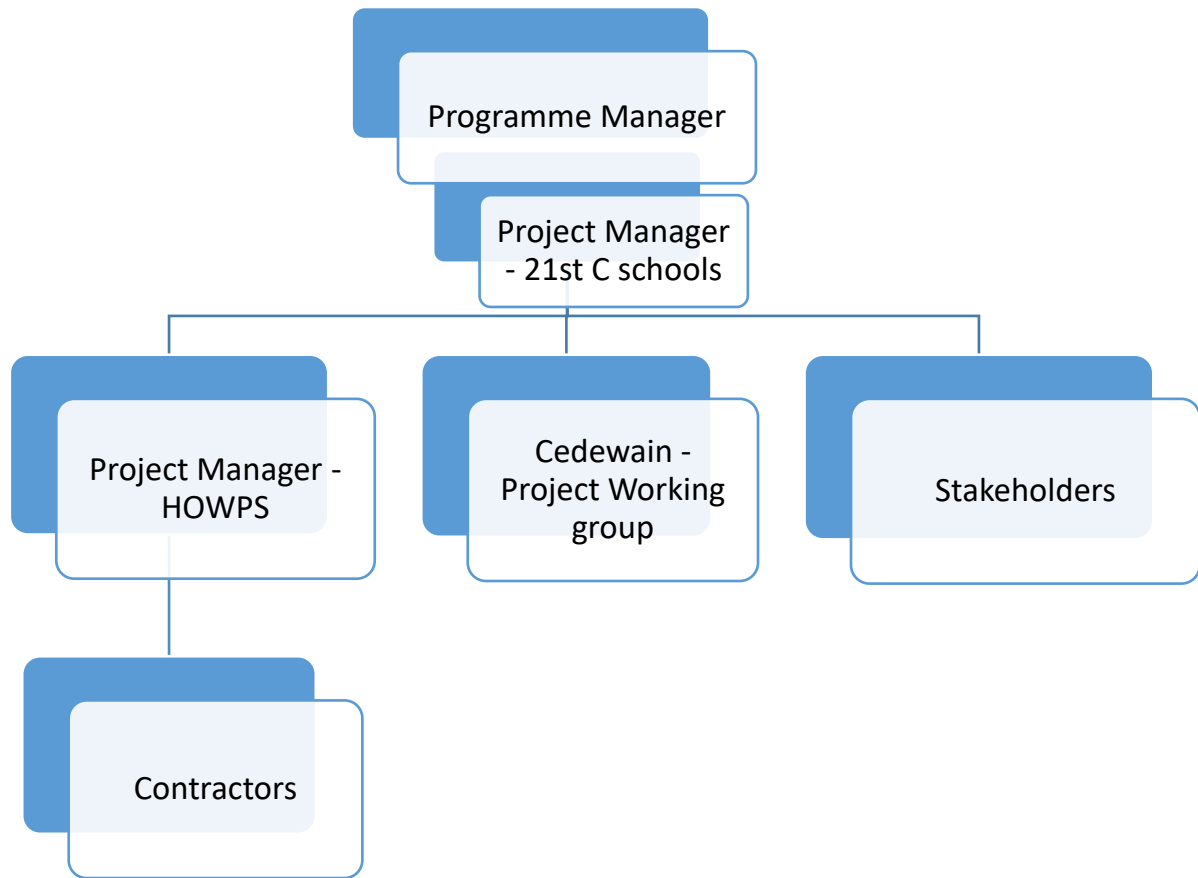


Table 29 – Project team

Name	Project Role
Diane Rees	Project Manager 21 st C Schools
Calvin Williams	Project Manager HoWPS
Jim Swabey	Professional Lead, Consultancy Services
Amy Jones	Finance Lead (Revenue)
Karen Gittins	Executive Head Teacher
Angela Davies	Acting Head Teacher
James Chappelle	Finance Lead (Capital)
Hayley Smith	Serve Manager for Inclusion
Simon Anderson	Inclusion Manager - ALN

Name	Project Role
Gary Leatherland	Procurement Specialist
Lee Evans	Communications Team Manager
Neil Clutton	Principal Property Manager

6.2.2 Outline Project Plan

Key dates for the remainder of the Project are as follows:

Table 30 – Outline project plan

Date	Actions (commencement)
10/04/21	RIBA 4 – Contract awarded to successful contractor
01/11/21	Planning Application Submitted
08/02/22	FBC: Cabinet approval
17/02/22	FBC: WG approval
09/03/22	RIBA 5 – Construction phase commences
01/05/23	RIBA 5 – Commissioning commences
25/04/23	School Opens
01/09/23	Defects RIBA 6
01/09/24	Closure report

6.2.3 Benefits Realisation

PCC will arrange for a PIR to take place 2 years following the completion of the school to measure benefits realisation.

The plan for dealing with the management and delivery of benefits is shown in Table 31 below. The plan will be coordinated with the project plan and highlights ownership and responsibilities for on-going operations in the changed state (where the benefits will actually accrue). There will be a Tracking Process, which will monitor achievement of benefits against expectations and targets. The tracking process will be capable of tracking both 'hard' (e.g. cost, headcount) and 'soft' (e.g. image) benefits and operates alongside the changing operation.

Table 31 – Benefits Realisation Plan

Benefit	Owner	Target	Method of measurement	Responsibility for measurement	Timing of measurement	Outcome
Specialist support and provision to pupils with significant additional learning needs, in a modern and innovative learning environment	Project Manager	A judgement of 'Excellent' or 'Good' for Estyn Inspection Area 2 – Wellbeing and attitudes to learning and Area 4 – Care, support and guidance	School self-evaluation, Local Authority & Estyn inspections	Governing Body & Headteacher	July 2024	
Better equipped teachers to tailor lessons to meet the specific needs, and improving accessibility to learners	Head Teacher	A judgement of 'Excellent' or 'Good' for Estyn Inspection Area 3 – Teaching and learning experiences	School self-evaluation, Local Authority & Estyn inspections	Governing Body & Headteacher	July 2024	
Improved accessibility to all areas of the site and extended access to specialist equipment, including IT facilities, to support teaching and learning outcomes	Project Manager	100% access to site and facilities	School self-evaluation, Local Authority & Estyn inspections	Governing Body & Headteacher	September 2023	
A holistic integrated multi agency approach, with dedicated physiotherapy and medical rooms, a hydrotherapy pool and sensory rooms and garden	Head Teacher	All new facilities available to learners during term time and hydrotherapy pool and sensory room available for nominated hours for the community	School and Leisure delivery partner's records of community use	Governing Body, Headteacher & Leisure delivery partner	September 2023	
A fully equipped early years class base, with breakout space, calming room, laundry and hygiene facilities, together with an individual outdoor learning area	Head Teacher	Facilities fully equipped for learners	School self-evaluation, Local Authority & Estyn inspections	Governing Body & Headteacher	September 2023	

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Benefit	Owner	Target	Method of measurement	Responsibility for measurement	Timing of measurement	Outcome
Zoned and bespoke facilities for flexible community use – giving a flagship community focused school, with community groups being able to access the facilities out of school hours	Project Manager	Increase the current Community use of School resources by 5 hrs/week	School and Leisure delivery partner's records of community use	Governing Body, Headteacher & Leisure delivery partner	September 2023	
Safeguarding assured as the school will be able to lock down the teaching areas while enabling community access to the community zone	Project Manager	Zonal security controls in place to optimise safeguarding	School self-evaluation, Local Authority & Estyn inspections	Governing Body & Headteacher	July 2024	
Creation of new opportunities for revenue generation e.g. Therapeutic facilities available to hire - these include a hydrotherapy pool and changing facilities, rebound room, touchtrust room, community kitchen and café, meeting room and hall.	Head Teacher	An increase in self-generated revenue of £5k per annum	Local Authority and School records	Governing Body & Headteacher	July 2024	
Improved learning outcomes for learners and families	Head Teacher	A judgement of 'Excellent' or 'Good' for Estyn Inspection Area 3 – Teaching and learning experiences	School self-evaluation, Local Authority & Estyn inspections	Governing Body & Headteacher	July 2024	
Improved levels of recruitment, quality, retention and reputation of staff	Head Teacher	Retention of staff higher than the County average	Staff complement records	Governing Body & Headteacher	July 2024	
Opportunities to benefit from a wider range of learning opportunities and skills	Head Teacher	All staff to have received relevant training and development	Record of staff professional development	Governing Body & Headteacher	July 2024	

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Benefit	Owner	Target	Method of measurement	Responsibility for measurement	Timing of measurement	Outcome
Access to a wider range of teaching materials	Head teacher	A judgement of 'Excellent' or 'Good' for Estyn Inspection Area 3 – Teaching and learning experiences	School self-evaluation, Local Authority & Estyn inspections	Governing Body & Headteacher	July 2024	
A more skilled set of students, prepared for entry into Further Education or employment	Head Teacher	Increase in learner attainment, as measured by Estyn	School self-evaluation, Local Authority & Estyn inspections	Governing Body & Headteacher	July 2025	
Improved energy efficiency of estate	School Estates Manager	To reduce Energy use as follows: - Gas by 20% - More effective use of electricity in the school	Energy output from the new school premises	Governing Body & Headteacher	July 2025	
Increased flexibility of accommodation to meet demands and expectations of stakeholders	School Estates Manager	50% of estate is suitable for flexible use	Local Authority and School records	Governing Body & Headteacher	July 2024	
More efficient and effective use of premises / estate – with appropriate learning spaces to deliver the new curriculum	Head Teacher	The school will no longer be dependent on demountable accommodation	Local Authority and School records	Governing Body & Headteacher	July 2024	
Reduced building operating costs	School Estates Manager	Reduced backlog maintenance and accessibility costs by £3.3m	Local Authority and School records	Governing Body & Headteacher	July 2024	

6.2.4 Risk Management

Risks associated with this scheme were identified in the strategic case then refined and assessed in the economic case. These are the core risks and form the initial risk register. The focus and importance of significant risks will change and will, therefore, receive active management as the scheme develops.

PCC's approach will be to ensure that risks are:

- Identified - includes risks being considered that could affect the achievement of the project's objectives, and then described to ensure that there is common understanding of these risks
- Assessed – includes ensuring that each risk can be ranked in terms of estimated likelihood, impact and immediacy, and understanding the overall level of risk associated with the project
- Controlled – includes identifying appropriate responses to risks, assigning risk owners, and then executing, monitoring and controlling these responses

The Schools Transformation Project Board will be responsible for managing and mitigating the risks up to the point of completion of new premises and commencement of the service, and is adopting the strategy of transferring risk to those best placed to manage it (see Commercial Case).

A risk register has been developed and is owned by the Ysgol Cedewain project board which will be reviewed and updated as required on a monthly basis.

The register will be a 'living document' and reviewed and amended (where required). The framework and plan of the risk register will involve a rated table format. The risk will be described and the date of its identification noted. An initial risk rating will be made and the probability and impact of the risk evaluated, followed by a residual risk rating column. The effects and impact of risk can involve elements such as environment, time, quality, cost, resource, function or safety and regular meetings will be held to review all aspects. Within the format there will also be the facility for proposals to mitigate and manage, identifying the control strategy, risk owner and the current risk status.

The total risk score for each risk will be calculated by multiplying the likelihood score (between 1-10 with 10 being certain) and impact score (between 1-10 with 10 being project failure) and all risks scoring above 6 referred to the Project Board for decision. The risk tolerance line for the project is illustrated in the following table.

6.2.5 Change and Contract Management

The proposed charging mechanisms will be in line with the NEC4 Option A form of contract. This means that the Council, alongside their preferred contractor will be looking at elements of gain share from the design stage of the project, through feasibility and construction - using techniques such as value engineering to reduce costs (on a shared basis) against target cost.

The following principles, however, are likely to be implemented:

- Payment will be made at key milestones/staged payments and following evaluation by

Powys County Council and its Technical Advisers. This will include payment for feasibility studies and for works contracts arising as a result of the development project;

- Payments will only be made by the Council's Head of Finance against invoices, which have been certified for payment by the appropriate head of department or budget holder/departmental authorised signatory;
- Order numbers must be quoted on the invoice and payment would be made within thirty days of receipt of a correctly submitted invoice; and
- The issue of the invoice and subsequent payment will be the last step in a process of work undertaken by the Project Quantity Surveyor (Cost manager) to verify that the work undertaken is as per the specification and meets the required standards.

The key contractual issues, such as Contract change control arrangements; remedies for breach of contract and general contract management (including management of disputes and agreements) are included within the standard form of contract that is NEC4 (Option A).

Project control documentation will be maintained by the Client Project Manager, reported to the School Transformation Board and escalated to the Transformation Board as necessary.

Monthly Highlight Report, updated Risk Register Report & Change Log (when necessary) will be forwarded to the Programme Manager monthly.

Risks to be escalated, or Changes to be agreed or notified, are reported via the Programme Manager to the School Capital Programme Oversight group.

6.3 Post Project Evaluation

PCC recognises the benefits that Post Project Evaluation can bring to the successful delivery and realisation of benefits for a scheme, as well as providing lessons for future investments.

PCC will arrange for a Post implementation review to take place 2 years following the completion of the schools to measure benefits realisation. This review will be based on the principles of a Gateway 5 (Benefits Realisation).

PCC will arrange for a Project Evaluation Review (PER). This review ascertains how well the project was managed and whether or not it delivered to expectations. It is timed to take place within one year post construction.

Both these reviews feed into the Lessons Learned records.

6.4 Contingency Plans

In the event of project failure, or should this FBC not be approved, the default will be the 'Business as Usual' option until either the project is righted or an alternative business case is developed.

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Please read the accompanying guidance before completing the form.

This **Impact Assessment (IA)** toolkit, incorporates a range of legislative requirements that support effective decision making and ensure compliance with all relevant legislation. **Draft versions of the assessment should be watermarked as “Draft” and retained for completeness. However, only the final version will be made publicly available. Draft versions may be provided to regulators if appropriate. In line with Council policy IAs should be retained for 7 years.**

Service Area	Schools Service	Head of Service	Lynette Lovell	Director	Caroline Turner	Portfolio Holder	Cllr Phyl Davies
Proposal	New build 108 place special school at Ysgol Cedewain and associated outdoor facilities						
Outline Summary / Description of Proposal							
The Ysgol Cedewain project proposes to build a new 108 place SEN school with Early Years and Sixth Form provision with age appropriate environments to replace the current Ysgol Cedewain buildings and playing facilities. The proposed site for the new build will be on the current playing fields on Ysgol Maesyrrhandir. There will be a new grassed sports pitch and Multi Use Games Area for shared usage by Ysgol Cedewain & Ysgol Maesyrrhandir. The SOC was approved by Powys County Council Cabinet in March 2020. The project is part of the 21C School Organisation Programme – Band B							

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Version Control (services should consider the impact assessment early in the development process and continually evaluate)

Version	Author	Job Title	Date
1	Diane Rees	Project Manager – 21 st C W Schools	27/04/20
2	Diane Rees	Project Manager – 21 st C Schools	12/12/2020

2. Profile of savings delivery (if applicable)

2018-19	2019-20	2020-21	2021-22	2022-23	TOTAL
£0	£0	£0	£0	£0	£0

3. Consultation requirements

Consultation Requirement	Consultation deadline/or justification for no consultation
No consultation required (please provide justification)	Consultation not required as new school is proposed to be built on a site adjacent to the school, There is no change in provision and no increase in capacity.

4. Impact on Other Service Areas

**Does the proposal have potential to impact on another service area? (Have you considered the implications on Health & Safety, Corporate Parenting and Data Protection?)
 PLEASE ENSURE YOU INFORM / ENGAGE ANY AFFECTED SERVICE AREAS AT THE EARLIEST OPPORTUNITY**

Should a decision be made to proceed with implementation of the project, input from other service areas such as IT, Property, Communications, Data Protection and Finance would be required. Representatives of these service areas are invited to attend meetings of the Ysgol Cedewain Project Board, therefore are aware of the proposals, and will receive regular updates throughout the project.

5. How does your proposal impact on the council's strategic vision?

Council Priority	How does the proposal impact on this priority?	IMPACT Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
The Economy We will develop a vibrant economy	N/A	Choose an item.		Choose an item.
Health and Care We will lead the way in effective, integrated rural health and care	The design plan includes integrated health facilities for health and education and therapeutic facilities available for community hire.	Good	To ensure community are aware of facilities and strengthen links with Health	Good
Learning and skills We will strengthen learning and skills	The proposal would provide an innovative fit for purpose school with appropriate facilities and learning environments for all ages at the school which will have a positive impact of Special school provision in North Powys.	Very Good		Choose an item.
Residents and Communities We will support our residents and communities	The proposal would have a positive impact on residents in the North Powys area as it would provide a more sustainable model for delivering Special School provision and community facilities.	Good		Choose an item.

Source of Outline Evidence to support judgements
Engagement with Headteachers, governing bodies, staff, pupils, ALN Team, Health Board representatives, School Service,

6. How does your proposal impact on the Welsh Government's well-being goals?

Well-being Goal	How does proposal contribute to this goal?	<u>IMPACT</u> Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from drop down box below
A prosperous Wales: An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.	Low Carbon principles, SUDS and improved biodiversity all considered as part of the design proposal.	Good		Choose an item.
A resilient Wales: A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).	The proposal is to replace the current buildings with a new building which would be more significantly more energy efficient than the current buildings. The design incorporates environmental friendly outdoor spaces retaining existing trees combined with traditional grassed football pitch area and forest school.	Good	Regular opportunities for the staff, pupils and governing body to contribute to the plans for the new building and the wider site development.	Good

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Well-being Goal	How does proposal contribute to this goal?	<u>IMPACT</u> Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from drop down box below
<p>A healthier Wales: A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.</p> <p>Public Health (Wales) Act, 2017: Part 6 of the Act requires for public bodies to undertake a health impact assessment to assess the likely effect of a proposed action or decision on the physical or mental health of the people of Wales.</p>	<p>The proposed design integrates health and therapeutic facilities in the school plan. This would enable stronger links between the school and health & care provision. Improved physiotherapy opportunities, dedicated space to encourage clinics within the school</p>	<p>Good</p>		<p>Choose an item.</p>
<p>A Wales of cohesive communities: Attractive, viable, safe and well-connected Communities.</p>	<p>The new build will provide a safe environment for the pupils and community usage of the facilities will be managed by the school. The community café will enable cohesive links between community and school.</p>	<p>Good</p>		<p>Choose an item.</p>
<p>A globally responsible Wales: A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.</p> <p>Human Rights - is about being proactive (see guidance)</p> <p>UN Convention on the Rights of the Child: The Convention gives rights to everyone under the age of 18, which include the right to be treated fairly and to be protected from discrimination; that organisations act for the best interest of the child; the right to life, survival and development; and the right to be heard.</p>	<p>The proposal would provide improved, fit for purpose, innovative specialist facilities for SEN pupils in North Powys.</p>	<p>Good</p>		<p>Choose an item.</p>
<p>A Wales of vibrant culture and thriving Welsh language: A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.</p>				

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Well-being Goal	How does proposal contribute to this goal?	IMPACT Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
<i>Opportunities for persons to use the Welsh language, and treating the Welsh language no less favourable than the English language</i>	Pupils would continue to study Welsh as a second language and the Welsh ethos would continue to be promoted and it is anticipated that opportunities to use the Welsh Language would either be sustained or improved.	Neutral		Choose an item.
<i>Opportunities to promote the Welsh language</i>	Discussions to encourage promotion of the Welsh Language will be held with the Senior Leadership team	Neutral		Choose an item.
<i>Welsh Language impact on staff</i>	Discussions to encourage promotion of the Welsh Language will be held with the Senior Leadership team	Neutral		Choose an item.
<i>People are encouraged to do sport, art and recreation.</i>	The proposal would be to increase the appropriate environment and equipment to increase the opportunity to participate in sport, art and recreational activities.	Good		Choose an item.
A more equal Wales: A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio economic background and circumstances).				
<i>Age</i>	The proposal would provide improved educational opportunities, environments and specialised equipment for all ages 3 - 19 attending the school.	Good		Choose an item.
<i>Disability</i>	The proposal would provide improved, innovative, fit for purposes facilities with appropriate specialised equipment for pupils attending Ysgol Cedewain..	Good		Choose an item.
<i>Gender reassignment</i>	N/A	Choose an item.		Choose an item.
<i>Marriage or civil partnership</i>	N/A	Choose an item.		Choose an item.
<i>Race</i>	The proposal would provide improved educational opportunities for pupils attending Ysgol Cedewain, regardless of their race.	Good		Choose an item.
<i>Religion or belief</i>	The proposal would provide improved educational opportunities for pupils attending Ysgol Cedewain, regardless of their religion or belief.	Good		Choose an item.
<i>Sex</i>	The proposal would provide improved educational opportunities for pupils of all genders.	Good		Choose an item.

