

# Pecyn Dogfennau Cyhoeddus

## Cabinet

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

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Dyddiad y Cyfarfod  
**Dydd Mawrth, 8 Mawrth 2022**

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Amser y Cyfarfod  
**10.00 am**

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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

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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

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## AGENDA

<b>1.</b>	<b>YMDDIHEURIADAU</b>
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Derbyn ymddiheuriadau am absenoldeb.

<b>2.</b>	<b>DATGANIADAU O DDIDDORDEB</b>
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Derbyn unrhyw ddatganiadau o ddiddordeb gan Aelodau yn ymwneud ag eitemau i'w hystyried ar yr agenda.

<b>3.</b>	<b>ADRODDIAD GWRTHWYNEBU LLANBEDR</b>
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Ystyried adroddiad gan y Cynghorydd Sir Phyl Davies, Aelod Portffolio ar faterion Addysg ac Eiddo.  
(Tudalennau 1 - 218)

<b>4.</b>	<b>PROSIECT CYFALAF PONTSENNI SOC</b>
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Ystyried adroddiad gan y Cynghorydd Sir Phyl Davies, Aelod Portffolio ar faterion Addysg ac Eiddo.  
(Tudalennau 219 - 304)

<b>5.</b>	<b>RHAGLEN TRAWSNEWID ADDYSG - DIWEDDARIAD AR GYNNYDD</b>
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	<b>TRAWSNEWID YSGOLION LLANFYLLIN</b>
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Ystyried adroddiad gan y Cynghorydd Sir Phyl Davies, Aelod Portffolio ar faterion Addysg ac Eiddo.

(Tudalennau 305 - 308)

<b>6.</b>	<b>ACHOS AMLINELLOL STRATEGOL PROSIECT GOGLEDD POWYS</b>
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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.

(I Ddilyn)

<b>7.</b>	<b>STRATEGAETH RHAGLEN CYMORTH TAI POWYS 2022-2026</b>
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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 309 - 354)

<b>8.</b>	<b>CYFRIF REFENIW TAI - CYNLLUN BUSNES ARIANNOL DROS DDENG MLYNEDD AR HUGAIN YN DECHRAU 2022-2023</b>
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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 355 - 428)

<b>9.</b>	<b>AROLWG STAR TENANTIAID TAI CYNGOR SIR POWYS</b>
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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 429 - 462)

<b>10.</b>	<b>BUDDION CYMUNEDOL AC ECONOMAIDD GAN RAGLEN DATBLYGU TAI Y CYNGOR</b>
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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 463 - 468)

<b>11.</b>	<b>DIWEDDARIAD DIOGELU CORFFORAETHOL</b>
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Ystyried diweddariad gan y Grwp Diogelu Corfforaethol.

(Tudalennau 469 - 470)

<b>12.</b>	<b>PENDERFYNIADAU DIRPRWYEDIG A WNAED ERS Y CYFARFOD</b>
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<b>DIWETHAF</b>
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Nodi penderfyniadau dirprwyedig a gymerwyd gan yr Aelod Portffolio.  
(Tudalennau 471 - 472)

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



## CYNGOR SIR POWYS COUNTY COUNCIL.

CABINET EXECUTIVE  
8 March 2022

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

**REPORT TITLE:** Llanbedr C. in W. School

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**REPORT FOR:** Decision

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**1. Purpose**

- 1.1 Further to the decision made by Cabinet on the 9<sup>th</sup> November 2021, the Council published a Statutory Notice proposing to close Llanbedr C. in W. School from the 31<sup>st</sup> 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 Llanbedr C. in W. School from the 31<sup>st</sup> 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 9<sup>th</sup> February 2021, the Council's Cabinet considered an options appraisal paper in respect of Llanbedr C. in W. School, and agreed to carry out consultation on the following:

- To close Llanbedr C. in W. School from the 31<sup>st</sup> August 2022, with pupils to attend their nearest alternative schools

## **The Consultation Period**

- 2.7 Consultation on the proposal to close Llanbedr C.i.W Primary School was carried out in accordance with the requirements of the School Organisation Code (2018) from the 21<sup>st</sup> April 2021 to the 23<sup>rd</sup> 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 9<sup>th</sup> November 2021.
- 2.9 At the meeting on the 9<sup>th</sup> November 2021, Cabinet agreed to proceed with the publication of a Statutory Notice in order to proceed with the process to close Llanbedr C. in W. School from the 31<sup>st</sup> August 2022, with pupils to attend their nearest alternative schools.

## **Statutory Notice**

- 2.10 Further to the decision made by Cabinet on the 9<sup>th</sup> November 2021, the Council published a Statutory Notice proposing the following:

*'i. To discontinue Llanbedr Church in Wales Voluntary Aided Primary School, Llanbedr, Crickhowell, Powys, NP8 1SR.'*

*It is proposed to implement the proposal on 31<sup>st</sup> August 2022.'*

- 2.11 The Statutory Notice was published on the 18<sup>th</sup> November 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 16<sup>th</sup> December 2021.

## **Objections**

- 2.13 349 objections were received during the statutory objection period.
- 2.14 Objections were received from the following:

- Parents and members of the community
- Governing Body of Llanbedr C. in W. School
- Diocese of Swansea and Brecon
- Vale of Grwyney Community Council
- Jane Dodds MS
- Cllr Jackie Charlton
- Cllr John Morris
- The Venerable Alan Jevons, Archdeacon of Brecon
- Rev Annabelle Elletson

- 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 Llanbedr C. in W. School
  2. Impact on pupils
  3. Travel implications
  4. Impact on the community
  5. Comments about housing developments in the area
  6. Comments about other schools pupils might transfer to
  7. Comments about Church in Wales provision
  8. Comments about the Curriculum for Wales
  9. Comments about small and rural schools
  10. Comments about finance
  11. Criticism of the Council
  12. Comments about the process
  13. Comments about meetings which have taken place as part of the process
  14. Comments about documentation
  15. Comments about the Council's Transforming Education Strategy
  16. Comments about Welsh Government Strategies
  17. 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 Llanbedr C. in W. School from the 31<sup>st</sup> 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
  - To lead to rationalisation of the primary school estate
  - 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 funding 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 £101,100 per annum. This overall figure comprises a potential saving on schools' delegated funding of over £153,500 plus estimated savings on catering costs of around £9,000, reduced by estimated additional transport costs of £43,700 and a potential loss of funding for pupils that may move out of county of £17,700.

The Council has recently approved a new funding formula which will become operational from April 2022. Based on the new formula, the anticipated formula funding saving on this proposal is now estimated to be just over £91,000.

The other resource implications are not anticipated to change so the overall revised estimated saving, including transport costs, catering savings and potential loss of RSG is now just under **£39,000**.

- 4.3 The Statutory Notice published in respect of this proposal states that in addition to transport being provided in accordance with the Council's Home to School Transport Policy:

*'The Council will also provide transport for pupils currently attending Llanbedr Church in Wales Voluntary Aided Primary School who wish to access Church in Wales school provision at Llangattock Church in Wales Voluntary Aided Primary School. This will be provided on a case-by-case basis using the Council's discretionary powers under Section 6 of the Learner Travel (Wales) Measure 2008.*

*If there is no place available at Llangattock Church in Wales Voluntary Aided Primary School, the Council will use its discretionary powers, as outlined above, to provide transport for pupils currently attending Llanbedr Church in Wales Voluntary Aided Primary School to their next nearest Church in Wales school, if they wish to access Church in Wales school provision.'*

As the Council does not currently know which schools the pupils would choose to transfer to, it is not possible to estimate the potential cost of this. However the potential range of costs which might be incurred are set out below, depending on how many pupils require transport, over

what distance and whether existing transport provision could accommodate these pupils:

- **Minimal costs** – all pupils can be accommodated within existing transport provision, albeit some routes may need to be extended  
- £10 - £20 per school day - £1,900 - £3,800 per annum
- **Need to increase size of bus** – £50 per day - £9,500 per annum
- **Additional Taxi required** – approx. £60 - £75 per day - £11,400 - £14,250 per annum
- **New bus required** – £170 - £230 per day - £32,300 - £43,700

The financial impact of this arrangement would be for a limited period of up to 7 years, following which the whole life cost impact would continue to be a net saving to the Council.

Implementation of the proposal enables a more cost-effective and sustainable approach to the provision of school places within the cluster by utilising surplus places at other schools within the cluster, and removing any costs associated with maintaining Llanbedr C.i.W Primary School.

It can also be assumed that any additional transport costs to alternative Church in Wales provision would be minimal based on significant concerns raised during the consultation and objection period about children travelling excessive distances to schools.

4.4 The school had a cumulative surplus balance of £22,263 as at the 31st March 2021. The budget approved by the Governing Body for the current year shows this decreasing to £13,861 by 31st March 2022.

4.5 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'

4.6 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.

- 4.7 Implementation of the proposal would require involvement from a number of service areas, including staff from the Schools Service, HR and Finance.
- 4.8 The Head of Finance (Section 151 Officer) notes the financial implications of the proposal and supports the proposals set out in section 4.6 above as per the recommendation.

## **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 John Morris:

‘I have spent the last two days reading and checking the report and its accompanying papers. There are 349 objectors to this closure and not one in support.

The report and papers do not sustain any argument for closure in fact the conclusion in the impact assessment indicates that closure would have a significant impact on the community of Llanbedr which includes the pupils at the school. It also states that it would result in additional travel to school and for extra after school activities. It also raised concerns at the loss of nursery provision in a rural area and the lack of public transport to access this further afield.

The reasons given for closure have not been proven. The school is presently piloting the new curriculum with the head leading on this in the cluster. The recent letter from the Welsh Government experts states ‘I can confirm that the new Curriculum for Wales is appropriate for all schools and settings in Wales working with learners aged 3 to 16 including small rural schools.’ The school numbers have increase year on year and after Easter a further two pupils will join resulting in a full school. This means that the cost per pupil is below the Powys average.

What is concerning in this report is that there is a perceived lack of concern about the children themselves and the voice of the child is not being listened to. Those cabinet members who attended the school recently cannot have missed the happy children learning in a successful, high achieving school in a vibrant community. The report suggests that should the school close the pupils could attend other

nearby schools in the cluster. In fact, evidence shows there is little if any provision in all but one school, particularly for Church Schools and despite the report suggesting this is not a problem these 55 pupils will be scattered to the four winds to schools between 3 and 15 miles away with an increased travel commitment. The report also indicates that they cannot guarantee that siblings presently at the school could be accommodated in a single receiving school. This situation creates huge problem for parents. There is no educational, social or recreational benefit to the children in closing Llanbedr School and distributing them far and wide to other schools.

Recently and somewhat out of the blue it has been suggested that a consultation be launched on an all through School in Crickhowell. Whilst this may have some legs this is being proposed without including the other three primary schools in the catchment area. Surely this is a strong case for halting a decision that could come back to haunt the council and wait for a whole area consultation to be carried out. This would be a sound educational process unlike the peace-meal approach that appears to be being adopted here.

I would urge the cabinet to reject the proposal. Put yourself in the parents and children's shoes. Do you really think they would be better off when their present school can achieve the same high level of education and care?'

## **7. Integrated Impact Assessment**

- 7.1 An initial impact assessment was considered by Cabinet on the 9<sup>th</sup> 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 9<sup>th</sup> November 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 Llanbedr C. in W. School.



- To approve the proposal to close Llanbedr C. in W. School from the 31<sup>st</sup> August 2022, with pupils to attend their nearest alternative schools.
- In accordance with the Scheme for Financing Schools, to introduce the following restrictions on Llanbedr C. in W. 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
Corporate Director:	Lynette Lovell – Director of Education

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 LLANBEDR CHURCH IN WALES VOLUNTARY AIDED  
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 Llanbedr Church in Wales Voluntary Aided Primary School, Llanbedr, Crickhowell, Powys, NP8 1SR.

It is proposed to implement the proposal on 31<sup>st</sup> August 2022. The proposal will be implemented by Powys County Council.

The school is currently maintained by Powys County Council, and the school building is owned by the Diocese of Swansea and Brecon, Swansea and Brecon Diocesan Centre, Cathedral Close, Brecon, Powys, LD3 9DP.

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/10568/Llanbedr-Church-in-Wales-School>

**Admissions**

Pupils currently attending Llanbedr Church in Wales Voluntary Aided Primary School will be able to express a preference for an alternative school to attend from the 1<sup>st</sup> September 2022 via the in-year transfer process. 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 Llanbedr Church in Wales Voluntary Aided Primary School will be able to apply for a place at any school in accordance with the Council’s Admissions Policy.

Llangattock Church in Wales School is a Voluntary Aided Primary School and is therefore responsible for its own admissions arrangements. Any pupils wishing to transfer to Llangattock Church in Wales Primary School would need to apply to the school for a place in accordance with the school’s admissions policy.

**Details of nearest alternative schools**

The nearest alternative schools for pupils currently attending Llanbedr Church in Wales Voluntary Aided Primary School would be as follows:

	<b>School Type</b>	<b>Language Category</b>	<b>Admission Number<sup>1</sup></b>
<b>Crickhowell C.P. School</b>	Community Primary	English-medium	33
<b>Llangattock C. in W. School</b>	Voluntary Aided Primary	English-medium	20
<b>Llangors C. in W. School</b>	Voluntary Controlled Primary	English-medium	25
<b>Llangynidr C.P. School</b>	Community Primary	English-medium	21
<b>Deri View Primary School<sup>2</sup></b>	Community Primary	English-medium	47
<b>Llanvihangel Crucorney C.P. School</b>	Community Primary	English-medium	11

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

<sup>1</sup> Powys Schools – Powys County Council Admission Arrangements and Information 2022/23; Monmouthshire Schools – Monmouthshire County Council School Admissions Policy 2022/23

<sup>2</sup> Monmouthshire County Council has recently completed the statutory objection period to discontinue Deri View Primary School from the 31 August 2023 and establish a new English-medium community school for pupils aged 3-18 years of age which will operate on the current site of King Henry VIII Comprehensive School, Old Hereford Road, Abergavenny, NP7 6EP.

No measures are proposed to be taken to increase the number of school places available at alternative schools on consequence of the proposed discontinuance of Llanbedr Church in Wales Voluntary Aided Primary School.

### **Home-to-School Transport Arrangements**

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

The Council will also provide transport for pupils currently attending Llanbedr Church in Wales Voluntary Aided Primary School who wish to access Church in Wales school provision at Llangattock Church in Wales Voluntary Aided Primary School. This will be provided on a case-by-case basis using the Council's discretionary powers under Section 6 of the Learner Travel (Wales) Measure 2008.

If there is no place available at Llangattock Church in Wales Voluntary Aided Primary School, the Council will use its discretionary powers, as outlined above, to provide transport for pupils currently attending Llanbedr Church in Wales Voluntary Aided Primary School to their next nearest Church in Wales school, if they wish to access Church in Wales school provision.

### **Proposal to close a rural school**

The proposal to discontinue Llanbedr Church in Wales Voluntary Aided Primary School is considered the most appropriate response to the reasons for formulating the proposal. The reasons are as follows:

- Would address the issue of low pupil numbers
- Would reduce the Council's overall surplus capacity in primary schools
- Financial 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
- Would lead to rationalisation of the primary school estate
- 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 **16<sup>th</sup> December 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](mailto: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 18<sup>th</sup> November 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 Llanbedr C. in W. Voluntary Aided Primary School on the 31<sup>st</sup> August 2022.
- Pupils currently attending Llanbedr C. in W. Voluntary Aided Primary School will be able to express a preference for an alternative school to attend from 1<sup>st</sup> September 2022 via the in-year transfer process. 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 Llanbedr C. in W. School will be able to apply for a place in any school in accordance with the Council's Admissions Policy. As Llangattock C. in W. School is a Voluntary Aided School, pupils wishing to transfer to the school would need to apply to the school for a place in accordance with the school'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/10568/Llanbedr-Church-in-Wales-School>
- Transport arrangements would be made for pupils in accordance with the Council's Home-to-School Transport Policy. Transport will also be provided to enable pupils currently attending Llanbedr C. in W. Voluntary Aided Primary School to continue to attend a Church in Wales school if they express a preference.



**Proposal to close Llanbedr C. in W.  
School**  
Objection Report



# Proposal to close Llanbedr C. in W. 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](mailto:school.organisation@powys.gov.uk).

# Consultation on the closure of Llanbedr C. in W. School

## Objection Report

### 1. BACKGROUND

Powys County Council consulted on proposals to close Llanbedr C. in W. School. The consultation took place from the 21<sup>st</sup> April 2021 to the 23<sup>rd</sup> June 2021. The Council published a consultation report outlining the findings of the consultation exercise.

On 9<sup>th</sup> November 2021, the Council's Cabinet agreed to proceed with the proposal, and a Statutory Notice was published from the 18<sup>th</sup> November 2021 to the 16<sup>th</sup> December 2021.

The proposal was as follows:

*'To close Llanbedr C. in W. School from the 31st August 2022, with pupils to attend their nearest alternative school'.*

### 2. SUMMARY OF OBJECTIONS RECEIVED

349 objections were received during the statutory objection period. 169 of these objections were the same, and consisted of one sentence, 'I object to the closure of Llanbedr Church in Wales School'.

As well as objections from parents and governors at Llanbedr C. in W. School and members of the community, objections were received from the following organisations and individuals:

- Governing Body of Llanbedr C. in W. School
- Diocese of Swansea and Brecon
- Vale of Grwyney Community Council
- Jane Dodds MS
- Cllr Jackie Charlton
- Cllr John Morris
- The Venerable Alan Jevons, Archdeacon of Brecon
- Rev Annabelle Elletson

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 Llanbedr C. in W. School
2. Impact on pupils

3. Travel implications
4. Impact on the community
5. Comments about housing developments in the area
6. Comments about other schools pupils might transfer to
7. Comments about Church in Wales provision
8. Comments about the Curriculum for Wales
9. Comments about small and rural schools
10. Comments about finance
11. Criticism of the Council
12. Comments about the process
13. Comments about meetings which have taken place as part of the process
14. Comments about documentation
15. Comments about the Council's Transforming Education Strategy
16. Comments about Welsh Government Strategies
17. 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 LLANBEDR C. IN W. SCHOOL

##### 1.1 Comments about the quality of provision

1.1.1	The school currently offers an excellent education.	The Council notes these positive comments about the quality of provision at Llanbedr C. in W. School.
1.1.2	The school is well performing.	As above.
1.1.3	Teaching standards at the school are great.	As above.
1.1.4	Llanbedr is the best school in Wales.	As above.
1.1.5	The school embodies what education should be about: it is nurturing, inclusive, community-focussed, digitally rich and environmentally robust.	As above.
1.1.6	Powys have acknowledged the excellent teaching standards at the school.	The Council fully recognises the strengths and qualities of Llanbedr C. in W. School.
1.1.7	The school has excellent educational standards, as acknowledged by Powys themselves.	As above.
1.1.8	The school has achieved excellent educational results and achievements, the equal at least of the larger surrounding primary schools.	Whilst recognising the strengths and qualities of Llanbedr C. in W. School, the Council has no concerns about the quality of education provided at any of the alternative schools in the Crickhowell

		<p>cluster. All the alternative Powys schools are regarded as 'self-improving' schools, according to the latest National Categorisation in 2019. Estyn, in its response to this consultation, concluded that</p> <p><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>
1.1.9	<p>It is a shame that there is no up-to-date Estyn report to reflect this because it has allowed you to rely on a very outdated report for the purposes of trying to compare whether other schools can provide a like-for-like education.</p>	<p>Comment noted. The School Organisation Code requires proposers to include information about the latest Estyn inspections of affected schools in consultation documents published as part of school reorganisation proposals, therefore the Council was required to include information about the latest Estyn inspection in the consultation document. The Council fully acknowledges that, having addressed the issues raised by Estyn, the school was removed from the category of Estyn monitoring' in 2015.</p> <p>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 National Categorisation system has been suspended in 2020-2021 and will also remain suspended for the 2021-22 academic year to help ease the burden on schools caused by the pandemic. However, the Council's School Improvement Advisors, who have experience and</p>

		expertise in primary education, carry out termly monitoring visits with schools and are assured that there are no concerns about the standard of provision at any of the schools in the cluster.
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## 1.2 Comments about the school's ethos / friendly nature

1.2.1	Staff get to know the children very well and the children form close friendships.	The Council notes these positive comments about Llanbedr C. in W. School.
1.2.2	Staff know every single family and pupil well throughout their education – this is not the case at many schools.	As above.
1.2.3	The school is very welcoming.	As above.
1.2.4	The children at the school support each other.	As above.
1.2.5	Everyone at the school know each other and they all help each other.	As above.
1.2.6	The school's smaller environment ensures that children can develop deep friendships.	As above.
1.2.7	The overall ethos of the school is kind, caring and dedicated to high quality education and the holistic development of happy, well-rounded children.	As above.
1.2.8	Children are taught in a happy and pleasant environment.	As above.
1.2.9	It is a happy, caring school with an ethos of inclusivity and the children thrive.	As above.
1.2.10	Llanbedr is a happy school as the children are relaxed in its caring environment and thrive.	As above.

## 1.3 Comments about school staff

1.3.1	The school has excellent staff	The Council welcomes these comments about the staff at Llanbedr C. in W. Primary School.
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1.3.2	The school has a dedicated team of teachers and assistants.	As above.
1.3.3	The school's dedicated staff do so much for the community, particularly the elderly.	As above.
1.3.4	The school has one of the hardest and most organisation workforces around.	As above.
1.3.5	Children educated at Llanbedr benefit from the personalised and dedicated approach of the staff who are able to bring out and nurture their strengths which gives them confidence to move forward to the next stage in their education.	As above.
1.3.6	The staff have done a wonderful job of fulfilling the requirements of the curriculum, including excellent IT provision for the children.	As above.
1.3.7	The staff are outstanding and have demonstrated their resilience against the challenges brought to educating children through a pandemic. Their skills and commitment have shown what an important role they play in the continuing excellence of this outstanding school.	As above.
1.3.8	The education received at the school is excellent because of the quality and experience of the teaching staff, rather than the additional facilities available at large schools.	As above.
1.3.9	The proposal has had a negative on school staff at Llanbedr.	<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 Llanbedr C. in W. School would be subject to a management of change process, and would be supported and consulted fully throughout the process.</p>

		The Council's HR team have offered to meet with staff, and would continue to meet with the staff as the process moves forward, should the Council proceed with implementation of the proposal.
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#### 1.4 Comments about the school being a Church in Wales school

1.4.1	The Church community in Llanbedr works hard to foster and nurture links with the school which is what enhances its distinctive Christian ethos, and the value of this seems to have been ignored.	The Council notes these comments regarding the Christian ethos at Llanbedr C. in W. Primary School and the links with the local Church.
1.4.2	The Church and clergy play an important part in religious education at the school.	As above.
1.4.3	As a Church in Wales school the ethos of the school is inclusive of all.	As above.
1.4.4	The Christian ethos of the school and its close links with the community and the church community are central to the education of our children.	As above.
1.4.5	There is a strong Christian ethos in Llanbedr.	As above.
1.4.6	Llanbedr School has strong links with the Church.	As above.
1.4.7	Pupils enjoy the faith aspect of the school, not just during the public holidays but throughout the year.	As above.
1.4.8	Families chose Llanbedr school because it is a Church in Wales school.	Comment noted. Should the Council proceed with the proposal to close Llanbedr C. in W. School, parents would be able to choose an alternative Church in Wales school should they wish their children to continue to attend Church in Wales provision.

## 1.5 Comments about leadership at the school

1.5.1	The school has an excellent headteacher who has been heavily involved with the development of the new curriculum, leading the cluster in many areas.	<p>The Council notes these positive comments regarding the leadership arrangements at Llanbedr C. in W. School and recognises that the headteacher has been the chair of the Cluster Group of Schools for the last two years. All schools in the cluster have worked together in preparing for the new Curriculum.</p> <p>The Council has no concerns about the quality of leadership at the school. Whilst there is permanent leadership in place at the school, 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>
1.5.2	The school has an excellent headteacher as recognised by Powys themselves.	As above.
1.5.3	The school has a very successful headteacher, as recognised by the Council.	As above.
1.5.4	The Headteacher leads her team well, creating a happy educational environment for staff and pupils, who thrive in this creative Rural School.	As above.
1.5.5	The school is led by an outstanding headteacher who leads the cluster of Crickhowell schools on the implementation of the new curriculum and provides a better education than any of the other cluster schools.	As above.

1.5.6	I'm sure Powys wouldn't be calling upon the headteacher to be mentoring other headteachers and providing consultation if they thought it could impact on her ability to perform in her current position – it would be unethical of them to give her extra work if they truly believe that teaching on top of leadership is too much for her already.	As above.
1.5.7	The school has excellent governance and leadership structures.	As above.

### 1.6 Comments about the school's financial position

1.6.1	Llanbedr School is well managed and operates within budget.	The Council has no concern about financial management at the school. As indicated in the Consultation Document published in respect of this proposal, ' <i>Llanbedr C. in W. School is not currently forecasting a cumulative deficit budget</i> '.
1.6.2	The school is financially managed well.	As above.
1.6.3	Llanbedr School has good financial management - It is currently well within budget and projected to be so for the next few years.	As above.
1.6.4	Llanbedr has a good record of financial management, it is well within budget this year and is projected to be over the next few years. Any additional pupils that are taken on at Llanbedr will strengthen the financial position of the school.	As above.
1.6.5	The school has a well managed budget with surplus – many schools don't.	As above.
1.6.6	The school has an able and proactive PTA with large fundraising ability – many schools don't.	The Council recognises that the school has an active PTA which raises money to support the school.

1.6.7	The school benefits from third party monies it receives from past and present parents and pupils.	The Council recognises that the school receives financial contributions from past and present parents and pupils.
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### 1.7 Comments about extra-curricular provision

1.7.1	There are excellent facilities learning opportunities and clubs at the school and pupils benefit from this.	<p>The Council notes these comments about the range of extra-curricular activities available at Llanbedr C. in W. School, and also notes the comments that there would be more opportunity for pupils in a smaller school to participate in all available activities as there are less pupils at the school.</p> <p>Whilst the activities available at alternative schools and the arrangements for accessing them may be different to the arrangements at Llanbedr C. in W. School, all the alternative schools within the cluster do provide a range of extra-curricular activities and would be expected to ensure that children have appropriate opportunities to participate in these activities.</p>
1.7.2	The school has a huge extra curricular programme, pre and post school clubs – many schools don't.	As above.
1.7.3	All pupils can access after school club – in many schools, clubs operate on a first come first serve or rotational basis.	As above.
1.7.4	All children at the school have the opportunity to attend breakfast and after school clubs everyday with a wide variety of activities.	As above.