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Well-being Goal	How does proposal contribute to this goal?	<u>IMPACT</u> Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from drop down box below
<i>Sexual Orientation</i>	The proposal would provide improved educational opportunities for pupils attending Ysgol Cedewain, regardless of their sexual orientation.	Good		Choose an item.
<i>Pregnancy and Maternity</i>	N/A	Choose an item.		Choose an item.

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Source of Outline Evidence to support judgements
Initial discussions with the governing bodies, staff, pupils, ALN team, health representatives

7. How does your proposal impact on the council's other key guiding principles?

Principle	How does the proposal impact on this principle?	IMPACT Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
Sustainable Development Principle (5 ways of working)				
Long Term: <i>Looking to the long term so that we do not compromise the ability of future generations to meet their own needs.</i>	The proposal would provide a more sustainable model of delivering education which will ensure that education can be delivered more efficiently in the long term and is designed to be future proofed in terms of capacity.	Good		Choose an item.
Collaboration: <i>Working with others in a collaborative way to find shared sustainable solutions.</i>	Discussions with the governing bodies and staff of Ysgol Cedewain and the Headteacher and Governing Body of the adjacent school, Ysgol Maesyrrhandir have taken place surrounding the proposal. Engagement meetings held which including ALN Team representatives, school staff, Health board representatives and School Services. Visits to a Special School in North Wales to share their knowledge following a new special school build on site. Discussion with Carmarthenshire 21 st Century team about a proposed new build special school in their programme. Involvement of other council depts. In project meeting to inform and discuss options. Engagement meeting with the community in conjunction with the housing dept.	Good		Choose an item.

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Principle	How does the proposal impact on this principle?	<u>IMPACT</u> Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from drop down box below
Involvement (including Communication and Engagement): <i>Involving a diversity of the population in the decisions that affect them.</i>	Should WG and Cabinet approve the proposed design and costs of the recommended option, a detailed communication plan outlines the milestones for new releases and engagement meetings will ensure the opportunity for all interested parties to give their views. This impact assessment will be updated throughout the process to reflect any feedback received.	Good		Choose an item.
Prevention: <i>Understanding the root causes of issues to prevent them from occurring.</i>	The Prince2 project management principles will be implemented to ensure risks and issues are understood and managed. All risks are logged onto the JCAD system and reviewed at least on a monthly basis.	Good		Choose an item.
Integration: <i>Taking an integrated approach so that public bodies look at all the well-being goals in deciding on their well-being objectives.</i>	The school is linked to health and care provision, a local primary school, the college campus, the local high school and other special schools within Powys. These links will continue as normal.	Good		Choose an item.
Preventing Poverty: Prevention, including helping people into work and mitigating the impact of poverty.	Social value targets to employ local people and target unemployed people are included in the procurement strategy.	Choose an item.		Choose an item.
Unpaid Carers: Ensuring that unpaid carers views are sought and taken into account	All stakeholders would have the opportunity to give their views as part of this process, this would include any unpaid carers in the area.	Good		Choose an item.

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Principle	How does the proposal impact on this principle?	IMPACT Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
Safeguarding: Preventing and responding to abuse and neglect of children, young people and adults with health and social care needs who can't protect themselves.	Safeguarding implications are a key consideration of the plans to develop the new site.	Good		Choose an item.
Impact on Powys County Council Workforce	The proposal will not impact on the numbers of current staff at Ysgol Cedewain. The improved facilities should have a positive well-being impact on staff due to fit for purpose facilities being available – this is detailed in the benefits realisation plan.	Good		Choose an item.
Source of Outline Evidence to support judgements				
Benefits outlined and developed in each of the business cases submitted to the Cabinet and Welsh Government.				

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8. What is the impact of this proposal on our communities?

Severity of Impact on Communities	Scale of impact	Overall Impact
Low	Low	Low
Mitigation		

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9. How likely are you to successfully implement the proposed change?

Impact on Service / Council	Risk to delivery of the proposal	Inherent Risk
Low	Low	Low
Mitigation		

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Risk Identified	Inherent Risk Rating	Mitigation	Residual Risk Rating
Lack of support and funding from Cabinet	Low		Choose an item.
Lack of support for the proposal from the school staff, pupils and the community	Low		Choose an item.
Lack of support from adjacent school whose school field will be used to build the new school on. Period of uncertainty for the two affected schools whilst the statutory process is being carried out and implemented may have a negative impact on standards at the two schools	Low		Choose an item.
Lack of support and funding from Welsh Government.	Low		Choose an item.
Changes resulting from new council initiatives e.g., ALN transformation	Low	ALN Transformation team involved in discussion and updated throughout the project.	Choose an item.
Lack of response to construction tender	Low	Engage through the SEWSCAPE framework	
Lack of support from members of the community who currently use the grass field to exercise and walk their dogs.	Medium	Consult with the local community	Medium
Overall judgement (to be included in project risk register)			
Very High Risk	High Risk	Medium Risk	Low Risk
			x

10. Overall Summary and Judgement of this Impact Assessment?

Outline Assessment (to be inserted in cabinet report)	Cabinet Report Reference:	Cabinet meeting 8 Feb 2022 – To approve FBC Submission
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The impact assessment suggests that the impact is generally positive with few negative aspects, such as the loss of Ysgol Maesyrrhandir sports field currently used as an area to exercise and walk dogs by the local community. The development of new age-appropriate innovative facilities for additional learning needs pupils in the North Powys area would address many issues related to the poor condition of the buildings, e improving their learner entitlement and experience for pupils aged 3 - 19. The proposed changes will meet the challenges of the anticipated raise in numbers of severely disabled or non - ambulant pupils in the area and may lead to less pupils needing to be placed in schools outside of the County.

11. Is there additional evidence to support the Impact Assessment (IA)?

What additional evidence and data has informed the development of your proposal?

Engagement meetings, project board meetings, inclusion in the Band B SOP approved by Cabinet and Welsh Government, the approved Strategic Outline Case and Outline Business case.

12. On-going monitoring arrangements?

What arrangements will be put in place to monitor the impact over time?

BREEAM post occupancy assessments, benefits assessment as detailed in the SOC and cabinet report, closure reports submitted to Welsh Government, Social Value report, Local authority and Estyn inspections.

Please state when this Impact Assessment will be reviewed.

The impact assessment will be reviewed at each stage of the process

13. Sign Off

Position	Name	Signature	Date
Impact Assessment Lead:	Marianne Evans		
Head of Service:	Emma Palmer		
Director:	Caroline Turner		
Portfolio Holder:	Cllr Phyl Davies		

14. Governance

Decision to be made by	Date required
Cabinet	Initial decision March 2020

Mae'r dudalen hon wedi'i gadael yn wag yn fwiadol

CYNGOR SIR POWYS COUNTY COUNCIL.
Cabinet

8th February 2022

REPORT AUTHOR: County Councillor Phyl Davies
Portfolio Holder for Education and Property

REPORT TITLE: 21st Century School Programme Gateway Review findings

REPORT FOR: Information

1. Purpose

- 1.1 This report sets out to inform you of the Delivery Confidence Assessment rating of the Welsh Government Gateway Review 0 of 21st Century Schools Programme in Powys. The full report is available at Appendix one.
- 1.2 The primary purposes of a Gateway Review 0: Strategic assessment are to review the outcomes and objectives for the programme (and the way they fit together) and confirm that they make the necessary contribution to Ministers' or the departments' overall strategy.
- 1.3 The Delivery Confidence Assessment rating was Amber Green; successful delivery appears probable. However, constant attention will be needed to ensure risks do not materialise into major issues threatening delivery.

2. Background

- 2.1 The review team were commissioned by the Senior Responsible Officer (SRO) of Transforming Education to provide independent guidance to the SRO on how best to ensure that the 21st Century Schools element of the Transforming Education programme is successful.
- 2.2 It should be noted that the '*Gateway Assurance methodology is widely used across the United Kingdom's public sector's Programmes and Projects. The methodology uses a Delivery Confidence Assessment (RAG rating) that independent Review Teams use to determine the successful delivery of a Programme or Project at key milestones within their lifecycles. Around 10% of all Programmes and Projects (circa years 2020/2021) receive an Amber/Green outcome. In 2020, only 8% of Programmes and Projects across Welsh Government and wider Welsh public sector received an outcome of Amber/Green.*

Welsh Government, 2021

3. Advice

- 3.1 The Review Team found that Powys County Council has made an excellent start to 21st Century Schools Band B, under strong leadership and well-anchored in the fulfilment of Welsh Government Policy and the Powys Improvement and Transformation Portfolio.
- 3.2 The approved Strategic Outline Programme (SOP) is well crafted and there is high confidence in its deliverability. Powys County Council is ambitious and has developed a revised SOP to expand the scope and include additional pipeline projects. The funding of that expanded scope is a current topic of discussion and will be informed by an asset review currently underway and led by the Director of Economy and Environment and Head of Planning, Property & Public Protection.
- 3.3 Governance is evolving and is appropriate for the present time, though there will be opportunities to map respective decision-making accountabilities to Portfolio, Programme and Project levels as the pace and complexity increases during delivery.
- 3.4 The review team made the following recommendations:
 - Set out the financial options for match funding the enhanced programme including the Value for Money proposition of investing in the future and the cost of doing nothing, so that all parties have a common understanding of options available.
 - Reiterate the Transformation and Improvement Vision and situate 21st Century Schools as an essential component in that narrative.
 - Develop a form of mapping across the Outputs/Outcomes/Benefits that clearly sets out who is responsible for what and how the dependencies will be managed to ensure benefits realisation.
 - Differentiate the governance levels, and memberships, required for each layer of Transformation Portfolio, 21st Century Schools Programme, and build Project.
 - Develop a Roadmap to assist in planning potential resources and funding needs during the Band B implementation.
- 3.5 The Senior Responsible Officer has accepted the recommendations which have subsequently been endorsed by Cabinet/EMT.

4. Resource Implications

- 4.1.1 The Deputy Head of Finance (Deputy Section 151 Officer) notes the content of the report and can confirm there are no additional budgetary requirements from this report.

5. Legal implications

5.1 Legal: the recommendations can be accepted from a legal point of view

5.2 The Head of Legal and Democratic Services (Monitoring Officer) has commented as follows: “ I note the legal comment and have nothing to add to the report”.

6. Comment from local member(s)

6.1 Not applicable.

7. Integrated Impact Assessment

7.1 Not applicable.

8. Recommendation

That the recommendations within the Gateway review report are noted. Officers will take forward the recommendations within the financial year 2021/22.

Contact Officer:	Emma Palmer
Tel:	01874 612217
Email:	emma.palmer@powys.gov.uk

Head of Service:	Transformation and Communications
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Corporate Director:	N/A Chief Executive Officer
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Mae'r dudalen hon wedi'i gadael yn wag yn fwriadol



OGC Gateway™ Review 0: Strategic assessment

Programme Title:	21st Century Schools – Band B Powys
IAH ID number:	AH21/82

Version number:	V1.0 FINAL
Senior Responsible Owner (SRO):	Caroline Turner
Date of issue to SRO:	06/11/2021
Department/Organisation of the Programme	Powys County Council
Review dates:	20/10/2021 to 22/10/2021
Review Team Leader:	David Wilkin
Review Team Members:	Jo Larnar Tracey Hill
Previous Review:	N/A
Security Classification:	Official

This assurance review was arranged and managed by:

Welsh Government Integrated Assurance Hub (IAH)

Cathays Park 2

Cathays

Cardiff

CF10 3NQ

1.0 Delivery Confidence Assessment (DCA)

<u>Delivery Confidence Assessment:</u>	Amber Green
<p>The Review Team finds that Powys County Council has made an excellent start to 21st Century Schools Band B, under strong leadership and well-anchored in the fulfilment of Welsh Government Policy and the Powys Improvement and Transformation Portfolio.</p> <p>The approved Strategic Outline Programme is well crafted and there is high confidence in its deliverability. Powys County Council is ambitious and has developed a revised SOP to expand the scope and include additional pipeline projects. The funding of that expanded scope is a current topic of discussion and will be informed by an asset review currently underway.</p> <p>Governance is evolving and is appropriate for the present time, though there will be opportunities to map respective decision making accountabilities to Portfolio, Programme and Project levels as the pace and complexity increases during delivery.</p> <p>The Review Team makes recommendations in relation to:</p> <ul style="list-style-type: none">• Financial narrative;• Vision communications;• Benefits mapping;• Evolving governance; and• Planning. <p>At this early phase of the Band B lifecycle, successful delivery appear probable, but it will be important for Powys County Council to maintain a tight grip on risk management to ensure that risks do not materialise into issues threatening delivery.</p>	

1.1 Delivery Confidence Assessment

The Delivery Confidence assessment RAG status should use the definitions below:

<u>RAG</u>	<u>Criteria Description</u>
Green	Successful delivery of the programme to time, cost and quality appears highly likely and there are no major outstanding issues that at this stage appear to threaten delivery.
Amber/Green	Successful delivery appears probable. However, constant attention will be needed to ensure risks do not materialise into major issues threatening delivery.
Amber	Successful delivery appears feasible but significant issues already exist requiring management attention. These appear resolvable at this stage and, if addressed promptly, should not present a cost/schedule overrun.
Amber/Red	Successful delivery of the programme is in doubt with major risks or issues apparent in a number of key areas. Urgent action is needed to ensure these are addressed, and establish whether resolution is feasible.
Red	Successful delivery of the programme appears to be unachievable. There are major issues which, at this stage, do not appear to be manageable or resolvable. The programme may need re-baselining and/or overall viability re-assessed.

2.0 Summary of Report Recommendations

The Review Team makes the following recommendations which are prioritised using the definitions below:

Ref. No.	Recommendation	Urgency (C/E/R)	Target date for completion	Classification (Please enter the categorisation number from the list provided here)
1.	Set out the financial options for match funding the enhanced programme including the Value for Money proposition of investing in the future and the cost of doing nothing, so that all parties have a common understanding options available.	E- Essential	End March 2022	1.3
2.	Reiterate the Transformation and Improvement Vision and situate 21 st Century Schools as an essential component in that narrative.	R - Recommended	End March 2022	3.5
3.	Develop a form of mapping across the Outputs/Outcomes/Benefits that clearly sets out who is responsible for what and how the dependencies will be managed to ensure benefits realisation.	R - Recommended	End March 2022	5
4.	Differentiate the governance levels, and memberships, required for each layer of Transformation <i>Portfolio</i> , 21 st Century Schools <i>Programme</i> , and build <i>Project</i> .	E- Essential	End March 2022	1.1
5.	Develop a Roadmap to assist in planning potential resources and funding needs during the Band B implementation.	E- Essential	End March 2022	3.1

Critical (Do Now) – To increase the likelihood of a successful outcome it is of the greatest importance that the programme should take action immediately

Essential (Do By) – To increase the likelihood of a successful outcome the programme/ project should take action in the near future.

Recommended – The programme should benefit from the uptake of this recommendation.

3.0 Comments from the SRO

The SRO would like to thank the Review Team for their comments and recommendations.

The SRO accepts the report, its findings and the recommendations contained within. The report will be tabled at the Transforming Education Programme Board 04th November 2021 where officers will be identified to lead the delivery of the recommendations in line with the recommended timescales.

The Council would like to pursue further PAR reviews: specifically Bro Hyddgen during 2022, possibly a Gate 3 Investment Decision on Transforming Education workstream one proposals and a further wider gateway review across Vision 2025 (or its successor).

4.0 Background

The aims of the programme:

Powys County Council's (PCC) Corporate Improvement Plan underpins the authority's vision and objectives and sets out the way in which the council intends to develop and improve its services.

Like all councils, PCC continue to face serious financial challenges and recognise that many of our residents are also facing hardships. The financial climate has meant thinking differently, it also provides an opportunity for innovation and radically changing the way the council delivers its services.

PCC is becoming a smaller more flexible organisation, one that uses technology to help deliver services more efficiently. Engaging with stakeholders and service users to better understand their needs in the future is critical. In recent years the council has used the process of commissioning to help identify the service need and then ensuring that these needs are met in the most effective and efficient way. Commissioning involves redesigning services around the current and future needs of communities and individuals, deciding how the service is best delivered and undertaking a procurement exercise to determine who should provide the required service.

It puts the focus on providing the right service for the citizen, from the right provider at the right price for the taxpayer. Sometimes this will mean we provide a service differently in the future. It could also mean that a service is provided by another organisation such as the third sector, or even by the communities themselves.

The council's guiding principles are based on the well-being of future generations. The Well-being of Future Generations (Wales) Act 2015 is about improving the social, economic, environmental and cultural well-being of the nation. It will ensure the council thinks more about the long-term, works better with people and communities and each other, looks to prevent problems and takes a more joined-up approach. This will help create a Powys and a Wales that everyone wants to live in, now and in the future.

Transforming skills and learning is a key aim of the council to make sure all children and young people are supported to achieve their full potential. The intention is for Powys to be an attractive place to work for young people with ambition to succeed. In the past the county has been rightly proud of the academic achievement of its young learners. However, there are many Powys pupils whose attainment could be better, especially those from low income households.

To succeed in its ambition the council has identified that it needs first class teaching, high quality leadership, and appropriate class sizes with a fair distribution of resources.

Although many schools in Powys are highly regarded it's clear that the quality of a significant percentage of the county's school buildings is no longer suitable for education in the 21st century. The young people of Powys demand the investment to compete with other parts of the country. There is a need to provide modern learning environments to take advantage of the latest technology.

It is in everyone's interest that the council's focus is on driving up the attainment and ambition of the majority of its pupils with a special emphasis on those from more disadvantaged backgrounds. The council is also committed to providing stimulating learning environments for all pupils, and especially those with additional learning needs.