1.7.5	The school has a good variety of after school clubs which all pupils have the chance to be involved in – there is no limit to the number of pupils who can stay.	As above.
1.7.6	Children at Llanbedr School have more choice of after school clubs than any of the other local schools and there is room for all in these.	As above.
1.7.7	The school is in a better place than all the other schools in the local area to offer better extra-curricular activities.	As above.
1.7.8	Llanbedr School is the only school in the area to have free after-school clubs every day of the week and all pupils are able to participate.	As above.
1.7.9	Only at Llanbedr School do ALL children have the opportunity to compete and enjoy ALL extra curricular activities, regularly receiving National and County awards for their skills.	As above.
1.7.10	The school has a wider range of extra-curricular activities on offer than other schools locally, showing that the enrichment opportunities are plentiful for Llanbedr children.	As above.
1.7.11	The school is able to accommodate all pupils in after school clubs and sports teams because of its size, showing the benefits of a smaller school when it comes to inclusion and opportunities.	As above.
1.7.12	Because of the small numbers ALL children have the opportunity to attend after school clubs or be on a sports team unlike larger schools	As above.
1.7.13	Being a small school, all pupils are given the opportunity to take part in interschool competitions. Pupils don't have to be the best, but being given the responsibility and opportunity to represent the school encourages them to believe they are, making them work to the best of their ability. This wouldn't be the case at a larger school.	As above.
1.7.14	This School provides fantastic after School clubs that supports all parents with working later hours and has an amazing	As above.

	breakfast club enabling parents to be able to start their working days early	Breakfast clubs are provided at all the alternative schools in the cluster 5 days a week.
1.7.15	The school provides breakfast clubs and after-school activities five days a week, thus providing support to working parents.	As above.
1.7.16	The school's sports teams always do well in competitions	The Council is pleased to note these comments regarding the successes of Llanbedr C. in W. School.
1.7.17	The school attends many STEM events and have been to the finals of the jaguar schools challenge competition. The children regularly punch above their weight in sporting events taking part in all cluster events and have reached the Welsh girls and mixed team quick cricket finals, with the girls placing 5th in Wales.	As above.
1.7.18	Sport at the school is of good standard. All pupils take part in a variety of sports and enjoy and excel at these.	The Council notes these comments regarding the provision at Llanbedr C. in W. School. Should the Council proceed with the proposal to close the school, pupils would continue to be able to take part in a variety of sports at the alternative schools in the area.
1.7.19	At key stage two, pupils have the opportunity to attend residential visits every year where they are able to partake in a variety of activities. In their four years at key stage two they are able to attend four times.	<p>The Council notes this comment about the residential visits available to pupils at Llanbedr C. in W. School.</p> <p>All schools offer this type of activity to pupils, however which educational / residential visits to attend would be a decision for individual schools. Whilst acknowledging that the arrangements at the alternative schools would be different to those at Llanbedr C. in W. School, pupils would still be able</p>

		to access these types of experiences at alternative schools.
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### 1.8 Comments about the school buildings / grounds

1.8.1	This school has excellent buildings with good grounds.	<p>The Council notes these comments about the buildings and grounds at Llanbedr C. in W. School. The condition of the learning environment at Llanbedr C. in W. School is not one of the challenges facing the school outlined in the Consultation Document. In the Consultation Document, the Council noted that the condition of the school is category B, and its suitability for teaching and learning is categorised as B/C, based on the condition assessments carried out by Welsh Government in 2009.</p> <p>However, it is recognised that school buildings age and deteriorate. The Council commissioned a condition survey in 2020 that was carried out by external surveyors which indicated that the condition grade of the school is now a C. This latest survey does not include an assessment of suitability therefore the Council has used the 2009 data in the Consultation Document.</p> <p>The Council notes that the school is located in rural setting, and that access to green space supports the wellbeing of children and adults alike.</p>
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1.8.2	The school building is fit for purpose.	As above.
1.8.3	The school has a beautiful rural setting with space and equipment.	As above.
1.8.4	Pupils can learn in the purpose built outdoor learning environment which is so important to fire up children's enthusiasm and imagination – they aren't just stuck learning in a classroom with a sterile hard outdoor environment.	The Council notes this comment about the outdoor learning environment at Llanbedr C. in W. School, and fully acknowledges that access to green space supports the wellbeing of children and adults alike.
1.8.5	The surroundings and equipment on offer to pupils at Llanbedr School is not matched or exceeded by any other alternative primary school in the area.	Whilst acknowledging that the surroundings and equipment on offer to pupils at alternative primary schools in the area are different to those at Llanbedr School, the Council has no concerns about the ability of the alternative schools in the area to offer appropriate provision for pupils currently attending Llanbedr C. in W. School should that be required.
1.8.6	Llanbedr School has excellent facilities, lacking for nothing - probably no thanks to Powys but to the hard work and dedication of the headteacher, teachers and local community.	Comment noted.
1.8.7	The school site isn't owned by Powys County Council.	The Council is fully aware that the school site is not owned by the Council – as stated in the Consultation Document published in respect of this proposal: <i>'Llanbedr C. in W. School is not owned by the Council, therefore the Council would not receive any capital receipts following any sale of the site.'</i>
1.8.8	There is room to extend the school and planning permission is in place.	The Council is aware that a planning application was made in 2018 for a proposed nursery building on the western side of the Llanbedr C. in W. School site. This application was approved by the Brecon

		Beacons National Park Planning Authority in June 2018.  However, there are no plans in the Council's capital programme to construct a new nursery classroom on the school site, nor is the Council aware that any other organisations have any plans to construct the new nursery classroom.
1.8.9	There is room to extend the school and planning permission has already been granted for a new classroom and facilities.	As above.
1.8.10	Llanbedr is due to have another classroom built on meaning it will be able to take more numbers anyway making it ideal for families moving to the area.	As above.
1.8.11	The school has received permission to expand the school and thus expand capacity. This has not been considered at any stage.	As above.

### 1.9 Comments about equipment at the school

1.9.1	All the children have access to up to date IT equipment, with each child having sole use of either a laptop, Mac book or iPad.	The Council notes these comments about access to technology at Llanbedr C. in W. School.  Whilst acknowledging the equipment that is available at the school, it must be noted that 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, which has resulted in an increase in the IT equipment available at all schools.
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		<p>Should the Council proceed with the proposal to close Llanbedr C. in W. School, pupils would still be able to use IT equipment at the alternative schools. Whilst it is acknowledged that there may not be such a high level of IT equipment at the alternative schools compared with what is available at Llanbedr C. in W. School, the equipment available would be similar to that available at other schools across Powys.</p> <p>The following IT equipment is available at the alternative schools in the Crickhowell cluster:</p> <p><b><u>Llangattock C. in W. Primary School:</u></b></p> <ul style="list-style-type: none"> <li>• 36 iPads</li> <li>• 44 chrome books/laptops approx.</li> <li>• 6 PCs</li> </ul> <p><b><u>Crickhowell C.P. School:</u></b></p> <ul style="list-style-type: none"> <li>• 58 iPads</li> <li>• 60 chrome books</li> <li>• 16 think pads</li> </ul> <p><b><u>Llangynidr C.P. School:</u></b></p> <ul style="list-style-type: none"> <li>• 56 chrome books</li> <li>• 30 laptops</li> <li>• 25 iPads</li> </ul>
1.9.2	Children at the school don't share technology in pairs or threes – children in many schools do	As above.
1.9.3	You have stated that larger primary schools are better equipped. Llanbedr school now have excellent IT facilities, and I cannot	As above.

	see that this would be improved by having to move to another school.	
1.9.4	During the COVID lock down each pupil were given iPad or laptops to enable them to work from home, at no cost to the school, but instead through fantastic funding from the community and school partners.	The Council recognises that Llanbedr C. in W. Primary School benefits from additional financial support. However, the aim of the proposal is to improve learner entitlement and experience for all learners, and to provide equity across the system.
1.9.5	There is excellent provision for IT equipment obtained through the legacy left to the school and enables children to have access to IT equipment that is in excess of the funding provided by Powys.	As above.

### 1.10 Comments about pupil numbers at the school

1.10.1	Pupil numbers at the school are rising, and are projected to rise further.	<p>Historical pupil numbers at the school are shown below:</p> <p><b><u>Llanbedr C. in W. School (N – Yr 6)</u></b></p> <ul style="list-style-type: none"> <li>• Jan 2014 – 39 (PLASC)</li> <li>• Jan 2015 – 41 (PLASC)</li> <li>• Jan 2016 – 40 (PLASC)</li> <li>• Jan 2017 – 39 (PLASC)</li> <li>• Jan 2018 – 43 (PLASC)</li> <li>• Jan 2019 – 42 (PLASC)</li> <li>• Jan 2020 – 46 (PLASC)</li> <li>• Jan 2021 – 52 (PLASC)</li> <li>• Jan 2022 – 53 (Teacher Centre)</li> </ul>
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		<p>The Council recognises that the number of pupils currently on roll at Llanbedr C. in W. Primary School, including nursery-aged pupils, is the highest since 2014.</p> <p>The current pupil numbers in January 2022 (Teacher Centre) are:</p> <ul style="list-style-type: none"> <li>• N1 – 5</li> <li>• N2 – 4</li> <li>• R – 5</li> <li>• Yr 1 – 6</li> <li>• Yr 2 – 2</li> <li>• Yr 3 – 12</li> <li>• Yr 4 – 8</li> <li>• Yr 5 – 4</li> <li>• Yr 6 – 7</li> </ul> <p>R – Year 6 (funded via delegated budget): 44 pupils N – Year 6: 53 pupils</p> <p>The school's capacity is 57 which means that there are currently 4 places available.</p> <p>Should the school meet and exceed its capacity, it would still meet the Welsh Government's definition of a small school.</p>
1.10.2	Pupil numbers show steady pupil growth year on year.	As above.
1.10.3	In January there will be 53 children attending the school, only four less than full capacity.	As above.



1.10.4	Numbers have risen in recent years, to reach capacity of nearly 57.	As above.
1.10.5	Numbers at Llanbedr are bucking the Powys trend, they are increasing and have been for several years.	As above.
1.10.6	There has been steady growth in numbers at Llanbedr over several years leading to a school at 90% plus of its capacity.	As above.
1.10.7	The reasons Powys give for the proposed closure just do not add up. For example; to address the issue of low numbers. Llanbedr School has seen its numbers steadily rise over the last couple of years and at present the school is near capacity.	As above.
1.10.8	Powys County Council (PCC) have stated that the number of pupils at the school is too low. However, the number of pupils has gradually risen over the past few years, near to its current capacity.	As above.
1.10.9	The school has growing numbers but can still accommodate more children.	As above.
1.10.10	Pupil numbers at the school have been steadily increasing and will soon be close to capacity, despite the school being blighted by this closure proposal over the last 12 months.	As above.
1.10.11	People are moving to the area so that their children can attend Llanbedr School – there is a steady influx of younger families.	As above.
1.10.12	The school doesn't have falling numbers or less than 30 children – many schools do.	The Council has not claimed that the school 'has falling numbers', nor that the school has 'less than 30 children'.

### 1.11 Comments about the school's small size

1.11.1	The school's smaller class numbers offer greater attention and support to pupils.	The Council notes these comments about the class sizes at Llanbedr C. in W. School, and comparing the school with larger schools. Whilst acknowledging that some pupils / parents may
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		<p>prefer smaller schools / classes, 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 2020-30.</p> <p>Llanbedr C. in W. School teaches children in two classes of mixed-age groups, with a third class for pre-school nursery children. 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</p>
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		<p>secures 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 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>
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		<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> <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</p>
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		<p>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. These 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</p>
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		<p>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> <p>It is the view of primary experts within the Council that mixed age classes of more than 2 years provide a challenge to teachers where they must constantly adapt their approach. As a result, a high level of flexibility and organisation in lesson planning is required to ensure that teaching caters for both age groups and all abilities within the class. This is an additional workload on teachers and leaders who have a range of other roles and responsibilities in a small school.</p> <p>Teachers in very small schools need to plan, implement and assess for the needs of up to four year groups within one class, and within each of those year groups plan, implement and assess for up to several ability groups, some with complex needs, thereby ensuring that the planning is</p>
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		differentiated for each child's needs. 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.
1.11.2	We don't have large class sizes of over 30 children at Llanbedr, whilst many schools do.	<p>As above.</p> <p>Current class sizes at the alternative schools in the Crickhowell catchment are as follows:</p> <p><b><u>Llangattock C. in W. Primary School</u></b></p> <ul style="list-style-type: none"> <li>• Reception/Year 1 – 18 pupils</li> <li>• Year 1/2 – 27 pupils</li> <li>• Year 3/4 – 30 pupils</li> <li>• Year 5/6 – 28 pupils</li> </ul> <p><b><u>Crickhowell C.P. School:</u></b></p> <ul style="list-style-type: none"> <li>• Reception – 19 pupils</li> <li>• Yr 1 – 22 pupils</li> <li>• Yr 2 – 27 pupils</li> <li>• Yr 3 – 26 pupils</li> <li>• Yr 4 – 35 pupils</li> <li>• Yr 5 – 29 pupils</li> <li>• Yr 6 – 30 pupils</li> </ul> <p><b><u>Llangynidr C.P. School:</u></b></p> <ul style="list-style-type: none"> <li>• Reception/Year 1    12/19 = 31</li> <li>• Year 2/Year 3        11/15 = 26</li> </ul>

		<ul style="list-style-type: none"> <li>• Year 4/Year 5      19/9 = 28</li> <li>• Year 5/Year 6      8/19 = 27</li> </ul> <p>It is acknowledged that these schools have classes of 30 or above.</p> <p>School leaders manage their class structure according to pupil numbers and the needs of pupils. Should the Council proceed with the current proposal to close Llanbedr C. in W. School, and should this lead to an increase in pupil numbers at other schools in the area, the schools would need to review their class structure to ensure that suitable provision was provided for all learners, and that the provision was in-line with Welsh Government guidance.</p>
1.11.3	<p>Llanbedr is a caring, unique and smaller school meaning it cares enormously about its pupils and staff making it a fantastic place for children to grow in confidence not being swallowed up in a big School where numbers are much greater and children there for do not always get the attention or help they need.</p>	<p>The Council notes these comments about the smaller size of Llanbedr C. in W. School compared with other schools in the area.</p> <p>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 2020-30. The Strategy aims to improve equity across the education system and to ensure an improvement for every pupil's learning entitlement and experience.</p>



		Regardless of a school's size, all schools care about their pupils, are required to support, challenge and nurture all pupils to achieve their potential, and provide education tailored to the needs of the individual child.
1.11.4	Llanbedr pupils thrive in the nurturing environment of a small school. Pupils are encouraged to reach their potential and the personal attention it affords its pupils cannot always be achieved in a larger school.	As above.
1.11.5	The individual attention pupils can receive due to the smaller class sizes gives them confidence and helps them believe in their own ability.	As above.
1.11.6	The staff and children are all extremely happy at the school and academically the children are achieving higher than other local schools. I believe this is down to the ratios and the time that can be given to the children that attend.	As above.
1.11.7	Children educated at Llanbedr School are well-balanced and successful which is far from the case in many larger schools.	As above.
1.11.8	There is no evidence that bigger is better – when children from Llanbedr transfer to high school, teachers recognise that they are in no way disadvantaged compared with their peers from other local primary schools.	The Council has not suggested that children from Llanbedr are disadvantaged compared with pupils from other local primary schools when they transfer to high school.
1.11.9	The way of learning at Llanbedr School is not the same as in larger schools.	We are not aware that Llanbedr School teach in any way that is different to other schools. School Improvement Advisors have termly visits to each school and do not see any differences between Llanbedr and other schools.

## 1.12 Comments about pupil engagement

1.12.1	Pupil attendance rates at the school are high.	Attendance rates across all schools in Powys are broadly similar. Where there are variations, these are due to individual child/family circumstances. To support legal requirements and national guidance, the local authority has clear guidance on school responsibilities for attendance, and monitors general attendance data in all schools, as well as individual cases. In this regard, attendance refers not just to physical attendance at school, but also to engagement with remote/blended learning at points through the pandemic.
1.12.2	There are high engagement rates at the school, even remotely during the pandemic.	As above.
1.12.3	Pupils attendance rates are consistently high with all children engaging with school during the pandemic.	As above.
1.12.4	The school has had excellent attendance rates during the pandemic, greater than several of the larger primary schools. This is likely to have been because of the ethos of the school and its staff, and the personal involvement parents have with a smaller school.	As above.
1.12.5	The Council has recognised that Llanbedr School remained engaged with the school and their schoolwork, unlike in many larger schools.	As above.

### 1.13 Comments about nursery / early years provision at the school

1.13.1	The irreplaceable voluntary funded nursery places would be a great loss to parents, their children and future generations to come.	The Council notes this concern about the loss of the nursery provision offered by the Llanbedr C. in W. School should the school close.
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		<p>The Council acknowledged in the Consultation Document published in respect of this proposal that 'Llanbedr C. in W. School is a Voluntary Aided School which is responsible for its own admissions arrangements and has continued to admit nursery aged pupils to the school'.</p> <p>In the Consultation Document, the Council goes on to state that: 'Implementation of the current proposal would result in the closure of Llanbedr C. in W. School, and would therefore mean that the provision for nursery aged pupils which is currently available at Llanbedr C. in W. School would no longer be available in Llanbedr.'</p> <p>This was also recognised in the Consultation Report which was published in respect of this proposal.</p> <p>Alternative nursery provision is available within the catchment. Whilst there is currently some pressure on the availability of early years education places at Allsorts Community Playgroup in Crickhowell, the funded places could be increased to accommodate any additional demand, if needed.</p> <p>There are early years education places available at Llangattock Little Sparks, which would also provide access to early years provision within a Church in Wales school.</p>
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1.13.2	There has been very good pre-school provision at the school, though this is currently suspended owing to the pandemic.	As above.
1.13.3	The nursery/toddler group at the school was second to none.	As above.

#### 1.14 Links between the school and the community

1.14.1	The school is committed to its local community.	<p>The Council fully acknowledges the links between Llanbedr C. in W. School and the community, the important role the school plays in the community, and in terms of community events.</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>
1.14.2	Llanbedr school plays an important part of the local community, helping to act as a glue to bring the community together.	As above.
1.14.3	The school is very integrated with the local community.	As above.

1.14.4	Children at Llanbedr schools form strong links with the local community, and the community with the school.	As above.
1.14.5	The school has strong links with the church and the local community. The village would be depleted if the school were to close.	As above.
1.14.6	The symbiotic relationship between the school and the community helps both to thrive, and adds richness to both the students wider education and to the life of the community.	As above.
1.14.7	The school has excellent relations with the local community. The children feel part of a bigger community of people and the school opens its doors to allow local events to be held there regularly.	As above.
1.14.8	Many local events are held on school premises and if the school closed those events are unlikely to continue.	As above.
1.14.9	The school hosts many events in the community beyond its educational remit.	As above.
1.14.10	The local community gather at the school for school and church events.	As above.
1.14.11	The school is an integral part of the community, with members of the community attending many extra curricular events at the school, such as fundraising events and sports days.	As above.
1.14.12	The mass involvement of the community as a whole in clubs and other activities is something that cannot be replicated in any other local school I know of in the area.	As above.
1.14.13	Many school events such as Harvest Festival, Easter celebrations and of course Christmas bring the village together.	As above.
1.14.14	The School Summer Fayre and Christmas Fayre are annual events, and the Eisteddfod is the only Welsh language element in the village.	As above.
1.14.15	Church visits, bonfire nights, school plays and concerts, harvest festivals, sports days and inter village sports events are all	As above.

	attended by the community as a whole, not just the parents and pupils.	
1.14.16	Children from the school come out into the community delivering Welsh cakes, going for long walks, holding services in the church.	As above.
1.14.17	The school has a special and unbreakable bond with the community – many school's don't.	As above.  Most schools play an important role in their community and have close links with the community, including individuals, organisations and businesses within the community.
1.14.18	The school has a long history, sense of place and belonging in the community – many school's don't.	As above.
1.14.19	The school actively fosters links with local businesses and the wider area – many schools don't.	As above.

### 1.15 Comments about pupils belonging to protected characteristic groups that attend the school

1.15.1	Being small, the school provides specialist support for children with additional learning needs.	The Council notes these comments about the support the school provides for pupils with additional learning needs.  There is very good support across the cluster schools in the Crickhowell area for pupils' wellbeing and for the support of pupils with SEN/ALN. All schools in the cluster have an experienced ALNCo and wellbeing champion who can provide support and guidance to pupils. In addition, all schools in the Crickhowell cluster have staff trained in adverse
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		childhood experiences, trauma informed approaches and mental health first aid. As such, any pupils with emotional or additional learning needs will be very well supported at any of the schools in the Crickhowell cluster.
1.15.2	The school provides exemplary support for pupils with additional needs, including the attention the staff have been able to give him and the support he receives from his fellow pupils.	As above.
1.15.3	Despite the Council's plan to close the school, the Council recommended that a child with special needs attend the school.	As above.
1.15.4	A number of children with ALN transfer to the school.	As above.
1.15.5	The school has a high percentage of MAT pupils.	<p>The Council notes these comments about MAT pupils at Llanbedr C. in W. School.</p> <p>The Council does not hold data about the percentage of MAT pupils at each school, therefore is unable to compare the percentage of MAT pupils at the school with other schools in the area. However, the Council has no concern about the provision at the other schools in the catchment area, and there is no reason to believe that these schools would not be able to meet the needs of any MAT pupils.</p>
1.15.6	The school has an excellent record of accommodating and supporting new arrivals from military families, and is the primary school of choice for families in military accommodation in the area.	The Council notes these comments about children from military families that attend the school. Whilst acknowledging that closure of the school would mean that pupils from these families would need to transfer to alternative schools, the Council has no concerns about the provision at the other schools in the catchment area, and there is no reason to

		believe that these schools would not be able to meet the needs of pupils from military families.
1.15.7	The school has a large amount of military children – many schools don't	As above.
1.15.8	The school provides reassurance and security for military families that have settled here.	As above.
1.15.9	Children from military families are thriving in the school. Their families have planted roots here because of the school.	As above.

## 2. IMPACT ON PUPILS

### 2.1 Concern about the impact of the proposal on pupil well-being

2.1.1	The mental health of the children and parents has in no way been considered	<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.</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 wellbeing.</p> <p>Schools receiving pupils as a result of a school closure are expected to work with the closing school, the pupils and their families to provide full support to pupils to ensure a smooth transition.</p>
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2.1.2	Our children's education, mental health and well-being and the rural community are all being put at risk.	As above.
2.1.3	The children's education and mental health should be put first at all times but the children of Llanbedr and its rural community have been completely let down.	As above.
2.1.4	The lives of Llanbedr pupils will be dramatically and negatively affected by closure of the school.	As above.
2.1.5	The proposal has had a terrifying, negative impact on pupils.	As above.
2.1.6	Concern about the mental health impact this will have on the pupils of Llanbedr should they be torn apart from their familiar surroundings, peers and teaching staff.	As above.
2.1.7	Closing the school would have a detrimental impact on our children and their education.	As above.
2.1.8	This is putting the education wellbeing and welfare of the children who attend the school at risk.	As above.
2.1.9	The children are happy and thriving well at Llanbedr school. Why would you want to rip away their childhood from these children?	As above.
2.1.10	The Council has not supplied enough evidence that this will be "in the best interest of the children".	As above.  The impact on pupils currently attending Llanbedr C. in W. School was considered in the Consultation Document published in respect of this proposal and in the Consultation Report which was considered by Cabinet when determining whether or not to proceed with the proposal.
2.1.11	Powys CC was more than happy to accept children from Monmouthshire, but now has no concern for the pupils they are keen to abandon.	As a Voluntary Aided school, Llanbedr C. in W. School is responsible for its own admissions arrangements, therefore the school itself would have decided whether or not to admit any pupils attending the school that live in Monmouthshire.

		It is not true that the Council are 'abandoning' pupils from Monmouthshire. Should the Council proceed with the proposal to close Llanbedr C. in W. School, the same arrangements would apply to pupils living in Monmouthshire as any other pupils attending the school. They would be able to apply for a place at an alternative school of their choice, either in Powys or in Monmouthshire, and the application would be considered in accordance with the relevant admissions arrangements.
2.1.12	Please could the Council confirm that pupils will not be required to move to schools which would be detrimental to their mental health, particularly in cases where they have already had to move from their closest school.	Should the Council proceed with the proposal, parents would be able to apply for a place at any alternative school for their child. If there is a place available, this would be allocated. No child would be 'required' to move to any particular school.

## 2.2 Concern about the proposal being taken forward during the Covid pandemic

2.2.1	There has been insufficient consideration of the mental health and well being of the pupils during Covid.	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.
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2.2.2	Closing the school will have a massive impact on the children's mental health in an already challenging time.	As above.
2.2.3	I question why are you considering destroying the lives of these children further, at a time that humanity is witnessing the devastating impact of Covid 19 on the most vulnerable in our society.	As above.

2.2.4	It will prove detrimental to the current pupils who will be disadvantaged by this upset in their learning environment, especially following the previous unstable years.	As above.
2.2.5	Where is the consideration given to children at the school as regards to their well-being? The children have had nearly two years of disruption and uncertainty at this difficult time owing to the Covid pandemic. They don't need anymore disruption in their school life. As it stands, Covid is still with us.	As above.
2.2.6	During a time where pupils education and mental/physical wellbeing have suffered due to the pandemic, to consider closing down a school with excellent standards, financial stability, caring supportive head teachers and staff is a ludicrous decision	As above.
2.2.7	Closing the school can only have a detrimental effect on the pupils and their families and will cause unnecessary distress and upheaval, especially after the difficult time we have all been through with the Coronavirus pandemic.	As above.
2.2.8	Covid 19 is impacting on the mental health of our children and will potentially affect their wellbeing for years to come. Closing this school which is providing constancy, stability and a sense of belonging will have a devastating and distressing impact on all children at the school.	As above.
2.2.9	The Council has decided to proceed with this process at a time when our children are at their most vulnerable, following all the disruption, stress, anxiety and uncertainty that has been caused by the COVID 19 pandemic. This is completely unacceptable and the proposed closure should not be allowed to happen.	As above.

### 2.3 Concern about pupils being separated from their friends

2.3.1	None of the nearby schools have space for all the children as originally stated by Powys which will result in children being shared out across nearby schools, breaking relationships, which	Should the Council proceed with the proposal to close Llanbedr C. in W. School, it is acknowledged that children and families would need to go through
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	<p>during a pandemic are extremely important. This is not in the interests of the well-being of the children.</p>	<p>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 Llanbedr C. in W. School to their alternative schools, to minimize the impact on their well-being and to ensure their successful transition to their new school, and to ensure that they make new friends in their new school.</p> <p>Parents would be able to apply for a place for their child(ren) at any school, and should a particular friendship group wish to transfer together, they could apply for a place in the same school. These applications would be considered in accordance with the relevant admissions arrangements. However, free home-to-school transport would only be provided to a pupil's 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 would be responsible for getting the child(ren) to and from school.</p>
2.3.2	<p>The pupils attending will be separated from peers as none of the nearby schools have capacity to facilitate them all. This can have a detrimental effect on children and young people's social, emotional mental health and wellbeing.</p>	<p>As above.</p>

2.3.3	The preferred option of scattering the children is not a good enough alternative and will add to the stress and upheaval the children will be forced to endure.	As above.
2.3.4	People in the area are anxious about the impact on their children of being sent to different schools in and out of the County, and what that will mean for their future friendships and the local community.	As above.
2.3.5	Where is the Council's consideration of the affected pupils? You are proposing to send them far and wide, breaking up their social groups which will have a severe detrimental impact on them all.	As above.
2.3.6	The school and community is very close knit, with children forming lasting bonds with friends and teachers. We do not want our children to be separated from their best friends.	As above.
2.3.7	There are not enough child places in Crickhowell so children will be split from friends and families may be split or they will be placed in over-crowded classrooms. How is this beneficial?	As above.  School leaders manage their class structure according to pupil numbers and the needs of pupils. Should the Council proceed with the current proposal to close Llanbedr C. in W. School, and should this lead to an increase in pupil numbers at other schools in the area, the schools would need to review their class structure to ensure that suitable provision was provided for all learners, and that the provision was in-line with Welsh Government guidance.

2.3.8	Can you guarantee that siblings will all have a place in the same school? It seems that this will not be the case, therefore children from the same family would have to attend different schools.	Should a school be over-subscribed, the over subscription criteria would apply. Every effort would be made to allocate places for siblings at the same school, however this would be dependent on availability of places at the school.
2.3.9	There is no guarantee that children from the same family will be able to go to the same school.	As above.

#### 2.4 Concern about the impact of pupils having to move to a different school

2.4.1	The children don't need to move to a different school to receive a better education, they are getting the best. Simple as that.	<p>The Council notes these comments about the quality of provision at Llanbedr C. in W. School.</p> <p>Whilst recognising the strengths and qualities of Llanbedr C. in W. School, the Council has no concerns about the quality of education provided at any of the alternative schools in the Crickhowell cluster. All the alternative Powys schools are regarded as 'self-improving' schools, according to the latest National Categorisation in 2019. Estyn, in its response to this consultation, concluded that</p> <p><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> <p>See also response 1.11.1.</p>
2.4.2	The Council has not presented any evidence to support the view that pupils will be better off under the new provisions and have not justified any proposed benefits to their well-being.	As above.