Scope:

The preferred option consists of 5 projects which meet the investment objectives outlined above and also the council's aims in relation to the development of Welsh-medium provision, as outlined in the WESP.

The projects included in this option are as follows:

- Ysgol Bro Hyddgen
- Newtown development (Primary, Secondary and Special)
- Remodelling of schools
- Welsh-medium Primary provision Mid Powys
- Brecon town area review

Service solution:

This investment would include refurbishment / remodelling of some schools, as well as rebuild and new build options where appropriate

Service delivery:

The council in partnership with Welsh Government and other public organisations e.g. health

The procurement/delivery status:

Band B construction is yet to commence, but feasibility work is underway.

Current position regarding previous assurance reviews:

This is the first Assurance Review for Band B.

5.0 Purposes and conduct of the OGC Gateway Review

The primary purposes of a Gateway Review 0: Strategic assessment are to review the outcomes and objectives for the programme (and the way they fit together) and confirm that they make the necessary contribution to Ministers' or the departments' overall strategy.

Annex A gives the full purposes statement for a Gateway Review 0.

Annex B lists the people who were interviewed during the review.

6.0 Acknowledgement

The Review Team would like to thank all participants for their contributions to the review. The support provided by Betsan Ifan was much appreciated.

7.0 Scope of the Review

This is an early Gate 0.

8.0 Review Team findings and recommendations

8.1: Policy and business context

Transformation & Improvement / Context

PCC covers a significant proportion of the Welsh land mass (Approx. 25% of Wales), however only around 4% of the population reside in this largely rural county. These factors present particular challenges in the provision of education across the age and ability ranges, particularly for pupils with Additional Learning Needs (ALN).

Powys County Council (PCC) has successfully progressed its 21st Century Schools Band A Programme, though not without difficulties in the commercial supply chain. Additionally, PCC has been recovering its position from an unfavourable ESYTN review report in September 2019. During the week of this Gateway Review, PCC was also in the midst of an ESYTN review assessing improvements made.

PCC has established a 'Transformation Board', to oversee all aspects of Improvement and Transformation, including those to be enabled via the 21st Century Schools Programme.

There are a very large number of very small schools with low pupil numbers; which limits the education provision, particularly in specialist subjects. The numbers of pupils also restricts access to extra-curricular enrichment activities such as team sports, choir etc. The Review Team understands that Schools Transformation will address these issues through the provision of fewer, larger, schools across Powys.

At this juncture, PCC 21st Century Schools has constructed its Band B Strategic Outline Programme (SOP) which demonstrates strong alignment with Welsh Government policy and is well placed to deliver the enablers for Transformation.

The strategic vision is well understood by Council Members and Officers. The Review Team was told that the Transformation agenda is broadly supported politically, though with forthcoming elections the political landscape could change.

21st Century Schools Backstory

Band A has progressed largely successfully, though many interviewees are of the view that it lacked ambition and that some more difficult decisions in respect of schools reorganisation were not made. There are some remaining Band A projects still underway which were delayed due to the collapse of the construction company Dawnus. Most notably, Ysgol Bro Hyddgen is delayed significantly and is unlikely to be completed for several years; in turns leading to maintenance issues in the existing poor-condition building.

The Review Team was told that Band A focussed mainly on the South of the county and that Band B will focus mainly on the North. As Band B progresses there will be a need to maintain balance between investment in the new and upkeep of the existing estate.

The Review Team observes a robust vision and a strong, ambitious and engaged leadership team fully committed to delivering world-class educational provision for the residents of Powys.

8.2: Business Case and stakeholders

Band B Scope & Business Case Status

The Band B Programme is underpinned by an approved SOP of £113.9 million. However, PCC have more ambitious plans and have developed a revised SOP which increases this figure to £263 million. This remains unapproved by Welsh Government until such time that substantial progress is made in the current programme (approx. 80% completed). Many interviewees suggested that early confirmation from Welsh Government in respect of funding for the enhanced pipeline would be extremely helpful in planning for the transformation.

The Review Team understands that the scope of the approved Band B SOP includes:

- Ysgol Bro Hyddgen, Machynlleth (2 schools)
- Newtown Development (5 schools)
- Refurbishment of schools (various)
- Mid Powys Primary Welsh medium (3 schools)
- Brecon Town centre (4 schools)

At this point in time, all projects are intended to be undertaken as Capital builds, the reason being that there is a high degree of community and leisure facilities planned as well as specialist schools catering for ALN pupils. These additions are not suitable for the Mutual Investment Model (MIM) as a funding mechanism, this MIM may well be considered for future schemes.

Funding

The approved Band B programme, sized at £113 million, will be funded 65% (75% for ALN) by the Welsh Government, with the remainder to be provided by PCC. Should Powys move to the more ambitious SOP there will be significantly more match funding to find in the order of £52 million. This is currently not budgeted for in the Local Authority and a number of interviewees expressed concern about the impact this could have on borrowing. This was balanced by an alternative view supported by the asset-rich position in Powys and the potential to raise funds through the sale of assets.

The Review Team understands that an Asset Review is underway to identify assets and assess whether they are revenue-generating or loss-making.

Affordability was a key topic of discussion, leading to quite polarised views about how or whether the expanded programme should be funded. The Value for Money, or enhanced benefit, position appears quite straightforward, but affordability is not so easy to resolve. Doing nothing is not a no-cost option.

Recommendation 1: Set out the financial options for match funding the enhanced programme including the Value for Money proposition of investing in the future and the cost of doing nothing, so that all parties have a common understanding options available. (Essential – do by end FY 2021/22

Stakeholders & Communications

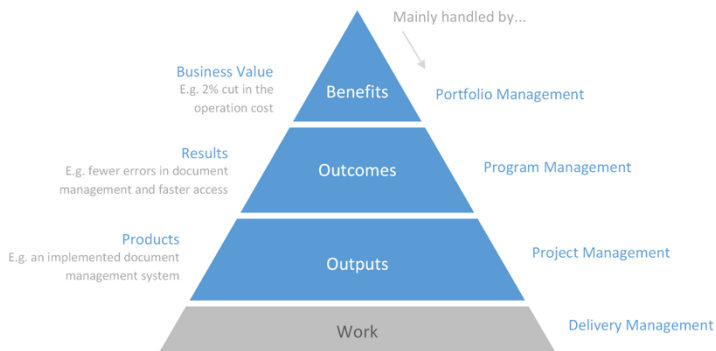
The stakeholders of the programme are well understood and much work has been done during Band A to understand local communities along with the opportunities and challenges likely to be presented during Band B. The Review Team heard encouraging narrative surrounding the vision for education in Powys and the potential for significant uplift in attainment. In a time of improvement and transformation, it is important to reiterate the message of what you are trying to achieve, rather being dragged into particular detail of specific projects that distract from the bigger picture. Powys has a great story to tell. In this period ahead of local elections, it would be prudent to cement the message and remain focussed on the overarching purpose of 21st Century Schools as one enabler of the change.

Recommendation 2: Reiterate the Transformation and Improvement Vision and situate 21st Century Schools as an essential component in that narrative. (Recommended – do by end FY 2021/22)

8.3: Management of intended outcomes

Outcomes & Benefits

The Review Team believes that it is important to establish a common lexicon in respect of P3M (Portfolio, Programme, Project Management), particularly in understanding what each layer is charged with delivering. The picture below (obtained open source from the internet) serves as a clear illustration of how P3M is structured.



In the context of 21st Century Schools:

- A Construction **Project** delivers an **Output** (e.g. a new school, building);
- The 21st Century Schools **Programme** used that Output to achieve an **Outcome** (e.g. enhanced learning environment and access to a greater range of subject areas and enrichment opportunities); and
- The Transformation and Improvement **Portfolio** leverages those Outcomes to deliver **Benefits** (e.g. improved educational attainment)

21st Century Schools Benefits Management

Whilst the vision in Powys is very strong, and the focus on projects as clear, the linkage through the programme layer and how the linkages knit together is less clear. This could be explained by the relatively early stage of the Band B programme lifecycle.

The Review Team observes that now would be an opportune time to develop the benefits management approach for the overall Transformation Portfolio and ensure that it is mapped to the governance arrangements.

Currently, the embedding of benefits management appears focussed on outputs and reporting. It would be helpful to establish dependencies among those outputs that drive outcomes from which benefits can be realised. This can be depicted in an Investment Logic Map or benefits contribution matrix (examples available open source from the internet). Furthermore, such a map would bring greater clarity around roles and responsibilities for sustainable benefits realisation.

Recommendation 3: Develop a form of mapping across the Outputs/Outcomes/Benefits that clearly sets out who is responsible for what and how the dependencies will be managed to ensure benefits realisation. (Recommended – do by end FY 2021/22)

Governance

Given the P3M discussion above, PCC is already well on the way to establishing appropriate governance.

The Review Team saw various documentation depicting:

- The Transformation Board;
- The Capital Oversight Board; and
- The Ysgol Bro Hyddgen Project Board

This maps very neatly onto the previous discussion about P3M levels. The Transformation Board has clear purpose. The Ysgol Bro Hyddgen Project Board currently reports into the Transformation Board as it is a major in-flight Project and there is some lack of clarity surrounding the role of the Capital Oversight Board. Some interviewees see it as decision-making, and others see it as advisory. The Review Team formed the view that as more projects initiate there will be a need for a 21st Century Schools Programme (Capital Build Projects) Board; which could be an evolution of the Capital Oversight Board and/or the Ysgol Bro Hyddgen Project Board. There is no 'one size fits all' for governance, but it is important to maintain focus on the purpose of any board meetings especially when there is likely to be overlap in membership.

- A Project(s) board needs to focus on the outputs of the project(s)
- A Programme Board needs to focus on the outcomes of 21st Century Schools
- A Portfolio Board needs to focus on the Benefits of the Improvement and Transformation.

The membership and frequency of the meetings is likely to vary and should be linked by clear escalation mechanisms and triggers. PCC does not need to turn this into an industry but there is opportunity to build on the good governance so far to further tighten the focus as the 21st Century Schools programme progresses. It is clear that the Leadership is strong and committed at all levels, with individuals demonstrating a passion to succeed.

The Review Team heard good articulation about the various workstreams and themes in Improvement and Transformation, including ALN, post-16, Welsh medium, primary and all-age, Digital and Commercial. The future governance structure should be cognisant of the need make sure that different contributors at each level, such as Digital, Commercial, Education Directorate and senior managers, end Users (e.g. Headteachers) are appropriately represented.

Recommendation 4: Differentiate the governance levels, and memberships, required for each layer of Transformation Portfolio, 21st Century Schools Programme, and build Project. (Essential – Do by end FY 2021/22)

8.4: Risk management

The Review Team heard about the establishment of a shared Risk Register which helps all parties to hold a common view about risk exposure. Risk management appears to be adequate at this stage, though it ought to increase in prominence along with benefits and used to drive the governance.

As with many programmes of this nature, there is opportunity to expand the P3M expertise to implement RAIDO (Risks, Assumptions, Issues, Dependencies, Opportunities) as a more integrated approach. (guidance available open source from the internet).

8.5: Review of current phase

Heart of Wales Property Services (HoWPS)

The HoWPS organisation is a commercial construct in partnership with Kier. The Review Team that the arrangement has a break-point after five years and that PCC had taken the decision to invoke this. In July 2022, former PCC roles will TUPE from HoWPS back into PCC.

The Review Team observed that stakeholders have a positive expectation of bringing those roles back in-house and that it should provide a more reliable basis upon which to plan delivery.

Programme Resources

The programme appears to be adequately resourced with a core programme management team sized for the job. The HoWPS change also present the possibility for more flexible resource use (being in-house); particularly in respect of project managers. That flexibility could prove valuable, especially as specialist recruitment is said to be an ongoing problem in Powys.

Commercial Construct

As projects progress and reach the procurement stage, the commercial strategy is likely to make use of existing frameworks such as SEWTAPS & SEWSCAP. Interviewees are of variable opinions about the

attractiveness of the build projects to the market; with some continued worry about post-Covid cost pressures and contractor availability. Views vary considerably from confidence that suppliers will be keen, to a more prominent belief that rural Wales is a difficult environment in which to attract market interest. There is a keenness amongst interviewees to work more closely and proactively with the local supply chain so that the pipeline of work can be better understood and planned for.

8.6: Readiness for the next phase

The Review Team explored potential for the Mid Wales Growth Deal and the Powys 21st Century Schools Programme to be mutually supportive. Encouragingly, this is already a topic of consideration amongst some Members, but there may be opportunity to further explore or accelerate how the Growth Deal could underpin the supply chain and the skills availability required to deliver elements of 21st Century Schools.

In a transformation portfolio such as in PCC there will inevitably be changes to the schools estate which will require extensive public consultation. The Local Authority is unable to pre-determine the outcomes of those consultations. However, that aside, it would, be very useful to map out the potential trajectory of the 21st Century Schools programme and what projects might be undertaken when. In the absence of such a roadmap, it will be very difficult to plan resource availability and funding profiles (and the consequential impact of funds elsewhere across PCC). The Review Team is of the view that a programme roadmap, setting out the various potential projects into timescales and groupings might be useful. The roadmap should be used as an internal planning tool, not a pre-determination of any consultation outcomes.

Recommendation 5 : Develop a Roadmap to assist in planning potential resources and funding needs during the Band B implementation. (Essential – do by end FY 2021/22)

9.0 Next Assurance Review

The Council would like to pursue further PAR reviews: specifically Bro Hyddgen during 2022, possibly a Gate 3 Investment Decision on Transforming Education workstream one proposals and a further wider gateway review across Vision 2025 (or its successor).

It SRO has indicated that it would be helpful to have a further review of a specific project e.g. Bro Hyddgen Community Campus in autumn 2022.

ANNEX A

Purposes of the OGC Gateway Review 0: Strategic assessment:

- Review the outcomes and objectives for the programme (and the way they fit together) and confirm that they make the necessary contribution to overall strategy of the organisation and its senior management.
- Ensure that the programme is supported by key stakeholders.
- Confirm that the programme's potential to succeed has been considered in the wider context of Government policy and procurement objectives, the organisation's delivery plans and change programmes, and any interdependencies with other programmes or projects in the organisation's portfolio and, where relevant, those of other organisations.
- Review the arrangements for leading, managing and monitoring the programme as a whole and the links to individual parts of it (e.g. to any existing projects in the programme's portfolio).
- Review the arrangements for identifying and managing the main programme risks (and the individual project risks), including external risks such as changing business priorities.
- Check that provision for financial and other resources has been made for the programme (initially identified at programme initiation and committed later) and that plans for the work to be done through to the next stage are realistic, properly resourced with sufficient people of appropriate experience, and authorised.
- After the initial Review, check progress against plans and the expected achievement of outcomes.
- Check that there is engagement with the market as appropriate on the feasibility of achieving the required outcome.
- Where relevant, check that the programme takes account of joining up with other programmes, internal and external.
- Evaluation of actions to implement recommendations made in any earlier assessment of deliverability.

ANNEX B

List of Interviewees

The following stakeholders were interviewed during the review:

Name	Organisation and role
Caroline Turner	SRO
Lynette Lovell	Director of Education
Jane Thomas	Head of Finance S151
Emma Palmer	Head of Transformation & Communications
Nigel Brinn	Executive Director
Marianne Evans	Service Manager – Schools Transformation
Vincent Hanly	Interim Commercial Services Lead
Betsan Ifan	21 st Century Schools Programme Manager
Diane Rees	21 st Century Schools Programme – Project Manager (Client)
James Chappelle	Capital Accountant
Jim Swabey	Professional Lead, Consultancy Services – Heart of Wales Property Services (HoWPS)
Phyl Davies	Councillor: Portfolio Holder for Education and Property
Aled Davies	Councillor: Portfolio Holder for Finance
Rosemarie Harris	Councillor: Council Leader
John Brautigam	Councillor: Vice Chair of Audit Committee
Dafydd Jones	Headteacher, Ysgol Bro Hyddgen
Geraint Rees	Strategic Lead for Education
Elwyn Vaughan	Councillor: Community Stakeholder
Diane Reynolds	Head of Economy and Digital Services

Mae'r dudalen hon wedi'i gadael yn wag yn fwriadol

CYNGOR SIR POWYS COUNTY COUNCIL.**CABINET EXECUTIVE
Date February 8th, 2022**

REPORT AUTHOR: County Councillor Myfanwy Alexander
Portfolio Holder for Adult Social Care, Welsh Language
Housing and Climate Change

REPORT TITLE: Housing Revenue Account Rent and Related Charges
Changes for 2022-23

REPORT FOR: Decision

1. Purpose

- 1.1 This report sets out a series of recommended changes for Council Housing Rents, Garage Rents and all property and tenancy related Service Charges, for the financial year 2022-23.
- 1.2 A separate report setting out the detail of Housing Revenue Account (HRA) Thirty Year Business Plan recommended for the period beginning in April 2022 and reflecting the decisions taken in respect of the recommendations made in this report, will be presented separately to Cabinet.

1. Background

- 2.1 The HRA is made up of income from rents and other housing related charges. This income is used to fund all HRA landlord related services including salaries, central service recharges and all services delivered to the Council's tenants. It also underpins the Council's ability to deliver a balanced and sustainable HRA Business Plan through financing the borrowing needed to invest in maintaining existing and developing new homes.
- 2.2 An important element of the HRA Business Plan is the projected future rental income over a thirty-year cycle. Rents need to be increased annually to make sure that the Business Plan remains sustainable. If the Business Plan does not generate enough income to meet its commitments, which include maintaining all homes to the Welsh Housing Quality Standard (WHQS) and improving thermal efficiency of Powys council housing as well as providing new homes to meet growing housing needs not fulfilled by open market housing, it will not be viable. The Welsh Government will not approve a non-viable HRA Business Plan and as a consequence the Council would not receive the Major Repairs Allowance (MRA), worth £3,732,000 million in capital funding each year, to support ongoing investment.

- 2.3 This report sets out the changes in rents and other charges that accrue to the HRA that will need to be introduced for 2022-23, to make sure the HRA Business Plan remains both sustainable and viable.
- 2.4 The recommendations take into account compliance with the Welsh Government's Policy for Social Housing Rents (Rent Policy).
- An annual rent uplift of up to CPI+1%, each year for five years from 2020-21 to 2024-25 using the level of CPI from the previous September each year.
 - The level of an individual rent can be reduced, frozen or can rise by up to an additional £2 per week over and above CPI, on condition that the total rental income collectable by the Council across the whole of its stock increases by no more than CPI+1%.
 - Should CPI fall outside the range of 0% to 3%, the responsibility to determine the appropriate increase to be applied for the relevant year will rest with the Minister with responsibility for housing.
 - When setting rents, the Council is expected to take into account affordability for tenants of the whole cost of living in a property, including for example, rent, service charges and energy costs.
- 2.5 For September 2021 CPI was 3.1%. This means that for 2022-2023, the Minister has exercised their right to determine the maximum rent increase for social landlords in Wales. The Minister has advised that the maximum annual rent uplift for 2022-2023 will be up to CPI, based on the September 2021 index of 3.1%. The most recent published CPI, for December 2021, is 5.4%.