		Support would be provided by staff in all schools to support children to settle in to new environments.
2.4.3	At this point in their school life children need continuity and stability with familiar faces around them and the support of their teachers.	<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.</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 wellbeing.</p> <p>Schools receiving pupils as a result of a school closure are expected to work with the closing school, the pupils and their families to provide full support to pupils to ensure a smooth transition.</p>
2.4.4	Many children can't thrive in a large school. The children deserve better.	<p>Whilst acknowledging that some pupils / parents may prefer a smaller school, 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.</p> <p>Attending a smaller school does not necessarily mean that pupils receive a better or more individual education as there are a number of year groups and a wider age range of pupils in each class.</p>



		<p>The Council has no concerns about the quality of education provided at any of the alternative schools in the Crickhowell cluster. All the alternative Powys schools are regarded as 'self-improving' schools, according to the latest National Categorisation in 2019. Estyn, in its response to this consultation, concluded that</p> <p><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>
2.4.5	The closure of Llanbedr CiW school denies children the opportunity to learn in a suitably focused environment close to their home	<p>Should the Council proceed with the proposal to close the school, pupils would transfer to alternative schools where they would continue to be able to learn 'in a suitably focused environment'.</p> <p>It is recognised that additional travel would be required for pupils for whom Llanbedr C. in W. School is currently the closest school. However, the majority of pupils currently attending Llanbedr C. in W. School live closer to other schools. For those pupils for whom Llanbedr is not currently their closest school, attending their closest school would enable them to access their education closer to their home.</p>
2.4.6	In time, you may look back and wonder for all those children, placed in the future in bigger, super schools, those children, who can't cope with them, who miss the individual care, that a smaller school gives...and you wonder why, so many of them	The Council notes these concerns about pupils transferring to larger schools should the Council proceed with the proposal to close Llanbedr C. in W. School. However, all schools, regardless of size, are able to provide for the needs of their pupils.

	have mental health problems, as they can't get the support and care they deserve and need.	
2.4.7	<p>I noted in the scrutiny meeting, Lynette Lovell made the comments that she had worked in a school which had incorporated another school and those children did fine with mental health. This flippant remark just proves that evidence base researched hasn't been used during this consultation. The children in the school that Lynette Lovelle worked at, had they just gone through a global pandemic? Had they been split from their friends and sent to other schools? May I remind everybody that professional opinion ranks right at the bottom on the hierarchy of evidence, and there is a wide range of evidence to show moving schools effects a child's mental health, and therefore effects their education.</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.</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 wellbeing.</p> <p>Schools receiving pupils as a result of a school closure are expected to work with the closing school, the pupils and their families to provide full support to pupils to ensure a smooth transition.</p> <p>At the Scrutiny meeting, the Director of Education provided information about her own experiences in response to concerns raised about the impact on pupils, however it is acknowledged that each situation is different and in particular, that current pupils have had a difficult two years due to the pandemic.</p>

## 2.5 Concern about the impact on pupils' ability to access extra-curricular activities

2.5.1	<p>Pupils will not be able to access or attend as much as they do now at Llanbedr either due to numbers or location difficulties that parents will now face, answering this concern in the report that this is recognised by officers but following closure some children would now be able to attend a closer school is not acceptable as they had already made their parental choice to not attend that school already for their own reasons so could just as likely choose to overlook their closest school again if they believe it still would not suit their children.</p>	<p>The Council has acknowledged that closure of Llanbedr C. in W. School could impact on pupils' ability to access extra-curricular activities.</p> <p>All schools offer extra-curricular activities, and should the school close, pupils would be able to access extra-curricular provision at their alternative school, although the range of activities available may be different to those available at Llanbedr C. in W. School.</p> <p>It is acknowledged that there would 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 in these.</p> <p>It is also acknowledged that it may be more difficult for some pupils to access extra-curricular activities that take place before and after the school day due to reliance on home-to-school transport. However, the alternative schools would be used to meeting the needs of 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 in school.</p>
2.5.2	<p>Closing Llanbedr school may also impact the young people's interaction in social and physical activities. Currently every child who wishes to participate can, regardless of ability, however</p>	<p>As above.</p>

	sending them to bigger schools where more children attend sports clubs and after school clubs may isolate some children. Children need to be encouraged to feel comfortable to participate not isolated.	
2.5.3	The children will then be unlikely to use the breakfast or after school clubs because of travelling times.	As above.

### 3. TRAVEL IMPLICATIONS

#### 3.1 Concern about additional travel time for pupils

3.1.1	Children shouldn't have to travel an hour a day to get to school.	<p>The Council recognises that there would be additional travel required for pupils for whom Llanbedr C. in W. School is currently the closest schools. However, the Council's view is that the additional travel required would not be excessive.</p> <p>The following outlines the nearest schools for pupils that were attending Llanbedr C. in W. School based on PLASC 2021 data:</p> <ul style="list-style-type: none"> <li>• Crickhowell C.P. School – 28.8%</li> <li>• Llanbedr C. in W. School – 38.5%</li> <li>• Llangattock C.in W. School – 9.6%</li> <li>• Llangynidr C.P. School – 11.5%</li> <li>• Llangors C. in W. School – 1.9%</li> <li>• Deri View Primary School – 9.6%</li> </ul>
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		<p>This shows that Llanbedr C. in W. School is the closest school for only 38.5% of pupils, therefore 61.5% of pupils are already choosing to undertake additional travel to attend the school.</p> <p>Should there be no school in Llanbedr the closest school for pupils would be as follows:</p> <ul style="list-style-type: none"> <li>• Crickhowell C.P. School – 61.5%</li> <li>• Llangattock C. in W. School – 9.6%</li> <li>• Llangors C. in W. School – 1.9%</li> <li>• Llangynidr C.P. School – 11.5%</li> <li>• Deri View Primary School – 13.5%</li> <li>• Llanvihangel Crucorney C.P. School – 1.9% of pupils</li> </ul> <p>Should there be no school in Llanbedr, the average distance for all pupils to their closest school would be 2.4 miles, and the maximum distance would be 6.0 miles.</p> <p>Should there be no school in Llanbedr, the average distance for pupils for whom Llanbedr C.i.W Primary School is currently their closest school would be 3.8m, and the maximum distance would be 4.49 miles.</p> <p>The Council's view is that these distances are not excessive, and therefore would not result in excessive journey times to school for pupils.</p>
3.1.2	Some children will be forced to travel great distances.	As above.

3.1.3	There aren't places in nearby schools for the children which means more travel would be required.	As above.
3.1.4	Travel to unfamiliar environments is not the best foundation to learning for such young children.	Children would not be expected to travel to 'unfamiliar environments'.  Should the Council proceed with the proposal, schools receiving pupils would be expected to work with the closing school, the pupils and their families to provide full support to pupils to ensure a smooth transition, to ensure that the new school is not an 'unfamiliar environment'.
3.1.5	Concern that children would be sent to Brecon which is a 1hr round trip just to access school.	Should the Council proceed with the proposal to close Llanbedr C. in W. School, it is not expected that pupils would need to travel to Brecon to school. However, it is possible that some pupils would choose to access a school in the Brecon area to be able to continue to access Church in Wales provision, should there be no Church in Wales places available nearer to Llanbedr.

### 3.2 Comments about additional transport costs

3.2.1	Concern about the additional cost of transport to a new school.	The Council fully acknowledges that there would be additional travel costs should the Council proceed with this proposal. As indicated in the Consultation Document published in respect of this proposal:  'It is estimated there would be additional transport costs of £43,700 per annum, this is based on pupil's
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		<p>current location and assuming the pupils will go to the next nearest school.'</p> <p>The Statutory Notice published in respect of this proposal states that in addition to transport being provided in accordance with the Council's Home to School Transport Policy:</p> <p><i>'The Council will also provide transport for pupils currently attending Llanbedr Church in Wales Voluntary Aided Primary School who wish to access Church in Wales school provision at Llangattock Church in Wales Voluntary Aided Primary School. This will be provided on a case-by-case basis using the Council's discretionary powers under Section 6 of the Learner Travel (Wales) Measure 2008.</i></p> <p><i>If there is no place available at Llangattock Church in Wales Voluntary Aided Primary School, the Council will use its discretionary powers, as outlined above, to provide transport for pupils currently attending Llanbedr Church in Wales Voluntary Aided Primary School to their next nearest Church in Wales school, if they wish to access Church in Wales school provision.'</i></p> <p>As the Council does not currently know which schools pupils would choose to transfer to, it is not possible to calculate the exact cost of this. However the following is an estimate of the range of costs which could be required, depending on how many pupils require transport:</p>
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		<ul style="list-style-type: none"> <li>• <b>Minimal costs</b> – all pupils can be accommodated within existing transport provision for secondary, albeit some routes may need to be extended - £10-£20 per school day - £1,900 - £3,800 per annum</li> <li>• <b>Need to increase size of bus</b> – £50 per day - £9,500 per annum</li> <li>• <b>Additional Taxi required</b> – approx. £60 - £75 per day - £11,400 - £14,250 per annum</li> <li>• <b>New bus required</b> – £170 - £230 per day - £32,300 - £43,700</li> </ul> <p>The financial impact of this arrangement would be for a limited period of up to 7 years, following which the whole life cost impact would continue to be a net saving to the Council.</p> <p>Implementation of the proposal enables a more cost-effective and sustainable approach to the provision of school places within the cluster by utilising surplus places at other schools within the cluster, and removing any costs associated with maintaining Llanbedr C.i.W Primary School.</p> <p>It can also be assumed that any additional transport costs to alternative Church in Wales provision would be minimal based on significant concerns raised during the consultation and objection period about children travelling excessive distances to schools.</p>
3.2.2	Having 50 pupils travelling further afield could have a high cost impact for the authority if pupils have to travel some distance.	As above.



3.2.3	Some children will be forced to travel great distances, at no small cost to the taxpayer, because the county will be duty bound to cover travel costs.	As above.
3.2.4	Providing transport will impact on any savings achieved.	As above.
3.2.5	Children many have to travel out of county, which will add to transport costs.	As above.

### 3.3 Environmental impact of additional travel

3.3.1	Children having to travel further afield will have a detrimental impact on the environment.	<p>The Council recognises that should the Council proceed with the proposal, additional travel would be required for pupils attending Llanbedr C. in W. 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 Llanbedr C. in W. Primary School for whom this is their closest school. Additional home-to-school transport would be required. 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 schools.'</i></p> <p>However, Llanbedr C. in W. School is not currently the closest school for 61.5% of pupils attending the school, therefore it is likely that pupils being transport by their parents to school is already resulting in an increase in transport. As stated in the Impact Assessment:</p>
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		<i>‘Currently, a high proportion of pupils attending Llanbedr C. in W. Primary 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 be required if pupils transferred to their nearest alternative schools.’</i>
3.3.2	Concern about the environmental impact as more cars will be required to travel greater distances – this will not help us to lower our environmental impact!	As above.
3.3.3	It will not aid climate change to have more than 50 pupils travelling further afield.	As above.
3.3.4	It also means that children may have to travel further daily, resulting in higher carbon emissions as we all strive to reduce the already dangerous levels.	As above.
3.3.5	Concern about the carbon footprint of additional journeys to alternative schools.	As above.
3.3.6	The additional travel will increase the area’s carbon footprint in direct contradiction to both the Welsh and Westminster governments’ stated aims.	As above.
3.3.7	The Council has marked the situation we are in as a climate emergency, and yet will directly contribute towards the greenhouse gases through additional cars being on the road to transport children to other schools.	As above.
3.3.8	A large percentage of children don’t currently use cars to travel to school, but would have to do so.	As above.  Whilst acknowledging that it is possible that some of the pupils for whom Llanbedr C. in W. School is currently the closest school are able to walk to school, Llanbedr C. in W. School is not the closest school for 61.5% of pupils. This suggests that a

		high proportion of pupils would be reliant on some form of transport to attend the school.
3.3.9	With so much focus on carbon emissions, it makes sense that children walking to their local school is healthier for them and our environment.	As above.  It is acknowledged that should the Council proceed with implementation of the proposal, pupils that are currently able to walk to school in Llanbedr would no longer be able to do so.

### 3.4 The additional travel would impact on parents / families

3.4.1	Parents would have to transport children to other schools in the area, in their own cars. Some of the other schools will be in Monmouthshire.	<p>Free home-to-school transport would be provided to eligible pupils to their nearest alternative school i.e. if they live 2 miles or more from that school, therefore there would be no requirement for parents to transport their children to other schools, unless they choose for their children to attend a school other than their closest school.</p> <p>The Council has also committed to provide transport to enable pupils that currently attend the school to continue to access Church in Wales provision, should that be their preference.</p> <p>Llanbedr C. in W. School is not currently the closest school for 61.5% of pupils attending the school, therefore the parents of these pupils are already making their own arrangements to transport their children to school.</p>
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3.4.2	The additional travel required would be inconvenient for working parents.	<p>The Council notes these concerns about the impact on parents of the additional travel that would be required for pupils for whom Llanbedr C. in W. School is currently the closest school. This is acknowledged in the impact assessment:</p> <p><i>‘Additional travel would be required for pupils currently attending Llanbedr C. in W. Primary 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.’</i></p> <p>However, Llanbedr C. in W. School is not currently the closest school for 61.5% of pupils attending the school, therefore the parents of these pupils are already making their own arrangements to transport their children to school.</p>
3.4.3	The additional travel required will create many obstacles for pupils’ parents / carers.	As above.
3.4.4	Parents would be unable to work due to the additional travel required as they are currently able to use the childcare before and after school.	<p>As above.</p> <p>Should the Council proceed with implementation of the proposal, parents would be able to access breakfast club and after school provision at the alternative schools.</p>

3.4.5	What about parents that don't drive – will the Council put taxis on for these children?	<p>Free home-to-school transport would be provided to eligible pupils to their nearest alternative school i.e. if they live 2 miles or more from that school.</p> <p>The Council has also committed to provide transport to enable pupils that currently attend the school to continue to access Church in Wales provision, should that be their preference.</p>
3.4.6	Some parents are reliant on childcare from family who live in Llanbedr who are unable to travel across the county to drop children off. Will transport be provided, or will working families who are already struggling have to sort it themselves?	As above.

### 3.5 Impact on traffic congestion in the area

3.5.1	The additional travel will cause additional traffic in the area.	<p>Llanbedr C. in W. School is not currently the closest school for 61.5% of pupils attending the school, therefore the parents of these pupils are already making their own arrangements to transport their children to school. It is likely that this is already leading to additional traffic in the area.</p> <p>Whilst it is acknowledged that additional transport would be required for pupils for whom Llanbedr C. in W. School is currently the closest school, the number of pupils is small, and it is not anticipated that this would have a significant impact on additional traffic in the area.</p>
3.5.2	There will be a huge increase in trafficked twice a day as children have to be driven many miles to other schools.	As above.

3.5.3	The lanes in the area are dangerous enough for traffic and pedestrians already, without adding heavy traffic.	As above.
3.5.4	Concern that it would not be appropriate to have additional traffic on the narrow lanes in the area.	As above.
3.5.5	Concern about the capacity for parking in other schools.	The Council notes this concern about parking arrangements at alternative schools in the area and the potential impact of implementation of the proposal on this. Should the Council proceed proposal, the parking arrangements at the alternative schools would be monitored, and action would be taken to address any issues identified.

#### 4. IMPACT ON THE COMMUNITY

##### 4.1 General concern about impact on the community

4.1.1	Closure of the school would without a doubt change this 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 Llanbedr C. in W. 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 community. These were listed in the Consultation Report. The impact assessments were also updated to reflect the comments received during the consultation period. The Consultation Report and updated impact</p>
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		<p>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>
4.1.2	Closure of the school would be devastating for everyone in the area.	As above.
4.1.3	Removing the school from Llanbedr would have a dramatic and long term effect on the community in Llanbedr.	As above.
4.1.4	Closure of the school would irretrievably damage the already fragile rural community which would then impact on the wider local economy.	As above.
4.1.5	The school is a vital community asset which must be seen as a critical building block for a future development plan for the area.	As above.

#### 4.2 The school is the heart of the community

4.2.1	This is a rural school that is at 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 Llanbedr C. in W. School close. This was recognised in the
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		<p>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 community. These were listed in the Consultation Report. The impact assessments were also updated to reflect the 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>
4.2.2	The school forms the centre of a growing and thriving community.	As above.
4.2.3	The school is the heart of this community and our parish.	As above.
4.2.4	If the school closes the heart of Llanbedr will be gone.	As above.



4.2.5	Llanbedr School is the heart of the community, acting as a focal point for the community's hopes and wishes for the next generation.	As above.
4.2.6	Llanbedr School is the hub of the local community.	As above.
4.2.7	The school is the centre-point of the community.	As above.

### 4.3 Concern about the impact on community activities

4.3.1	<p>Many events take place at the school with which the wider community are involved or attend. These are likely be lost if the school closes, and the community will become a poorer place as a result.</p>	<p>The Council acknowledges the school's central role in the community, and that there would be a negative impact on the community should Llanbedr C. in W. 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 community. These were listed in the Consultation Report. The impact assessments were also updated to reflect the 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</p>
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		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.
4.3.2	Closure of the school would see the devastating loss of the many local events that are held there with its strong connection with the church and our community will lose a valuable social structure and link.	As above.
4.3.3	The Community Impact Assessment shows a lack of understanding on the impact it would have on the community by suggesting that the village hall would be an alternative location for gatherings when it is the school and its children which are at the core and driving force of community events and once scattered will be irretrievable.	As above.  The Community Impact Assessment states that there is a village hall in the village which is located separately to the school, and which would continue to be available to the community to hold community events should the school close. Whilst acknowledging the important role the school plays in respect of community events, it remains the case that a community building would continue to be available in the village in which community events could take place, should there be no school in the village.

#### 4.4 Closure of the school would mean that people would not want to live in Llanbedr

4.4.1	There is a very real threat that closing the school would mean young and future families would no longer find the area suitable and would look to settle elsewhere.	The Council acknowledges the school's central role in the community, and that there would be a
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		<p>negative impact on the community should Llanbedr C. in W. 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 Llanbedr. 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 Llanbedr 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>
4.4.2	If the school closed, Llanbedr will become the exclusive preserve of holiday lets and retirees.	As above.

4.4.3	The Council is inviting even more second-home owners to swamp the fragile community in the Vale of Grwyney, likely permanently destroying any prospect of a full-time community.	As above.
4.4.4	The area is already vulnerable to the impact of second homers and people retiring to the area. If the school closes, it will be a body blow for local people weakening their ties to the area, another step towards making Llanbedr a holiday village or retirement home.	As above.
4.4.5	The ongoing pandemic had led to deep seated social changes and more families are seeking the quality of life offered by rural areas. It would be short sighted and ruinous to close Llanbedr School at this time.	As above.

#### 4.5 Concern about impact of closure of the school on community well-being

4.5.1	The school provides a place where many living in the potentially isolated, rural pockets of the community can meet.	<p>The Council acknowledges the school's central role in the community, and in particular these comments which express concern about the impact of closure of the school on community well-being, suggesting that it would result in increased isolation.</p> <p>A number of comments were received during the consultation period which expressed concern about the proposal's impact on the community. These were listed in the Consultation Report. The impact assessments were also updated to reflect the comments received during the consultation period. The Consultation Report and updated impact</p>
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		<p>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>
4.5.2	Closure of the school would sever important community links for parents moving to the area. Where else would they meet people in a similar situation and integrate into the community?	As above.
4.5.3	Closure of the school would severely disadvantages new parents and will promote loneliness and isolation and presents a real risk of mental harm to new mothers in particular.	As above.
4.5.4	The dispersal of children to up to six different schools will have serious consequences for the well-being and social cohesion of the area.	As above.
4.5.5	The mental health effect of closing the school on children, parents and others in the community will be nothing but negative.	As above.

#### 4.6 Comments about the impact of previous school closures on communities

4.6.1	<p>The closure of Cwmdu Church in Wales school some time ago has completely changed the village. People no longer move there because of the school and long time residents do not feel a bond with the schools their children now have to go to.</p>	<p>The Council acknowledges these concerns about the impact previous school closures have had on the communities in which they are located. However, 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.</p> <p>The Council fully acknowledges the potential negative impact of the proposal to close Llanbedr C. in W. 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 which are considered by Cabinet when making a final decision on whether or not to proceed with implementation of the proposal.</p>
4.6.2	<p>Closure of our own village school had a negative impact not only on the children but the local community, with children from one year group not only attending a variety of schools but also attending schools across different boroughs – Powys, Monmouthshire, Torfaen and Blaenau Gwent.</p>	<p>As above.</p>
4.6.3	<p>Please reconsider and reflect on the effect other school closures have had on our rural communities.</p>	<p>As above.</p>

## 5. COMMENTS ABOUT HOUSING DEVELOPMENTS IN THE AREA

5.1	No account has been taken of new building in the area, or families relocating to the area with the increase of 'working from home'	<p>Comments about housing developments in the area were made in the consultation responses received, and were listed in the Consultation Report in respect of this proposal, which was considered by Cabinet when determining whether or not to proceed with this proposal.</p> <p>The Council recognises that there are current and planned housing developments in the area, but it is not expected that these would lead to a significant increase in pupil numbers at Llanbedr C. in W. Primary School.</p> <p>Pupils from the Glangrwyney area, and specifically the proposed new development of 72 houses at Cwrt y Gollen, would be closer to Crickhowell C.P. School than to Llanbedr C.i.W Primary School and therefore would only be provided with free home-to-school transport to their nearest school.</p> <p>The Council's planning department uses a pupil-yield ratio of .45 pupils per new house, which could lead to an estimated additional 32 pupils in the cluster based on a housing development of 72 houses. If this happens, and pupil numbers increase, then the Council would consider the impact on school capacities and any adjustments required to the schools to accommodate additional pupils.</p>
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5.2	The school is almost at total capacity and there is every reason to believe that this will continue to be case if numbers increase which they undoubtedly will as new houses are built in the area.	As above.
5.3	The proposed housing development in Glangrwyney will bring more families within the school's catchment area.	As above.
5.4	Planning permission for 74 new house in the Vale of Grwyney has been passed.	As above.
5.5	Additional houses are being in built at Glangrwyne, within the same parish area, suggesting that the demand for places at Llanbedr school will further increase.	As above.
5.6	There are several housing developments ongoing in the area with one development to go into build in 2022 which will provide 70 family homes within the catchment of Llanbedr school. There was no mention of this in any evidence given to the Cabinet and this wasn't discussed at the meeting.	As above.
5.7	No account has been taken of new housing being built in Glangrwyne, Crickhowell or Llangattock.	As above.  New housing developments in these three areas would be located closer to other schools, not Llanbedr C. in W. School. Should there be an increase in pupil numbers in the catchment area following new housing developments, the Council would consider the impact on school capacities and any adjustments required to the schools to accommodate additional pupils.



5.8	Houses are also being built at Crickhowell and Llangattock making it almost certain that any small spare capacity which might exist there now will be taken up.	As above.
5.9	Low-cost homes have been developed in the surrounding villages to support the school recently with an influx of younger families with children.	As above.

## 6. COMMENTS ABOUT OTHER SCHOOLS PUPILS MIGHT TRANSFER TO

### 6.1 Concern that there are no places available in the surrounding schools

6.1.1	There is a lack of available spaces to absorb pupils in any single alternative school.	<p>The current capacities and pupil numbers<sup>1</sup> of the three other primary schools in the Crickhowell catchment are as follows:</p> <p><b>Crickhowell C.P. School</b> Capacity – 230 Current pupil numbers – 186</p> <p><b>Llangattock C. in W. School</b> Capacity – 121 (exc. Nursery) Current pupil numbers – 117 pupils (N – Yr 6); 104 pupils (R – Yr 6)</p> <p><b>Llangynidr C.P. School</b> Capacity – 147 Current pupil numbers – 108</p>
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<sup>1</sup> Teachers Centre 20<sup>th</sup> January 2022

		Whilst acknowledging that it is unlikely that it would be possible for all pupils to transfer to the same school, there is sufficient capacity within the catchment to accommodate all pupils currently attending Llanbedr C. in W. School.
6.1.2	None of the schools nearby have space for all the children, meaning they would be torn apart, out of county.	As above.
6.1.3	None of the closest schools have real capacity for more children.	As above.
6.1.4	No schools nearby have space for all the children so it will displace them out of county which will have adverse affects on the local community.	As above.
6.1.5	The limited places and locations of the receiving schools absolutely restricts the parental choice that you believe we have.	As above.
6.1.6	I gather that the surrounding primary schools are full, and that there would be no space for Llanbedr primary school pupils if they were forced to move. They would therefore have to travel outside the area, which could hardly be seen as an advantage.	As above.
6.1.7	There are no spaces available for the children in nearby schools which means families will have to travel out of the county causing long commutes and uncertainty.	As above.
6.1.8	Crickhowell, Llangynidr and Llangattock have all said that they are full.	As above.
6.1.9	If children were required to move to other local schools do they have the capacity to take on 49 children between them without	As above.

	increased class numbers becoming an issue and having a negative effect on the children? I have spoken to a number of parents from surrounding schools and they say they are concerned that the influx of the pupils from Llanbedr into other local schools is a real issue for them. They are of the opinion that their class sizes are too big already.	Should the Council proceed with the current proposal to close Llanbedr C. in W. School, and should this lead to a significant increase in pupil numbers at any of the other schools in the catchment, these schools would need to review their class structure to ensure that suitable provision was provided for all learners, and that the provision was in-line with Welsh Government guidance.
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## 6.2 Comments about Crickhowell C.P. School

6.2.1	Crickhowell Primary School is large and, I believe, full to capacity.	The capacity of Crickhowell C.P. School is 230 and there are currently 186 pupils on roll.
6.2.2	I am advised that the school building at Crickhowell C.P. School cannot cope with the additional numbers on anything other than a theoretical basis.	The capacity of Crickhowell C.P. School has been calculated as 230, therefore the Council's expectation is that this number of pupils could be accommodated at the school.
6.2.3	I am concerned for the surrounding school, such as Crickhowell. Class numbers here already feel high (despite what ratio rules say).	The current class structure in Crickhowell C.P. School in September 2021 was as follows: <ul style="list-style-type: none"> <li>- Reception – 19 pupils</li> <li>- Yr 1 – 22 pupils</li> <li>- Yr 2 – 27 pupils</li> <li>- Yr 3 – 26 pupils</li> <li>- Yr 4 – 35 pupils</li> <li>- Yr 5 – 29 pupils</li> <li>- Yr 6 – 30 pupils</li> </ul>

		<p>School leaders manage their class structure according to pupil numbers and the needs of pupils. Should the Council proceed with the current proposal to close Llanbedr C. in W. School, and should this lead to an increase in pupil numbers at Crickhowell C.P. School, it is possible that the school would need to review its class structure to ensure that suitable provision was provided for all learners, and that the provision was in-line with Welsh Government guidance.</p>
6.2.4	<p>The increased class sizes at Crickhowell School are clearly to the detriment to children, particularly those who are especially young or fall behind for other reason.</p>	<p>As above.</p>
6.2.5	<p>Concern about bullying at Crickhowell C.P. School.</p>	<p>The Council acknowledges this concern about bullying at Crickhowell C.P. School.</p> <p>Llanbedr C. in W. School is a small school, and therefore it is possible that there are fewer incidents of bullying at this school than at larger school, such as Crickhowell C.P. 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>

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### 6.3 Comments about Llangattock School

6.3.1	Currently Llangattock Church in Wales School has approximately 12 places available, mostly in nursery.	<p>The Council recognises that there are a limited number of places available at Llangattock C. in W. Primary School and that the school would not have sufficient places for all the pupils from Llanbedr C. in W. Primary School.</p> <p>In January 2022, there are 104 pupils attending the school in reception to year 6. The school's capacity for pupils is 121, therefore there are 15 places available. This capacity figure does not include nursery places.</p>
6.3.2	Llangattock is a considerable distance away and is itself near it's lawful capacity of 121 pupils.	As above.
6.3.3	It is now apparent that there is no space in the junior half of Llangattock School and spaces only in the nursery part. Surely you don't expect siblings to go to different school? A colleague of mine has recently moved to Llangattock and his 2 children were unable to get a place in the school there. How can you claim there is capacity at this school if it can't even accommodate children who live on its door step?	<p>As above.</p> <p>School leaders manage their class structure according to pupil numbers and the needs of pupils. Should the Council proceed with the current proposal to close Llanbedr C. in W. School, and should this lead to an increase in pupil numbers at Llangattock C. in W. School, it is possible that the school would need to review its class structure to ensure that suitable provision was provided for all learners, and that the provision was in-line with Welsh Government guidance.</p>

6.3.4	The closure would put added pressure on the resources of Llangattock School.	<p>The Council notes this concern about the potential impact on Llangattock School.</p> <p>Should the Council proceed with the proposal, Llangattock School would receive funding as part of it's delegated budget for any pupils transferring to the school.</p>
6.3.5	Llangattock School would need additional staff and toilet facilities if they are suddenly to take additional pupils, however there are no plans in place for this.	<p>School leaders manage their class structure according to pupil numbers and the needs of pupils. Should the Council proceed with the current proposal to close Llanbedr C. in W. School, and should this lead to an increase in pupil numbers at Llangattock School, it is possible that the school would need to review its class structure to ensure that suitable provision was provided for all learners, and that the provision was in-line with Welsh Government guidance. Should this mean that additional staff were required, the school would need to recruit additional staff.</p> <p>The Council is aware that there is a need to increase the toileting facilities at Llangattock School. If pupil numbers increased at the school, the Council would review the school's pupil:toilet ratio, and would address any issues identified.</p>

#### 6.4 Comments about Llangynidr School

6.4.1	Concern that pupils that previously attended Llangynidr School but moved to Llanbedr would have to return there and that this would jeopardise their well-being.	The Council notes this concern. Should the Council proceed with the proposal to close Llanbedr C. in W. School, parents would be able to apply for a place for their child at whichever school they choose and these applications will be considered in accordance with the relevant admissions processes.
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## 6.5 Comments about other Powys schools

6.5.1	Llangorse and Priory Schools are also full	<p>The current capacities and pupil numbers<sup>2</sup> of Llangorse C. in W. School and Priory C. in W. School are as follows:</p> <p><b>Llangorse C. in W. School</b> Capacity – 178 Current pupil numbers – 165 (N – Yr 6); 148 (R – Yr 6)</p> <p><b>Priory C. in W. School</b> Capacity – 165 Current pupil numbers – 158 (R – Yr 6)</p>
6.5.2	Llangorse and Priory Schools are not realistic options as they are not in the Crickhowell area – pupils would wish to remain with their friends.	Should the Council proceed with the proposal to close Llanbedr C. in W. School, the expectation is that pupils would transfer to alternative schools in the Crickhowell catchment area, or in other local authorities for pupils living outside Powys.