3. Advice

- 3.1. The Council, like all social landlords working in Wales, is expected to be able to justify its rent increases with reference to a rigorous approach to securing cost efficiencies and by putting affordability for tenants at the core of its considerations. A self-certification monitoring form prepared by the Welsh Government, which is used to monitor compliance with the Welsh Government Rent Standard, is attached to this report as Appendix A.
- 3.2 The Welsh Government recognises that not enough homes are being built, with particular concerns about the wider impacts arising from the shortage of social housing. There is therefore a need to strike a balance between affordability and allowing the Council to contribute towards increasing the supply of secure, affordable, energy efficient and well-maintained homes.
- 3.2 Rents
- 3.2.1 The Council's HRA Business Plan has been stress tested to see what changes in rents and services charges need to be made to allow it to remain viable and able to increase the number of affordable homes

available across Powys. The conclusion is that a rent increase of CPI, equivalent to 3.1%, is necessary to make sure that the Housing Service is sustainable and able to provide homes and services for both current and future tenants. Such an increase allows rents to remain affordable, and an increase below the December 2021 inflation rate of 5.1%.

3.2.2 It is therefore recommended that with effect from April 2022 the average rent in Powys will increase by 3.1% for all 5,433 Council owned homes and 31 Gypsy Pitches. Table One below shows the average rent in 2021-2022 and 2022-23. It should be noted that the figures in Table One show rents over a 52-week rent year. In Powys rents for municipal homes are charged over a 48-week rent year with two 'rent free weeks' at Christmas and two 'rent free weeks' at Easter.

Table One: Housing Rents for 2021-22 and 2022-23

	Current Rent - 2021-2022	Recommended Rent - 2022-2023	Weekly Increase
Average HRA rent	£93.82	£96.37	£2.55

3.2.3 The total rental income to the HRA from housing rents, if the recommendation is approved, will increase from £26,289,872 in 2021-22 to £27,225,024 in 2022-2023¹. This represents gross income before any allowance is made for void rent loss and arrears of rent. If the recommendation is not approved, then taking into account inflation and other unavoidable cost increases faced by the landlord service, it will be necessary to reduce the level of services provided, including investment in the Council's housing assets.

3.2.4 The Council has during the Covid pandemic taken a proportionate and pragmatic approach to the collection of rent. While the 'Rent First' ethos remains the guiding principle, tenants who are facing unavoidable financial challenges linked to Covid have been and continued to be offered additional support to secure additional income, including for example submitting claims for housing benefit and universal credit, and accessing advice via the Councils money advice team. Officers are keeping in touch with people to make sure that help is offered as soon as possible to prevent arrears climbing to high levels. The approach is proving to be successful in maintaining income to the HRA. At the start of Quarter Four 2021-2022 income recovery is running at 97.14% of rent due; for the same period last year this was 96.99%. This rigorous but pragmatic approach will continue in 2022-2023 when it is expected to yield a similar success rate.

3.2.5 Powys County Council rents for 2021-2022 are £0.07 above average for local authority landlords in Wales². It is not yet possible to provide

¹ Rents for 2022-2023 have been set to take account of adjustments made to rent roll 2021-2022 to reflect clarification, received during 2021-2022 of the Welsh Government guidance issued for the rent year 2020-2021.

² Source: www.statswales.gov.wales

comparative data for 2022-2023 as landlords are currently agreeing rents for the next rent year.

3.3 Service Charges

3.3.1 Service charges will need to be amended from April 2022 to allow the Council to recover the cost of providing these services. The service charges levied in 2021-22 are shown alongside the proposed charges for 2022-23 in Table Two. It should be noted that service charges vary from year to year, dependent on the costs of providing those services.

Table Two: Service Charges for 2021-22 and 2022-23

Service Charge	Highest Weekly Service Charge		Lowest Weekly Service Charge (where a charge is made)		How the Service Charge is Calculated
	2021-2022	2022-2023	2021-2022	2022-2023	
Grounds maintenance	£2.47	£2.47	£0.06	£0.06	Calculated on a site-by-site basis, based on the size of the site and the cost of undertaking the work
Communal cleaning	£1.61	£1.55	£1.61	£1.55	Based on the total cost of the work, divided by all those who receive the service.
Communal heating and lighting	£1.18	£1.07	£1.18	£1.07	Based on the total cost of the service, divided by all those who receive the service.
Fire safety work	£1.33	£1.00	£0.04	£0.08	Based on actual costs per block and divided by all residents of the block.
TV aerials	No costs for 21/22	No costs for 22/33	No costs for 21/22	No costs for 22/33	Based on the costs associated with each aerial and divided by all

					potential users of the aerial system.
Repairs to entrance doors	N/A	N/A	N/A	N/A	Based on actual costs per block and divided by all residents of the block.
Communal washing lines	£0.44	£0.44	£0.26	£0.44	Based on actual costs per block and divided by all residents of the block.
Sewerage treatment	£7.90	£5.97	£7.90	£5.97	Based on the total cost of the work, divided by all those who receive the service.
Lift maintenance	£1.62	£1.62	£0.23	£0.32	Costs split equally between tenants with lifts (for servicing)
Repairs to communal areas in flats	N/A	N/A	N/A	N/A	Costs per block divided between all residents of the block

3.3.2 For the majority of service charges, the calculation of the charge is based on the costs incurred in the previous full year. The service charge for lift maintenance for the only block of flats which benefits from a through floor vertical lift (Maes yr Ysgol in Llanidloes), is based on the cost of the service agreement with the contractor, plus the cost of any repairs undertaken in the previous financial year.

3.3.3 Grounds maintenance service charges are based on the charges incurred two years prior to the current year. This means that the charges for 2021-2022 were based on 2019-2020 costs, while costs for 2022-2023 will be based on costs incurred for 2020-2021. In 2019-2020, the Council increased the level of service to include winter works on the estates such as minor repairs and clearance of overgrown and unsightly areas, inspections and weed spraying. However, the cost for 2019-2020 is fixed for 2020-2021 and 2021-2022, which means that this service charge for tenants remains fixed for the next two years - 2022-2023 and 2023-2024.

- 3.4.1 In February 2020, the Council agreed that the decision to have the Careline Service would rest with individual tenants and would no longer be mandatory for tenants of designated properties. This was to allow greater customer choice. At the same time, Careline would be available to all tenants who would like to pay for such a service. This could include people who are vulnerable for reasons other than age and who would benefit from having 24/7 access to the Careline Service for example.
- 3.4.2 To take account of technological developments, the needs and aspirations of residents and the experiences in delivering services remotely gained during the Covid pandemic, a review of the options available for tenants to have access to careline-style services is underway. The HRA Business Plan for 2022-2023 includes provision to allow for any necessary capital investment to replace the Careline equipment with up-to-date kit, should this option be one of the outcomes of the review.
- 3.4.3 To recover any costs incurred by any introduction of new equipment, it would be necessary to reconsider the charges made for Careline. As part of the Council's Rent Policy for 2019-2020, it was agreed that any increase to the cost of the Careline service would only be introduced alongside the roll out of any new equipment. It would not be prudent to introduce a revised charge until any new equipment has been installed. This means a revised charge to reflect the actual cost of installing the new equipment will need to await completion of the review of careline-style services and, if appropriate, the installation of new equipment via a renewal programme. It is therefore recommended that the charge for Careline in 2022-2023 remains at £1.10 per week.

Table Three: Careline Community Alarm Charges for 2021-2022 and 2022-2023

	Current Charge – 2021-2022	Recommended Charge - 2022- 2023	Weekly Increase
Careline Community Alarm Charge	£1.10	£1.10	£0.00

3.5 Garages

- 3.5.1 A review of all the garage sites and plots owned by the Council has considered the demand for and suitability of garages for car parking, the condition of the buildings and the options for other uses for the sites, for example the development of new homes or car parking. For garage provision to continue to be viable, investment in the existing garage estate or new build garages to accommodate modern cars will be necessary in those sites that are to be retained.

3.5.3 Table Four below show the current rents for HRA garages in 2021-22 in Powys and the proposed rent for 2022-23. It also shows the current and proposed rents for garage plots owned by the HRA. It is recommended that HRA garage rents in Powys are increased by 3.1%, which equates to £0.39 per week, and garage plots by the same percentage, which equates to £4.92 per annum.

Table Four: Garage and Garage Plot Rents for 2021-22 and 2022-23

	Existing Rent - 2021-22	Recommended Rent - 2022-23
Garage Rents	£12.50 per week	£12.89 per week
Rent for Garage Plots (not subject to rate at time of letting)	£159.00 per annum	£163.93 per annum

3.5.4 The total rental income to the HRA from the provision of garages, if the recommendation is approved, income will increase from £717,850 in 2021-22 to £722,520 in 2022-23. The income for Garage Plot Ground rent in 2021-22 was £24,960. In 2022-2023 this will be £23,890. Due to a review of historical garage ground rents agreements, a provision will be set aside in the Housing Revenue Account Business Plan to cover any credits that may be necessary upon completion of an audit of tenancy agreements.

3.6 Gypsy and Traveller Sites

3.6.1 The Council currently operates three Gypsy and Traveller Sites in Powys – Leighton Arches in Welshpool, Trem yr Afon in Machynlleth and Kings Meadow in Brecon. All sites are managed by Housing Services although the costs of providing this service falls on the General Fund. Service charges for the sites cover grass cutting for the Kings Meadow Site and sewerage for all sites.

3.6.2 It is recommended that weekly occupation charges for Gypsy and Traveller sites in 2022-2023 will be increased by 3.1%, in line with the increase in HRA rents. Table Five below shows the existing charge for occupation of a plot on the Gypsy and Traveller sites, and associated service charges, in the current year and the recommended charge for 2022-23.

Table Five: Gypsy & Traveller Site Weekly Occupation Charge and Service Charges for 2021-22 and 2022-23

	2021-2022	2022-23
Weekly Occupation Charge for plots on Gypsy & Traveller sites	£105.33	£108.60
Grass Cutting Service Charge (Kings Meadow site only)	£0.95	£0.95
Grass Cutting Service Charge (Trem Yr Afon site only)	N/A	£2.02
Sewerage Service Charge	£8.73	£5.51

3.6.4 The total income to the General Fund from the Council's gypsy and traveller sites, if the recommendation is approved, will increase from £136,450 in 2021-22 to £143,090 in 2022-23.

3.7 Temporary Accommodation for Homeless Households

3.7.1 It is recommended that the weekly charge for the occupation of temporary accommodation, provided to households to whom the authority owes a statutory duty is increased by 3.1% in 2022-2023. It should be noted that the scope for setting charges for temporary accommodation is influenced by the need to recognise the low incomes of some of those who are homeless, the restrictions the social security system places on the amount of help homeless people can claim for accommodation, and the capacity of the General Fund to meet the costs for those who are unable to make full payments from their own resources. The increase recommended represents a pragmatic compromise between these external factors. Tables Six and Seven shows the current and proposed weekly charge for the occupation of temporary homeless accommodation managed by the council.

Table Six. Temporary Homelessness Accommodation Weekly Occupation Charges for 2021-2022 and 2022-2023 (including Council Tax)

Weekly occupation charge for temporary homeless accommodation	Occupation Charge - including Council Tax		Service Charge		Weekly Total Occupancy Charge	
	2021-2022	2022-2023	2021-2022	2022-2023	2021-2022	2022-2023
Single person	£106.05	£109.34	£16.44	£16.95	£122.49	£126.29
Couple	£129.26	£133.27	£20.41	£21.04	£149.67	£154.31
Family	£154.20	£158.98	£29.34	£30.25	£183.54	£189.23

The 'including Council Tax' figures are the charges for people placed into shared accommodation (accommodation modified to allow separate households people to occupy a single property) example).

Table Seven. Temporary Homelessness Accommodation Weekly Occupation Charges for 2021-2022 and 2022-2023 (excluding Council Tax)

Weekly occupation charge for temporary homeless accommodation	Occupation Charge excluding Council Tax		Service charge		Weekly Total Occupancy charge	
	2021-2022	2022-2023	2021-2022	2022-2023	2021-2022	2022-2023
Single person	£85.82	£88.48	£16.44	£16.95	£102.26	£105.43
Couple	£106.23	£109.52	£20.41	£21.04	£126.64	£130.57
Family	£128.19	£132.16	£29.34	£30.25	£157.53	£162.41

The 'excluding Council Tax' figures are the sum charged to people placed in self-contained accommodation.

3.8 Other Rental Charges

- 3.8.1 The HRA collects rent from other services and properties, albeit on a small scale. These include such things as scooter stores and sheds. It is recommended that all other rental charges, not detailed above, will increase by 3.1% from April 2022.

4. **Resource Implications**

4.1 Financial

- 4.1.1 The recommended increases to housing rents and other related charges will allow Powys County Council to continue to maintain a viable and sustainable Thirty Year HRA Business Plan, continue to provide high quality services, develop more new social rented homes and support continued investment in its homes to maintain WHQS and improve thermal efficiency.
- 4.1.2 The Council's Section 151 Officer notes the content of the report and that the recommended increase proposed ensures that the HRA Business Plan remains both sustainable and viable. The recommendations are compliant with the Welsh Government's Policy for Social Housing Rents (Rent Policy). As CPI falls outside the range of 0% to 3%, the responsibility to determine the appropriate increase to be applied for the relevant year will rest with the Minister with responsibility for housing. The Minister has advised that the maximum annual rent uplift for 2022-2023 will be up to CPI, based on the September 2021 index of 3.1%.

5. **Legal implications**

- 5.1 Legal: The recommendation can be supported from a legal point of view.
- 5.2 The Head of Legal and Democratic Services (Monitoring Officer) has commented as follows: "I note the legal comment and have nothing to add to the report".

6. **Comment from local member(s) and other relevant bodies**

- 6.1 This matter has equal effect across the Council.
- 6.2 A report on proposed rents for 2022-2023 was considered on 14.01.22 by the Powys Tenant Scrutiny Panel (TSP). The panel includes both tenant representatives and councillors.

- 6.3 Concerns were expressed that with reported increases in living costs, and increases in both National Insurance and Council Tax, tenants will be struggling with a rent increase of 3.1%.
- 6.4 The proposal to increase rents by the maximum amount allowed was discussed, with the TSP requesting clarification as to why this was being proposed. It was acknowledged that getting the balance between keeping rents affordable and being able to invest in current and new homes was challenging. There are more than 4,000 households registered with 'Homes in Powys' on the waiting list for affordable homes, and 200 households in temporary accommodation awaiting availability of permanent accommodation.

7. Integrated Impact Assessment

- 7.1 An Impact Assessment has been completed for this report.

8. Recommendation

- 8.1 The recommendations set out in this report are:
- 8.1.1 That with effect from April 5th, 2022 the average rent in Powys will increase by 3.1% (the average rent being £96.37 per week) for all 5,446 Council owned homes, excluding service charges.
 - 8.1.2 That service charges charged to HRA tenants are amended with effect from April 5th, 2022 to allow the Council to recover the cost incurred in providing these services.
 - 8.1.3 That the weekly cost effect from April 5th, 2022 for Careline in 2022-2023 is £1.10 per week.
 - 8.1.4 That HRA garage rents in Powys with effect from April 5th, 2022 for 2022-2023 are increased by £0.39 per week.
 - 8.1.6 That garage plot charges effect from April 5th, 2022 for 2022-2023 increase by £4.93 per annum.
 - 8.1.7 That the weekly occupation charge from April 5th, 2022 charges for Gypsy and Traveller pitches in 2022-2023 will be increased by 3.1% the average rent being £108.60.
 - 8.1.8 That all other rental and service charges, not detailed above, effect from April 5th, 2022 will increase by 3.1%.

Contact Officer:	Andy Thompson (Professional Lead - Housing) Tel: 01597 827464 Email: andy.thompson@powys.gov.uk
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Head of Service:	Nina Davies
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Corporate Director:	Nigel Brinn
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Welsh Government	Powys County Council
Annual Self-Certification Monitoring Return	
Name of Social Landlord	Powys County Council
Date return completed	
PART ONE (MANDATORY): Please answer all the following questions relating to your rental income.	
Questions for year APRIL 2021/22	
Q1. Please confirm the overall percentage increase you applied to your rents at April 2021 and stock numbers on the 31st March 2021.	Rent Increase for 2021-2022: CPI+1%, equivalent to 1.5%. Stock numbers 31.03.21: 5,389 homes.
Q2. Please confirm that the level of rent for an individual tenant did not rise more than CPI+1% plus an additional £2	The rent for individual tenants was capped at CPI +1% plus £2 for 2021-2022, so no individual tenant's rent was increased by more than this amount.
Questions for year APRIL 2022/23	
Q3. Please indicate the estimated gross annual rental income for 2022-23 for general needs and sheltered self-contained dwellings based on revised rents at April 2022 and stock numbers on the 31st March 2022. (Definition of 'estimated gross annual rental income' is the rental income you expect to receive for your whole portfolio of properties, including any new builds you are anticipating in year, and regardless of whether properties are occupied or void)	Gross Rental Income for 2022-2023: £27,255,024 Stock numbers 31.03.22: 5,433
Q4. Please confirm the overall percentage increase YOU INTEND to apply to your rents at April 2022	CPI - 3.1%