<sup>2</sup> Teachers Centre 20<sup>th</sup> January 2022

		Llangorse C. in W. School and Priory C. in W. School have only been suggested as possible alternatives for pupils wishing to access alternative Church in Wales provision should there be no places available at Llangattock C. in W. School.
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## 6.6 Comments about out of county schools

6.6.1	Schools in Abergavenny present difficulty with distance, school catchment and so on. They really are not viable for working parents.	<p>Should the Council proceed with the proposal to close Llanbedr C. in W. School, the expectation is that pupils would transfer to alternative schools in the Crickhowell catchment area. However, it is acknowledged that some pupils currently attending the school live in other local authorities, such as Monmouthshire, therefore it is possible that these pupils would choose to transfer to schools in these areas.</p> <p>An analysis of pupil postcodes based on PLASC 2021 data suggests that 9.6% of pupils attending Llanbedr C. in W. Primary School at that time lived closer to an out-of-county school – Deri View Primary School. Should there be no school in Llanbedr, this would increase to 13.5%. However, parents are able to apply for a place at any school for their child(ren).</p>
6.6.2	The new Welsh Medium Primary School in Abergavenny is not yet built and the present school is bursting at the seams.	Comment noted.



6.6.3	Deri View is ranked as an 'Amber' school by MCC and is also up for consultation. If displaced Monmouthshire children are to attend their closest school ... would this not be putting them at a disadvantage?	<p>The Council has noted in the Consultation Document the outcome of Deri View's latest Estyn inspection and National Categorisation as being Amber. The school has also been under Estyn review, but was judged to have made sufficient progress in addressing Estyn's recommendations, and were removed from Estyn review in March 2020.</p> <p>It is correct that Monmouthshire Council recently consulted on a proposal to close Deri View Primary and King Henry VIII Comprehensive to make a new all-age school in Abergavenny</p> <p>On the 19<sup>th</sup> January 2022, Monmouthshire County Council's Cabinet considered an objection report to establish a new all-age school in Abergavenny and decided to proceed with the proposal. The new school will open on 31<sup>st</sup> August 2023.</p>
6.6.4	The out of county school suggested has a worse rating and are about to be going through their own closure – I don't want to put my child through this process again.	As above.
6.6.5	Concern that pupils would be lost to out of county alternative schools such as Deri View in Abergavenny.	It is acknowledged that some pupils currently attending the school live in other local authorities, such as Monmouthshire, therefore it is possible that these pupils would choose to transfer to schools in these areas, should the Council proceed with the proposal to close Llanbedr C. in W. School.

		An analysis of pupil postcodes based on PLASC 2021 data suggests that 9.6% of pupils attending Llanbedr C. in W. Primary School at that time lived closer to an out-of-county school – Deri View Primary School. Should there be no school in Llanbedr, this would increase to 13.5%. However, parents are able to apply for a place at any school for their child(ren).
6.6.6	Closing the school would see children move to Monmouthshire and Blaenau Gwent schools.	As above.
6.6.7	Gilwern School (which is out of county) is already so oversubscribed that Gilwern children are already attending Crickhowell primary – whilst this is a good school there is no genuine opportunity for our children to attend here.	Comment noted.
6.6.8	Gilwern school is full to capacity.	Comment noted.
6.6.9	If pupils attend out of county schools they risk losing out on a place at Crickhowell High School when the time comes.	Should pupils transfer to out of county schools, they could still apply for a place at Crickhowell High School and any applications would be considered in accordance with the Council's Admissions Policy.
6.6.10	Children may have to travel out of county, which may affect their chances of later being able to get into Crickhowell High School.	As above.
6.6.11	Will children that go out of county be allowed to come back to Crickhowell High School?	As above.

## 6.7 Other comments

6.7.1	All the schools nearby have classes with over 30 in them.	<p>Current class sizes at the alternative schools in the Crickhowell catchment are as follows:</p> <p><b><u>Llangattock C. in W. Primary School</u></b></p> <ul style="list-style-type: none"> <li>• Reception/Year 1 – 18 pupils</li> <li>• Year 1/2 – 27 pupils</li> <li>• Year 3/4 – 30 pupils</li> <li>• Year 5/6 – 28 pupils</li> </ul> <p><b><u>Crickhowell C.P. School:</u></b></p> <ul style="list-style-type: none"> <li>• Reception – 19 pupils</li> <li>• Yr 1 – 22 pupils</li> <li>• Yr 2 – 27 pupils</li> <li>• Yr 3 – 26 pupils</li> <li>• Yr 4 – 35 pupils</li> <li>• Yr 5 – 29 pupils</li> <li>• Yr 6 – 30 pupils</li> </ul> <p><b><u>Llangynidr C.P. School:</u></b></p> <ul style="list-style-type: none"> <li>• Reception/Year 1    12/19 = 31</li> <li>• Year 2/Year 3        11/15 = 26</li> <li>• Year 4/Year 5        19/9 = 28</li> <li>• Year 5/Year 6        8/19 = 27</li> </ul> <p>It is acknowledged that these schools have some classes of 30 or above, however the majority of classes are below that figure.</p>
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		School leaders manage their class structure according to pupil numbers and the needs of pupils. Should the Council proceed with the current proposal to close Llanbedr C. in W. School, and should this lead to an increase in pupil numbers at other schools in the area, the schools would need to review their class structure to ensure that suitable provision was provided for all learners, and that the provision was in-line with Welsh Government guidance.
6.7.2	The lack of equipment, extra curricular activities and lack of facilities available to pupils in other schools are factually documented by their management teams to the governing body of Llanbedr School.	Whilst acknowledging that the equipment, extra-curricular activities and facilities available at different schools does vary, the Council has no reason to believe that the provision at the alternative schools would not meet the needs of pupils currently attending Llanbedr C. in W. School.
6.7.3	Moving children to schools which also have combined age classes and a teaching head would not address the Council's apparent concerns with these matters.	As shown in 6.7.1 above, Crickhowell C.P. School has single-year groups. The headteacher is a non-teaching head.  Llangynidr C.P. School and Llangattock C.i.W Primary School do teach in mixed age groups of no more than 2 years. The headteacher of Llangynidr C.P School has a 0.4 teaching commitment per week and the headteacher of Llangattock C.i.W Primary School has a 0.5 teaching commitment per week. The decision on whether a headteacher has a teaching commitment is the responsibility of governing bodies.

## 7. COMMENTS ABOUT CHURCH IN WALES PROVISION

### 7.1 Parents would be unable to choose a Church in Wales School

7.1.1	<p>The choice to attend a Church in Wales school would be taken away from the children if the school was to close. There are not enough spaces at other church schools for all the children at Llanbedr Church in Wales School.</p>	<p>The proposal is to close Llanbedr C. in W. Primary School and for pupils to transfer to their nearest alternative schools. However, parents are able to apply for a place for their child(ren) at any school and are able to attend any school if there is a place available.</p> <p>Pupils wishing to continue to access Church in Wales provision could apply for a place at Llangattock C. in W. Primary School. However, the Council recognises that there are a limited number of places available at this school, and that the school would not have sufficient places for all the pupils from Llanbedr C. in W. Primary School.</p> <p>The number on roll at Llangattock in January 2022 is 104 (R-Yr 6) and the capacity of the school is 121. There are places available for nursery-aged children at Little Sparks in Llangattock.</p> <p>Should there be no places available Llangattock C. in W. School, alternative Church in Wales provision is also available within 16 mile radius of Llanbedr at Llangorse C. in W. School and Priory C. in W. School for pupils wishing to access this provision.</p>
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		<p>The Welsh Government's School Organisation Code states the following:</p> <p><i>'with reference to the nature of the schools subject to proposals, whether the alternative school-based provision is sufficient to meet existing and projected demand for schools of the same:</i></p> <p><i>a. language category as set out in "Defining schools according to Welsh medium provision" Welsh Assembly Government Information document No: 023/2007 or any successor documents; and</i></p> <p><i>b. (if relevant) designated religious character.</i></p> <p><i>Proposals <b>should</b> ensure that the balance of school provision reflects the balance of demand. This means that where school provision is being reduced or removed, alternative school provision of the same nature (language category or, if relevant, religious character), wherever possible, should remain available and accessible to pupils in the local area. However in some areas it may not be compatible with the cost effective provision of education to continue to maintain access to schools of the same nature.'</i></p> <p>The Council is adhering to the requirements of the School Organisation Code.</p>
7.1.2	Children in the area won't be able to attend a church school if Llanbedr closes.	As above.

7.1.3	The choice of going to a church school is limited – very few places being available, the majority of children would have no choice but to go to a non church school.	As above.
7.1.4	Llangattock School is the only other CiW school within the cluster and this does not have capacity for Llanbedr children. Looking further afield, Llangorse and Priory CIW schools are full or close to capacity and the same is true out of County in Monmouthshire.	As above.
7.1.5	If this closure was forced upon the community not all Llanbedr children will be able to find alternative places in other church schools – Llangattock is close to being full and Llangorse is already full.	As above.
7.1.6	Pupils attending a Church in Wales school should have the choice to continue in a church school if they wish. Can Llangattock accommodate all of the children from Llanbedr should they wish to go there to continue their learning?	As above.
7.1.7	No consideration was given to the pressure on parents having to move their children to another Church in Wales primary in the cluster. Llangors was mentioned as having room but this school isn't even in the Crickhowell Cluster. Llangattock is almost at capacity as the nearest CiW school but was hardly given a mention. Why was this? What was the thinking behind this? 4 and 5 year olds having to travel over 8 miles along narrow country lanes to get to school is not ideal and parents with busy lives, work and commitments will find this particularly stressful and challenging.	As above.

7.1.8	The proposals do not offer adequate alternatives for those pupils who wish to go to another Church in Wales School. Llangattock Primary School has already indicated that they do not have spaces available for these pupils. It is also at odds with Powys' statement that it wishes to increase Faith Schools.	As above.  The Council has not made a statement that it wishes to increase Faith Schools.
7.1.9	If Llanbedr Church in Wales Primary School is to close, the nearest other Church schools apart from Llangattock are Llangorse which is eleven miles from Llanbedr and is currently full, and Brynmawr which is ten and a half miles from Llanbedr.	As above.
7.1.10	You cannot provide or guarantee that every child who leaves Llanbedr will be able to access a CiW education given the lack of capacity in the nearby CiW schools. This would be in contravention of the Equality Act 2010 where religion is a protected characteristic and a breach of Art. 14 of the European Convention on Human Rights.	The Council does not agree with the comment that not providing access to Church I Wales provision is in contravention of the Equality Act 2010.  The proposal is to close Llanbedr C. in W. Primary School and for pupils to transfer to their nearest alternative schools. However, parents are able to apply for a place for their child(ren) at any school and are able to attend any school if there is a place available.  The nearest alternative schools for Llanbedr C. in W. Primary School pupils within Powys are:  Crickhowell C.P. School Llangynidr C.P. School Llangattock C. in W. Primary School Llangors C. in W. School  The Council recognises that there are a limited number of places available at Llangattock C. in W.



		<p>Primary School and that the school would not have sufficient places for all the pupils from Llanbedr C. in W. Primary School. The number on roll at Llangattock in September 2021 is 103 and the capacity of the school is 121. There are places available for nursery-aged children at Little Sparks in Llangattock.</p> <p>However, the Council is adhering to the requirements of the Welsh Government's School Organisation Code which states the following:</p> <p><i>'with reference to the nature of the schools subject to proposals, whether the alternative school-based provision is sufficient to meet existing and projected demand for schools of the same:</i></p> <p><i>a. language category as set out in "Defining schools according to Welsh medium provision" Welsh Assembly Government Information document No: 023/2007 or any successor documents; and</i></p> <p><i>b. (if relevant) designated religious character.</i></p> <p><i>Proposals <b>should</b> ensure that the balance of school provision reflects the balance of demand. This means that where school provision is being reduced or removed, alternative school provision of the same nature (language category or, if relevant, religious character), wherever possible, should remain available and accessible to pupils in the local area. However in some areas it may not be compatible with the cost effective provision of</i></p>
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		<p><i>education to continue to maintain access to schools of the same nature.'</i></p> <p>Whilst not in the immediate area, the nearest Church-in-Wales provision is at Llantilio Pertholey VC School in Abergavenny (7 miles from Llanbedr), Llangors C. in W. Primary School (11 miles) and Priory C. in W. Primary School (16 miles). If parents were unable to access a place at Llangattock C. in W. School, they would be able to apply for places at these Church-in-Wales schools. Although the Council's Home-to-School transport policy does not provide free transport to denominational schools specifically, it would be able to consider using its discretionary powers under the Learner Wales Travel Measure to provide transport – this would only be available to pupils currently attending Llanbedr C. in W. School and consideration would be on a case-by-case basis.</p>
7.1.11	<p>In going ahead with these closure proposals Powys CC has shown a disregard for the religious nature of the school and the right of children and parents to choose such a faith based education. There are not enough vacant places in other local C in W schools to guarantee that all children can be offered a place in an equivalent setting. Therefore, some children will be able to access a C in W school, while other will be denied this opportunity. This is discriminatory, as religion is a protected characteristic under the Equality Act 2010.</p>	As above.

## 7.2 Reference to the School Organisation Code

7.2.1	<p>According to the School Organisation Code (2018), section 1.4 page 6, when an LEA is considering a school closure it should consider whether the alternative school based provision will meet the demand for education of a <i>designated religious character</i> and there is not the provision for this in any of the local Church schools including Llangorse and Brynmawr which are both considerable journeys away and both are at capacity, and Llangattock which does not have space for this number of pupils to transfer.</p>	<p>The Welsh Government's School Organisation Code states the following:</p> <p><i>'with reference to the nature of the schools subject to proposals, whether the alternative school-based provision is sufficient to meet existing and projected demand for schools of the same:</i></p> <p><i>a. language category as set out in "Defining schools according to Welsh medium provision" Welsh Assembly Government Information document No: 023/2007 or any successor documents; and</i></p> <p><i>b. (if relevant) designated religious character.</i></p> <p><i>Proposals <b>should</b> ensure that the balance of school provision reflects the balance of demand. This means that where school provision is being reduced or removed, alternative school provision of the same nature (language category or, if relevant, religious character), wherever possible, should remain available and accessible to pupils in the local area. However in some areas it may not be compatible with the cost effective provision of education to continue to maintain access to schools of the same nature.'</i></p> <p>The Council is adhering to the requirements of the School Organisation Code.</p>
7.2.2	<p>My main objection is that this is a church school and there is insufficient capacity in other local church schools to accommodate all the pupils from Llanbedr. The Local Authority -</p>	<p>As above.</p>

	Powys County Council - is not paying due regard to the law in this matter. As recently as 2018, The Schools Organisation Code states in section 1.4, page 6 that they should have regard to the designated religious character of the school when considering closure.	
7.2.3	Powys would be unable to provide enough Church in Wales places for the children in the area as by the School Organisation Code it would “not be compatible with the cost effective provision of education to continue to maintain access to schools of the same nature”, how can discrimination of religious preference be allowed in this day and age?	As above.
7.2.4	I understand that the School’s Organisation Code states that relevant bodies (in this case the Local Authority) should have regard to the following factors: ‘Where a school closure, reduction in capacity or age range contraction is proposed, with reference to the nature of the schools subject to proposals, whether the alternative school-based provision is sufficient to meet existing and projected demand for schools of the same: a. language category as set out in “Defining schools according to Welsh medium provision” Welsh Assembly Government Information document No: 023/2007 or any successor documents; and b. (if relevant) designated religious character.’ I would question whether the above has been taken account of and whether there has been any real regard at all to the lack of provision of education of a designated religious character.	As above.

### 7.3 Insufficient consideration has been given to the school’s Church in Wales status

7.3.1	In your deliberations, the County Council seems to have paid scant attention to the points made by the Archdeacon and others about the importance of the Christian ethos of the school and the benefits that a good religious education brings to the social	The Council fully acknowledges the school’s status as a Church in Wales school. All comments received during the process, including those made by the Archdeacon and others, were reflected in the
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	development of the individual – and in the longer term, to the community as a whole. This would, tragically, be lost if the school were to close.	Consultation Report produced in respect of this proposal, which was considered by the Council's Cabinet when determining whether or not to proceed with the proposal. This included comments about the school being a Church in Wales school.
7.3.2	I am deeply disappointed at the lack of regard taken by the Council for the Church characteristic of the school, and the commitment to that expressed by parents.	As above.
7.3.3	Our daughter is being discriminated against on the grounds of her faith by PCC failing to take into account the need for this provision in the local area.	<p>The Council does not agree that pupils are being discriminated against on the grounds of their faith.</p> <p>The Council recognises that Llanbedr is a Church in Wales School. Should the Council proceed with the proposal to close the school, parents would be able to apply for a place for their child(ren) at any other school. Alternative Church in Wales provision is available at Llangattock C. in W. School. Any pupils wishing to continue to access Church in Wales provision could apply for a place here.</p> <p>However, the Council recognises that there are a limited number of places available at Llangattock C. in W. Primary School and that the school would not have sufficient places for all the pupils from Llanbedr C. in W. Primary School.</p> <p>However, there are other Church-in-Wales schools available within a 16 mile radius of Llanbedr. Should there be no places available at Llangattock</p>

		C. in W. School, pupils could apply for a place at these alternative schools.
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#### 7.4 Reference to transport arrangements

7.4.1	The criteria of how parents are to be considered eligible for the promised free transport to a Church in Wales school even if it is not the closest available school worries me.	<p>As stated in the Statutory Notice published in respect of this proposal:</p> <p><i>'The Council will also provide transport for pupils currently attending Llanbedr Church in Wales Voluntary Aided Primary School who wish to access Church in Wales school provision at Llangattock Church in Wales Voluntary Aided Primary School. This will be provided on a case-by-case basis using the Council's discretionary powers under Section 6 of the Learner Travel (Wales) Measure 2008.</i></p> <p><i>If there is no place available at Llangattock Church in Wales Voluntary Aided Primary School, the Council will use its discretionary powers, as outlined above, to provide transport for pupils currently attending Llanbedr Church in Wales Voluntary Aided Primary School to their next nearest Church in Wales school, if they wish to access Church in Wales school provision.'</i></p>
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### 8. COMMENTS ABOUT THE CURRICULUM FOR WALES

#### 8.1 Llanbedr School is already delivering the Curriculum for Wales

8.1.1	<p>The school is delivering on the new Welsh curriculum and will continue to develop its expertise in this, as are other schools.</p>	<p>The Council recognises that Llanbedr C. in W. School is preparing well for the implementation of the new Curriculum for Wales.</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 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>
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		<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> <p>Teachers in very small 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</p>
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		<p>class, and who also leads on behalf of the whole school on a single AoLE such as Humanities.</p> <p>Good learning and teaching challenges all learners by encouraging them to recognise the importance of sustained effort in meeting expectations that are high but achievable for them. This is one of the 12 pedagogical principles in the new curriculum and all teachers need to engage effectively with research and professional development to enable them to have high expectations of all learners and develop as 'high expectation' teachers who have more positive attitudes towards learners and more effective teaching practices. This is a priority for the Council to ensure equity for all learners.</p>
8.1.2	Llanbedr leads the cluster in the development and introduction of the new curriculum.	As above.
8.1.3	The staff at Llanbedr are leading the way in teaching the new curriculum.	As above.
8.1.4	The new curriculum is already being successfully introduced.	As above.
8.1.5	Llanbedr School has been at the forefront of the development and implementation of the new curriculum in Powys and has been seen by Powys CC as an exemplar of good practice	As above.
8.1.6	The school have been working tirelessly on implementing the new curriculum for some time to the point that the headteacher leads the cluster in meetings as to how the new curriculum should be implemented! This alone suggests that your argument is deeply flawed.	As above.
8.1.7	Llanbedr school, within the Crickhowell Cluster, had been leading on elements of the new curriculum and has been a	As above.

	'Pioneer' school in assessing and piloting curriculum development.	
8.1.8	The staff at Llanbedr are implementing the new curriculum ahead of time – many school's aren't.	As above.

## 8.2 It is untrue that it would be more difficult for small schools to deliver the Curriculum for Wales

8.2.1	A recent question in the Senedd to the minister of education and Estyn confirmed that a small school does not prohibit the implementation of the new curricula or indicate any issues with the implementation. Powys has alleged it does, but have provided no evidence in support of this claim.	<p>The Welsh Government's definition of a small school is a school with 91 pupils or less.</p> <p>Teachers in very small 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</p>
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		class, and who also leads on behalf of the whole school on a single AoLE such as Humanities.
8.2.2	The closure proposal by the LA has frequently claimed that small schools will struggle to deliver the new curriculum in Wales. This is an assumption which is not backed up by evidence and is counter to the views of the Education Minister in the Welsh Government and the position taken by Estyn.	As above
8.2.3	Neither Estyn nor the Welsh Education Minister have indicated that small schools are unable to deliver the New Curriculum	Very small primary schools can deliver the new curriculum, however, it will be significantly more challenging and will place significantly greater demands on teachers in very small 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. Teachers in very small 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.
8.2.4	Powys claims that small schools are not suited to delivering the new curriculum. But, as I understand, no evidence has been produced that that Llanbedr is failing in this, and have admitted that it is an excellent school.	As above
8.2.5	Powys County Council claims that small schools are not suited to delivering the new curriculum and yet Llanbedr is already teaching the new curriculum, and staff there are mentoring other (larger) schools as they introduce it.	All Powys schools are working towards the implementation of the new curriculum. Schools are working in collaboration across their clusters and supporting each other. The schools in the Crickhowell cluster are sharing approaches and plans with each other rather than any one school taking the lead.
8.2.6	You have provided zero evidence to support your view that small schools cannot implement the new curriculum, yet you use this as an argument to close the school. I see no evidence from Estyn or the Welsh Government to support your view. With respect, I fail to see how Lynette Lovell's opinion could possibly outweigh the opinion of the Welsh Govt or Estyn.	Please see comment 8.1.1
8.2.7	My understanding is the new curriculum is based on models used in New Zealand and Scandinavia and very successfully adapted to small rural school environments. Where is the independent expert evidence this will not work?	Please see comment 8.1.1

8.2.8	There is no evidence that larger schools are better equipped to meet the requirements of the new curriculum.	Please see comment 8.1.1
8.2.9	Please provide evidence of how larger schools are better equipped to meet the requirements of the new curriculum.	Please see comment 8.1.1

### 8.3 Other comments

8.3.1	I personally consider it a slur on the staff to suggest they will not be able to give the children an adequate education under the new curriculum.	The Council has not suggested that the staff at Llanbedr C. in W. School 'would not be able to give the children an adequate education under the new curriculum'. The quality of education and the quality of teaching at the school are not reasons for the proposal.
8.3.2	'To enable children to attend larger schools which would be better equipped to meet the requirements of the New Curriculum' – firstly I understand that Llanbedr has adequate equipment to provide the New Curriculum – what specifically is lacking at the school to justify the upheaval on this ground? In addition – where is this capacity?	

## 9. COMMENTS ABOUT SMALL AND RURAL SCHOOLS

### 9.1 Positive comments about small schools

9.1.1	A smaller school is much more suitable for some children.	The Council notes these comments about small schools. Whilst the Council recognises that some parents prefer smaller schools, all schools, regardless of size, are required to support, challenge and nurture all pupils to achieve their full
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		<p>potential, and are able to provide for the needs of their pupils. Attending a smaller school with 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.</p> <p>As stated in the Council's Strategy for Transforming Education 2020-2030, the Council faces a challenge due to the high proportion of small schools in the county and the lack of equity amongst schools. 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 also remains the case that the Council is concerned about the challenge facing very small schools in delivering education at a time of significant change.</p>
9.1.2	There is nothing inherently wrong with a small school.	As above.
9.1.3	I also feel it is a great advantage to have small, mixed age classes where older pupils learn to take responsibility for younger pupils both in class and at play.	As above.
9.1.4	Smaller schools better enable pupils to develop social skills and the ability to care for others, which will ensure that they grow up to be socially responsible adults, which will benefit the communities in which they live. These skills must be learned in a school community which is small enough for all the pupils to	As above.

	know each other, and for the older pupils to develop a sense of caring responsibility for each other and for the younger pupils. This isn't possible in a very large school.	
9.1.5	Small schools are vital to maintain the infrastructure of smaller rural communities and cannot be discriminated against.	As above.  The Council recognises the role that small, rural schools such as Llanbedr C.i.W Primary school have in their local communities. The draft Community Impact Assessment has already recognised the negative impact on the community should the school close. This was updated to reflect comments received during the consultation period, and will be further updated to reflect comments received during the objection period.

## 9.2 Concerns about larger schools

9.2.1	Whilst it is no fault of the teachers at larger schools, they don't have the time to help all pupils and fully understand their educational needs. Learning difficulties aren't picked up due to the large class sizes and pupils suffer as a result.	Whilst the Council recognises that some parents prefer smaller schools, 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.  As stated in the Council's Strategy for Transforming Education 2020-2030, the Council faces a
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		<p>challenge due to the high proportion of small schools in the county and the lack of equity amongst schools. 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 also remains the case that the Council is concerned about the challenge facing very small schools in delivering education at a time of significant change.</p>
9.2.2	In larger schools, there is a greater risk of disruptions from some pupils who do not thrive in these larger classes.	As above.
9.2.3	A lot of larger, merged schools are detrimental to individuals' education and well-being (not to mention the detriments it brings to staff).	As above.
9.2.4	Larger numbers often bring many issues so what may appear to be cost-effectiveness in closing a school is not often the case.	As above.
9.2.5	Larger schools are not better equipped to meet the needs of our children. Bigger is not better, however it is cheaper and this seems to be the sole motivation of PCC.	As above.
9.2.6	Larger schools can be very impersonal and just do not suit many children. They are scary places for little children to be in school life.	As above.
9.2.7	Large schools bursting at the seams with large class sizes are de-personalised and amount to child factory farms. Factory	As above.



	farming of animals has led to poor outcomes for animal and human health and for the wildlife of our countryside. Factory farming our children will result in mediocre education where individual needs will be lost in a one size fits all approach.	
9.2.8	You would think, by now, the majority of people would know big is not necessarily best. Just look at this new hospital called The Grange – a disaster for people working there and those needing its help!	As above.

### 9.3 Comments about rural schools

9.3.1	The OECD (Organisation for Economic Co-operation and Development) recently stated: “Providing access to quality education in rural areas is crucial to meet the needs of rural youth and also to attract young families to settle in these regions.”	The aim of the Council’s Strategy for Transforming Education 2020-2030 is to provide access to education of highest quality across Powys, to ensure that young families are attracted to the area.
9.3.2	There is evidence that tells you that rural schools are well-placed for strong co-operation and collaboration and facilitate a strong sense of belonging and community. For the education system to reach the very highest standards for all, we need to draw on these rural advantages, as well as the distinct strengths of urban and valley schools. A study by Bangor University recently reported that there are: “..significant benefits – academic, cultural and social – to learners and communities through the delivery of high-quality education in small and rural schools. This can be critical in engaging learners and families from the most disadvantaged backgrounds in rural areas and raising learner aspirations, as well as making a significant contribution to the long-term sustainability of the local community.”	<p>The Council recognises the role that small, rural schools such as Llanbedr C.i.W Primary school have in their local communities. The draft Community Impact Assessment has already recognised the negative impact on the community should the school close. This was updated to reflect comments received during the consultation period, and will be further updated to reflect comments received during the objection period.</p> <p>However, it remains the case that the Council is concerned about the challenge facing very small schools in delivering education at a time of</p>

		significant change. The Council is also concerned about the inequity between schools in Powys currently, where some schools are funded generously whilst others are required to provide the same education provision with a much lower funding per pupil.
9.3.3	I disagree with the systematic closure of village schools which will undermine rural communities that are the backbone of Powys.	As above.
9.3.4	Powys is known for its rural villages, churches and communities. Remove the school and you take away the heart of the villages. The surrounding villages, churches, schools and communities make Powys unique.	As above.
9.3.4	Should you want to keep talented young people in Powys, shutting rural schools is not the answer.	As above.
9.3.5	Your decision to close the school is further discrimination against working rural families.	As above.

#### 9.4 There is a need for choice

9.4.1	We need a mix of small and large schools.	<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</p>
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		<p>school that has fewer than 91 pupils. In Powys, there are 33 schools with fewer than 91 pupils. However, the Council has a 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, and could apply for a place in a smaller school in the catchment should that be their preference.</p>
9.4.2	Whatever the curriculum, there must be choice for parents too.	As above.
9.4.3	Currently parents have choice.	As above.
9.4.4	Whilst some children excel wherever they are educated, some do not. Some benefit from the competitive element and facilities a large school offers, some prefer the close knit, nurturing environment a small school affords. There is a need for both.	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.

		Whilst recognising that parents are able to choose any school for their child(ren) to attend, there is no requirement to provide a range of schools according to size. All schools, regardless of size, are able to provide for the needs of their pupils.
9.4.5	Children after all are different, no size fits all. Powys County Council has a duty to provide education for all its citizens, no matter what. It should not discriminate.	As above.
9.4.6	We need both large and small schools and Powys County Council has a duty of care to provide both options. It is obliged under The Well-being of Future Generations Act to improve our social, cultural, environmental and economic well-being and must think about the long-term impact of its decisions.	As above.  The proposal's impact on the Well-being Goals outlined in the Well-being of Future Generations is considered in the impact assessment document.

## 10. COMMENTS ABOUT FINANCE

### 10.1 Cost per pupil

10.1.1	Llanbedr's numbers have been rising steadily, this brings the cost per pupil down closer to the Powys average.	The delegated school budget per pupil for each school is published annually by the Welsh Government based on the Section 52 budget statement submitted by the Council. The pupil numbers used to calculate the budget per pupil are the pupils that were attending the school on the November count date and do not include nursery pupils. The delegated school budget per pupil at Llanbedr C. in W. School over the last two years is
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		<p>outlined below, as well as the average for primary schools in Powys:</p> <p><u>2020/2021</u></p> <ul style="list-style-type: none"> <li>• Llanbedr C. in W. School – £5,948</li> <li>• Powys Average – £4,384</li> </ul> <p><u>2021/2022</u></p> <ul style="list-style-type: none"> <li>• Llanbedr C. in W. School – £6,010</li> <li>• Powys Average – £4,617</li> </ul> <p>The budget per pupil as outlined in the Section 52 budget statement for 2020/21 and 2021/22 were based on 39 pupils.</p> <p>An increase in pupil numbers at the school during the school year would not lead to a change in this published figure.</p> <p>These figures are accurate at the time these reports are written and are based on the latest data available. Welsh Government will publish the figures for next financial year during the summer of 2022.</p> <p>The Powys average primary school budget per pupil was the second highest in Wales in 2021-22. However as highlighted by Estyn in 2019, the pupils and the funding are shared across too many schools meaning that more of that budget per pupil is needed to cover premises-related costs and less is then available for educational provision – there</p>
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		<p>would be an improvement to this situation if there were fewer schools within the county.</p> <p>The budget per pupil figures for 2021-22 for primary phase schools in Powys range from £8,412.46 per pupil at Ysgol Bro Cynllaith, Llansilin (with 24 pupils) to £3,473.20 per pupil at Penygloddfa C.P. School, Newtown (with 303 pupils), resulting in inequitable funding levels across the authority.</p>
10.1.2	An increase of just 5 new pupils would see Llanbedr fall from 9th highest budget (per pupil) to 48 <sup>th</sup> / 90.	As above.
10.1.3	If the cost per pupil was calculated using correct data, the school's cost per pupil would be close to the Powys average.	As above.
10.1.4	The Council continues to cite the high cost per pupil at Llanbedr based on incorrect data.	As above.
10.1.5	Why are the schools in the top 8 places not also being considered for closure as they cost the council more per pupil?	<p>The 8 primary schools that had a higher budget share per pupil than Llanbedr C in W in 2021-22 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, Gladestry C in W School and Ysgol Cwm Banwy.</p> <p>Most of these schools have been reviewed 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</p>

		Cynllaith. The Council will be reviewing all its schools over time.
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## 10.2 The sole aim of the proposal is to save money

10.2.1	<p>This seems to be purely a money making exercise by Powys County Council and appears extremely poorly thought out and researched.</p>	<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. Llanbedr C. in W. Primary School teaches children in three 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, but through all of the engagements with stakeholders and the subsequent development of the Strategy to Transform Education in Powys, it is very apparent that there needs to be a vision for a stronger entitlement for all learners in Powys and equity for</p>
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		learners across the county. That vision, as the education profession moves towards the realisation of the new Curriculum for Wales does require the Council to pursue a transformational vision that secures an attractive entitlement and equity for all learners, professional learning for all staff and secure leadership across all schools.
10.2.2	I believe that the closure of this thriving school is entirely a cost cutting exercise with zero consideration given to the impact on the children and community.	As above.
10.2.3	Closing the school for financial gain is morally wrong the school is achieving and delivering education above other schools.	As above.
10.2.4	The only reason for closure is money – this is not a valid reason to lose an amazing educational setting like Llanbedr.	As above.
10.2.5	Learners’ interests should always be at the forefront of any decisions, not cost.	As above.
10.2.6	The proposals are to save money which is against the interest and well-being of the children.	As above.

### 10.3 Queries about where the savings would go

10.3.1	Any money that PCC saves by closing the school is not guaranteed to be put back into education.	Education and the Transforming Education Strategy are both amongst the highest priorities for the Council and there has been significant work over the last few years to agree an appropriate level of funding in the delegated schools’ budget. Given that the Council’s funding is only confirmed on an annual basis, it is not appropriate to ring-fence to Education. The funding allocated to all services has to be considered collectively and the Council will
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		prioritise its resources in order to deliver its objectives and vision. This approach has seen investment in Education over recent years.
10.3.2	Any money saved by Powys County Council by closing the school goes back to the general council budget and not education. Therefore there are no guarantees that the small amount of money saved would be spent on schools and the children within Powys.	As above.
10.3.3	Powys have not provided any guarantees that any savings generated from the closure of the school will be provided to the pupils of Llanbedr or uplift the provision of other children to improve their provision, but will go into the general budget.	As above.
10.3.4	I am advised that the projected saving of around £101,000.00 would not fall back into the education budget to support our children, but instead will fall into the budget. This means that the futures of our children in the Vale of Grwyney will be directly liable for Powys CC's consistent budgeting failures.	As above.
10.3.5	I object because it is morally and ethically wrong to consider closing schools and depleting education facilities for the benefit of saving money. The money that you would save is tax payers money and so let tax payers have their say.	<p>The driver for the Strategy for Transforming Education in Powys is equity of educational provision, to improve learner entitlement and best learning outcomes/education, not solely to save money.</p> <p>Powys County 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.</p> <p>Ultimately the decision on the future of Llanbedr C. in W. school will be made by Councillors who are</p>

		the elected representatives of the taxpayers of the county.
10.3.6	The amount purported to be saved will be swallowed in a jiffy on expenses, perks for the great and the good, subsidising the canteen for Powys whilst staff whilst OAPs at the Day Centres pay twice or four times as much for their lunch.	As above, Powys County 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.

#### 10.4 Other comments

10.4.1	Since the funding formula will be introduced in April, the proposed savings figure should be available to accurately reflect these changes over the next few years allowing for transition along with the updated free transport costs incurred due to the recent promise from officers to extend the free transport to be also available for those wishing to still attend a Church in Wales School even if it is not the closest available school.	<p>Based on the newly agreed formula, the anticipated formula funding saving on this proposal is now estimated to be just over £91,000.</p> <p>The other resource implications are not anticipated to change so the overall revised estimated saving, including transport costs, catering savings and potential loss of RSG is now just under <b>£39,000</b> per annum.</p> <p>Should the Council proceed with the proposal to close Llanbedr C. in W. School, the nearest alternative Church in Wales school would be Llangattock C. in W. School, which is located less than 5 miles away from Llanbedr.</p> <p>However, it is recognised that there are not sufficient places available at Llangattock C. in W. School to accommodate all pupils currently attending Llanbedr C. in W. School</p>
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		<p>Whilst not in the immediate area, the nearest Church-in-Wales provision is at Llantilio Pertholey VC School in Abergavenny (7 miles from Llanbedr), Llangors C. in W. Primary School (11 miles) and Priory C. in W. Primary School (16 miles). If parents were unable to access a place at Llangattock C. in W. School, they would be able to apply for places at these Church-in-Wales schools.</p> <p>Although the Council's Home-to-School transport policy does not provide free transport to denominational schools specifically, it would be able to consider using its discretionary powers under the Learner Wales Travel Measure to provide transport – this would only be available to pupils currently attending Llanbedr C. in W. School and consideration would be on a case-by-case basis.</p> <p>As the Council does not currently know which schools the pupils would choose to transfer to, it is not possible to estimate the potential cost of this. However the potential range of costs which might be incurred are set out below, depending on how many pupils require transport, over what distance and whether existing transport provision could accommodate these pupils:</p> <ul style="list-style-type: none"><li>• <b>Minimal costs</b> – all pupils can be accommodated within existing transport provision, albeit some routes may need to be extended - £10 - £20</li></ul>
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		<p>per school day - £1,900 - £3,800 per annum</p> <ul style="list-style-type: none"> <li>• <b>Need to increase size of bus</b> – £50 per day - £9,500 per annum</li> <li>• <b>Additional Taxi required</b> – approx. £60 - £75 per day - £11,400 - £14,250 per annum</li> <li>• <b>New bus required</b> – £170 - £230 per day - £32,300 - £43,700</li> </ul> <p>The financial impact of this arrangement would be for a limited period of up to 7 years, following which the whole life cost impact would continue to be a net saving to the Council.</p> <p>Implementation of the proposal enables a more cost-effective and sustainable approach to the provision of school places within the cluster by utilising surplus places at other schools within the cluster, and removing any costs associated with maintaining Llanbedr C.i.W Primary School.</p> <p>It can also be assumed that any additional transport costs to alternative Church in Wales provision would be minimal based on significant concerns raised during the consultation and objection period about children travelling excessive distances to schools.</p>
10.4.2	The decision to close is in contravention of the Schools Organisation Code 2018. The presumption against closure will not allow cost alone to be a valid reason for closure. It is clear	The driver for the Strategy for Transforming Education in Powys is equity of educational provision, to improve learner entitlement and best

	<p>from the document and from subsequent Powys CC meetings that the sole driving factor is cost. It was interesting to note that during the Cabinet meeting dated 14th December, that you propose amending the current funding formula applied to Powys schools to bring it back in line with The School Funding (Wales) Regulations 2010 which is based on cost per pupil and not size of the school. As you are aware, by the time this is implemented in 3-years, it will mean that small schools will receive significantly less funding and bring them more in line with the Powys average. I can only presume that your ambition is to close all small schools before the new formula is implemented thus allowing you to apply the cost argument to all school closures. Had the funding formula been applied as per the statutory framework from 2018, then the closure of Llanbedr would not be up for debate.</p>	<p>learning outcomes/education, not solely to save money. Reducing the range of funding per pupil will allow for reinvestment and greater equity across the authority.</p> <p>Both the current formula and the new formula comply with the School Funding (Wales) regulations 2010. The revision of the funding formula and the Strategy for Transforming Education are completely independent of each other, and the proposal to close Llanbedr would have been considered regardless of the funding formula in place.</p>
10.4.3	<p>The amount of money that could be saved by closing the school is small in the context of the council's budget and I think costs could be saved elsewhere.</p>	<p>As stated above, the driver for the Strategy for Transforming Education in Powys is equity of educational provision, to improve learner entitlement and best learning outcomes/education, not solely cost savings. Powys County 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.</p>
10.4.4	<p>It is apparent that only short term costs are being considered, not the long term effect on our society, communities and most importantly our children.</p>	<p>The Strategy for Transforming Education in Powys is a 10 year strategy that considers the long term educational provision for all children and communities in Powys.</p>

10.4.5	Losing children to other authorities, providing travel costs for the remaining children and the process of consultation has already offset any saving being cited.	The estimated savings (now approximately £39,000) are recurring annual savings and already include the potential impact of children attending schools outside of Powys and the potential additional travel costs for learners currently attending Llanbedr C. in W. School. The costs of consultation are one-off costs.
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## 11. CRITICISM OF THE COUNCIL

### 11.1 Criticism of county councillors

11.1.1	As I understand it, this decision has been based on the views of one County Councillor, whose opinion is not a professional one (this was reported in the Brecon and Radnor and elsewhere).	<p>The decision to proceed with the proposal to close Llanbedr C. in W. School was made by the Council's Cabinet, who have the authority to make decisions on school reorganisation proposals.</p> <p>The proposal was developed by officers in accordance with the requirements of the School Organisation Code.</p>
11.1.2	We do believe Cllr Phil Davies when he told us it was embarrassing for him to learn that highly paid officers had got it so wrong in our case, but don't believe him when he said he would rectify all mistakes and look again at the figures.	It is acknowledged that there was an error in the original consultation document in respect of the capacity of Llangattock C. in W. School. This was due to an error in the capacity calculation for the school which was included in the School Premises Data Return to Welsh Government. The Council rectified this by issuing an addendum with the correct information.

		Apart from this, the data within the Consultation Document was the most up-to-date information available at the time of writing. The data sources are clearly referenced within the document.
11.1.3	I don't know which councillors voted in favour of the school closures and I think people should know this information so that they can make an informed decision about who to vote for ahead of the council elections next year.	The decision to proceed with the proposal to close Llanbedr C. in W. School was made by the Council's Cabinet. All Cabinet meetings are held in public and are webcast on the Council's website. Recordings of the meetings are also available. Any member of the public wishing to follow the proceedings and wishing to know which councillors are involved in the decision making are able to do so.

## 11.2 Criticism of Council officers

11.2.1	We don't have any faith or trust in the competence of Powys CC Educational Dept and Transformation programme.	The proposal in respect of Llanbedr C. in W. School has developed in accordance with the requirements of the School Organisation Code based on the priorities outlined in the Council's Strategy for Transforming Education.
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## 11.3 Other criticisms

11.3.1	The whole procedure is a farce and I hope the people involved from the council get exactly what they deserve in court.	The proposal in respect of Llanbedr C. in W. School has developed in accordance with the requirements of the School Organisation Code based on the
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		priorities outlined in the Council's Strategy for Transforming Education.
11.3.2	I don't doubt that the council has many difficult decisions to make and that the education department is dedicated to providing the best learning experience and outcome for every child in Powys but when every person involved with this school is in agreement that closure of Llanbedr CiW School would be a mistake then this should give pause for thought.	As above.
11.3.3	Powys County Council need to get more in touch and listen to the people who pay their wages and pensions with their council taxes and support local country schools as bigger schools are not always the answer.	Comment noted.

## 12. COMMENTS ABOUT THE PROCESS

### 12.1 Comments about the process taking place during the Covid pandemic

12.1.1	We believe PCC used the mask of a COVID pandemic to force this decision.	<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</p>
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		<p>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 pandemic.</p> <p>The process has been carried out in accordance with the School Organisation Code, and the level and detail of responses received to all recent consultations outlines that stakeholders have engaged fully in these processes, even though there have been restrictions in place.</p>
12.1.2	In an unprecedented time when community and mental wellbeing have been championed, Powys County Council have proposed a cruel and divisive proposal to its residents, voters and tax payers.	As above.

## 12.2 The Council has not listened to the issues raised in the consultation period

12.2.1	Powys County Council have not taken the wishes of the parents, pupils or local community into account - any worries or concerns have just been dismissed.	The Council produced a 287 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.
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12.2.2	The points raised during the consultation process appear to have been ignored.	As above.
12.2.3	I wrote to the councillors with my concerns before the decision was made and was given a generic, unhelpful response saying that my concerns would be addressed in the Consultation Report. My concerns have not been addressed, and I still feel closure is an immoral decision.	As above.

### 12.3 The decision is pre-determined

12.3.1	It seems like the decision to proceed with the proposal was going to be made whatever the outcome of the consultation.	<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 the statutory notice when determining 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,</p>
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		as happened recently following consultation on the proposal to close Churchstoke C.P. School.
12.3.2	I am concerned this consultation process is a sham. PCC have made its decision and do not wish to engage in sensible debate based on actual evidence. The school and parents have forwarded evidence and challenged statements relied upon by PCC. These have been dismissed, glossed over or not responded to. I feel badly let down by a system stacked against proper and meaningful debate.	As above.
12.3.3	That the process is still continuing following such valid concerns and evidence against the council's plans highlights the drive to push this through no matter what, even at a time where schools are still now being held back by the pandemic.	As above.
12.3.4	I worry that a decision had already been arrived at to close the school regardless of the feedback from the public consultation and that the decision may have been made on grounds of cost without regard to the best interests of the children, families, staff and local community.	As above.
12.3.2	The whole process smacks of pre-determination on the part of Powys CC. There is multiple evidence of this such as when the education portfolio holder actively told the press he would be recommended proceeding to statutory notice prior to the scrutiny committee meeting. Your total ignorance of the valid points raised during scrutiny demonstrates this point further.	As above.  Whilst the paper considered by Cabinet included the portfolio holder's recommendation to proceed with the proposal to close the school, Cabinet also considered Scrutiny's recommendations in respect of the proposal. Having considered these recommendations, Cabinet decided to proceed with the proposal.

#### 12.4 Suggestions that the process has not been carried out correctly

12.4.1	There is no evidence of consultation with the local community through the community council or any other form of communication to help realise the importance of a school like Llanbedr and the effect its closure would have on the community.	<p>Consultation has been carried out in accordance with the requirements of the School Organisation Code (2018). Community Councils in the area were informed of the consultation and had the opportunity to respond – as stated in the Consultation Report published in respect of this proposal, responses were received from the Vale of Grwyney Community Council and Crickhowell Town Council.</p> <p>Concerns about the proposal's impact on the community were raised during the consultation period, and are outlined in the Consultation Report. The draft impact assessments were also updated to reflect feedback received during the consultation period and were considered by Cabinet when deciding whether or not to proceed with the proposal.</p>
12.4.2	Finally I believe that your proposal may be unlawful under the School Organisation Code.	The process has been carried out in accordance with the requirements of the School Organisation Code (2018).

#### 12.5 Comments about meetings with the Portfolio Holder

12.5.1	I understand the Portfolio Holder for Education promised to meet with parents and children but it doesn't appear to have taken place.	A visit is being arranged for all Cabinet members before the Objection Report is considered.
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12.5.2	Cllr Phyl Davies attended a meeting with parents at our school, many things which he said have not been followed through, one being that he said he would re-visit us to discuss the final document before it went to Cabinet.	As above.

## 12.6 Comments about the presumption against closing rural schools

12.6.1	The proposal contradicts the presumption against closing rural schools.	<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 November 2021.</p>
12.6.2	I object to the closure of Llanbedr School as the Rural Schools Policy has in no way been followed.	As above.

12.6.3	The consultation exercise and Scrutiny Committee were no more than a box ticking exercise and as such the LA has not adequately followed Welsh Government guidance regarding its 'Presumption against closure of rural schools' (School Organisation Code – 2018).	As above.
12.6.3	Llanbedr is one of the schools mentioned by the Welsh Government as a rural school requires a presumption to retain and keep the school open before entering consultation to close, there is no evidence this has been considered by the cabinet when taking this decision. There is no evidence in any of the consultation documents I have read that makes this clear. That is a massive flaw and leads the public to believe that pre-determination is at work here.	As above.
12.6.4	In consideration of the Welsh Government's presumption against closure there is an expectation that the Local Authority will explore all alternatives to closure. In the case of Llanbedr C in W School I believe that an in-depth analysis of such alternatives has not been undertaken and the school has certainly not been engaged in any dialogue with the LA to explore the feasibility of options such as federation with Llangattock C in W School or the consideration of becoming a Welsh medium school for the cluster.	As above.

## 12.7 Comments about potential Judicial Review

12.7.1	Legal advice was given to the cabinet and Powys officials in view of the Judicial Review which is being undertaken by parents. This advice has been requested by the local Councillor	It is not possible to share the advice provided due to legal privilege.
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	Member but I understand this will not be shared. Public money was used to obtain this advice so the assumption is it should be more widely available than just the cabinet. Obviously this should not be shared beyond official members but it gives the impression of an acute lack of transparency using public funds to obtain legal advice.	
12.7.2	Your proposal is an utter shambles and I bid you the best of luck for judicial review where I hear Powys has a strong and consistent record of losing them. Perhaps you need to heed advice from others and not the current legal team who have systematically let you down on previous occasions and will let you down with this flawed proposal.	Comment noted.

### 12.8 General criticism of the proposal

12.8.1	I object to the closure of small schools for no justifiable reason.	The reasons for the proposal were outlined in the Consultation Document.
12.8.2	It is clear that Llanbedr Church in Wales School does not meet any of the criteria which would see a school selected for closure.	As above.
12.8.3	From the beginning the proposal has been poorly conceived, and before it is too late I hope the Council will withdraw the idea.	The proposal has been developed in accordance with the requirements of the School Organisation Code.

### 13. COMMENTS ABOUT MEETINGS WHICH HAVE TAKEN PLACE AS PART OF THE PROCESS

### 13.1 Comments about Cabinet meetings which have taken part as part of this process.

13.1.1	We are shocked that the Cabinet acted contrary to the Scrutiny Committee's recommendation that the school should not be closed.	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, along with the information gathered during the consultation and officers' responses to issues raised, which were outlined in the Consultation Report and associated papers, the Cabinet decided to proceed with the proposal.
13.1.2	It is disappointing that the Council did not take into account the concerns of its Scrutiny Committee in making its decision.	As above.
13.1.3	The Cabinet meeting was a foregone decision – no consideration was given to the views of the scrutiny committee.	As above.
13.1.4	It is clear that the overriding reason for Cabinet's decision to endorse closure was a cost cutting exercise alone.	<p>It is not true that 'the overriding reason for Cabinet's decision to endorse closure was a cost cutting exercise'. The reasons for the proposal are listed in the Statutory Notice published in respect of this proposal, and are as follows:</p> <ul style="list-style-type: none"> <li>- <i>Would address the issue of low pupil numbers</i></li> <li>- <i>Would reduce the Council's overall surplus capacity in primary schools</i></li> <li>- <i>Financial saving to the Council</i></li> <li>- <i>Pupils would attend larger schools, which would be better equipped to meet the requirements of the new curriculum</i></li> </ul>



		<ul style="list-style-type: none"> <li>- <i>Pupils would attend larger schools, which could provide a wider range of educational and extra-curricular opportunities</i></li> <li>- <i>Would lead to rationalisation of the primary school estate</i></li> <li>- <i>Meets all of the Critical Success Factors</i></li> </ul>
13.1.5	The video produced by children and families was due to be shared with the Cabinet however this did not happen.	On the advice of the Council's Data Protection Officer, it was not possible to share the video at the Cabinet meeting.
13.1.6	The children compiled a video response which was pulled from public view at the last moment. The meeting should have been adjourned or deferred to enable an update on data protection to be properly discussed. I understand permission had been given by those appearing in the video for it to be viewed by Cabinet and the public.	As above.
13.1.7	In the Cabinet meeting, a major question in respect of funding was left open, unanswered and a reason to defer any decision until it was clarified. With a very small increase in pupil numbers, which will take place in January, the school becomes financially viable. This was a bizarre decision made by a Cabinet which had made a pre-determined decision without fully discussing the issue before voting.	<p>The delegated school budget per pupil for each school is published annually by the Welsh Government based on the Section 52 budget statement submitted by the Council. The pupil numbers used to calculate the budget per pupil are the pupils that were attending the school on the November count date and do not include nursery pupils. The delegated school budget per pupil at Llanbedr C. in W. School over the last two years is outlined below, as well as the average for primary schools in Powys:</p> <p><u>2020/2021</u></p> <ul style="list-style-type: none"> <li>• Llanbedr C. in W. School – £5,948</li> </ul>

		<ul style="list-style-type: none"> <li>• Powys Average – £4,384</li> </ul> <p><u>2021/2022</u></p> <ul style="list-style-type: none"> <li>• Llanbedr C. in W. School – £6,010</li> <li>• Powys Average – £4,617</li> </ul> <p>The budget per pupil as outlined in the Section 52 budget statement for 2020/21 and 2021/22 were based on 39 pupils.</p> <p>An increase in pupil numbers at the school during the school year would not lead to a change in this published figure.</p> <p>These figures are accurate at the time these reports are written and are based on the latest data available. Welsh Government will publish the figures for next financial year during the summer of 2022.</p> <p>The Powys average primary school budget per pupil was the second highest in Wales in 2021-22. However as highlighted by Estyn in 2019, the pupils and the funding are shared across too many schools meaning that more of that budget per pupil is needed to cover premises-related costs and less is then available for educational provision – there would be an improvement to this situation if there were fewer schools within the county.</p> <p>The budget per pupil figures for 2021-22 for primary phase schools in Powys range from £8,412.46 per</p>
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		<p>pupil at Ysgol Bro Cynllaith, Llansilin (with 24 pupils) to £3,473.20 per pupil at Penygloddfa C.P. School, Newtown (with 303 pupils), resulting in inequitable funding levels across the authority.</p> <p>The decision to proceed with the proposal was not pre-determined. Information about the financial aspects of the proposal was included in the Cabinet paper and the Consultation Report.</p>
13.1.8	<p>No assessment of the transformation programme for the future of the Crickhowell Cluster has been made. No evidence was provided at this cabinet to indicate how the closure of Llanbedr could provide the appropriate outcome in relation to other schools in the local cluster or, indeed, any other school in Powys. There was nothing in this decision to provide evidence of improvements elsewhere or the positive impact on education for a single child or as a whole.</p>	<p>The Council's long term vision as outlined in the Strategy for Transforming Education in Powys is <i>'The Council's aspiration is to develop, within the 13 secondary school localities, an infrastructure of all-age (sometimes known as all-through) schools. Initially, these may be multi-sited all-age schools, however, the aspiration is to develop new purpose-built schools...'</i></p> <p>However, this is a long term plan. It is intended that an area review is carried out in the Crickhowell catchment in Wave 2 of the Transformation Programme (2022-2025), which would be the start of this process.</p> <p>The potential impact of the proposal on the other schools in the cluster was considered in the Consultation Document and there was an opportunity for stakeholders associated with these schools to submit responses during the consultation period. Any concerns raised were listed in the Consultation Report which was considered by</p>

		Cabinet when determining whether or not to proceed with the proposal.
13.1.9	There was no evidence produced to the cabinet in that meeting to suggest that Llanbedr School had not delivered on that planning, providing other schools with excellent feedback in the Cluster or any suggestion that the school could not deliver the new curriculum so was not proven. For the cabinet member for education to suggest otherwise was ill-judged and inaccurate.	Officers have not said that the school 'could not deliver the new curriculum', however as outlined earlier in this report, the requirements of the new curriculum are significant, therefore it will be more challenging for smaller schools.