Q5. Please confirm you have a local rent and service charge policy in place.	Confirmed.																																																																		
Q6: Please outline the factors you considered when assessing affordability when you set your rents and service charges for the 2022/23 rent year. Include details of how affordability for your tenants was taken into account and influenced the approach taken.	<p>Housing Affordability</p> <ul style="list-style-type: none"> • House price to earnings ratio in Powys: 6.3 (UK - 7.69) • Annual pay - gross - for all employee jobs in Powys: £31,200 (UK – £33,400) • Average annual rent for Powys County Council (all property types): £4,927. • Average annual heating costs (all properties) per annum Powys: £987 (England & Wales - £650). • 35% of gross income (assumed maximum percentage of gross income to be spent on housing and energy costs): £10,920 per annum • Powys County Council municipal rent plus energy costs (using multi-tenure energy cost data): £5,914 per annum <p><i>NB: Data for 2021 – source: www.plumpot.co.uk</i></p> <p>Comparisons of Weekly Municipal Rent with Private Sector Rent, Living Rent and Social Landlords in Powys</p> <table border="1" data-bbox="533 987 1377 1417"> <thead> <tr> <th></th> <th>Median private rents (2021-2022)</th> <th>Living rent (2021-2022)</th> <th>Housing association average (2021-2022)</th> <th>Median municipal rents (2021-2022)</th> <th>Proposed municipal rents (2022-2023)</th> </tr> </thead> <tbody> <tr> <td>One bedroom</td> <td>£76</td> <td>£77</td> <td>£79</td> <td>£76</td> <td>£82.05</td> </tr> <tr> <td>Two bedrooms</td> <td>£102</td> <td>£100</td> <td>£96</td> <td>£90</td> <td>£92.62</td> </tr> <tr> <td>Three bedrooms</td> <td>£127</td> <td>£124</td> <td>£109</td> <td>£102</td> <td>£104.82</td> </tr> <tr> <td>Four bedrooms</td> <td>£159</td> <td>£ N/A</td> <td>£128</td> <td>£111</td> <td>£113.92</td> </tr> </tbody> </table> <table border="1" data-bbox="533 1451 1377 1998"> <thead> <tr> <th></th> <th>LHA January 2022 Rate (Brecon and Radnor)</th> <th>LHA January 2022 Rate (Neath Port Talbot)</th> <th>LHA January 2022 Rate (North Powys)</th> <th>Median municipal rents (2021-2022)</th> <th>Proposed municipal rents (2022-2023)</th> </tr> </thead> <tbody> <tr> <td>Single room allowance</td> <td>£52.50</td> <td>£62.50</td> <td>£52.50</td> <td>N/A</td> <td>N/A</td> </tr> <tr> <td>One bedroom</td> <td>£71.86</td> <td>£79.55</td> <td>£67.89</td> <td>£76</td> <td>£82.05</td> </tr> <tr> <td>Two bedrooms</td> <td>£98.96</td> <td>£95.00</td> <td>£90.90</td> <td>£90</td> <td>£92.62</td> </tr> <tr> <td>Three bedrooms</td> <td>£115.07</td> <td>£103.56</td> <td>£109.32</td> <td>£102</td> <td>£104.82</td> </tr> <tr> <td>Four bedrooms</td> <td>£138.08</td> <td>£121.40</td> <td>£136.93</td> <td>£111</td> <td>£113.92</td> </tr> </tbody> </table>		Median private rents (2021-2022)	Living rent (2021-2022)	Housing association average (2021-2022)	Median municipal rents (2021-2022)	Proposed municipal rents (2022-2023)	One bedroom	£76	£77	£79	£76	£82.05	Two bedrooms	£102	£100	£96	£90	£92.62	Three bedrooms	£127	£124	£109	£102	£104.82	Four bedrooms	£159	£ N/A	£128	£111	£113.92		LHA January 2022 Rate (Brecon and Radnor)	LHA January 2022 Rate (Neath Port Talbot)	LHA January 2022 Rate (North Powys)	Median municipal rents (2021-2022)	Proposed municipal rents (2022-2023)	Single room allowance	£52.50	£62.50	£52.50	N/A	N/A	One bedroom	£71.86	£79.55	£67.89	£76	£82.05	Two bedrooms	£98.96	£95.00	£90.90	£90	£92.62	Three bedrooms	£115.07	£103.56	£109.32	£102	£104.82	Four bedrooms	£138.08	£121.40	£136.93	£111	£113.92
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	<p>Rent Arrears The low level of rent arrears demonstrates that Powys rental charges are reasonable – for example, very few tenants are referred for eviction. Rent collected 2021-2022 Q1 to Q3 equates to 96.50% of all income due.</p> <p>Service Charges Service charges are recovered based on actual costs incurred in the last full year preceding 2022-2023.</p>
<p>Q7: Please outline the tenant involvement (engagement, consultation and feedback) undertaken and how feedback received has influenced your rent setting policy for the 2022/23 rent year.</p>	<p>STAR Survey Outcomes for 2021 Tenants were generally positive about rent and service charges providing value for money (78% and 77% satisfied respectively), and almost three quarters (74%) were satisfied with the overall quality of their home.</p> <p>Tenant Scrutiny Panel Meeting 14.01.22 A report on proposed rents for 2022-2023 was considered on 14.01.22 by the Powys Tenant Scrutiny Panel (TSP). The panel includes both tenant representatives and councillors.</p> <p>Concerns were expressed that with reported increases in living costs and increases in April of both National Insurance and Council Tax increases, tenants will be struggling with having a rent increase of 3.1%.</p> <p>The proposal to increase rents by the maximum amount allowed was discussed, with the TSP requesting clarification as to why this was being proposed. It was acknowledged that getting the balance between keeping rents affordable and being able to invest in current and new homes was challenging, with 4,000 households registered with ‘Homes in Powys’ for affordable and the 200 households in temporary accommodation, awaiting availability of more permanent accommodation.</p> <p>Tenant Feedback to Officers The Council’s Senior Income Officer collates feedback received by officers from tenants about current rents. Main points stated were: Powys County Council rent is seen as significantly cheaper than all other providers.</p> <ul style="list-style-type: none"> • Tenants felt Powys County Council rents were extremely good value for money as they see them as not just being for the properties themselves but also for the services they receive from Housing Services and the security being a Powys County Council tenant brings in comparison to other landlords, particularly the private rented sector. • There has been negative feedback regarding rent affordability when put in the context of the current financial climate. Although the annual rent increase is very rarely mentioned in itself, the common concerns expressed were annual council tax increases, struggles with cost of living and the price of utilities increasing.

Q8: Please state the date your Board/Council/Committee made or ratified the final decision on your rent setting for 2022/23	08.02.2022
Q9: Please explain how your annual assessment on operating costs and cost efficiencies has impacted on your rent setting decision for April 2022/23	<p>In 2021-2022, the Council undertook a detailed assessment of how repairs and maintenance services are provided for its tenants. This work included a detailed examination of the processes involved from service request to completion of repair. The process was found to be cumbersome and inefficient. All options for the future delivery of these services were assessed, with the recommendation to undertake direct provision of repairs and maintenance to municipal housing being adopted by the Council in summer 2021. The current contract with Heart of Wales Property Services will end in July 2022, with service thereafter being provided directly by Housing Services. The directly provided service will include, for example, more pre-inspections of repairs to improve diagnosis of problems, pre-empt future service requests and make sure that right first time, every time ethos applies wherever practicable to avoid repeat visits and focus on prevention rather than cure.</p> <p>In 2020-2021, the Council reviewed the structure of Housing Services, in response to changing service demands. In 2021-2022, a revised structure has been developed to allow more flexible deployment of resources across the whole service, increasing efficiency by, for example, introducing locally focused mini-teams to take ownership of all asset management works for patches of homes and make sure that responsive, cyclical and improvement works are better co-ordinated. The new structure is to be introduced in March 2022.</p>
Q10: Please provide any other comments or raise an issue in relation to your rent setting exercise for April 2022/23	There are as of January 10 th , 2022, 4,073 people registered with 'Homes in Powys' for secure, affordable housing, an increase from the December 2020 figure of 3,326. Maintaining and increasing the rate of development for new Council-owned homes is a major priority for the Council to meet this demand. Communities will benefit socially and economically by increasing the number of people who can enjoy secure, affordable accommodation – including current tenants who need to move and their families and friends who are no yet council tenants. The rent increase for Powys 2022-2023 will help support the expansion of our development programme to increase the availability of good homes for people living in our county.
PART TWO – Voluntary	
a) End all evictions into homelessness	

<p>Q11: Please confirm that you are strengthening your approaches designed to ensure you minimise all evictions and deliver on a new agreement not to evict into homelessness</p>	<p>Ongoing focus is continuing to minimise the threat of eviction through regular contact with tenants, maximising rent payment options and regular referrals by our Housing Officers, who are tasked with arrears case management, to our 'in-house' Tenancy support Team to provide tailored financial support which has contributed significantly to ongoing tenancy sustainability.</p>																												
<p>Q12: If you would like to provide further details please do so here:</p>	<p>To minimise potential evictions into homelessness, in the exceptional cases where possession proceedings are needed for ongoing breaches of tenancy conditions, our Housing Officers work alongside our Housing Options Officers. This is to ensure a timely consideration of the individual household's housing and support needs, in line with current homelessness legislation, including the provision of temporary accommodation where needed while ongoing work is done to secure settled, alternative accommodation.</p>																												
<p>b) Undertake a standardised tenant satisfaction survey</p>																													
<p>Q13: Confirm that you will complete a tenant satisfaction survey, including the core questions, for submission by 28th February 2022</p>	<p>STAR survey completed December 2021. The results show an increase in satisfaction with services when compared to the last such survey in 2019.</p> <div data-bbox="544 969 1385 1585"> <table border="1"> <caption>Overall Satisfaction – Key Survey Measures</caption> <thead> <tr> <th>Category</th> <th>2021 (%)</th> <th>2019 (%)</th> <th>2019 to 2021 change</th> </tr> </thead> <tbody> <tr> <td>Overall satisfaction with services provided by Powys CC Housing Services</td> <td>71</td> <td>65</td> <td>+6</td> </tr> <tr> <td>Your neighbourhood as a place to live</td> <td>88</td> <td>84</td> <td>+4</td> </tr> <tr> <td>That your rent provides value for money</td> <td>78</td> <td>71</td> <td>+7</td> </tr> <tr> <td>The overall quality of your home</td> <td>73</td> <td>77</td> <td>-4</td> </tr> <tr> <td>The way PCCHS deals with repairs & maintenance</td> <td>63</td> <td>54</td> <td>+9</td> </tr> <tr> <td>That PCCHS listens to your views & acts upon them</td> <td>55</td> <td>47</td> <td>+8</td> </tr> </tbody> </table> <p><small>Comparisons made for all questions asked in both 2019 and 2021 Base (all, 2021): 704 Powys County Council - Tenants Satisfaction Survey 2021 *Base = those who pay a service charge (201)</small></p> <p><small>beaufortresearch</small></p> </div>	Category	2021 (%)	2019 (%)	2019 to 2021 change	Overall satisfaction with services provided by Powys CC Housing Services	71	65	+6	Your neighbourhood as a place to live	88	84	+4	That your rent provides value for money	78	71	+7	The overall quality of your home	73	77	-4	The way PCCHS deals with repairs & maintenance	63	54	+9	That PCCHS listens to your views & acts upon them	55	47	+8
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<p>c) Standards</p>																													
<p>Q14: Please confirm that all new build development financed by Welsh Government Housing Capital Funding, will comply with the new housing quality standard</p>	<p>Confirmed.</p>																												

“WDQR 2021” across all tenures on sites.	
d) EPC A	
Q15: Please confirm that all new build financed by Welsh Government Housing Capital Funding will achieve energy efficient standard of EPC A and above.	Confirmed.
Authorised Signatory	
Name	Jane Thomas
Position (Section 151 Officer)	Head of Finance (Section 151 Officer)
Date	

Cyngor Sir Powys County Council

Impact Assessment (IA)

The integrated approach to support effective decision making



Please read the accompanying guidance before completing the form.

This **Impact Assessment (IA)** toolkit, incorporates a range of legislative requirements that support effective decision making and ensure compliance with all relevant legislation. **Draft versions of the assessment should be watermarked as "Draft" and retained for completeness. However, only the final version will be made publicly available. Draft versions may be provided to regulators if appropriate. In line with Council policy IAs should be retained for 7 years.**

Service Area	Housing Services	Head of Service	Nina Davies	Director	Nigel Brinn	Portfolio Holder	Cllr Myfanwy Alexander
Proposal	Changes to Housing Rent and Service Charges for 2022-2023						
Outline Summary / Description of Proposal							

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The Housing Revenue Account (HRA), which is the means by which all municipal landlords in Wales are expected to manage the financing of their landlord services, is funded primarily by the income generated from rents. Additional one-off payments are available from the Welsh Government to support the building of new council-owned homes. These payments are designed to reduce the cost of providing additional homes so that the future rent charges can be set at genuinely affordable social rent levels. An annual sum of £xxxx is made available to the Council by the Welsh Government – this is the Major Repairs Allowance (MRA) to support the maintenance of municipal housing to the Welsh Housing Quality Standard (WHQS), which is set by the Welsh Government.

The Council cannot use its General Fund (GF) to subsidise the provision of municipal landlord services and the HRA cannot be used to fund services which are expected to be paid for out of the GF. The HRA is required by the Welsh Government to, at all times, be sustainable and self-financing. In short, it can – with the limited exceptions set out above – only spend what it collects in rental income. That expenditure must also cover the debts incurred to buy and build the housing stock. These are long term loans managed on behalf of the Housing Service by the Council’s Treasury Team.

The rents the Council can charge for properties held within the HRA are subject to controls set by the Welsh Government. These controls include expected bands for different types of properties in different areas, assessed by reference to a number of market conditions including house prices, private rents and local incomes. Increases in rents are limited by a formula set by the Welsh Government. For the period 2020-2021 to 2025-2026 this formula allows social landlords in Wales, both councils and housing associations, to increase rents by no more than CPI+1%, averaged across each landlord’s entire stock. This means that while rents could be increased by more than CPI+1% on some properties the overall increase for all homes cannot increase the income by more than CPI+1%. This approach is designed to encourage landlords to operate efficiently while maintaining pressure to keep all rents as affordable as practicable.

Should CPI fall outside the range of 0% to 3%, the responsibility to determine the appropriate increase to be applied for the relevant year will rest with the Minister with responsibility for housing. For September 2021 CPI was 3.1%. This means that for 2022-2023, the Minister has exercised their right to determine the maximum rent increase for social landlords in Wales. The Minister has advised that the maximum annual rent uplift for 2022-2023 will be up to CPI, based on the September 2021 index of 3.1%.

The HRA is able to recover service charges for services provided for specific properties or groups of property where it is more practical and efficient to provide services on a collective basis. Examples include grass cutting of communal areas in and around flatted blocks. Such charges are not subject to any formal controls but must not amount to more than the actual cost of providing the services.

The HRA in Powys owns a number of garages, garage sites and retail shops. The rents on these are not controlled by the Welsh Government and can therefore be set to reflect the Council’s strategic and financial aims for these assets.

This proposal, in the form of the Cabinet Report: “Housing Revenue Account Rent and Related Charges Changes for 2022-23”, sets out the Council’s proposals for all charges and rents relating to the HRA for the period 2022-2023.

Cyngor Sir Powys County Council

Impact Assessment (IA)

The integrated approach to support effective decision making



1. Version Control (services should consider the impact assessment early in the development process and continually evaluate)

Version	Author	Job Title	Date
V1	Andy Thompson	Professional Lead - Housing	January 5 th , 2022

2. Profile of savings delivery (if applicable)

2020-21	2021-22	2022-23	2023-24	2024-2025	2025-26
£ N/A	£ N/A	£ N/A	£ N/A	£ N/A	£ N/A

3. Consultation requirements

Consultation Requirement	Consultation deadline/or justification for no consultation
Public consultation required	<p>Changes to rents and service charges must be notified to tenants and affected residents no later than 28 days before the changes are due to come into effect. It is therefore necessary for the Council to come to a decision about its proposals by no later than February 28th to allow sufficient time for tenants and residents to be notified of the changes. Residents can respond to the proposed changes during this time. However, all tenancy and related agreements issued by the Council make provision for annual changes and uplifts in rents and service charges.</p> <p>In addition to formally notifying tenants and affected residents, the Council will, in the interests of open governance, advise the following groups of its intentions:</p> <ul style="list-style-type: none"> • Strategic Housing Partnership • Tenant Scrutiny Panel

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Cyngor Sir Powys County Council

Impact Assessment (IA)

The integrated approach to support effective decision making



4. Impact on Other Service Areas

**Does the proposal have potential to impact on another service area? (Have you considered the implications on Health & Safety, Corporate Parenting and Data Protection?)
PLEASE ENSURE YOU INFORM / ENGAGE ANY AFFECTED SERVICE AREAS AT THE EARLIEST OPPORTUNITY**

Income and Awards – impact on housing benefit payments for tenants not receiving social security housing assistance via the Universal Credit system.

5. How does your proposal impact on the council's strategic vision?

Council Priority	How does the proposal impact on this priority?	IMPACT Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
The Economy We will develop a vibrant economy	Even a modest increase in rent and service charges means that individual residents may have less disposable income available.	Poor	Judicious increases in social rents, as per this proposal, will allow the Council to support the development of new affordable, social rented homes. This programme supports the local economy providing employment opportunities and local spend. Rents remain at an affordable level, below that expected by private rented accommodation providers. The Council will be able to maintain its investment programme in municipal housing – which accounts for one in ten of all homes in Powys – providing employment and business opportunities for local and regional people and enterprises. This will help support the 'Powys Pound'.	Good

Cyngor Sir Powys County Council

Impact Assessment (IA)

The integrated approach to support effective decision making



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Council Priority	How does the proposal impact on this priority?	IMPACT Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
Health and Care We will lead the way in effective, integrated rural health and care	<p>Social rented housing is required to meet the Welsh Housing Quality Standard. This includes making sure homes are thermally efficient, do not suffer from intrinsic damp and have decent facilities for such things as food preparation and personal hygiene. Such requirements do not apply to other tenures.</p> <p>The proposed modest increase in rents allows this work to continue.</p>	Good	<p>The Council will with the rent changes set out in this proposal be able to maintain its investment programme to keep municipal housing at the Welsh Housing Quality Standard, providing for 10% of all households in Powys safe, healthy homes in both urban and rural locations.</p>	Good
Learning and skills We will strengthen learning and skills	<p>Homelessness, which continues to rise across Powys, can significantly affect households with children having a detrimental effect on the children's education as they do not have a suitable environment to learn. The proposed rent increase allows the Council to continue to increase the provision of accessible, secure and affordable homes across the county.</p>	Good	<p>Judicious increases in social rents, as per this proposal, will allow the Council to support the development of more affordable, social rented homes to help provide homes for families. An additional benefit of providing more homes in a way that can help stem the rise in homelessness is that the Council may not face such a steep increase in demands on its General Fund for services to help those at risk of or experiencing homelessness.</p>	Good
Residents and Communities We will support our residents and communities	<p>As landlord for one in ten of all Powys households, and responsible for the neighbourhoods of many owner occupiers living on estates developed by the Council, the Council needs to have the capacity and capability to maintain these areas to a high standard so that people can 'Love Where They Live'.</p> <p>The proposed rent increase will support this ongoing work.</p>	Good	<p>The reasonable and comparatively low increases in social rents set out in this proposal will allow the Housing Service to continue to positively support the well-being of neighbourhoods and communities through the Estate Maintenance Service, developing new Caretaker Service and supporting the provision and improvements of play areas on municipal housing estates.</p>	Good

Source of Outline Evidence to support judgements

Welsh Government Rent Policy (December 2019); Welsh Government Rent Notification Notice (December 2021); Powys HRA Business Plan (2022); STAR Survey of Tenant Satisfaction (December 2021); WHQS Compliance Policy for Powys (2020-2021); Homeless Review and Strategy (2018); Compliance One Hundred Board reports; Housing Improvement and Assurance Board reports; 'Love Where You Live' Tenancy Sustainability Strategy (2018); WHO 12¹ quarterly returns; 'Homes in Powys' housing waiting list data; Housing Service performance data.

6. How does your proposal impact on the Welsh Government's well-being goals?

Well-being Goal	How does proposal contribute to this goal?	IMPACT Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
A prosperous Wales: An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.	Increased rents allows the Council to fund new affordable homes maintaining the ability of Powys to attract and retain the employees needed to contribute towards prosperous Wales. Houses will be more energy efficient and contribute to lower carbon footprint.	Good	Providing the opportunity for the Council to support the development of more affordable, social rented homes by making judicious increases in rents will support the economy by allowing people to have more money to spend in the wider economy. It will also keep rents at a genuinely affordable level. The Council will also be able to maintain its investment programme in municipal housing – which accounts for one in ten of all homes in Powys – providing employment and business opportunities for local and regional people and enterprises. This will help support the 'Powys Pound'.	Good
A resilient Wales: A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).	Allowing the Council to fund 'Love Where They Live' and 'Green Powys' will allow maintaining a natural environment in and around council owned homes.	Good	Investment in 'Love Where They Live' and 'Green Powys' is designed to increase planting and improve maintenance of the natural environment on housing estates. The HRA Business Plan includes provision for increasing the thermal efficiency of council homes, reducing environmental damage and reducing running costs for residents.	Good

¹ WHO 12: mandatory quarterly return to the Welsh Government, reporting the incidence of homelessness in Powys and the work undertaken by the Council to both prevent and deal with homelessness.