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

13.2.1	The Scrutiny Committee raise a number of significant issues which challenged the Council's rationale for the closure of Llanbedr School.	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 receive.
13.2.2	As the scrutiny committee suggested, the evidence for closure of this school is weak.	Officers, including the Director of Education, explained the challenges facing Llanbedr C.i.W School, to the Learning and Skills Scrutiny Committee in particular in planning for and delivering the new Curriculum for Wales.
13.2.3	It was raised in the Scrutiny meeting that the proposal lacked clarity and did not meet all 'Critical Success Factors', that Powys had 'not fully explored alternative avenues and that the proposal needed revisiting with detailed analysis.'	It was explained that all alternative options had been included within the Consultation Report, and reasonable alternative options had been assessed

		in accordance with the requirements of the School Organisation Code.
13.2.4	The Scrutiny Committee pointed out that Federation and Welsh language options should be explored further.	As above.
13.2.5	The purpose of the scrutiny meeting was to examine the specific closure of Llanbedr and not the merits of the wider strategy (which is appallingly flawed in itself). Cllr. Berriman raised pertinent points around the cost aspect. The reason the cost-per-pupil is currently high is due to Powys adopting a funding formula that is radically different to the other local authorities and contrary to the statutory guidance. I see that you have finally got around to addressing this stark error in this month's cabinet meeting.	<p>The current school funding formula was introduced in April 2019 to bring stability to the budgets of the existing schools estate, particularly the smaller schools.</p> <p>The development of the formula was overseen by the Formula Working Group which included several representatives from across the full range of schools in Powys, including headteachers and governors. All schools were consulted about any proposed changes.</p> <p>A new funding formula has recently been approved by Cabinet – its development was overseen by the Formula Working Group as outlined above.</p> <p>Both the current formula and the new funding formula comply fully with all the requirements of the School Funding (Wales) Regulations 2010 and associated guidance.</p>
13.2.6	No consideration was given to the pressure on parents having to move their children to another Church in Wales primary in the cluster. Llangors was mentioned as having room but this school isn't even in the Crickhowell Cluster. Llangattock is almost at capacity as the nearest CiW school but was hardly given a mention. Why was this? What was the thinking behind this? 4	<p>All issues raised were during the consultation were included in the Consultation Report and associated papers. These were considered by Cabinet, in particular:</p> <ul style="list-style-type: none"> <li>- Impact on parents wishing to access Church in Wales places for their children, given that</li> </ul>

	<p>and 5 year olds having to travel over 8 miles along narrow country lanes to get to school is not ideal and parents with busy lives, work and commitments will find this particularly stressful and challenging. Not a single thought given to parents or children in the cabinet meeting where this decision was made. It will also mean an end to local nursery/pre-school provision too.</p>	<p>Llangattock C.i.W Primary School is near its capacity, and that the closest alternative Church in Wales provision is at Llangorse C.i.W Primary School, which is further away.</p> <ul style="list-style-type: none"> <li>- Impact on loss of nursery provision in Llanbedr on parents.</li> </ul>
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## 14. COMMENTS ABOUT DOCUMENTATION

### 14.1 Comments about consultation documentation

14.1.1	<p>The document is written to paint a picture of a school that is failing and not thriving. Nothing is further from the truth and for a document to be written with a bias towards closure clearly demonstrates that there is an underlying predetermination for closure which is unhealthy and unacceptable. A number of generalisations were made.</p>	<p>The Consultation Document was prepared in accordance with the requirements of the Welsh Government's School Organisation Code. The data sources within the Consultation Document are referenced and this was the most up-to-date information available at the time of writing.</p>
14.1.2	<p>Llanbedr School has highlighted the lack of clarity and the use of incorrect and misleading information in the consultation document. It is totally unacceptable that this document was released and still contain inaccurate information.</p>	<p>As above.</p>
14.1.3	<p>Too much of the consultation appeared to rely on a large school against small school agenda instead of addressing the differences in education and extracurricular activities in the schools involved, anticipating benefits when there is actually evidence that Llanbedr pupils and their families would be disadvantaged by a move.</p>	<p>As above.</p>

14.1.4	We've heard many figures being thrown around claiming that there are around 90 places, however the consolation document failed to state where in the school years these are. For example Llangattock primary has approximately 16 places spare, but we have not been informed what year groups the spaces are in. I feel the consultation would have been better and more informative had this been explored more.	<p>See 1.11.2</p> <p>Year groups in Llangattock in September 2021 are as follows:</p> <p><u>Llangattock C. in W. School</u></p> <ul style="list-style-type: none"> <li>• Reception/Year 1 - 18 pupils</li> <li>• Year 1/2 - 27 pupils</li> <li>• Year 3/4 - 30 pupils</li> <li>• Year 5/6 – 28 pupils</li> </ul>
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## 14.2 Comments about the consultation report

14.2.1	PCC's Consultation report does little to respond to many comments made objecting to the closure.	<p>The Consultation Report is a lengthy, 287-page document which lists the issues raised in the consultation responses received and provides the Council's response to those issues.</p> <p>A number of similar comments were made, for which the local authority's response was the same / similar. In addition, no response is required for some of the points raised – in these cases, the Council has noted the comment.</p>
14.2.2	Responses based on opinion are not sufficient for a process which will have far reaching implications for our children's future education and happiness.	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.

<p>14.2.3</p>	<p>Pupils from military families [1.18.1 – 1.18.3 all with ‘comment noted’] and 5.2.3</p>	<p>The Council notes this comment that the response provided to all comments relating to pupils from military families was ‘comment noted’. Where a comment is noted, the comment does not require a response, however this does not mean that the comments have not been taken into consideration by the Cabinet when deciding whether or not to proceed with the proposal.</p> <p>As well as the comments included in Consultation Report, reference was also made to the potential impact on pupils from military families in the updated impact assessments which were also considered by Cabinet when determining whether or not to proceed with the proposal.</p> <p>Comments about the potential impact on military families were also received in some of the Objections received, therefore concern about the impact on military families is also noted in this Objection Report, which will be considered by the Council’s Cabinet when determining whether or not to proceed with implementation of the proposal.</p>			
<p>14.2.4</p>	<p>I am very disappointed in this report: slight, far too many similar copy-and-paste responses, and far too many ‘comments noted’. Additionally there is some very poor editing, such as:</p> <table border="1" data-bbox="360 1305 1249 1366"> <tr> <td data-bbox="360 1305 427 1366">1.21.3</td> <td data-bbox="427 1305 871 1366">Llanbedr School has very strong non-educational advantages. This is helped by the third-party funding it receives from past and present parents, and pupils in one form or another.</td> <td data-bbox="871 1305 1249 1366">As 1.21.3</td> </tr> </table>	1.21.3	Llanbedr School has very strong non-educational advantages. This is helped by the third-party funding it receives from past and present parents, and pupils in one form or another.	As 1.21.3	<p>A number of similar comments were made, for which the local authority’s response was the same / similar.</p> <p>Where a comment is noted, the comment does not require a response.</p>
1.21.3	Llanbedr School has very strong non-educational advantages. This is helped by the third-party funding it receives from past and present parents, and pupils in one form or another.	As 1.21.3			



		The editing error displayed here is noted.
14.2.5	I was very surprised that PCC seems unable to respond to in any meaningful way to concerns raised under 6.1. 'The Council notes these comments about families choosing Llanbedr C. in W. Primary School for its Christian ethos' is the only comment for 6.1.1 – 6.1.11. The report acknowledges that there are fewer than 10 vacancies in the nearest church school, Llangattock (and these mostly in Nursery).	<p>The Council fully acknowledges that that some families choose Llanbedr C. in W. School due to the fact that it is a Church in Wales school and because of its Christian ethos, and therefore it was not considered that any further response was required to this point.</p> <p>There are many references to the school's Church in Wales status throughout the Consultation Report, and the updated impact assessment document also considers the potential impact of the proposal on the protected characteristic 'religion and belief'.</p> <p>It is correct that the Consultation Report acknowledges that there are not sufficient alternative Church in Wales places in the area to accommodate all pupils currently attending Llanbedr C. in W. School, however the Report does explain that there are other Church in Wales schools within approximately 15 miles of the school.</p>
14.2.6	The Council suggests in the Consultation Report [6.4.1] that: 'Whilst not in the immediate local area, the nearest Church-in-Wales provision is at Llantilio Pertholey 143 VC School in Abergavenny (7 miles from Llanbedr), Llangorse C. in W. Primary School (11 miles) and Priory C. in W. Primary School (16 miles). If parents were unable to access a place at Llangattock C. in W.	Should the Council proceed with the proposal to close Llanbedr C. in W. School, the nearest alternative Church in Wales school would be Llangattock C. in W. School, which is located less than 5 miles away from Llanbedr.

	<p>School, they would be able to apply for places at these Church-in-Wales schools.’ Should parents be expected to undertake a twice daily journey of up to 32 miles so that their child can benefit from church school education?</p>	<p>However, it is recognised that there are not sufficient places available at Llangattock C. in W. School to accommodate all pupils currently attending Llanbedr C. in W. School. The other schools were referenced in the Consultation Report to explain that there are other Church in Wales schools located within approximately 15 miles of Llanbedr which pupils could access should they wish to continue to access Church in Wales provision but not be able to secure a place at Llangattock C. in W. School.</p> <p>Whilst recognising parents’ ability to apply for a place for their child in whichever school they choose, there is no requirement for the Council to provide access to Church in Wales provision within a certain distance.</p>
14.2.7	<p>It is recognised that there are not enough places to provide alternative Church in Wales places for the majority of Llanbedr pupils. In answer to parents’ concerns with this for the report to state that “pupils would continue to be taught about religion at the alternative schools they transfer to, whether they transfer to alternative C. in W. provision or an alternative C.P. school” highlights the lack of understanding and respect shown towards how important it is for parents who wish for their children to continue their Church in Wales education and upbringing.</p>	<p>Whilst recognising parents’ ability to apply for a place for their child in whichever school they choose, and therefore parents’ ability to apply for a place at a Church in Wales school should they wish to do so, there is no requirement for the Council to provide access to Church in Wales provision within a certain distance.</p> <p>As stated in the Consultation Report, pupils would continue to be taught about religion should they transfer to a C.P. school instead of a Church in Wales school.</p>

14.2.8	Regarding availability of places, the answers from Powys to this have been that there are enough places overall in the catchment and as it is down to parental choice it's not likely that all would want to move to one school, of course however with the limited places available in each school we will be reliant on if there is a place for our children which eliminates our actual choice in the matter.	Comment noted. Should the Council proceed with the proposal, every effort would be made to accommodate parental choice in terms of alternative provision for their children. However, it is acknowledged that this may not be possible in all cases.
14.2.9	Regarding the limited availability of places in the receiving schools, the report does not confirm that each child will have a place in the relevant year in their closest school just that over the cluster there is enough space overall, how can that have been adequate? There is no parental choice with such limited options and parents will be forced to race to be able to secure a space which is ridiculous.	As above.
14.2.10	I feel that the consultation report fails to adequately consider the impact on Monmouthshire children.	The consultation report lists and responds to the points raised in the consultation responses received.  Information about the provision at schools in Monmouthshire was included in the Consultation Document.
14.2.11	Whilst it has been established that Powys children will not be disadvantaged by being moved to Llangynidr, Llangattock or Crickhowell - the future education standards of Monmouthshire children appear to have been somewhat disregarded.	Information about the provision at schools in Monmouthshire was included in the Consultation Document.
14.2.12	Of the reasons for school closure summarised at the end of your report [pp206,207] only one actually stands up to scrutiny – Revenue saving to the Council.	Comment noted.

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### 14.3 Comments about Estyn’s consultation response

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14.3.1	<p>Estyn also states that ‘the information provided in the proposal indicates that there is currently extensive links between the Llanbedr building, and extensive links between the school and the local community.’ So the impact on losing this facility is indeed a massive blow to the whole area.</p>	<p>Estyn’s response to the consultation on the proposal to close Llanbedr C. in W. School states the following: ‘The information provided in the proposal indicates that there is currently extensive community use of the Llanbedr building, and extensive links between the school and the local community. As a Church in Wales School, the Llanbedr School building is owned by the Diocese, therefore the future use of the building is outside the council’s jurisdiction. It would be up to the Diocese to determine the building’s future use, and therefore whether facilities would remain in Llanbedr. The school is not the only remaining public building in the community, as there is a village hall located in the village. Therefore, should the school no longer be available, community events and activities could take place elsewhere.’</p> <p>Whilst noting the community use of the school building which was identified by the Council in the consultation documentation, Estyn’s response also goes on to explain, as explained in the consultation documentation, that the school building is owned by the Diocese, therefore should the school close, the Diocese would need to determine the building’s future use. Estyn’s response also goes on to state that there are alternative public buildings in the</p>
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		village where community events could take place should the school building no longer be available.
14.3.2	Estyn also raises concerns regarding the loss of nursery provision in the rural area, and the alternative framework does not detail clearly enough how the authority proposes to address the lack of nursery provision in Llanbedr.	<p>Estyn's response to the consultation on the proposal to close Llanbedr C. in W. School states the following: 'Estyn is of the opinion that the current proposal is likely to at least maintain the education provision for pupils in the area. However, there are concerns regarding the loss of nursery provision in a rural area.'</p> <p>The Council notes this concern about the loss of the nursery provision offered by the Llanbedr C. in W. School should the school close which has been raised by Estyn and in other consultation responses received.</p> <p>The Council acknowledged in the Consultation Document published in respect of this proposal that 'Llanbedr C. in W. School is a Voluntary Aided School which is responsible for its own admissions arrangements and has continued to admit nursery aged pupils to the school'.</p> <p>In the Consultation Document, the Council goes on to state that: 'Implementation of the current proposal would result in the closure of Llanbedr C. in W. School, and would therefore mean that the provision for nursery aged pupils which is currently available at Llanbedr C. in W. School would no longer be available in Llanbedr.'</p>

		<p>This was also recognised in the Consultation Report which was published in respect of this proposal.</p> <p>Alternative nursery provision is available within the cluster. Whilst there is currently some pressure on the availability of early years education places at Allsorts Community Playgroup in Crickhowell, the funded places could be increased to accommodate any additional demand, if needed.</p> <p>There are early years education places available at Llangattock Little Sparks, which would also provide access to early years provision within a Church in Wales school.</p>
14.3.3	Estyn raises some concern that some of the consultation process was done during a period when public meetings could not be held.	<p>Estyn's response to the consultation on the proposal to close Llanbedr C. in W. School states the following: 'The proposer has consulted as widely as possible due to the current pandemic, including with children and young people, parents/carers, school staff, a wide range of interested parties and members of the public. However, there is some concern that this was done during a period when public meetings could not be held.'</p> <p>The process has been carried out in accordance with the requirements of the School Organisation Code (2018), which does not require public meetings to be held. In recent years, the Council has moved away from holding public meetings as part of school reorganisation proposals, therefore it</p>

		<p>is possible that no public meetings would have taken place had the consultation taken place at a time when there wasn't a pandemic.</p> <p>The Council has carried out a number of consultations over the last two years, and the level and detail of responses received to all these consultations outlines that stakeholders have engaged fully in these processes, even though there have been restrictions in place.</p>
14.3.4	<p>There are concerns that because of the travel restrictions for these pupils, if they move to different schools, that they might in fact not be able to take advantage of some of the extra curricular activities in place anyway. This is a concern also raised by Estyn as whilst it is acknowledged that on the one hand there could be additional opportunities for extra curriculum activities, for the children if they move schools, because of transport restrictions, there could be an impact on the pupils ability to access them. Indeed, travel issues could also impact on the ability of parents to take part in school events and meetings. Estyn states that "the proposal does not address this well. For example, it does not mention whether there is public transport to and from the village of Llanbedr, and does not detail how it proposes to address travel issues related to after school activities."</p>	<p>The Council has acknowledged that closure of Llanbedr C. in W. School could impact on pupils' ability to access extra-curricular activities, and that it may be more difficult for some pupils to access extra-curricular activities that take place before and after the school day due to reliance on home-to-school transport.</p> <p>Whilst noting Estyn's concerns, the alternative schools would be used to meeting the needs of 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 in school.</p> <p>There is no public transport to and from the village of Llanbedr.</p>

#### 14.4 Comments about data

14.4.1	Your numbers for pupils attending Llanbedr and capacity in the receiving schools are incorrect and have been throughout the process. Powys CC have literally no idea what schools have capacity to take Llanbedr pupils.	<p>Data used throughout the process has reflected the latest information available at the time. Data sources have been referenced throughout.</p> <p>Current pupil numbers<sup>3</sup> and capacity at Llanbedr C. in W. School and the other schools in the Crickhowell catchment are as follows:</p> <p><b>Llanbedr C. in W. School</b> Capacity – 57 Current pupil numbers: 53 pupils (N – Yr 6); 44 pupils (R – Yr 6, funded via delegated budget)</p> <p><b>Crickhowell C.P. School</b> Capacity – 230 Current pupil numbers – 186</p> <p><b>Llangattock C. in W. School</b> Capacity – 121 (exc. Nursery) Current pupil numbers – 117 pupils (N – Yr 6); 104 pupils (R – Yr 6)</p> <p><b>Llangynidr C.P. School</b> Capacity – 147 Current pupil numbers – 108</p>
14.4.2	During the consultation period highly paid officers time and again used outdated fact and figures regarding Llanbedr School, they were offered many opportunities to correct them but refused. In particular numbers on roll were repeatedly incorrect, especially	Data used throughout the process has reflected the latest information available at the time. Data sources have been referenced throughout.



	when the numbers are rising and have been so for the past 5 years, so much so that we have applied for and received planning permission for an extra classroom and community space.	
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#### 14.5 Comments about the statutory notice

14.5.1	The reasons Powys Council has given for closing the school are flawed.	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. The Council's view is that the reasons for closure which are listed in the Statutory Notice are valid.
14.5.2	I am in no way convinced of your reasons to close Llanbedr school, and would ask that you explain why you feel the need to close a perfectly excellent school? It's a simple question that, even after all these months of consultation and pointless meetings of which all seemed based on empty promises, has still not been answered honestly.	<p>The reasons for the proposal were provided in the Consultation Document published in respect of this proposal and in the Statutory Notice and are as follows:</p> <ul style="list-style-type: none"> <li>• Would address the issue of low pupil numbers</li> <li>• Would reduce the Council's overall surplus capacity in primary schools</li> <li>• Financial saving to the Council</li> <li>• Pupils would attend larger schools, which would be better equipped to meet the requirements of the new curriculum</li> <li>• Pupils would attend larger schools, which could provide a wider range of educational and extra-curricular opportunities</li> </ul>

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		<ul style="list-style-type: none"> <li>• Would lead to rationalisation of the primary school estate</li> <li>• Meets all of the Critical Success Factors</li> </ul>
14.5.3	<p>The proposal does not meet the Critical Success Factors. Not all avenues have been explored, especially the possibility of Welsh medium education – the language is increasingly popular in the area and many residents are learning the language and attending Siop Siarad in Talybont – soon we will have our own version here.</p>	<p>All options considered were assessed against a number of ‘Critical Success Factors’ in the Consultation Document. These Critical Success Factors were as follows:</p> <ol style="list-style-type: none"> <li>1 – Strategic fit and business needs</li> <li>2 – Value for money</li> <li>3 – Potential achievability</li> <li>4 – Potential affordability</li> </ol> <p>The option to close Llanbedr C. in W. 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. The option to develop Welsh-medium education in Llanbedr was considered as a reasonable alternative in the Consultation Report.</p>

#### 14.6 Comments about the Council’s response to objections received

14.6.1	<p>I strongly object to the closure of Llanbedr School, and expect this letter to have an evidenced based response to the objections I have raised above.</p>	<p>The School Organisation Code outlines the following requirements in respect of Objection Reports:</p>
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		<p><i>'Under section 49 of the 2013 Act when objections have been received proposers <b>must</b> publish a summary of the statutory objections and the proposer's response to those objections.'</i></p> <p>This Objection Report has been prepared in accordance with these requirements.</p>
14.6.2	I look forward to your response, please don't quote the usual lines from your transforming education policy. I would like an honest and original answer.	As above.

## 15. COMMENTS ABOUT THE COUNCIL'S TRANSFORMING EDUCATION STRATEGY

15.1	Having a positive ambition to transform education in the County is indeed very worthwhile, but in the 21 <sup>st</sup> Century this should not now mean that small schools, especially those that work so well within the community, should be closed.	<p>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'. The proposal in respect of Llanbedr C. in W. School aims to address this issue.</p> <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>Whilst recognising the strengths and qualities of Llanbedr C. in W. School, the Council has no concerns about the quality of education provided at any of the alternative schools in the Crickhowell</p>
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		<p>cluster. All the alternative Powys schools are regarded as 'self-improving' schools, according to the latest National Categorisation in 2019. Estyn, in its response to this consultation, concluded that</p> <p><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>
15.2	The so-called 'transformation' of education plans PCC is currently proposing is just a joke. So much for protecting the needs of our children, protecting rural schools and supporting rural life. This is not in the best interest of our children at all.	As above.
15.3	The guiding principles behind Powys County Council's ambitious strategy for Transforming Education do seem admirable on paper. However, when explored in more depth, and looked at specifically with the closure of Llanbedr in mind, it is gravely concerning that accurate facts and figures regarding the school have not been collected by the council and that Crickhowell and the surrounding area does not appear to be included in the Council's major investment plans. This means that our children will not be provided with a new, purpose built all singing and dancing school but will just be slotted into already stretched primary schools within the area.	<p>The ultimate aim is that all areas of Powys will benefit from investment, however this is an ambitious, long term strategy, which will take time to achieve. It is intended that an area review is carried out in the Crickhowell catchment in Wave 2 of the Transformation Programme (2022-2025).</p> <p>The Council's long term vision as outlined in the Strategy for Transforming Education in Powys is <i>'The Council's aspiration is to develop, within the 13 secondary school localities, an infrastructure of all-age (sometimes known as all-through) schools. Initially, these may be multi-sited all-age schools, however, the aspiration is to develop new purpose-built schools...'</i></p>
15.4	There is nothing within the transformation agenda for this area – no plans to build a new school for the area.	As above.

15.5	We don't believe the children of Llanbedr are included in the 21 <sup>st</sup> Century Schools programme.	As above.
15.6	There are no plans for increased funding or building in this cluster, however there are for many schools.	As above.  The Council has taken forward a number of plans and proposals since the Strategy for Transforming Education was introduced in April 2020. Whilst there are plans for capital investment associated with some of these, other proposals are being taken forward which don't have any capital investment associated with them.
15.7	I object to the aim of having every school with a minimum of 210 pupils. In many areas of rural Powys, it will lead to the ending of community cohesion and very long daily journeys for some very young children.	The Council's Strategy for Transforming Education in Powys does not include an aim that every school will have a minimum of 210 pupils. The Council fully recognises the rural nature of Powys, and notes that different solutions may be needed in different areas of Powys in order to meet local needs.
15.8	I understand that County Councillor Phyl Davies now expects primary schools in Powys to have at least 91 and preferably 'a middle hundred' number of pupils. This might be just about possible in Llanidloes, but just not feasible in large parts of rural Powys, where the primary school and the church are the only public buildings and the centres of their communities.	The Council's Strategy for Transforming Education in Powys does not include an aim that every school will have at least 91 pupils, however the Strategy does identify the large number of small schools in the county as a challenge facing education in Powys. The Welsh Government defines a school with fewer than 91 pupils as a small school.  The Council fully recognises the rural nature of Powys, and notes that different solutions may be needed in different areas of Powys in order to meet local needs.

15.9	<p>This plan will consolidate all pupils in super schools at the expense of rural schools and the sense of community that these schools offer.</p>	<p>The Council's Strategy for Transforming Education in Powys will not 'consolidate all pupils in super schools'. Whilst the Strategy includes a long term vision to '<i>develop, within the 13 secondary school localities, an infrastructure of all-age (sometimes known as all-through) schools</i>' this does not mean that there will be no other primary schools in Powys.</p> <p>The Council fully recognises the rural nature of Powys, and notes that different solutions may be needed in different areas of Powys in order to meet local needs.</p> <p>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'. The proposal in respect of Llanbedr C. in W. School aims to address this issue.</p>
15.10	<p>We are given to understand that eventually children will attend a new super school in Crickhowell with the catchment including all of the surrounding villages. This hasn't been planned for. There is no budget, site, or even a timetable for its completion. The complicated journey from feasibility to planning to building, and eventually completion of a working school, will take many years and likely cost millions. It would be inappropriate to base a decision to close one school assuming the benefits of a theoretical fantasy.</p>	<p>The Council's long term vision as outlined in the Strategy for Transforming Education in Powys is '<i>The Council's aspiration is to develop, within the 13 secondary school localities, an infrastructure of all-age (sometimes known as all-through) schools. Initially, these may be multi-sited all-age schools, however, the aspiration is to develop new purpose-built schools...</i>'</p>

		<p>However, this is a long term plan. It is intended that an area review is carried out in the Crickhowell catchment in Wave 2 of the Transformation Programme (2022-2025), which would be the start of this process.</p> <p>The current proposal in respect of Llanbedr C. in W. School is not being taken forward assuming the potential benefits of a new all-age school in Crickhowell in the future.</p>
15.11	<p>The lack of clear and competent research and presentation making regarding all schools that have faced the proposal of closure has today been further highlighted by the resignation of Cllr McIntosh. As a member of the cabinet who couldn't stand by and see the gross incompetency in his own ward, his decision shows the lack of belief and trust that these angered communities share.</p>	<p>The school reorganisation processes which are currently ongoing across Powys are being undertaken in accordance with the requirements of the School Organisation Code. The comments raised at each stage of the process have been included in reports which are considered by the Council's Cabinet at each stage of the process when determining whether or not to proceed with the process. There is no evidence of 'gross incompetency'.</p>

## 16. COMMENTS ABOUT WELSH GOVERNMENT STRATEGIES

16.1	<p>The Welsh Government recently commented: "As a government, we believe in the principle that places matter and we are ambitious in delivering better jobs closer to home, within prosperous, healthier and secure communities. Just as we are committed to working with businesses, we will continue to work with schools, parents/carers and local authorities to give them</p>	<p>Comment noted.</p>
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	<p>the tools to shape successful and sustainable futures. Therefore, we are delivering the largest investment in our schools and colleges since the 1960s, rolling out superfast broadband and supporting rural schools to be at the heart of their communities.”</p> <p>The Council obviously doesn’t take this into account (even though they say they may do) when arriving at these kinds of decisions. I’m sure we will be told that difficult decisions need to be made to improve the overall improvement of the learning process, but there is a difference between difficult decisions and the wrong decision.</p>	
16.2	<p>These proposals are at odds with the provisions in the Well Being of Future Generations Act.</p>	<p>The proposal’s impact on the Well-being of Future Generations Act’s 7 well-being goals for Wales has been considered in the impact assessment document. This was updated after the consultation period to reflect comments received during consultation and the updated version was considered by Cabinet when considering whether or not to proceed with the proposal.</p> <p>The impact assessment has been further updated to reflect comments received in the Objections, and the updated version will be considered by Cabinet when making a final decision on whether or not to proceed with implementation of the proposal.</p>

## 17. ALTERNATIVE OPTIONS

### 17.1 Retain the school

17.1.1	Saving the school is in the best interest of the children.	Comment noted.
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17.1.2	The school should stay open, and next time the issue is revisited in years to come, the Council should take all of these reasons into consideration again.	Comment noted.
17.1.3	The right decision here is to keep the school open.	Comment noted.

## 17.2 Federation

17.2.1	You have failed in your obligation to consider the possibility of federation.	<p>Federation with Llangattock C. in W. School was considered in the Consultation Document published in respect of this proposal, and was further considered in the Consultation Report. The Council's view is that this option would not address the challenges in respect of Llanbedr C. in W. School which were outlined in the Consultation Document.</p> <p>Federation with Crickhowell C.P. School was also considered in the Consultation Document, however it is not possible to federate a C. in W. School with a C.P. School, therefore this option was discounted.</p>
17.2.2	Measures to federate the school within a broader management structure that can bring additional expertise and support to children [rather than the children having to travel to access that expertise and support] have not been tried in practice and therefore cannot be discounted as an appropriate alternative to full closure. With modern technology improving at a rapid rate too, the role that this can play, to ensure remote schools can access content and wider professional expertise should not be overlooked.	As above.

17.2.3	Federation is a stark omission in the consultation document. It is entirely reasonable that you should have explored the issue of federation with Llangattock CiW School. Neither school was approached or consulted on this possibility and the SWOT analysis produced by council officers on why this is not a viable option is, to be frank, pathetic.	As outlined above, the Council did consider federation with Llangattock C. in W. School. As well as the SWOT analysis, consideration was given to the factors outlined in the School Organisation Code, and this was reviewed in the Consultation Report.
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### 17.3 Extend Llanbedr School

17.3.1	I understand that the planning permission is in place to extend the school and improve facilities to accommodate a greater number of pupils. Has this been explored? If so provide details, if not, the council has clearly failed to explore all available avenues.	<p>The Council is aware that a planning application was made in 2018 for a proposed nursery building on the western side of the Llanbedr C. in W. School site. This application was approved by the Brecon Beacons National Park Planning Authority in June 2018.</p> <p>However, there are no plans in the Council's capital plan to construct a new nursery classroom on the school site, nor is the Council aware that any other organisations have any plans to construct the new nursery classroom.</p> <p>The aim of the Council's Strategy for Transforming Education is to rationalise the Powys school's estate. Extending the Llanbedr building would not achieve this aim.</p>
17.3.2	There is a room to extend the school and planning permission is in place for a new classroom and facilities. This option was not explored.	As above.

17.3.3	<p>Designs were prepared, which have been approved through planning, for a separate teaching block, to house nursery and reception classes, and internal alterations to make the school fully disabled accessible. I estimate costs for these works to be around £200,000, with very little disruption to the running of the school and a timescale of less than a year. For very little outlay, this school could grow to accommodate a further 35 students. It would then become one of the larger schools in the area, with a capacity of over 90 students. Closing the school would only add to the shortage of places in the future. Instead, an affordable expansion of the school might help to future proof the requirements for additional places our growing rural population will need. As a school already has an excellent record for academic teaching, for sport and perhaps most importantly, for helping educationally and physically challenged children, this school could become an integral part of the educational provision of Powys.</p>	As above.
17.3.4	<p>Once the threat of closure has disappeared the community will be rallying together to raise funds to provide a new classroom at the school, which will increase its capacity.</p>	Comment noted.