Cyngor Sir Powys County Council
Impact Assessment (IA)

The integrated approach to support effective decision making



Tudalen 401

Well-being Goal	How does proposal contribute to this goal?	<u>IMPACT</u> Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from drop down box below
<p>A healthier Wales: A society in which people’s physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.</p> <p>Public Health (Wales) Act, 2017: Part 6 of the Act requires for public bodies to undertake a health impact assessment to assess the likely effect of a proposed action or decision on the physical or mental health of the people of Wales.</p>	<p>Social rented housing is required to meet the Welsh Housing Quality Standard. The rent increase supports this by making sure homes are thermally efficient, do not suffer from intrinsic damp and have decent facilities for such things as food preparation and personal hygiene. Such requirements do not apply to other tenures.</p> <p>Homelessness, which continues to rise across Powys, can significantly affect the health of affected households. One of the main causes of homelessness is the lack of secure, affordable rented accommodation of the type provided by the Council.</p>	<p>Good</p>	<p>Judicious increases in social rents, as per this proposal, will allow the Council to support the development of more affordable, social rented homes to help provide and maintain a rising number of ‘healthier’ homes in Powys.</p>	<p>Good</p>

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Tudalen 402

Well-being Goal	How does proposal contribute to this goal?	<u>IMPACT</u> Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from drop down box below
<p>A Wales of cohesive communities: Attractive, viable, safe and well-connected Communities.</p>	<p>The Council’s role as a social landlord is consistent with all relevant Powys County Council strategic plans, in particular the ‘Powys Housing Strategy’, ‘Vision 2025’ and ‘Love Where You Live’. All the partnerships and organisations responsible for these strategic plans believe and support the principle that communities can thrive and prosper if individuals, families and groups are treated fairly, with respect, and given access to rights and services – which includes a safe, secure and affordable home. Indeed, a decent home is for most people the foundation of being able to have and enjoy a decent life.</p> <p>The rent increase will help maintain the ability of the Council to fund new affordable homes to make sure that communities, especially those in rural areas, remain viable and sustainable by offering homes for people across the socio-economic spectrum.</p>	<p>Good</p>	<p>The Council will be better able to support the development of more affordable, secure, social rented homes and maintain those it already owns to a decent standard, providing the bedrock for ‘attractive, viable, safe and well-connected communities’ by progressing the pragmatic changes to rents for social housing contained in this proposal.</p>	<p>Good</p>

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Tudalen 403

Well-being Goal	How does proposal contribute to this goal?	IMPACT Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
<p>A globally responsible Wales: A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.</p> <p>Human Rights - is about being proactive (see guidance)</p> <p>UN Convention on the Rights of the Child: The Convention gives rights to everyone under the age of 18, which include the right to be treated fairly and to be protected from discrimination; that organisations act for the best interest of the child; the right to life, survival and development; and the right to be heard.</p>	<p>There is growing demand for safe and secure homes in Powys that are affordable to people with modest incomes, the county face the increased risks of more homelessness having detrimental impacts of social well-being, poor standards of accommodation affecting the quality of life and opportunities available to children and their parents and poorly maintained housing increasing fuel poverty and necessitating excessive use of fuels to keep homes warm. Maintaining rent income allows the council to provide quality homes that underpin wellbeing and a good start in life for young people.</p>	<p>Good</p>	<p>The reasonable and comparatively low increases in social rents set out in this proposal will allow the Housing Service to continue to positively support the well-being of neighbourhoods and communities by increasing the availability of high quality, fuel-efficient homes.</p>	<p>Good</p>
<p>A Wales of vibrant culture and thriving Welsh language: A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.</p>				
<p><i>Opportunities for persons to use the Welsh language, and treating the Welsh language no less favourable than the English language</i></p>	<p>Housing Services currently involves and engages with tenants through communication in their language of choice</p>	<p>Neutral</p>	<p>The reasonable and comparatively low increases in social rents set out in this proposal will allow the Housing Service to continue to positively support communications with tenants in the language of their choice, including Welsh.</p>	<p>Neutral</p>
<p><i>Opportunities to promote the Welsh language</i></p>	<p>No impact expected</p>	<p>Choose an item.</p>		<p>Choose an item.</p>
<p><i>Welsh Language impact on staff</i></p>	<p>No impact expected</p>	<p>Choose an item.</p>		<p>Choose an item.</p>
<p><i>People are encouraged to do sport, art and recreation.</i></p>	<p>No impact expected</p>	<p>Choose an item.</p>		<p>Choose an item.</p>
<p>A more equal Wales: A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio economic background and circumstances).</p>				

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Tudalen 404

Well-being Goal	How does proposal contribute to this goal?	IMPACT Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
Age	Homes are provided by the Council for people of all age groups. There is growing need amongst younger people for a first home and an aging population who need homes better suited to their needs, for example level access.	Neutral	Judicious increases in social rents, as per this proposal, will allow the Council to support the development of more affordable, social rented homes to help provide and maintain a wider choice of homes for people of all age groups. The 'Fit for Life' programme will help improve access to homes for older people and those with mobility needs.	Neutral
Disability	Capital allocations by the HRA for aids and adaptations works improve the quality of homes for people who need help to better enjoy their home and cope with disabilities.	Neutral	The reasonable and comparatively low increases in social rents set out in this proposal will allow the Housing Service to continue to support a comprehensive programme of aids and adaptations. The 'Fit for Life' programme will help improve access to homes for those with mobility needs.	Neutral
Gender reassignment	No impact expected	Choose an item.		Choose an item.
Marriage or civil partnership	No impact expected	Choose an item.		Choose an item.
Race	No impact expected	Choose an item.		Choose an item.
Religion or belief	No impact expected	Choose an item.		Choose an item.
Sex	No impact expected	Choose an item.		Choose an item.
Sexual Orientation	No impact expected	Choose an item.		Choose an item.
Pregnancy and Maternity	No impact expected	Choose an item.		Choose an item.

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Source of Outline Evidence to support judgements

Welsh Government Rent Policy (December 2019); Welsh Government Rent Notification Notice (November 2020); Powys HRA Business Plan (2020); STAR Survey of Tenant Satisfaction (June 2019); WHQS Compliance Policy for Powys (2020-2021); Homeless Review and Strategy (2018); Compliance One Hundred Board reports; Housing Improvement and Assurance Board reports; 'Love Where You Live' Tenancy Sustainability Strategy (2018); WHO 12² quarterly returns; 'Homes in Powys' housing waiting list data; Housing Service performance data.

7. How does your proposal impact on the council's other key guiding principles?

Tudalen 405

Principle	How does the proposal impact on this principle?	IMPACT Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
Sustainable Development Principle (5 ways of working)				
Long Term: Looking to the long term so that we do not compromise the ability of future generations to meet their own needs.	The rent increase will allow the council to progress its preventative agenda (preventing homelessness, housing market dysfunction, poor housing standards).	Good	The Council will be better able to support the development of more affordable, secure, social rented homes and maintain those it already owns to a decent standard, providing a solid foundation for future generations to have secure, affordable homes by progressing the pragmatic changes to rents for social housing contained in this proposal.	Good
Collaboration: Working with others in a collaborative way to find shared sustainable solutions.	The service currently collaborates with a number of organisations and agencies.	Neutral	A sustainable and adequately resourced HRA will help the Council to work more effectively with a range of businesses, investors and service agencies to provide together services needed and desired by the people of Powys.	Neutral
Involvement (including Communication and Engagement): Involving a diversity of the population in the decisions that affect them.	The Housing Service supports active intelligence gathering about the way its services are received, experienced and perceived by the people of Powys, allowing improvements to be made that benefit people across the county.	Neutral	The Housing Service will be better able to continue to engage with neighbourhoods and communities if the HRA remains sustainable and viable and able to finance the needs and desires, where practicable, of tenants.	Good

² WHO 12: mandatory quarterly return to the Welsh Government, reporting the incidence of homelessness in Powys and the work undertaken by the Council to both prevent and deal with homelessness.

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Tudalen 406

Principle	How does the proposal impact on this principle?	IMPACT Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
Prevention: Understanding the root causes of issues to prevent them from occurring.	The Housing Service has adopted a preventative agenda with regard to its statutory duties, including maintaining homes to the WHQS and making sure homes are available, where possible, for those face with or experiencing homelessness.	Neutral	Judicious increases in social rents, as per this proposal, will allow the Council to support the development of more affordable, social rented homes to help provide and maintain a rising number of high-quality, affordable homes in Powys that will help prevent the social and economic problems associated with homelessness, insecure homes and poor quality accommodation.	Good
Integration: Taking an integrated approach so that public bodies look at all the well-being goals in deciding on their well-being objectives.	The importance of affordable, secure housing is an essential foundation for people to have a good education, be healthy, find decent employment and to be able to participate in their communities. Many other agencies find their work hindered and hampered if their clients do not have a safe, secure, affordable homes of the type offered by the Council.	Neutral	Judicious increases in social rents, as per this proposal, will allow the Council to support the development of more affordable, social rented homes to help provide and maintain a rising number of high quality, affordable homes in Powys that will help support the ability of Housing Services to contribute to the work of such diverse bodies and agencies examples including the Powys Teaching Health Board, Dyfed Powys Police, the Council's own social services teams, education services, the Mid-Wales Growth Deal	Good
Preventing Poverty: Prevention, including helping people into work and mitigating the impact of poverty.	The lack of genuinely affordable homes, let at social rents, is directly linked to poverty. The more people have pay in rent, the less they have for other expenditure, exacerbating poverty and poor quality of life. The same applies if people are compelled to live in thermally inefficient accommodation, where high heating costs can add to the problems of low incomes, causing practical poverty.	Poor	Providing the opportunity for the Council to support the development of more affordable, social rented homes – and maintain those it currently owns to a high standard with reducing energy needs - by making judicious increases in rents will support the economy by allowing people to have more money to spend in the wider economy. This will help reduce poverty.	Good
Unpaid Carers: Ensuring that unpaid carers views are sought and taken into account	No impact expected	Unknown		Unknown

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Principle	How does the proposal impact on this principle?	IMPACT Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
Safeguarding: Preventing and responding to abuse and neglect of children, young people and adults with health and social care needs who can't protect themselves.	The Council's landlord service provides secure housing opportunities to help support households with children and vulnerable adults. This benefits the welfare of those concerned and helps to protect children and vulnerable adults from harm.	Neutral	Judicious increases in social rents, as per this proposal, will allow the Council to support the development of more affordable, social rented homes to increase the overall capacity of the Council to help people needing safeguarding related support.	Neutral
Impact on Powys County Council Workforce	None expected	Neutral		Neutral

Source of Outline Evidence to support judgements

Welsh Government Rent Policy (December 2019); Welsh Government Rent Notification Notice (December 2021); Powys HRA Business Plan (2022); STAR Survey of Tenant Satisfaction (December 2021); WHQS Compliance Policy for Powys (2020-2021); Homeless Review and Strategy (2018); Compliance One Hundred Board reports; Housing Improvement and Assurance Board reports; 'Love Where You Live' Tenancy Sustainability Strategy (2018); WHO 12³ quarterly returns; 'Homes in Powys' housing waiting list data; Housing Service performance data.

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What is the impact of this proposal on our communities?

Severity of Impact on Communities	Scale of impact	Overall Impact
Low	Low	Low

Mitigation

Increasing rents means the council can continue to:

- 👉 Operate a viable and sustainable HRA. This will mean it may maintain WHQS.
- 👉 Maintain the current housing stock to a habitable standard, increasing health and well-being problems for residents.
- 👉 Continue the development programme for new homes, increasing the choice and options open to people looking for a safe, secure and affordable place to live in Powys.
- 👉 Provide tangible support to other Council services to help provide a balanced and coherent range of services to the people of Powys.

³ WHO 12: mandatory quarterly return to the Welsh Government, reporting the incidence of homelessness in Powys and the work undertaken by the Council to both prevent and deal with homelessness.

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9. What are the risks to service delivery or the council following implementation of this proposal?

The increases in rents proposed are within the parameters set by the Welsh Government's Rent Policy and are therefore likely to be accepted by the Welsh Government and residents in Powys. However, the Council will in future need to provide evidence to the Welsh Government of efficient and cost effective management of housing services to be able to increase rents at the maximum rate allowed by the Government. It is as yet unclear how the Welsh Government will assess this evidence and what action it may take should it consider the Council's proposals to be inadequate or do not meet its criteria for allowing full rent increases.

Description of risks			
Risk Identified	Inherent Risk Rating Impact X Likelihood (See Risk Matrix in guidance document)	Mitigation	Residual Risk Rating Impact X Likelihood (See Risk Matrix in guidance document)
Rent and charges increases proposed are not approved	9	Services and investment plans will be reviewed to identify those which can be reduced with the least risk to the integrity of the condition of the Council's housing assets, the development of new homes and the core management activities of letting homes promptly and collecting income due to the Council. Such programmes will be scaled back to bring overall expenditure in line with income.	4

10. Overall Summary and Judgement of this Impact Assessment?

Outline Assessment (to be inserted in cabinet report)	Cabinet Report Reference:
The impact on the Council of being able to increase rents by the amount set out in this proposal, will be considerable, as it will underpin a sustainable HRA Business Plan for 2022/23 and subsequent years.	

11. Is there additional evidence to support the Impact Assessment (IA)?

What additional evidence and data has informed the development of your proposal?
N/A

12. On-going monitoring arrangements?

What arrangements will be put in place to monitor the impact over time?

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All HRA budgets are reviewed on a monthly basis.

Please state when this Impact Assessment will be reviewed.

December 2022 (to help inform and shape rent and service charge proposals for 2023-2024 Rent Year and the 2023-2024 HRA Business Plan update)

13. Sign Off

Position	Name	Signature	Date
Impact Assessment Lead:	Andy Thompson	<i>Andy Thompson</i>	January 5 th , 2022
Head of Service:	Nina Davies		
Director:	Nigel Brinn		
Portfolio Holder:	Cllr Rosemarie Harris		

14. Governance

Decision to be made by	Date required
Cabinet	February 8 th , 2022

Judgment

FORM ENDS

Mae'r dudalen hon wedi'i gadael yn wag yn fwiadol

CYNGOR SIR POWYS COUNTY COUNCIL.**CABINET EXECUTIVE****8th February 2022**

REPORT AUTHOR: County Councillor Myfanwy Alexander
Portfolio Holder for Adult Social Care, Welsh Language,
Housing and Climate Change

REPORT TITLE: Adoption of the Powys Empty Property Enforcement
Action Plan

REPORT FOR: Decision

1. Purpose

- 1.1 This report recommends adoption by the Council of the Powys Empty Property Enforcement Action Plan (attached to this report as Appendix One).
- 1.2 The Empty Property Enforcement Action Plan has been developed in collaboration with Welsh Government, which has requested all local authorities in Wales to set out a clear plan of action to bring into productive use, long term empty properties in their area.

2. Background

- 2.1 Empty properties in town centres, villages and surrounding neighbourhoods represent an underused community asset and lost opportunities to accommodate housing or commercial solutions tailored to fit the needs and demands of the local area. In instances whereby the properties are in poor condition, they can blight a community, adversely affecting the quality of life of residents and acting as a drag on property values, becoming a constant source of concern for people and businesses. In extremis, empty properties contribute to the decline of a neighbourhood if left unaddressed.
- 2.2 The Well-being of Future Generations (Wales) Act 2015 places a duty on local authorities and the Welsh Government to deliver sustainable development contributing directly to several of its goals, which include delivering a Prosperous Wales, a Healthier Wales, a Wales of Cohesive Communities and a Resilient Wales. Bringing into productive use empty properties can make a substantial contribution towards meeting all of these goals.
- 2.3 The Welsh Government is now increasing its efforts to work with and support local authorities and other agencies to realise the potential of the empty buildings, particularly within town centres. Of particular

interest is realising the potential empty properties have for increasing the net supply of affordable, secure homes. There are an estimated 28,000 properties in Wales standing vacant, classed as 'empty homes'. In Powys, residential properties that have been empty in excess of six months (the parameter used for the national performance denominator for empty properties) total 1,616 of which 993 have been empty for longer than twelve months.

- 2.4 The Welsh Government is developing with all twenty-two local authorities across Wales, a National Action Plan for tackling empty dwellings, setting priorities and targets, informed by the thirteen recommendations of the Empty Properties¹ report published in 2019. The National Action Plan will be created by drawing upon the twenty-two local plans, representing a grass-roots approach to tackling empty properties.
- 2.5 Bringing empty properties back into use can be time consuming and expensive. The reasons for this include:
- Clarifying ownership of properties
 - Market research to provide a robust evidence base to inform investment for a sustainable future use
 - Assessing the condition of properties to identify the extent of works needed to bring them into use
 - Negotiations with property owners, who may have challenges or objections in bringing the properties into use
 - Identifying and where necessary bringing together investors with property owners
 - Enforcement action where negotiation is unsuccessful
 - The cost of works to properties
 - Managing works in default, compulsory purchase orders (CPO) or empty dwelling management orders (EDMO) where other options have failed to bring about a positive solution.
- 2.6 The Welsh Government's initiative is designed to raise the profile of the importance and benefits of bringing back into productive use empty properties. Expert advice and financial assistance will be offered to local authorities to make sure that they can start accruing the resources and knowledge needed to reduce now, and in the future, the number of empty properties in their areas.
- 2.7 Local authorities are expected to support the initiative by taking a proactive approach to empty properties. Examples of successful activity include:
- Deployment of dedicated, appropriately qualified or experienced Empty Property Officers, tasked with identifying empty properties, negotiating with owners and initiating investment, partnerships or enforcement action where appropriate.

¹ 'Empty Properties' – Equality, Local Government and Communities Committee Report (National Assembly for Wales; October 2019).

- Offering a range of financial inducements, such as grants or loans, to encourage investment by property owners in their assets. Housing Services and Economic Regeneration both offer financial products to property owners to bring empty properties into use.
- Developing partnerships with investors, such as housing associations, to bring properties into use. Housing Services is working closely with local associations to expand this work to not only address the blight caused by empty properties but to increase the net availability of secure, affordable homes in the county to address burgeoning demand for social housing.
- Homesteading schemes to help homebuyers take on empty properties to refurbish them for use as homes.

2.8 The benefits of bringing into use empty properties extends beyond providing more homes and, where appropriate, high quality business premises. These include:

- Increased revenue to the Council from Council Tax payments as properties move into occupancy.
- Enhanced streetscapes that encourage investment by other property owners.
- Safer environments for communities by reducing potentially dangerous structures in places where people live and work.
- Opportunities for local businesses to engage in refurbishment and construction work.
- Opportunities to support energy efficiency programmes.
- Opportunities to support first time buyers.

3. Advice

3.1 Each local authority is expected by the Welsh Government to have its own local Property Enforcement Action Plan, the Powys iteration of which is attached to this report in Appendix One. The plan sets out how the Council can both improve and develop its approach to bringing into use empty properties. It also highlights a number of challenging properties that need urgent attention, but which are also an opportunity to develop in 'real-time' the techniques, resources and capacity needed to enhance the Council's future ability to bring more empty properties into productive use.