#### 17.4 Area Review

17.4.1	<p>If a catchment area review were to take place in this area, it would need to include all present schools including Llanbedr. To consider closure prior to a catchment review would mean that the terms of the rural schools' policy in this area would not have been met, and to proceed with closure would be unlawful.</p>	<p>The Council is not currently carrying out an area review in the Crickhowell area. It is intended that an area review is carried out in Wave 2 of the Transformation Programme (2022-2025), and should the Council proceed with the current process in respect of Llanbedr C. in W. School, the area review would consider options relating to the remaining schools in the catchment.</p>
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## 17.5 Develop Welsh-medium provision

17.5.1	Further exploration surrounding the Welsh language and the support from the Welsh Government in this area of education should be strongly considered.	<p>The alternative option to develop Welsh-medium provision at Llanbedr C. in W. School was considered in the 'Further Assessment and Conclusion' section in the Consultation Report prepared in respect of this proposal.</p> <p>The Council's view is that this would not address the challenges faced by the school as outlined in the Consultation Document.</p>
17.5.2	You have failed in your obligation to consider the possibility of Welsh language provision.	As above.



## **Proposal to close Llanbedr C. in W. School**

### **Final Impact Assessments**

**Updated February 2022**

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# Proposal to close Llanbedr C. in W. School

## Final Impact Assessments

### 1. Introduction

Powys County Council had consulted on a proposal to close Llanbedr C. in W. School. The proposal is as follows:

- To close Llanbedr C. in W. 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.

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

<b>Outline Summary / Description of Proposal</b>
The Council carried out consultation and subsequently published a statutory notice on the following proposal to close Llanbedr C. in W. School: <ul style="list-style-type: none"> <li>To close Llanbedr C. in W. School from the 31<sup>st</sup> August 2022, with pupils to transfer to their nearest alternative schools</li> </ul>

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

Version	Author	Date
1	Transforming Education Programme Officer	January 2021
2	Service Manager Schools Transformation	January 2021
3	Service Manager Schools Transformation	November 2021
4	Strategic Programme Manager	January 2022

2. Profile of savings delivery (if applicable)

2020-21	2021-22	2022-23	2023-24	2024-25	TOTAL
£	£	£23,000	£16,000	£	£101,000

### 3. Consultation requirements

Consultation Requirement	Consultation deadline/or justification for no consultation
Public consultation required	Consultation was carried out on the proposal to close Llanbedr CiW Primary School in accordance with the requirement of the School Organisation Code.

### 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**

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

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

5. How does your proposal impact on Vision 2025?

<b>Council's Well-being Objective</b>	<b>How does the proposal impact on this Well-being Objective?</b>	<b><u>IMPACT</u></b> Please select from drop down box below	<b>What will be done to better contribute to a more positive impact or to mitigate any negative impacts?</b>	<b><u>IMPACT AFTER MITIGATION</u></b> Please select from drop down box below
<b>The Economy</b>  <b>We will develop a vibrant economy</b>	<p>Implementation of the proposal would have an impact on employment opportunities in Llanbedr as there would no longer be a school in the village. It is also possible that there would be an impact on local businesses in Llanbedr 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 Llanbedr would be less attractive to families, therefore people would not want to live in Llanbedr.</p> <p>Comments received during consultation and objection period also suggested that the loss of a school in the village of Llanbedr would have a negative impact on parents for whom Llanbedr C.</p>	<p>Poor</p>		<p>Poor</p>

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	<p>in W. Primary School is their nearest school. In particular, concerns were raised about parents needing to access early years provision elsewhere in the cluster and having to travel further to ensure access to extra-curricular activities/after-school clubs, and that this would have a financial impact on these families. However, the majority of pupils currently attending Llanbedr C. in W. Primary School live closer to other schools which should be more convenient for them to access provision if they chose to attend their nearest school.</p>			
<p><b>Health and Care</b></p> <p><b>We will lead the way in providing effective, integrated health and care in a rural environment</b></p>	<p>No impact</p>	<p>Neutral</p>		
<p><b>Learning and skills</b></p> <p><b>We will strengthen learning and skills</b></p>	<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. Llanbedr C. in W. Primary School teaches children in three 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</p>	<p>Good</p>		

	<p>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 small 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 Llanbedr C. in W. Primary School would transfer to their nearest alternative schools. For the majority of pupils currently attending Llanbedr C. in W. Primary School, the closest alternative school would be Crickhowell C.P. School, however some pupils would live closer to other schools, including Llangattock C. in W. Primary School, Llangynidr C.P. School and two out of county schools – Deri View C.P. School and Llanvihangel Crucorney C.P. School in Monmouthshire.</p> <p>Llanbedr C. in W. Primary School was in the green support category based on the 2019 categorisations. All the other alternative Powys schools were also identified as green schools, therefore the Council has no concerns in relation to quality and standards at any of these schools, and the Council’s view is that provision for pupils would be at least equivalent to the current</p>			
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	<p>provision. The overall aim of the proposal is to improve learning opportunities for pupils.</p> <p>Deri View C.P. School in Abergavenny, however, had an amber rating as part of the National Categorisation in 2019. This school is the closest alternative school for 13.5% of pupils.</p> <p>Monmouthshire County Council, however, are currently reorganising schools in Abergavenny and have consulted on a proposal to establish a new 3 – 18 school in the town, which would include Deri View C.P. School.</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 Llanbedr C. in W. Primary School. The Council is of the view that all the alternative schools in the catchment re 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><b>Residents and Communities</b></p> <p><b>We will support our residents and communities</b></p>	<p>There would be a significant impact on the community of Llanbedr as there would be no provision in the area, and therefore potential loss of any community facilities or activities associated with the school.</p> <p>Additional travel would be required for pupils currently attending Llanbedr C. in W. Primary School. Whilst free home to school transport would be provided to eligible pupils in accordance</p>	Very Poor	<p>As a Church in Wales School, the Llanbedr School building is owned by the Diocese, therefore the Diocese would need to determine the building’s future use, and therefore whether or not facilities would remain in Llanbedr.</p> <p>There is a village hall in Llanbedr which would continue to be available. Community events could be held here.</p>	Very Poor

	<p>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. However, a number of pupils currently attending Llanbedr C. in W. 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>Concerns were raised during the consultation and objection periods about the loss of nursery provision from the area, and parents would need to access early years provision elsewhere in the cluster. Transport to these alternative early years providers was raised as an issue for those not able to access their own transport, as there is no public transport in the area.</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"> <li>• General concern about the impact on the community</li> <li>• The school is the heart of the community</li> <li>• Reference to other community activities/organisations</li> <li>• Closure of the school that people would not want to live in Llanbedr</li> <li>• Reference to previous generations of families that have attended the school</li> <li>• Queries about what would happen to the school building should the school close</li> </ul>			
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	<ul style="list-style-type: none"> <li>• Comments relating to community wellbeing</li> <li>• Other comments/queries</li> </ul> <p>A separate community impact assessment has been carried out which includes input from the school. This has also been updated to reflect comments made during the consultation and objections received following publication of the Statutory Notice.</p>			
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<b>Source of Outline Evidence to support judgements</b>
Consultation responses, consultation report, objections, objection report

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

<b>Well-being Goal</b>	<b>How does proposal contribute to this goal?</b>	<b><u>IMPACT</u></b> Please select from drop down box below	<b>What will be done to better contribute to a more positive impact or to mitigate any negative impacts?</b>	<b><u>IMPACT AFTER MITIGATION</u></b> Please select from drop down box below
<p><b>A prosperous Wales:</b></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</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 Llanbedr C. in W. School close, all the alternative schools are prepared to deliver the new, innovative curriculum for Wales from</p>	Neutral		

<p>people to take advantage of the wealth generated through securing decent work.</p>	<p>September 2022. This should lead to developing a skilled and well-educated population.</p>			
<p><b>A resilient Wales:</b></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 Llanbedr C. in W. Primary School for whom this is their closest school. Additional home-to-school transport would be required. 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.</p> <p>As Llanbedr C. in W. School is a Church in Wales school, the Council has committed to provide transport to the nearest alternative Church in Wales provision for any pupils currently attending Llanbedr C. in W. School wishing to continue to access Church in Wales provision. Should pupils wish to access this provision, this could lead to a further increase in the home-to-school transport required and the environmental impact of this transport.</p> <p>Currently, a high proportion of pupils attending Llanbedr C. in W. Primary 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 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</p>	<p>Poor</p>		



	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><b>A healthier Wales:</b></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><b>Public Health (Wales) Act, 2017:</b></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 Llanbedr C. in W. Primary 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, particularly due to the process taking place during the current pandemic, creating an additional pressure on their well-being during a difficult time.</p> <p>Comments were also received which expressed concern that pupils would not all be able to transfer to the same school, and that this would have a further negative impact on pupil well-being.</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>The Council aims to conclude the process as quickly as possible to minimise the period of uncertainty for pupils, staff and other stakeholders.</p>	Neutral
<b>A Wales of cohesive communities:</b>	There would be a significant impact on the community of Llanbedr as there would be no provision in the area, and therefore potential loss	Very Poor	As a Church in Wales School, the Llanbedr School building is owned by the Diocese, therefore the Diocese would need to determine the building's	Very Poor

<p>Attractive, viable, safe and well-connected Communities.</p>	<p>of any community facilities or activities associated with the school.</p> <p>Additional travel would be required for pupils currently attending Llanbedr C. in W. Primary 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. However, a number of pupils currently attending Llanbedr C. in W. 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>Concerns were raised during the consultation and objection periods about the loss of nursery provision from the area, and parents would need to access early years provision elsewhere in the cluster. Transport to these alternative early years providers was raised as an issue for those not able to access their own transport, as there is no public transport in the area.</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"> <li>• General concern about the impact on the community</li> <li>• The school is the heart of the community</li> </ul>		<p>future use, and therefore whether or not facilities would remain in Llanbedr.</p> <p>There is a village hall in Llanbedr which would continue to be available. Community events could be held here.</p>	
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	<ul style="list-style-type: none"> <li>• Reference to other community activities/organisations</li> <li>• Closure of the school that people would not want to live in Llanbedr</li> <li>• Reference to previous generations of families that have attended the school</li> <li>• Queries about what would happen to the school building should the school close</li> <li>• Comments relating to community wellbeing</li> <li>• Other comments/queries</li> </ul> <p>A separate community impact assessment has been carried out which includes input from the school. This has also been updated to reflect comments made during the consultation and objections received following publication of the Statutory Notice.</p>			
<p><b>A globally responsible Wales:</b> 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><b>Human Rights - is about being proactive (see guidance)</b></p> <p><b>UN Convention on the Rights of the Child:</b> 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 affected by the proposal, ensuring that all affected by the plans have the opportunity to give their views. This included 2 meetings with pupils at the school.</p>	<p>Neutral</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.

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

<b>Well-being Goal</b>	<b>How does proposal contribute to this goal?</b>	<b><u>IMPACT</u></b> Please select from drop down box below	<b>What will be done to better contribute to a more positive impact or to mitigate any negative impacts?</b>	<b><u>IMPACT AFTER MITIGATION</u></b> Please select from drop down box below
<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>Llanbedr C. in W. Primary 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 language no less favourably than the English language.</p> <p>Comments were received during the consultation 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 Llanbedr C. in W. Primary School. However, pupils would continue to learn Welsh at the alternative schools. All the other alternative Powys schools are taking part in the Siarter Iaith initiative. Llanbedr and Llangattock C. in W. Schools are currently working towards the bronze award, and Crickhowell C.P School and Llangynidr C.P. School have already achieved the bronze award.</p>	<p>Neutral</p>		

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<p><b><i>Opportunities to promote the Welsh language</i></b></p>	<p>Llanbedr C. in W. Primary School is an English-medium school, therefore it is not anticipated that implementation of the proposal would impact on opportunities to promote the Welsh language.</p> <p>See additional comments above.</p>	<p>Neutral</p>		
<p><b><i>People are encouraged to do sport, art and recreation.</i></b></p>	<p>Implementation of the proposal would lead to the closure of Llanbedr C. in W. Primary 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 suggest that there a number of extra-curricular activities happening at Llanbedr C. in W. Primary School, including Breakfast Club and after school clubs 5 days a week. 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. There is also the availability of extra-curricular activities within the Crickhowell 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</p>	<p>Neutral</p>		

	<p>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 activities.</p> <p>It must also be noted that 61% of pupils currently attending the school live closer to other schools and are therefore reliant on private transport arrangements to access after school activities – this suggests that parents would still be able to access these activities or clubs at alternative schools.</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).*

<b>Well-being Goal</b>	<b>How does proposal contribute to this goal?</b>	<b><u>IMPACT</u></b> Please select from drop down box below	<b>What will be done to better contribute to a more positive impact or to mitigate any negative impacts?</b>	<b><u>IMPACT AFTER MITIGATION</u></b> Please select from drop down box below
<b>Age</b>	The proposal would impact on primary aged pupils currently attending Llanbedr C. in W. Primary 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.	Neutral		

	<p>The Council does not have any concerns over the quality of education provided at the alternative schools in the catchment, and believes that pupils would not be disadvantaged by attending these schools. Should the Council proceed with the proposal, some pupils would live closer to schools located outside Powys, in particular Deri View C.P. School in Abergavenny, and concern has been raised about the quality of provision at this school. Monmouthshire County Council are currently reorganising schools in Abergavenny and recently completed the statutory process to establish a new 3 – 18 school in the town, which would include Deri View C.P. School.</p>			
<i>Disability</i>	<p>The proposal would impact on any pupils with disabilities currently attending Llanbedr C.P School. The proposal aims to provide improved educational opportunities for all affected pupils, including any pupils with disabilities.</p> <p>Comments received during the consultation and objection period expressed concern about the impact on pupils with ALN if they had to move to different schools. The Council’s view is that pupils with additional learning needs would be fully supported at any of the alternative schools.</p> <p>There is very good support across the cluster schools in the Crickhowell area for pupils’ wellbeing and for the support of pupils with SEN/ALN. All schools in the cluster have an experienced ALNCo and wellbeing champion who can provide support and guidance to pupils. In addition, all schools in the Crickhowell cluster</p>	Neutral		

	have staff trained in adverse childhood experiences, trauma informed approaches and mental health first aid. As such, any pupils with emotional or additional learning needs will be very well supported at any of the schools in the Crickhowell cluster.			
<b>Gender reassignment</b>	The proposal would impact on LGBTQ+ pupils currently attending Llanbedr C. in W. Primary School. The proposal aims to provide improved educational opportunities for all affected pupils.	Neutral		
<b>Marriage or civil partnership</b>	No impact.	Neutral		
<b>Race</b>	The proposal would impact on all primary aged pupils currently attending Llanbedr C. in W. Primary 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 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.	Neutral		
<b>Religion or belief</b>	The proposal aims to provide improved educational opportunities for all pupils currently attending Llanbedr C. in W. Primary 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	Poor	Whilst the Council's Home-to-School transport policy does not provide free transport to denominational schools specifically, it would be able to consider using its discretionary powers under the Learner Wales Travel Measure to provide transport – this would only be available to pupils currently attending	Neutral



	<p>of pupils during the transition period, the long term aim is to provide improved learning opportunities for all learners.</p> <p>Llanbedr C. in W. Primary School is a church school. There is alternative Church in Wales provision available in the catchment at Llangattock C. in W. School for pupils wishing to continue to access denominational provision, however concerns were raised during the consultation period and the objection period that there are not sufficient places available at Llangattock C. in W. School for all pupils currently attending Llanbedr C. in W. School.</p> <p>The Council recognises that there are a limited number of places available at Llangattock C. in W. School and that there would not be sufficient places for all pupils attending Llanbedr CiW School. The number on roll at Llangattock in September 2021 is 103, and the capacity of the school is 121. There are places available for nursery-aged children at Little Sparks in Llangattock.</p> <p>Whilst not in the immediate area, there is also Church-in-Wales provision at Llantilio Pertholey VC School in Abergavenny (7 miles from Llanbedr), Llangors C. in W. Primary School (11 miles) and Priory C. in W. Primary School (16 miles). If parents were unable to access a place at Llangattock C. in W. School, they would be able to apply for places at these Church-in-Wales schools.</p>		<p>Llanbedr C. in W. School and consideration would be on a case-by-case basis.</p> <p>The Statutory Notice published in respect of this proposal stated the following:</p> <p><i>'The Council will also provide transport for pupils currently attending Llanbedr Church in Wales Voluntary Aided Primary School who wish to access Church in Wales school provision at Llangattock Church in Wales Voluntary Aided Primary School. This will be provided on a case-by-case basis using the Council's discretionary powers under Section 6 of the Learner Travel (Wales) Measure 2008.</i></p> <p><i>If there is no place available at Llangattock Church in Wales Voluntary Aided Primary School, the Council will use its discretionary powers, as outlined above, to provide transport for pupils currently attending Llanbedr Church in Wales Voluntary Aided Primary School to their next nearest Church in Wales school, if they wish to access Church in Wales school provision.'</i></p>	
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	Concern was also expressed during the consultation period that the Council's Home to School Transport Policy does not provide transport to denominational provision.			
<b>Sex</b>	The proposal aims to provide improved educational opportunities for all pupils currently attending Llanbedr C. in W. Primary 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.	Neutral		
<b>Sexual Orientation</b>	The proposal would impact on primary aged pupils currently attending Llanfihangel Rhydithon C.P. School, including any LGBTQ+ pupils attending the 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.	Neutral		
<b>Pregnancy and Maternity</b>	No impact.	Neutral		
<b>Socio-economic duty</b>	The aim of the proposal is to provide improved educational opportunities for all pupils currently attending Llanbedr C. in W. Primary School, including any pupils from low income households. Should the Council proceed with implementation	Poor		

	<p>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.</p> <p>PLASC 2021 information shows that 9.6% pupils at Llanbedr C. in W. School were eligible for Free School Meals, and these pupils would continue to receive free school meals at any alternative school that they would transfer to.</p> <p>Should the proposal be implemented, there would be no school in Llanbedr. This would mean that pupils currently attending Llanbedr C. in W. School would need to travel to their nearest alternative provision. Whilst free home to school transport would be provided to eligible pupils, it acknowledged that there would also be an additional travel requirement for parents to access school activities / events, and that this could impact on pupils' ability to access extra-curricular / after school activities. It is acknowledged that the impact would be greater in respect of pupils from lower income households. However, the school is not the closest school for a majority 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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	<p>Comments received during the consultation and objection periods suggested that the loss of a school in the village of Llanbedr would have a negative impact on parents for whom Llanbedr C. in W. Primary School is their nearest school. In particular, concerns were raised about parents needing to access early years provision elsewhere in the cluster and having to travel further to ensure access to extra-curricular activities/after-school clubs, and that this would have a financial impact on these families. However, the majority of pupils currently attending Llanbedr C. in W. Primary School live closer to other schools which should be more convenient for them to access provision if they chose to attend their nearest school.</p>			
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<b>Source of Outline Evidence to support judgements</b>
Consultation responses, consultation report, objections, 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?	IMPACT <small>Please select from drop down box below</small>	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	IMPACT AFTER MITIGATION <small>Please select from drop down box below</small>

<p><b>Long Term:</b> <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>Llanbedr C. in W. School is a small school, and whilst pupil numbers have increased over the last few years, and information received during the consultation / objection periods suggests that pupil numbers are increasing, the school will remain a small school.</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 better strategic management of the Powys schools estate, and to improve equity across the Powys education system.</p>	Good		
<p><b>Collaboration:</b> <i>Working with others in a collaborative way to find shared sustainable solutions.</i></p>	<p>Consultation has been carried out, which gave all interested parties an opportunity to give their views. This included an opportunity to suggest any alternative solutions for the catchment. There has also been a 28 day objection period, during which stakeholders could submit written objections to the proposal.</p>	Neutral		
<p><b>Involvement (including Communication and Engagement):</b> <i>Involving a diversity of the population in the decisions that affect them including:</i></p> <p><b>Unpaid Carers:</b></p> <p><i>Ensuring that unpaid carers views are sought and taken into account</i></p>	<p>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 how to proceed.</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</p>	Good		

	<p>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><b>Prevention:</b> <i>Understanding the root causes of issues to prevent them from occurring including:</i></p> <p><b>Safeguarding:</b> <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><b>Integration:</b> <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><b>Powys County Council Workforce:</b></p>	Implementation of the proposal would impact on all current staff at Llanbedr C. in W. Primary School as there would no longer be a school in	Poor		

<p>What Impact will this change have on the Workforce?</p>	<p>Llanbedr, therefore staff would be subject to a Management of Change process.</p> <p>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. There has also been a 28 day objection period, during which stakeholders could let us know if they don't agree with the proposal.</p> <p>A member of the HR team met with the staff informally at the start of the process.</p>			
<p><b>Payroll:</b> 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 Llanbedr C. in W. Primary School.</p>	Neutral		
<p><b>Welsh Language impact on staff</b></p>	<p>Llanbedr C. in W. Primary School is an English-medium school, therefore it is not anticipated that there would be a Welsh language impact on staff.</p>	Neutral		
<p><b>Apprenticeships:</b> Has consideration been given to whether this change impacts negatively, or positively on</p>	<p>No impact</p>	Neutral		

Apprenticeships within the service?				
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<b>Source of Outline Evidence to support judgements</b>
Consultation responses, consultation report, objections, objection report

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

<b>Communities</b>	<b>How does the proposal impact on residents and community?</b>	<b><u>IMPACT</u> See impact definitions in guidance document</b>	<b>What will be done to better contribute to a more positive impact or to mitigate any negative impacts?</b>	<b><u>IMPACT AFTER MITIGATION</u> See impact definitions in guidance document</b>	<b>Source of Outline Evidence to support judgement</b>
Llanbedr	<p>There would be a significant impact on the community of Llanbedr as there would be no provision in the area, and therefore potential loss of any community facilities or activities associated with the school.</p> <p>Additional travel would be required for pupils currently attending Llanbedr C. in W. Primary 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. Transport would also be provided to the nearest alternative Church in Wales</p>	Major	<p>As a Church in Wales School, the Llanbedr School building is owned by the Diocese, therefore the Diocese would need to determine the building's future use, and therefore whether or not facilities would remain in Llanbedr</p> <p>There is a village hall in Llanbedr which would be continue to be available. Community events could be held here.</p>	Major	

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	<p>provision, for pupils wishing to continue to access Church in Wales provision.</p> <p>Concern has been raised about the loss of nursery provision from the area and parents would need to access early years provision elsewhere in the cluster. Transport to these alternative early years providers was raised as an issue for those not able to access their own transport, as there is no public transport in the area.</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"> <li>• General concern about the impact on the community</li> <li>• The school is the heart of the community</li> <li>• Reference to other community activities/organisations</li> <li>• Closure of the school that people would not want to live in Llanbedr</li> <li>• Reference to previous generations of families that have attended the school</li> <li>• Queries about what would happen to the school building should the school close</li> <li>• Comments relating to community wellbeing</li> </ul>				
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	<ul style="list-style-type: none"> <li>• Other comments/queries</li> </ul> <p>A separate community impact assessment has been carried out which includes input from the school. This has also been updated to reflect comments made during the consultation and objections received during the objection period.</p>				
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9. What are the risks to service delivery or the council following implementation of this proposal?

<b>Risk Identified</b>	<b>Inherent Risk Rating</b> Impact X Likelihood (See Risk Matrix in guidance document)	<b>Mitigation</b>	<b>Residual Risk Rating</b> Impact X Likelihood (See Risk Matrix in guidance document)
Period of uncertainty for Llanbedr C. in W. 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 staff at the school during any period of uncertainty, to minimise the impact on their well-being.	Medium
Parents unable to access alternative Church-in-Wales school places	High	The nearest Church -in-Wales schools within Powys are Llangatock C. in W. Primary School, Llangors C. in W. Primary School and Priory C. in W. Primary School.	Medium/High

		<p>Whilst the Council's Home-to-School transport policy does not provide free transport to denominational schools specifically, it would be able to consider using its discretionary powers under the Learner Wales Travel Measure to provide transport – this would only be available to pupils currently attending Llanbedr C. in W. School and consideration would be on a case-by-case basis. This commitment was reflected in the Statutory Notice published in respect of this proposal.</p>	
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#### 10. Overall Summary and Judgement of this Impact Assessment?

This impact assessment has been updated following the consultation exercise and following the objection period.

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 Llanbedr due to loss of educational provision from the village, 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. Lack of access to sufficient alternative Church in Wales school places is also noted as a negative issue. 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?**

Consultation responses., consultation report, objections, objection report

#### 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

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13. Sign Off

Position	Name	Signature	Date
Impact Assessment Lead:	Sarah Astley		
Head of Service:	Emma Palmer/Lynette Lovell		
Portfolio Holder:	CLlr Phyl Davies		

14. Governance

Decision to be made by	Cabinet	Date required	01/03/2022
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### 3. Equality Impact Assessment

## Powys County Council

### Equality Impact Assessment (EqIA)



<b>Proposal</b>	To close Llanbedr C. in W. School from the 31st August 2022, with pupils to transfer to their nearest alternative schools
<b>Service Area</b>	Schools Service
<b>Date of Assessment</b>	November 2021 Updated September 2021 Updated February 2022
<b>Lead Person undertaking the assessment</b>	SA
<b>Relevant Head of Service who has agreed this assessment</b>	LL

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 Llanbedr C. in W. School.

The proposal is as follows:

- To close Llanbedr C. in W. Primary School from the 31<sup>st</sup> 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 Llanbedr C. in W. School for the following reasons:

- Would address the issue of low pupil numbers at Llanbedr C. in W. Primary 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
- 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 Llanbedr C. in W. Primary 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
- Would reduce the Council's surplus places in primary schools
- Would lead to rationalisation of the primary school estate
- Financial saving to the Council

#### 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?

No

## 6. DATA ANALYSIS

### 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.

#### **Key questions:**

- i)** Are certain groups currently underrepresented in service user figures? Will a change affect this?
- ii)** How do satisfaction levels compare across the protected characteristic groups? How will a change affect this?

### PLASC 2021

Based on the information provided in the school's PLASC return for 2021, the following pupils at Llanbedr C. in W. School belong to the protected characteristic groups:

- Free school meals: 9.6% of pupils are eligible for Free School Meals.
- ALN: 32.7% of pupils have special educational needs. Of these, 13.5% of pupils are on School Action, 17.3% of pupils are on School Action Plus and 1.9% of pupils have statements.
- Disabilities: 32.7% of pupils have additional learning needs.
- English as an Additional Language: 0% of pupils are identified as EAL pupils.
- Ethnicity: The ethnic group of 96.2% of pupils in the school is White British. 3.8% of pupils belong to ethnic groups other than White British.
- Looked after Children: 0.0% of pupils are looked after.