3.2 The Empty Property Enforcement Action Plan is a living document, and will be regularly updated to capture expertise gained, recommend future actions and resource deployment and feed productively into the Welsh Government's National Action Plan.

3.3 To support local authorities in developing their capacity and capability to deal effectively with long-term empty properties, the Welsh Government has developed an Empty Property Enforcement Programme. In line with the Welsh Government's Transforming Towns agenda, this programme enables a focus on town centres through an

Empty Property Management Fund (EPMF). The total amount available across Wales is £15.2 million. Local authorities will be able to apply for funding for individual projects and properties identified in their local plan Empty Properties Enforcement Action Plan.

3.4 A Confidential Index provides details of specific properties to be the initial focus of the Empty Property Enforcement Action Plan. This document is restricted to members of the Cabinet to consider, as it contains information concerning details of potential commercial negotiations and information that, if disclosed, may have a detrimental effect on the interests of the Council or third parties involved.

3.5 Option Appraisal

3.5.1 Option One: Adopt the attached Powys Empty Property Enforcement Action Plan.

Advantages

- ✓ Allows the Council to access the EPMF.
- ✓ Demonstrates robust support for the National Empty Properties Action Plan.
- ✓ Raises the profile of empty property work and facilitates identification of empty residential and commercial units to inform quick and effective action to bring them into use.
- ✓ Facilitates engagement with owners of empty units to encourage them back into use.
- ✓ Supports the deployment of financial incentives for redevelopment and occupation including, for example, sustainable revolving loans
- ✓ Encourages use across the Council of the full range of regulatory powers and where necessary, enforcement to address problem empty units.

Disadvantages

- ✗ The ability of the Council to deliver effectively on its ambitious approach to bringing into productive use empty properties may require a commitment of additional resources (for example employing appropriately qualified Empty Property Officers) although any such costs may be offset by additional income generated from enhanced Council Tax revenue if it is possible to bring into use as residential homes, commercial properties currently not in use.

3.5.2 Option Two - Do not adopt the Powys Empty Property Action Plan, potentially missing an opportunity to address issues associated with empty residential/commercial units, together with associated funding/support from the Welsh Assembly Government.

Advantages

- None.

Disadvantages

- ✗ The Council will not be able to access the EPMF.

- ✘ The profile of empty property work will not be raised locally and the Council will miss out on opportunities to facilitate identification of empty residential and commercial units, thereby hampering effective action to take opportunities to bring empty commercial units into use as homes and so increase Council Tax revenues.
- ✘ Opportunities to facilitate engagement with owners of, and investors in, empty units to encourage them back into use, may be reduced.
- ✘ Opportunities to offer financial incentives for redevelopment and occupation via use of sustainable revolving loans may be reduced.
- ✘ The use and range of regulatory powers and enforcement activity to address problem empty units may be limited.
- ✘ Powys County Council will not be contributing towards the consistency of empty property enforcement across Wales and the National Empty Property Action Plan.

3.6 Option One is the recommended option. Powys County Council will be able to play an active role in the Welsh Government's National Empty Property Action Plan, develop a greater specialist knowledge to tackle empty dwellings and reduce the number of empty properties in the county.

3.7 Adoption of the Powys Empty Property Action Plan will demonstrate to the Welsh Government the Council's commitment to holistically addressing housing market failures and increasing the net supply of homes for the people of Powys.

4. Resource Implications

4.1 To make a success of the Powys Empty Property Enforcement Action Plan, there will need to be effective and efficient deployment of resources by the Council. These include investigative and field work by the Housing Services, Economic Regeneration, Building Control and Planning Services teams working with communities, investors, housing associations and owners of empty properties to bring such buildings into use.

4.2 The potential enhancement to driving forward the Powys Empty Properties Enforcement Action Plan by the Council employing dedicated Empty Property Officers is currently being assessed by Housing Services. A further report will be presented to Cabinet, setting out the conclusions of the assessment.

4.3 The Council already has in place a range of financial support packages to help bring empty homes into use – including for example Landlord Loans and Houses into Homes for empty residential property and Welsh Government Town Centre Loans for redundant domestic and commercial property. These funds, which use both Council and Welsh

Government resources, are made up of repayable loans, which means that as the loans are repaid further property owners can benefit. Housing Services receives in the region of £250,000 per annum in the form of fees to cover the cost of managing and administering interest free revolving loans.

- 4.4 Further schemes being considered include a homesteading scheme for home buyers to take on empty properties to improve and refurbish as homes. A further report will be presented to Cabinet, setting out the conclusions of the options for additional schemes to both bring empty homes into use and increase the range of options for people in Powys to find a place in which to live.
- 4.5 Additional financial implications may arise from an increase in enforcement activity in support of the Powys Empty Properties Enforcement Action Plan if it is not possible to secure negotiated and mutually beneficial outcomes that create new uses for empty properties. Examples include undertaking works in default, enforced sales and the exercise of CPO and EDMO powers to tackle empty and redundant dwellings. It is possible to reclaim such costs from the owners of the properties. However, in some extreme examples the assets of the owners can be less than the costs of the activity necessary to resolve the adverse impacts the properties are having on the wider community. In such cases, a Cost Benefit Analysis (CBA) approach is used to inform the way forward, taking into account financial, social, economic and environmental costs and benefits.
- 4.6 In 2016, the Council introduced a Council Tax premium of 50% for residential properties that are periodically occupied and properties that were long term empty². This generates additional income for the Council and acts as a disincentive to property owners to keep properties empty for long periods of time. Any such properties brought into use may result in the Council receiving a lower Council Tax. However, against this needs to be offset the wider socio-economic benefits of there being more homes available for people in Powys, which may contribute to a reduction in homelessness and associated costs, and a reduced risk of blight caused by empty properties adversely affected property values.
- 4.7 In support of the National Action Plan to reduce the number of empty properties, the Welsh Government is making available the £15.2 million EPMF.
- 4.8 The EPMF is a fifteen-year loan programme from Welsh Government, repayable in full at the end of the term. The fund provides support to the Council to undertake enforcement action on prominent town centre empty properties, including where appropriate those detailed in the Powys Empty Property Enforcement Action Plan. A funding offer has

² A long-term empty property is one that is unfurnished and unoccupied for a period exceeding one year.

been put made to the Council via an award letter, setting out terms and conditions under which the loan is provided, which are that applications in respect of specific properties must be preceded by the Council formally adopting the Empty Property Enforcement Action Plan. It should be noted that while the action plan can deal with commercial and residential properties EPMF is only available for empty town centre units.

- 4.9 Loans made under the aegis of the EPMF are expected to be repaid following successful intervention, including for example enforced sale or CPO where costs are recovered.
- 4.10 To access the offer of EPMF, it is a requirement that Powys representatives, both officers and members of the Cabinet, have attended an Empty Property Enforcement course which took place in Powys in November 2020, and that the Council has adopted an Empty Property Enforcement Action Plan as recommended in this report. Additional training is available from the Welsh Government, as required by the Council, for new members and officers who were unable to attend the original training event.
- 4.11 If additional resources are needed, arising from an increased pace and scale of activity, to meet the aspirations of tackling an increased range of empty properties, appropriate reports will be presented to Cabinet.
- 4.12 **The Head of Finance (Section 151 Officer) notes the content of the report and....**

5. Legal implications

- 5.1 To drive forward the Powys Empty Property Enforcement Action Plan will encourage an even closer working relationship between officers in the Housing, Regeneration, Building Control, Planning Services and the Council's legal team.
- 5.2 Appropriate enforcement action is likely to be necessary to address persistent empty properties, with success depending on the Council being able to make full use of legal powers to not only bring properties into productive use but also to recover costs associated with enforcement action.
- 5.3 The 'Principal Solicitor – Housing' has advised that the scheme is to be encouraged to bring properties back into use and to assist in providing additional housing within Powys. A further bonus of the scheme is that it will be possible to revitalise town centres by bringing commercial properties back into use.
- 5.4 The Head of Legal and Democratic Services (Monitoring Officer) has commented as follows: "I note the legal comment and have nothing to add to the report".

6. Data Protection

- 6.1 The proposal will involve interaction with empty property owners and processing of personal data.
- 6.2 The Data Protection Officer has commented as follows: “The resultant processing of personal data will need to be supported through the development of appropriate documentations and processes to ensure compliance with data protection legislation, such as the identification of the lawful basis to support processing and the publishing of privacy notices”.

7. Comment from local member(s)

- 7.1 The Empty Property Enforcement Action Plan will apply county wide and could therefore affect all members.

8. Impact Assessment

- 8.1 The Impact assessment associated with adoption of the Powys Empty Property Enforcement Action Plan has highlighted financial implications associated with empty property enforcement. In mitigation, Welsh Government is making available £15.2 million (throughout Wales in the form of an interest free loan) for such interventions.

9. Recommendation

- 9.1 It is recommended that:
 - 9.1.1 The Powys Empty Property Enforcement Action Plan is adopted by the Council.

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Head of Service:	Nina Davies
Corporate Director:	Nigel Brinn

Appendix One: Powys Empty Property Enforcement Action Plan

Powys Empty Buildings - ACTION PLAN



1. Overall Aim of Plan

To help bring empty properties back into use and improve the physical condition of the existing built environment by targeting those properties that are having a detrimental effect on the area or local community.

2. Objectives of Plan and Associated Actions

Objective 1: Better working or strengthening of existing practices and adoption of a corporate approach and development of new partnerships (Integration and Collaboration)

Tudalen 419	ACTION What are we going to do?	WHAT WE WILL DO How are we going to do it?	BY WHOM?	BY WHEN?	MONITORING / MEASURE / TARGET
	Make empty properties a strategic priority and provide a dedicated resource to deal with empty commercial and residential properties.	Consideration to ring-fencing funding from application of the Empty Homes premium, to support this area of work. Review and extend delegation of relevant legislation to appropriately qualified officers across the Local Authority to provide greater flexibility and resources to deal with the issue.	D. Morris (CT) A. Thompson (H) & Cabinet	April 2022	Review annually
2.	Corporate approach - co-ordinate activity of the Local Authority across all departments ensuring a unified and effective approach to deal with empty properties.	Formalise current joint working arrangements with Planning, Highways, Building Control, Public Health / Environmental Health, Street Scene, Legal Services, Revenue and Benefits. Re-establish our Problem Empty Property Group to make strategic decisions regarding empty properties.	G. Jones (R) & I. Maddox (BR)	April 2022	Review annually

3.	Prioritise effective debt recovery (Council Tax, business rates or statutory debt), where debt relates to empty properties.	Consideration to pursuing enforced sale in appropriate cases.	D. Morris (CT) & Legal	April 2022	Review annually
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Objective 2: Improve Intelligence - identify extent and location of long-term empty properties and/or properties having a negative or detrimental impact on the area or local community (commercial and residential).

Tudaten 420	ACTION	WHAT WE WILL DO	BY WHOM?	BY WHEN?	MONITORING / MEASURE / TARGET
	What are we going to do?	How are we going to do it?			
	Review Council Tax 'exemptions' available to long-term empty properties and the application and level of the Empty Homes and Second Home Premium.	Ensure early notification of the application of the Empty Homes Premium to encourage engagement by the owner. Consider utilising Empty Homes Premium for creation of dedicated 'Empty Property Officers'	D. Morris (CT) A. Thompson (H) & Cabinet	April 2022	Review annually
2.	Review current information available from Council Tax, Business Rates and any other internal or external sources of information available to the Local Authority.	Undertake a visual street survey of key town centres areas, identifying properties that are having a negative impact on the street scene or where there may be an opportunity for regeneration or development, such as Living over the Shops (LOTS) or Homes above Retail Premises (HARP) Schemes.	New 'Empty Property Officers'	April 2022	Complete & review annually
3.	Take early action or	Provide a greater level of information /	New 'Empty Property	April 2022	Review annually

	intervention to prevent from becoming empty or having a negative impact on the area or local community (Prevention)	support for empty property owners to highlight issues and options available to return them to use or to improve them.	Officers'		
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Objective 3: Identify and implement effective intervention 'Toolkit' in dealing with empty properties from advice and guidance through to appropriate enforcement action (Solution Based Responses - Involvement / Long-Term / Collaboration).

	ACTION What are we going to do?	WHAT WE WILL DO How are we going to do it?	BY WHOM?	BY WHEN?	MONITORING / MEASURE / TARGET
Tidalen 4212	Website development, production of up-to-date Information for empty property owners	Develop web page dedicated to the issue of empty homes.	J Preece (H) & Web Team	April 2022	Review annually & ensure detail current & up to date.
	Financial advice for redevelopment of empty homes - Transforming Towns, Houses into Homes, Landlord Loans & Home Improvement Loans.	Develop up-to-date fact sheet detailing all financial products available.	J Preece (H)	April 2022	Review detail quarterly to ensure information remains current.
3.	Review Powys Empty Homes Strategy	Ensure strategy aligns with new Housing Service redesign	J Preece (H)	April 2022	Periodically review policy.

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Document is Restricted

Mae'r dudalen hon wedi'i gadael yn wag yn fwriadol

CYNGOR SIR POWYS COUNTY COUNCIL.**CABINET****8th February 2022****REPORT AUTHOR: County Councillor Aled Davies
Portfolio Holder for Finance****REPORT TITLE: Procurement Strategy 2022 -25**

REPORT FOR: Decision

1. Purpose

- 1.1. The purpose of this report is to seek endorsement of the Procurement Strategy (Appendix 1) for the purchase of all the Council's goods, and services to cover the period from 2021 to 2025.
- 1.2 That the Head of Service for Finance develop and implement the action plan to deliver the requirements into all procurement in the future.

2. Background

- 2.1 The Council's strategy sets out the Council's ambitions for Procurement for the next 4 years and has been aligned closely to Vision 2025 objectives for all services. It also takes cognisance of other Welsh Government key legislative and policy documents and attempts to anticipate some change such as the arrival of the new intended Transform Procurement legislation due to replace the current Public Contract Regulation 2015, the Social Partnership Bill and all the new Draft Procurement Policy Statement and Procurement Policy notes issued by Welsh Government which need to be in-built to any procurement process
- 2.2 It provides the leadership to ensure that services and services meet the exacting value standards set out within the contract. It redefines value to include social value, ethical and fair working, community benefits, learning and skills development sustainability and community engagement as important metrics in the price value quality and social value evaluation process in any procurement. The Council wishes to source as much as possible within the Powys economy via the Powys Pound requirements and to develop and use local suppliers' contractors and sub-contractors wherever possible

2.3 The Well Being of Future Generations Commissioner is also redefining what is important in any procurement process and defines that the public sector to be broader in terms of its value assessment and has suggested that procurement is one of key areas that public bodies can use to help deliver their obligations under the Well Being of Future Generation Act 2015. The Powys Red Kite Climate Strategy will also redfine the approach to specifications and procurement now and in the future. This all has to be balanced with delivering value for money and our services will need to be innovative and to deliver best possible outcomes for resident of the County.

3. Advice

3.1 It is proposed that Cabinet agree the report to act as a catalyst for transforming procurement and provide leadership to the Council to reconsider all intended procurement through the lens of the Council Vision 2025 and new legislation and strategies.

4. Resource Implications

4.1 Services will need to consider any cost implications as part of their service budgets and any other implications to their intended procurement plans.

4.2 The Head of Finance (s151 Officer) supports acceptance of the procurement strategy.

5. Legal implications

5.1 Legal: the recommendations can be accepted from a legal point of view

5.2 The Head of Legal and Democratic Services (Monitoring Officer) has commented as follows: “ I note the legal comment and have nothing to add to the report”.

6. Data Protection

Processing of Personal Data Not Required

7. Comment from local member(s)

7.1 Not required

8. Integrated Impact Assessment

9. Recommendation

- 9.1 It is recommended that Cabinet approve the procurement strategy in Appendix 1 and task the Head of Finance with developing an implementation plan for the next 3 years to realise the benefits including the development of measures and outcomes to demonstrate progress

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Head of Service: Jane Thomas

Corporate Director: Dr Caroline Turner

Mae'r dudalen hon wedi'i gadael yn wag yn fwriadol



Powys County Council

Procurement Strategy 2021 - 2025

Yn agored a blaengar - Open and Enterprising



Introduction

Our Procurement Strategy for Powys County Council (2021-2025) contributes to the Welsh national vision for procurement, the main principles of which are set out in the [Wales Procurement Policy Statement 2021](#) and also supports Powys County Council's [Vision 2020-2025](#) and [Medium Term Financial Strategy 2021-2026](#)

*“Welsh public sector procurement is a powerful lever with ability to affect sustained change to achieve social, economic, environmental and cultural outcomes for the well-being of Wales”
(Source: Wales Procurement Policy Statement, 2021)*

Our Vision

We are committed to transforming the procurement of goods and services which contributes to the delivery of social value, and the development of the local and national foundational economies. Through better procurements, we will help to make Powys a community which supports healthy living, embraces environmental change, and provides opportunities for continuous learning and economic business growth.

Our Mission

Our mission is to support the Council in the effective delivery of its Vision 2025 Plan and Wales National Strategy, by focusing on the delivery of professional procurements to help make Powys a fantastic place in which to work, live and play.



What is procurement?

“Procurement is the process of acquiring, goods, works and services, covering both acquisition from third parties and in-house providers. The process spans the whole cycle from identification of needs through to the end of a services contract or the end of the useful life of an asset. It involves options appraisal and the critical ‘make or buy’ decision which may result in the provision of services in-house in appropriate circumstances”.

(Source: National Procurement Strategy for Local Government).

Progressive Procurement

The Procurement landscape in the public sector has changed dramatically over the last 2 years. A Welsh Government report published in March 2021 acknowledges that despite the unprecedented challenges facing the Welsh public sector through Brexit and Covid-19, Procurement has risen to the challenge and through effective leadership and collaborative working has accelerated its progress in the [Procurement Evolution](#) journey in Wales.

Brexit has had a significant impact on the supply chain and the economy in which our Procurement will be constantly reviewed. During the coming years, Procurement decisions will be further impacted by Welsh Government reforming the procurement legislation in Wales.

The Covid-19 crisis has required public bodies including Powys to increase its collaborative efforts to ensure that effective and efficient procurement delivers value for money and that vital supplies are provided in a timely manner.

The Commercial Service Team have reflected on the following changes to lead to the development of this new strategy.

- The [Well-Being of Future Generations \(Wales\) Act 2015](#) and the refreshed [Wales Procurement Policy Statement 2021](#) remain important drivers (and some might say represent a golden opportunity) to deliver further well-being benefits for the people of Powys through the supplier selection and award of contracts at this time.
- The [Social Service Wellbeing Act 2014](#) provides the legal framework for improving the well-being of people who need care and support, and carers who need support, and for transforming social services in Wales.
- The Council's pledge of a [Climate Emergency](#) has placed additional responsibility on the role of procurement within the Council and in delivering on these important agendas.
- The principles of Welsh Government's [Circular Economy Strategy](#) will ensure a greener, fairer and more prosperous community.
- The [Foundational Economy](#) directs public bodies in Wales to focus on services and products that keep us safe, sound, and civilised.
- Public bodies in Wales are expected to commit to Welsh Government's Ethical Procurement with reference to the [Code of Practice](#). Which includes obligations under Modern Slavery Act. Full account will be taken of the Welsh Language Act when procuring and delivering services.
- The Welsh Government are proposing the introduction of legislation on [Social Partnership and Procurement](#) to ensure fair work outcomes for all by delivering socially responsible Procurement.
- There is an ongoing consultation period by Welsh Government on the impact of a potential [Procurement Reform](#) that by introducing new legislation this does not minimise the opportunities for local supply chains.
- The [Public Contracts Regulations 2015](#) provides Commissioners with much more flexibility to achieve the outcomes they seek for their communities. By working more collaboratively with commissioning, we can explore the [Art of the Possible](#) for more innovative Procurement where the emphasis is on value rather than just cost savings. In this we will consider procurement procedures to better enable innovative practices.
- Collaborative Working underpins future progress in public service procurement and delivery. Local Authorities are encouraged to seek collaborative opportunities with other members of the [WLGAs](#) network and to embrace regional working where it makes economic sense to do so.

How we will Support Vision 2025

Powys County Council has ambitious plans which have been set out in its [Vision 2025](#). These include objectives for the Economy, Learning and Skills, Health and Care, and Resident and Communities. The Procurement Strategy aims to set out the vision and priorities to help support the delivery of Vision 2025 through Procurement.

The Council values the support Procurement can deliver across all its objectives and how it will also support the Authority's Well-being Objectives and Welsh Government's Procurement policy, to achieve value for money in the most efficient and effective way, whilst aiming to achieve long term-term sustainable solutions for all its non-pay spend including benefiting local communities.

A Procurement strategy is important to align the Council's objectives with its procurement whilst identifying areas which require improvement.

Vision 2025: Objectives Summary

 <p style="background-color: #4699c9; color: white; padding: 10px; border-radius: 10px 10px 0 0;"> We will develop a vibrant ECONOMY </p>	 <p style="background-color: #e67e7e; color: white; padding: 10px; border-radius: 10px 10px 0 0;"> We will strengthen LEARNING AND SKILLS </p>
 <p style="background-color: #f1c40f; color: white; padding: 10px; border-radius: 10px 10px 0 0;"> We will lead the way in providing effective, integrated HEALTH AND CARE in a rural environment </p>	 <p style="background-color: #5dade2; color: white; padding: 10px; border-radius: 10px 10px 0 0;"> We will support our RESIDENTS AND COMMUNITIES </p>



“ Making It Happen ”

 **Engagement and communication**
 **Leadership and governance**
 **Changing how we work**

Developing a Vibrant Economy

- The Council will work with **partner organisations** to support the development of businesses in Powys including Powys Association of Voluntary Organisation, Business

Wales, and Wales Cooperative. This will include regular meet the buyer events and training & development events.

- The Council will **simplify its Procurement process** to be more inclusive and assist smaller businesses and local suppliers to bid for contracts, as well as using procurement models such as the dynamic procurement system (DPS) for smaller repetitive procurements.
- We will build into contracts, terms and conditions and consequences to safeguard against further waves of Covid-19 occurring for **an equitable allocation of risk** and to protect safe working of employees and employment.
- The Council values their local suppliers and providers and will do all it can with its non-pay spend to provide the necessary support to help them bid and be successful in their contracts. Local suppliers will be paid within a **maximum of 30 days** by the Council and its supply chain, and the Council will continue to extend the use project bank accounts for all projects valued at more than £2m.
- Where appropriate Contracts will be packaged to ensure **local supply chains have more opportunities** to bid for contracts either directly or in the supply chain.
- We will collaborate with relevant agencies in Wales to encourage **3rd sector involvement** to help develop the market and give better access to procurement activities.
- We will advertise appropriately to **ensure competition, value for money** and to target local interest.
- We will share links to our immediate and future pipeline of projects and procurements on our [Website](#) and with partners.



Effective and Integrated Health and Care

- The focus now is on the lessons learned from the **Covid-19 pandemic which presented** significant challenges to the Council and its communities and for its business suppliers and third sector.
- By collaborating with relevant public bodies and other organisations, we will continue to ensure that our **frontline services** receive the protective equipment and medical supplies they need and when they need it.
- We will ensure that **sustainable** new Health and Social Care facilities are fit for purpose and meet the Council's 2022 targets.
- We will coordinate with the [Centre for Public Digital Services](#) to procure digital solutions which will enable more joined up Care.
- We will work to support the Council's objective to **reduce the number of cared for children** in Powys.
- We will continue to work with our partners to ensure people receive the support which **prevents homelessness**.



Strengthen Learning and Skills

A central Commercial Services team support services to procure their needs through a Category Management approach.

- Collaborative working and **long-term** thinking and planning are central to our skills set in Progressive Procurement.
- To support digital training, skills development and benefit from knowledge sharing across Wales, we will **collaborate** with the [Centre for Public Digital Services](#)
- All procurement professionals will be made aware of ongoing changes to procurement legislation and policy to ensure that all spend is governed through **strict legislation and**

regulation set out in UK law (UK Public Contract Regulations) as well as internal Powys governance.

- We will ensure **prevention** measures are in place to ensure **safe working** with suppliers and contractors which will offer skills and learning opportunities for children.
- Ongoing **contract management** for the delivery of supplies, service, or ongoing use of and assets will continue to be managed by each individual service with advice, guidance, and support from Commercial Services Team.
- Business Wales will be engaged as a **key partner** in the delivery of any new contracts to provide support to local companies. Local companies will be required to engage early with Business Wales to obtain the support they need and to give them a better chance of success.

Support Residents and Communities

- We will continue to engage with the market to procure **affordable and sustainable innovative housing** solutions for future generations.
- We will continue to invest in digital resources to protect and to improve access to our libraries and cultural heritage sites.



Governance and Leadership

Leadership and governance play a key part of the organisation, and requires openness, transparency and integrity, performance orientation and effective collaboration. The structure for Procurement within Powys County Council is as follows:

- Leadership through Cabinet Members, the Portfolio Member for Finance Services and Deputy Leader and the Head of Service for Finance (S151 Officer).
- A Commercial Services Team, which sits within the Financial Services Directorate.

- A professionally qualified Professional Lead for Procurement who oversees Procurement activities, reporting to the Head of Service for Finance (S151 Officer)
- Clearly defined processes and procedures along with delegation of authority in respect of procurement activities embodied in the Financial Regulations and Standing Orders
- All Procurement over £50,000 to be managed via the Sell2Wales and/or Wales E-tender system Procurement electronic system. All procurements under £50,000 are devolved to service areas for efficiency of process: with common and repetitive spend being managed by pre-established arrangements which have been set up for such purposes.

All this is set out within the regulation in the Council Constitution through the Contract Procedure Rules and Financial Regulations, which in turn fits with the UK Public Contract Regulations.

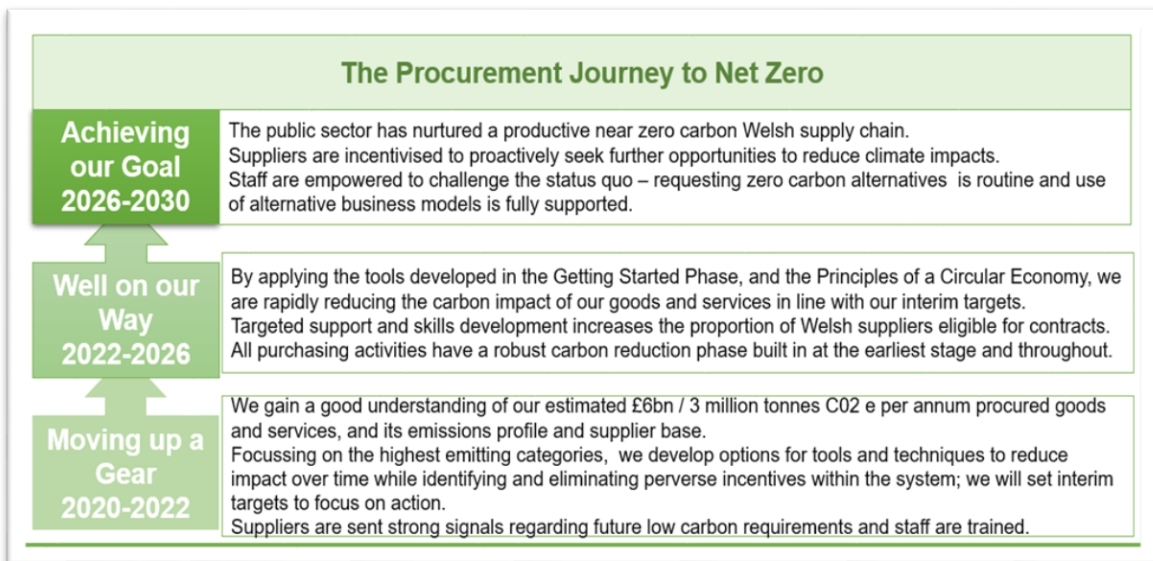


Climate Change and Decarbonisation

Powys County Council declared a [Climate Emergency](#) on 24th September 2020. This included an ambition to reduce its carbon emissions to [net zero](#), which is in line with the Welsh public sector target for 2030.

Our priorities include:

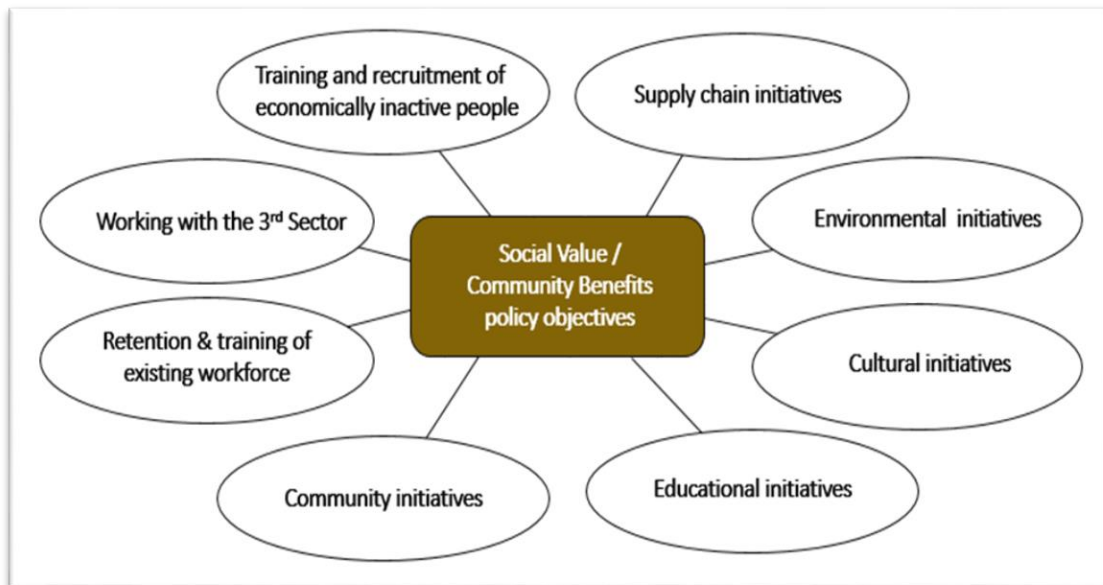
- Allow for and encourage innovation in tender specifications to enable decarbonisation.
- Endeavour to include CO2 target reductions within contracts.
- Gain a better understanding of markets to have an insight of carbon usage and impact within supply chains, identifying categories of opportunity and prioritisation, meaning the Council can purchase more sustainably and efficiently.
- Work with service areas to help the Council meet the Welsh Government targets for decarbonisation.
- Raise awareness of sustainability within the procurement process.



Embedding Social Value

Wales Procurement Policy Note [WPPN 01/20](#) advises public bodies such as Powys County Council of Welsh Government’s overarching policy objectives and how to report the outcomes in relation to social value clauses and community benefits. [Socio-Economic Duty](#) has now come into force and aimed as a key mechanism to reduce inequality in Wales.

Community Benefits clauses will be included in all projects of more than £1m pound in value and where appropriate for projects under £1m, the Community Benefits Toolkit will enable the outcomes of the Community Benefits as illustrated below to be measured and reported on.



- We actively seek to address the seven Well-being Goals and Five Ways of Working from the [Well-Being of Future Generations \(Wales\) Act 2015](#).
- We will embrace the opportunity presented in the refreshed [Wales Procurement Policy Statement 2021](#) to deliver further well-being benefits for the people of Powys through the supplier selection and award of contracts at this time.
- The Council's pledge of a [Climate Emergency](#) has placed additional responsibility on the role of Procurement within the Council and in delivering on these important agendas.
- We will start to include the principles of Welsh Government's [Circular Economy Strategy](#) which will ensure a greener, fairer and more prosperous community in Powys.
- We support the development of the [Foundational Economy](#) in Powys which encourages us to develop new and existing supply chains to bid and to be successful in future council contracts.
- We will ensure as many of our suppliers and providers commit to Welsh Government's Ethical Procurement with reference to the [Code of Practice](#).
- We will continue to consult with Welsh Government on the proposed introduction of legislation on [Social Partnership](#) to ensure fair work outcomes for all and in our ongoing aim to deliver socially responsible Procurement.
- We will continue to consult with Welsh Government on the potential [Procurement Reform](#) to minimise the impact on our local supply chains.
- We will ensure Social Value Themes Outcomes and Measures (**TOMs**) are requirements for all Procurements over the value of £2m and where appropriate for procurements under £2m, to maximise the delivery of social value for our local communities. Companies will be evaluated in any tender process for what they are able to deliver.

- We will work with **partner organisations** to develop TOMs to maximise the outcomes for the communities in Powys.
- We will include social value clauses in our contracts and use the social value portal increase benefits to local communities.
- We will procure swiftly for any new funding provided to Powys to **enhance economic regeneration** post Covid-19.
- We will lobby Welsh Government to provide **funding and resources** to support our local economy either through our Public Service Board or directly.

Measurement and Reporting

Measuring and Reporting is an important method of tracking progress of the goals within the Procurement Strategy.

- An **Action Plan** is appended to accompany this strategy identifying responsibilities and accountabilities for its delivery.
- Set up a **Procurement delivery cell** with key senior officers to drive the implementation of the strategy and Chaired by the appropriate Head of Service.
- Progress will be **reported regularly to EMT (Executive Management Team)** and through the CIP (Corporate Improvement Plan).
- **KPI's** will be developed and monitored.
- **Regular reports** will be provided to Cabinet as to the progress of the action plan and strategy.
- **A full review** will be undertaken at key milestones (e.g. 6 monthly) considering feedback and progress and actions plan will be refined if required.
- Ensure value for money is achieved for all our purchases through competition or where necessary by benchmarking.



Mae'r dudalen hon wedi'i gadael yn wag yn fwriadol

14 January	Leader	Approved the letting of the county farms at Cwmcaebitra, Sarn and Brynhyfryd, Penstrowed following interviews by the Farm Letting Panel
18 January	Portfolio Holder for Adult Social Care	Approved the closure of day centres and day services for a further 6 months, up to 12 th August 2022.
28 January	Leader	Approved a budget virement of £30,000 contribution from the Regeneration Strategy revenue budget into the capital project for the Riverside Venue in Newtown.

Mae'r dudalen hon wedi'i gadael yn wag yn fwiadol

Cabinet / Delegated Decision				
Date	Title	Portfolio Holder	Lead	Decision Maker
08/02/22	Cedewain Capital Business Case	Councillor Phyl Davies	Emma Palmer	Cabinet
08/02/22	Llanfihangel Rhydithon School Objection Report	Councillor Phyl Davies	Emma Palmer	Cabinet
08/02/22	Procurement Strategy	Councillor Aled Davies	Vincent Hanly	Cabinet
08/02/22	HRA Business Plan 2022-23	Councillor Rosemarie Harris	Nina Davies	Cabinet
08/02/22	Rent Setting 2022/23	Councillor Rosemarie Harris	Nina Davies	Cabinet
08/02/22	Empty Property Action Plan	Councillor Rosemarie Harris	Nina Davies	Cabinet
15/02/22	Possible Alternative Budget		Jane Thomas	Cabinet
22/02/22	LDP Delivery Agreement	Councillor Rosemarie Harris	Peter Morris	Cabinet
22/02/22	National Collaborative Arrangements for Welsh (local authority) Adoption and Fostering services	Councillor Rachel Powell	Jan Coles	Cabinet
22/02/22	Response to the Staffing Crisis & Other Pressures in Children's Social Services	Councillor Rachel Powell	Jan Coles	Cabinet
22/02/22	Revenue Report for period ended 31 December 2021	Councillor Aled Davies	Jane Thomas	Cabinet
22/02/22	Capital Programme Update	Councillor Aled Davies	Jane Thomas	Cabinet
22/02/22	Cluster Business Manager	Councillor Phyl Davies	Lynette Lovell	Cabinet
01/03/22	Population and Well Being Assessment	Councillor Rosemarie Harris	Emma Palmer	Cabinet
01/03/22	North Powys Project Strategic Outline Case	Councillor Myfanwy Catherine Alexander	Alison Bulman	Cabinet
01/03/22	North Powys Project Memorandum of Understanding	Councillor Myfanwy Catherine Alexander	Alison Bulman	Cabinet
01/03/22	Llanbedr CP School Objection report	Councillor Phyl Davies	Emma Palmer	Cabinet
01/03/22	Climate Strategy	Councillor Myfanwy Catherine Alexander	Diane Reynolds	Cabinet

Tudalen 451

01/03/22 Socio-Economic Benefits from Council homes development	Councillor Myfanwy Catherine Alexander	Nina Davies	Cabinet
01/03/22 Wellbeing and Population Assessment	Councillor Rosemarie Harris	Emma Palmer	Cabinet
08/03/22 Powys Nature Recovery Action Plan	Councillor Heulwen Hulme	Sian Barnes	Cabinet
08/03/22 Corporate Safeguarding Update	Councillor Rachel Powell	Alison Bulman	Cabinet
Mount Street Infants, Mount Street Juniors, Cradoc CP			
08/03/22 School Objection report	Councillor Phyl Davies	Emma Palmer	Cabinet
08/03/22 Sennybridge capital project Strategic Outline Case	Councillor Phyl Davies	Emma Palmer	Cabinet
08/03/22 Brecon capital project Strategic Outline Case	Councillor Phyl Davies	Emma Palmer	Cabinet
08/03/22 Llanfyllin Catchment Report	Councillor Phyl Davies	Emma Palmer	Cabinet
08/03/22 Schools Major Improvement Programme	Councillor Phyl Davies	Emma Palmer	Cabinet
08/03/22 Welshpool CiW School Finance Report	Councillor Phyl Davies	Lynette Lovell	Cabinet
08/03/22 STAR Survey	Councillor Myfanwy Catherine Alexander	Nina Davies	Cabinet
08/03/22 HRA Business Plan	Councillor Myfanwy Catherine Alexander	Nina Davies	Cabinet
08/03/22 Housing Support Programme Strategy	Councillor Myfanwy Catherine Alexander	Nina Davies	Cabinet
08/03/22 Regional infrastructure team for RPB	Councillor Myfanwy Catherine Alexander	Alison Bulman	Cabinet