This information shows that a proportion of pupils that belong to the protected characteristic groups will be affected by this proposal. In particular:



	<ul style="list-style-type: none"> <li>- 9.6% of pupils at Llanbedr C. in W. School are eligible for Free School Meals. This is lower than the Powys average for primary schools (13.5%)</li> <li>- 32.7% of pupils at Llanbedr C. in W. School have additional learning needs. This is higher than the Powys average for primary schools (19.2%)</li> </ul> <p>The proposal to close Llanbedr C. in W. School would impact on all pupils currently attending the school, including those pupils belonging to protected characteristic groups.</p>
<p><b><u>6.2 Qualitative</u></b>  <b>Summarise the key qualitative data analysis, providing key themes or patterns.</b>  Include data that relates to existing provision and also data relating to proposal. E.g. protected characteristics focus group on the proposal.</p> <p><b>Key questions:</b></p> <ul style="list-style-type: none"> <li><b>i)</b> Do certain groups have a different service user experience? How will a change affect this?</li> <li><b>ii)</b> Have any areas for improvement been communicated by particular groups? Will a change have an impact upon these views?</li> <li><b>iii)</b> What are the reasons behind some groups not using the service? How will a change affect this position?</li> </ul>	<p>Consultation has been carried out on the proposal relating to Llanbedr C. in W. School, which included consultation with pupils at the affected 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 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 potential impact on the protected characteristic groups:</p> <p><b>4. Concern about impact on pupils with ALN</b></p> <p><b>5. Other comments:</b></p> <ul style="list-style-type: none"> <li>- Impact on religion and belief as it is a Church in Wales School</li> <li>- Impact on military families attending Llanbedr C. in W. Primary School due to potential further disruption to their education.</li> <li>- Impact on LGBTQ+</li> </ul>

<p><b>iv) What has consultation on your proposals revealed about impact on the protected characteristics?</b></p>	<p>Concern was also raised that implementation of the proposal would impact on pupils' ability to access a Church in Wales school.</p> <p>During the objection period, the following comments were received about the proposal's impact on the protected characteristic groups:</p> <p><b>1.15 Comments about pupils belonging to the protected characteristic groups that attend the school</b></p> <ul style="list-style-type: none"> <li>- Comments about the school's support for pupils with ALN</li> <li>- The school has a high percentage of MAT pupils</li> <li>- The school has a number of pupils from military families</li> </ul> <p>Concern was also raised that implementation of the proposal would impact on pupils' ability to access a Church in Wales school.</p> <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><b>The proposal does not present any adverse impact on equality.</b> [Proceed to question 10]</p>	
<p><b>The proposal presents some adverse impact on equality.</b> [Proceed to question 8]</p>	✓

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

<p><b>Please provide detail of weak or sensitive areas of the proposal identified by the assessment.</b></p> <ul style="list-style-type: none"> <li>i) Which protected characteristic groups are particularly affected?</li> <li>ii) Will people on low incomes be affected?</li> <li>iii) Will Welsh speakers be affected?</li> </ul>	<ul style="list-style-type: none"> <li>i) Pupils with additional learning needs (ALN) attending the school would be affected by the proposal, as they would need to transfer to alternative schools. As indicated above, 32.7% of pupils have additional learning needs. This is higher than the Powys average. Comments received during the consultation expressed concern about the impact on pupils with ALN if they had to move to different schools. However, there is very good support across the cluster in the Crickhowell area for pupils' wellbeing and for th support of pupils with SEN/ALN. All schools in the cluster have an experienced ALNCo and wellbeing champion who can provide support and guidance to pupils. In addition, all schools in the Crickhowell cluster have staff trained in adverse childhood experiences, trauma informed approaches and mental health first aid. As such, any pupils with emotional or additional learning needs would be very well supported at an of the schools in the Crickhowell cluster.</li> </ul> <p>The protected characteristic group of 'religion and belief' is also affected, as the school is a Church in Wales school. Although there are Church in Wales places available in the cluster at Llangattock C. in W. Primary School, these are not sufficient for all the pupils currently attending Llanbedr C. in W. Primary School. Other Church in Wales schools are available in neighbouring catchment areas and out of county, but additional travel would be required to attend these schools. The Statutory Notice published in respect of this proposal included a commitment to provide transport to the nearest alternative Church in Wales provision for pupils currently attending Llanbedr C. in W. School who wished to transfer to an alternative Church in Wales school. Whilst recognising that Llanbedr C. in</p>
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	<p>W. Primary School has a distinct Christian ethos, all schools are required to teach religious education.</p> <p>Comments were also received expressing concern about the proposal's impact on military families who currently attend the school.</p> <p>ii) 9.6% of pupils attending Llanbedr C. in W. School are eligible for Free School Meals. This is lower than the Powys average.</p> <p>Comments were received during the consultation period and the objection period about the potential negative impact on low income parents/families if there was no nursery provision available in Llanbedr, and that they would have to travel further to access early years provision elsewhere in the cluster, which could have a financial impact on them. This was also an area of concern for parents/families who would have to travel further to access extra-curricular provision/after-school clubs.</p> <p>iii) Llanbedr C. in W. School is an English medium school - therefore the proposal will not directly affect Welsh speakers.</p>
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## 9. EQUALITY IMPROVEMENT

<p><b>9.1 Having identified problematic aspects to the proposal, how will this now be addressed?</b></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>Should the proposal be implemented, Llanbedr C. in W. Primary School C.P. School would close, and pupils would transfer to their nearest alternative schools. This would have a significant impact on pupils currently attending Llanbedr C. in W. Primary School, including any pupils belonging to the protected characteristic groups that attend that school, as for those pupils for whom Llanbedr C. in W.. Primary School is currently the closest school, some additional travel would be required in order to attend their nearest alternative school.</p>
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<p>i) Can the impact be mitigated, and how will this be done?</p> <p>ii) Does the proposal require modification to reduce or remove this impact?</p> <p>iii) Should the proposal be considered for removal, owing to the degree of impact it is likely to have?</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, transgender pupils, pupils eligible for Free School Meals and Looked After Children. The number of pupils belonging to the protected characteristic groups currently attending Llanbedr C. in W. Primary School C.P. School is relatively 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 Crickhowell cluster for pupils with ALN.</p> <p>As Llanbedr C. in W. is a Church in Wales school, the protected characteristic of 'religion and belief' would also be affected by the proposal. There aren't sufficient alternative Church in Wales places in the cluster to provide places for all pupils that currently attend Llanbedr C. in W. Primary School. Whilst recognising that Llanbedr C. in W. Primary School has a distinct religious ethos, all schools are required to teach religious education, therefore should the Council proceed with the proposal to close the school, pupils would continue to be taught about religion at the alternative schools. The nearest alternative Church-in-Wales schools within Powys are Llangattock C. in W. Primary School, Llangors C. in W. Primary School and Priory C. in W. Primary School. Whilst the Council's Home-to-School transport policy does not provide free transport to denominational schools specifically, it would be able to consider using its discretionary powers under the Learner Wales Travel Measure to provide transport – this would only be available to pupils currently attending Llanbedr C. in W. School and consideration would be on a case-by-case basis.</p>
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	<p>The Statutory Notice published in respect of this proposal included a commitment to provide transport to the nearest alternative Church in Wales provision for pupils currently attending Llanbedr C. in W. School who wished to transfer to an alternative Church in Wales school.</p> <p>Concern has also been expressed about the potential disruption to military families currently attending the school. The Council recognises that all school reorganisation processes create a period of uncertainty for all families, and recognises that this could be increased in military families due to the nature of military life. Should Llanbedr C.P. School close, then all schools receiving pupils as a result are expected to work with the closing school, the pupils and their families to provide full support to pupils to ensure a smooth transition.</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><b>Yes</b> <input type="checkbox"/></p> <p>Date added.....</p> <p>Reference.....</p>	<p><b>No</b> <input checked="" type="checkbox"/></p> <p>If no, please explain why not:  <b>Need was not identified at time of writing Service Strategy</b></p>
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## 6. Community Impact Assessment – Llanbedr C. in W. School

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

The closest provider for pupils attending Llanbedr C. in W. School in January 2020 was as follows:

School	% of Pupils
Llanbedr C. in W. School	48.8%
Crickhowell C.P. School	24.4%
Llangynidr C.P. School	14.6%
Llangattock C. in W. School	4.9%
Deri View Primary School (Out of County)	7.3%

This suggests that 48.8% of pupils attending the school were attending their closest primary school, whilst 51.2% of pupils attending the school live closer to other primary schools.

### Updated information – PLASC 2021

The closest provider for pupils attending Llanbedr C. in W. School on the PLASC counting date 2021 was as follows:

School	% of Pupils
Llanbedr C. in W. School	38.5%
Crickhowell C.P. School	28.8%
Llangynidr C.P. School	11.5%
Llangattock C. in W. School	9.6%
Deri View Primary School (Out of County)	9.6%
Llangors C. in W. School	1.9%

This suggests that 38.5% of pupils attending the school were attending their closest primary school, whilst 61.5% 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:

- Puppet Club
- Welsh Club
- Art and Craft Club
- IT and Technology Club
- Gardening Club
- Cookery Club
- Dragon Sports Club
- Storytelling
- STEM Club
- Charity Club
- Show Ground Categories Club
- Recorder and Music Club
- Drama Club
- House Teams Challenges
- Mandarin
- School Council
- Eco Club
- Criw Cymraeg

Whilst some of these clubs are run by staff and governors, some are assisted by older pupils from Crickhowell High School. Many of the clubs are shared with the community. The gardens, ponds and vegetable plots are attended by community members in evening, holidays and during the school week.

**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:

- Tots and Tiddlers Support Group
- Friends of the School and Community Group
- Raven Drama
- Puppet Soup Company
- Faith in Family



- Messy Church
- Family Film Club
- Breakfast Club
- A new library was opened in the school in 2018

**iv) Other use by the community of the school building**

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

- Fell running
- Puppetry and Theatre Crafts Club
- Community Environmental projects
- Charity Bingo and Beetle Drive events
- Auction events
- Pond and garden development
- Vegetable plots and community engagement events

The school also acts a meeting hub for the three parishes of Llanbedr, Patricio and Llangenny which includes Lent lunches, Harvest festival and Easter which are prepared and served by the pupils.

**v) Other links between the school and the community**

- Community Annual Eisteddfod
- Community Harvest Festival
- Community Scarecrow Festival
- Christmas Fayre
- Easter Parade
- Summer Fayre
- Lantern Parade
- Christingle

The opportunities offered by the school for children in the community benefit the whole community. The school also has a highly effective Friends of the School group who work raising funds for the school, charity and community projects.

**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, Llanbedr C. in W. School would close and pupils transferring to their nearest alternative schools and there would no longer be a school in Llanbedr.

It is acknowledged that there would be a significant impact on the community of Llanbedr, as there would be no provision in the village, and therefore a potential loss of community facilities associated with the school.

As a Church in Wales School, the Llanbedr School building is owned by the Diocese, therefore the Diocese would need to determine the building's future use, and therefore whether or not facilities would remain available to the community in Llanbedr.

There is a village hall located in Llanbedr, therefore should the school no longer be available, community events and activities could take place at the hall.

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

Should the proposal be implemented, Llanbedr C. in W. School would close and pupils would transfer to their nearest alternative schools. For the majority of pupils, the closest alternative Powys schools would be Crickhowell C.P. School, Llangynidr C.P. School and Llangattock C. in W. School.

The closest alternative school for the pupils that were attending Llanbedr C. in W. School according to PLASC 2021 is as follows:

	<b>Pupils' closest alternative school should there be no school in Llanbedr</b>
Crickhowell C.P. School	61.5%
Deri View Primary School	13.5%
Llangynidr C.P School	11.5%
Llangattock C. in W. Primary School	9.6%
Llangors C. in W. School	1.9%
Llanvihangel Crucorney C.P School	1.9%

**Travelling distances for all pupils attending Llanbedr C.i.W Primary School (PLASC 2021):**

<b>Current average travelling distance to Llanbedr C. in W. Primary School</b>	<b>Average travelling distance to alternative provision, if there was no school in Llanbedr</b>
3.3mi	2.4mi

<b>Current maximum travelling distance to Llanbedr C. in W. Primary School</b>	<b>Maximum travelling distance to alternative provision, if there was no school in Llanbedr</b>
10.8mi	6mi

**Travelling distances for pupils for whom Llanbedr C.i.W Primary School is their closest school:**

<b>Average travelling distance to Llanbedr C. in W. Primary School</b>	<b>Average travelling distance to alternative provision, if there was no school in Llanbedr</b>
1.56mi	2.7mi

<b>Maximum travelling distance to Llanbedr C. in W. Primary School</b>	<b>Maximum travelling distance to alternative provision, if there was no school in Llanbedr</b>
3.8mi	4.49mi

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.

**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**

- At present, public transport is not a requirement for pupils to attend school, as although some may live further than walking distance by road, there are many cross country and short cycle stretches that families use.
- Many families who attend the school are able to travel safely across the country routes within their journey from home to school. The school has an access gate from the yard to an adjoining field which avoids the roads and is better for the environment.
- If the school was to close, pupils would need transport to attend their alternative schools which would therefore not promote walking to school as there are no safe walking or safe cycle routes.

**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 Llanbedr C. in W. 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. It is also suggested that recent housing developments actively targeted this group due to the proximity with the school.

Should there be no school in Llanbedr, 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 place. There is a village hall located in Llanbedr, therefore should the school no longer be available, community events and activities could take place at the hall.

As a Church in Wales School, the Llanbedr School building is owned by the Diocese, therefore the Diocese would need to determine the building's future use, and therefore whether or not facilities would remain in Llanbedr.

- **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.

There is a village hall located in Llanbedr, therefore should the school no longer be available, community events and activities could take place at the hall.

In addition, as a Church in Wales School, the Llanbedr School building is owned by the Diocese, therefore the Diocese would need to determine the building's future use, and therefore whether or not facilities would remain in Llanbedr.

- **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 subsequently the loss of families from Llanbedr could have some impact on local business in Llanbedr 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, traditions and culture which are central to the area. Implementation of the proposal could eventually lead to a reduction in employment opportunities in the village of Llanbedr.

- **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 Llanbedr 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 Llanbedr would have a significant effect on the local community.

As a Church in Wales School, the Llanbedr School building is owned by the Diocese, therefore the Diocese would need to determine the building's future use, and therefore whether or not facilities would remain in Llanbedr.

There is a village hall located in Llanbedr, therefore should the school no longer be available, community events and activities could take place at the hall.

**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**

- Additional travel time / distance
- Environmental impact
- Concern about traffic congestion
- Queries about the Council's Home to School Transport Policy

- **Comments about Church in Wales provision**

- Families chose Llanbedr because it is a church school
- Comments about links between Llanbedr C. in W. School and the church
- Concern that there is no alternative Church in Wales provision available
- Comments that closure of the school would remove parental choice to choose a Church in Wales school

- Concern about the impact on pupils from not being able to attend a Church in Wales school
- Positive comments about Church in Wales schools / Christian ethos
- Insufficient consideration has been given to providing access to faith-based provision

**- Impact on the community**

- General concern about the impact on the community
- The school is the heart of the community
- Reference to other community activities / organisations
- Closure of the school would mean that people would not want to live in Llanbedr
- 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 relating to community well-being

**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**

- Concern about additional travel time for pupils
- Comments about additional travel costs
- Environmental impact of additional travel
- The additional travel would impact on parents / families
- Impact on traffic congestion in the area

**- Impact on the community**

- General concern about impact on the community
- The school is the heart of the community
- Concern about the impact on community activities
- Closure of the school would mean that people would not want to live in Llanbedr
- Concern about impact of closure of the school on community well-being

- Comments about the impact of previous school closures on communities
- **Comments about Church in Wales provision**
  - Parents would be unable to choose a Church in Wales School
  - Reference to the School Organisation Code
  - Insufficient consideration has been given to the school's Church in Wales status
  - Reference to transport arrangements

### **xiii) Conclusion**

The proposal would have a significant impact on the community of Llanbedr as there would be no provision in Llanbedr. Many comments received during the consultation period and the objection period emphasise the importance of the school within the local community and the benefits of being part of a close community on the development of pupils. It is also recognised that there are strong links between the school, being a C. in W. school and the local church, and how this contributes to pupils' development, and that this would be lost should the school close. Concern has also been expressed that closure of the school could mean that people would not want to live in Llanbedr in the future, and could lead to a reduction in community activity in the village.

It is clear that a wide range of extra curricular activities are available to pupils at Llanbedr, and as the school is a small school, all pupils are able to take part in all activities. Should there be no school in Llanbedr, 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 pupils would need to travel to the alternative schools, which 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 over 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 also suggest that due to the size of Llanbedr C. in W. 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. There is also the availability of extra-curricular activities within the Llandrindod catchment area which are delivered by other organisations.

Should the proposal be implemented, this would mean that there would be no school provision in the village of Llanbedr. The information provided throughout the process



indicates that there is currently extensive community use of the Llanbedr building, and extensive links between the school and the local community, and that many community activities are arranged by 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 activities available. As a Church in Wales School, the Llanbedr School building is owned by the Diocese, therefore the Diocese would need to determine the building's future use, and therefore whether or not facilities would remain in Llanbedr. There is a village hall located in Llanbedr, therefore should the school no longer be available, community events and activities could take place at the hall.

It is also acknowledged that implementation of the proposal would result in additional travel to school for pupils for whom Llanbedr 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 and objection periods about the loss of nursery provision from the area, and parents would need to access early years provision elsewhere in the cluster. Transport to these alternative early years providers was raised as an issue for those not able to access their own transport, as there is no public transport in the area.

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

## CYNGOR SIR POWYS COUNTY COUNCIL.

## CABINET EXECUTIVE

8<sup>th</sup> March 2022

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

**REPORT TITLE:** Sennybridge C.P. School Strategic Outline Case (SOC)

**REPORT FOR:** Decision

## 1. Purpose

1.1 This report requests Cabinet approval for the following:

a) To submit a Strategic Outline Case (SOC) to the Welsh Government's Sustainable Communities for Learning Programme (formerly the 21<sup>st</sup> Century Schools Programme) for investment to develop:

- A new 150 place dual stream primary school to replace Sennybridge C.P. School's current building.

1.2 The cost of the preferred way forward is estimated to be £10,254,582 including \*8% Risk and 24% Optimism Bias, which is acceptable at SOC stage, and will be mitigated as the business case process continues into the next stages. The funding is allocated for this project in the Council's Band B 21<sup>st</sup> C Schools Programme.

<b>Welsh Government contribution (65%)</b>	<b>£6,665,478</b>
<b>PCC (35%)</b>	<b>£3,589,104</b>
<b>Total</b>	<b>£10,254,582</b>

1.3 The report is supported by the following appendices:

Appendix A – Sennybridge C.P. School SOC  
Appendix B – Integrated Impact Assessment

## 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 In addition, the strategy 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.'*

- 2.6 The strategy also includes a Strategic Aim to *'improve access to Welsh-medium provision across all key stages'*. Within this aim, the Strategy sets out Strategic Objectives to *'Move schools along the language continuum'*.
- 2.7 In September 2020, Cabinet considered a Programme Business Case which identified a preferred way forward for the Brecon catchment. The Programme Business Case identified a preferred way forward which included providing a replacement school building for Sennybridge C.P. School.

### **The Case for Change**

- 2.8 Sennybridge Community Primary School is located in the village of Sennybridge, which is in the community of Maescar which has a population of 965 usual residents. Maescar has a community council with eleven locally elected or co-opted community councillors.
- 2.9 The school has a strategic location, sitting as an outlier on the Powys border, but within the Brecon catchment area. The school lies 9 miles (14 km) west of Brecon and is close to the border with Neath Port Talbot County Borough Council.
- 2.10 The main school building was built in 1939 and was designated until the 1980s as Defynnog Primary School. The school was originally constructed as a Secondary Modern school, with a wing of accommodation of one side of the hall for boys and the other wing for girls. Each wing had a separate entrance and toilet facilities. To the rear of the school an extension was constructed in the 1970s/80s. This has subsequently been adapted and now contains the Early years setting alongside an upper-level community gymnasium with a restricted height external store beneath. More recently the school constructed a small conservatory to the north of the KS1 accommodation. A separate canteen building was constructed to the south of the main school, this is believed to be contemporary to the main building.
- 2.11 The case for change at Sennybridge C.P. School is based on the following issues:
- The condition of the buildings at Sennybridge is poor
  - Building accessibility at the school is poor
- 2.12 Sennybridge County Primary school is currently slightly over-subscribed in numbers (hosting 2 more pupils than its capacity). The building is poor (condition C) and is not fully DDA compliant (suitability

condition B/C). There is estimated backlog maintenance required of over £1M.

- 2.13 Substantial issues exist with the site, its access, egress and external layout. Access to the school from Defynnog Road is very narrow. It leads to a recently enlarged car park at the rear of the school but does not allow for passing places. Pedestrian access from the north is via steep and dilapidated steps adjacent to the cattle market. The surfacing of these steps is worn and uneven. Site safeguarding is a significant issue that has been raised in recent Estyn reports. Although the playing field has been fenced recently, the main school entrance is to the south of the building and visitors must cross the school playground to reach it. The entrance is not overlooked by an adjacent staff or administration room and the corresponding lack of supervision remains a significant impediment to the school's operation.
- 2.14 Assessment of the building shows that the current Sennybridge CP School has inadequate spaces for modern teaching. Overall the building itself is not too small, but its rooms are not the right size and they are not in the right place. Both of these issues are difficult to resolve. For example, increasing the size of a classroom by 10m<sup>2</sup> is disproportionately expensive and massively disruptive. All of the classrooms are either too large or too small. The arrangement of the school along a single corridor also restricts options for re-planning the building, which has resulted in a piecemeal series of modifications.
- 2.15 For Staff and Administration, the total space available is three quarters of the area recommended within BB99. The difficulties caused by this shortfall are compounded when there was an extension to the building, by the switching of the main entrance to the south of the building. The resultant layout meant that there is no adjacent office of staffroom offering easy supervision.
- 2.16 Substantial issues exist with many of the elements of the structure, most notably including:
- Flooring – The original terrazzo flooring and lower wall sections to the main school building have been overlaid with now dilapidated vinyl sheeting. The terrazzo itself is cracked and would require specialist repair if retained. Some areas of the school still feature the original woodblock or quarry tile flooring, which is now de-bonded and requiring replacement.
  - Walls – External walls are uninsulated, and although they are in a generally sound condition the lack of insulation allows surface condensation and promotes mould growth within habitable rooms.
  - Ceilings – Most classrooms have a reduced height suspended ceiling. Inspection has shown that the original cast iron heating panels remain in-situ. The hall ceiling is unimproved, and this contributes to the high reverberation time and poor acoustics.

- Roof Windows – Roof windows are generally original and dilapidated. There are several instances where high level clerestory windows remain as part of the building fabric into rooms where a lower level suspended ceiling has been installed, meaning they no longer provide either light or ventilation to the rooms.
- Electrical Services - The amount of socket outlets distributed around the school is very limited. This leads to the use of extension leads that pose a trip hazard and fire risk. The school is long due a full rewire to bring up to modern standards and to comply with BS7671 electrical wiring regs.
- Heating - The heating system in the main school is generally in poor condition with varying heat emitters and poor controls. All pipework is aged and liable to failure. The system pipe work is in fair to poor condition and is also liable to failure.

### **The Strategic Outline Case (SOC)**

2.17 The SOC has been developed in accordance with HM Treasury’s Five Case Business Model. The five ‘cases’ are:

- Strategic Case (The Case for Change)
- Economic Case (Options to address the issues raised in the case for change)
- Commercial Case (Procurement routes)
- Financial Case (high-level indicative costs)
- Management Case (how the project will be managed)

2.18 A number of options relating to the planned development in Sennybridge have been considered when developing the SOC. These are outlined from page 30 of the SOC, which is attached as Appendix A.

### **The Preferred Way Forward**

2.24 Following an appraisal of options against the identified Investment Objectives and Critical Success Factors, an Economic Appraisal of shortlisted options and a Financial evaluation, the emerging preferred option for Sennybridge C.P. School is as follows:

***Option 5: New build 150 place 4-11 dual stream community primary school in Sennybridge on existing site.***

2.25 The following table provides a summary of the advantages and disadvantages of the preferred way forward:

Advantages	Disadvantages
<ul style="list-style-type: none"> <li>• Replicates the existing school</li> </ul>	<ul style="list-style-type: none"> <li>• Larger capital investment</li> </ul>

<p>size.</p> <ul style="list-style-type: none"> <li>• Provides a future proofed school, based on current pupil/population forecasts;</li> <li>• Enables the curriculum to be delivered in a continuous and coherent way from the Foundation Stage through to the end of Key Stage 2;</li> <li>• Maintains early year and primary age provision in the local community;</li> <li>• Minimises disruption to Sennybridge pupils, parents and teachers;</li> <li>• Enables wider integration of the school within the community;</li> <li>• Continuation of Welsh Medium Education in the Sennybridge area;</li> <li>• Collocated early years childcare provision on the one site.</li> <li>• Delivers a new build school which extends the time horizon for the requirement for substantial future works into the long term.</li> <li>• Removes backlog maintenance of circa £1.032m.</li> <li>• Will enable energy efficiencies reducing the buildings carbon footprint and ongoing running costs.</li> <li>• Provision of appropriate number of school pupil places.</li> <li>• Addresses condition, suitability and sustainability issues in current school.</li> <li>• Reaffirms the strategy to keep Primary schools in strategic locations.</li> <li>• New building will be condition A.</li> <li>• Meets BREEAM and</li> </ul>	<p>required from an already over-stretched capital budget.</p> <ul style="list-style-type: none"> <li>• Substantial noise disruption to existing school setting during building work.</li> <li>• May require temporary relocation of School pupils during building work and associated costs of this.</li> </ul>
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<p>environmental building standards.</p> <ul style="list-style-type: none"> <li>• Potentially attractive to local community and stakeholders.</li> <li>• Appropriate facilities for teaching and learning for 21C curriculum.</li> <li>• Provides community focussed facilities.</li> </ul>	
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### **3 Advice**

3.1 The advice of officers is that the SOC should be submitted to Welsh Government for approval, to enable the Council to proceed with the project and progress to the next stage of the business case process.

3.2 The Welsh Government's intervention rate for schools within Band B of the 21<sup>st</sup> Century Schools programme is 65%, which represents good value for money for the Council. Cabinet is advised that there is a significant early stage risk contingency of 25% within the estimated project costs, which is appropriate at a SOC stage. More detailed estimated costs will be confirmed at Full Business Case stage.

### **3.4 Indicative Timescales**

<b>Date</b>	<b>Actions (commencement)</b>
<b>03/2022</b>	SOC to Powys CC Cabinet Submit SOC to WG
<b>05/2022</b>	Complete RIBA 2
<b>06/2022</b>	OBC to Powys CC Cabinet Submit OBC to WG
<b>07/2022</b>	Commence Procurement
<b>09/2022</b>	Award Contract
<b>05/2023</b>	Complete RIBA 3/4
<b>07/2023</b>	Planning Approval

Date	Actions (commencement)
10/2023	Submit FBC to PCC Cabinet Submit FBC to WG
01/2024	Commence Construction
01/2025	New school building open

#### 4. Resource Implications

4.1 Estimated costs are as follows:

Project Costs	
Capital Cost	£7,569,575
Optimism Bias	£1,816,698
Risk	£868,308
VAT (only to be included where non-recoverable by applicant)	N/A
<b>Total Project Cost (inclusive of optimism bias and risk)</b>	<b>£10,254,582</b>
<b>Welsh Government Contribution (65%)</b>	<b>£6,665,478</b>
<b>PCC Contribution (35%)</b>	<b>£3,589,104</b>

4.2 The project can be accommodated within the current 21<sup>st</sup> Century Schools Programme funding envelope, however there isn't sufficient funding to complete this scheme and the proposed Brecon Primary School so additional funding will need to be found to finance the shortfall currently estimated at £5 million to complete both schemes.

4.3 The Councils contribution towards this scheme will be funded from borrowing as no other funding has been identified. The cost to the council revenue budget as a result of this borrowing is estimated at £160,000 per year for 34 years. This is included in the councils Financial Resources Model (FRM) but there are significant funding shortfalls in future years to close the budget gap.

4.4 The current 21<sup>st</sup> Century Schools grant conditions allow Welsh Government to claw back grant if the school has over 15% surplus capacity 5 years after occupation of the school. The capacity of the planned new building is higher than the current pupil numbers, so this remains a risk to this scheme.

- 4.4 The attached SOC identifies that from the opening of the new school building in 2025, there will be a small increase in the recurring revenue cost of the school, of approximately £13k per annum. This is due to the additional cost of rates following a move to the new build. Any change to the formula funding provided will impact on the Council's revenue budget.
- 4.5 Development and implementation of the recommendation would require involvement from a number of service areas, including staff from the Schools Service, Finance, Property, Highways and ICT.
- 4.5 The Head of Finance (Section 151 Officer) notes the comments as set out in section 4 above. There is currently a shortfall in the Council's contribution to fully fund this project based on the estimated costs. This shortfall would need to be resolved at the Outline Business Case (OBC) stage. The submission of the SOC is fundamental to gaining the investment from Welsh Government and can therefore be supported.

## **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 Edwin Roderick:

'I fully support the proposal to build a replacement school at Sennybridge. The old school dates back to 1938 but has now reached the end of its life and there is an urgent need for considerable investment. There are many issues with the school fabric, heating and electrics and a new school is essential to meet the needs of the new school curriculum together with appropriate sports facilities both for the school use and the local community. The school has traditionally been an integral part of the Community and these links will be further improved by state-of-the-art facilities. Sennybridge school is a dual stream school with a growing number of pupils in the Welsh stream, however I am pleased to note how much incidental Welsh is used as part of everyday school life within the English stream. Although the teaching areas are in poor condition, the school produces confident and mature pupils, a new building will provide a learning environment which will aid pupils educational and wellbeing.'

## **7. Integrated Impact Assessment**

- 7.1 An initial impact assessment of the preferred way forward is attached as Appendix B. The impact assessment considers the project'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:

'This impact assessment suggests that the impact would be positive. The development of a new building to replace the current Sennybridge Primary School building would address many issues related to the poor condition of the current building, ensuring that future pupils would be taught in facilities that are fit-for-purpose, improving their learner entitlement and experience. The new facilities would be fully DDA compliant, supporting learners with disabilities. Further opportunities for integration between the school and other services, to have a positive impact on the health and well-being of pupils attending the school and their families.'

Should Cabinet approve continuing with the preferred option, the impact assessment will be regularly updated throughout the process to take account of any feedback received.

## 8. **Recommendation**

- 8.1 It is recommended that Cabinet approves the following:

To submit a Strategic Outline Case (SOC) to the Welsh Government's 21<sup>st</sup> Century Schools Programme for investment to develop:

- A new 150 place dual stream primary school to replace Sennybridge C.P. School's current building.

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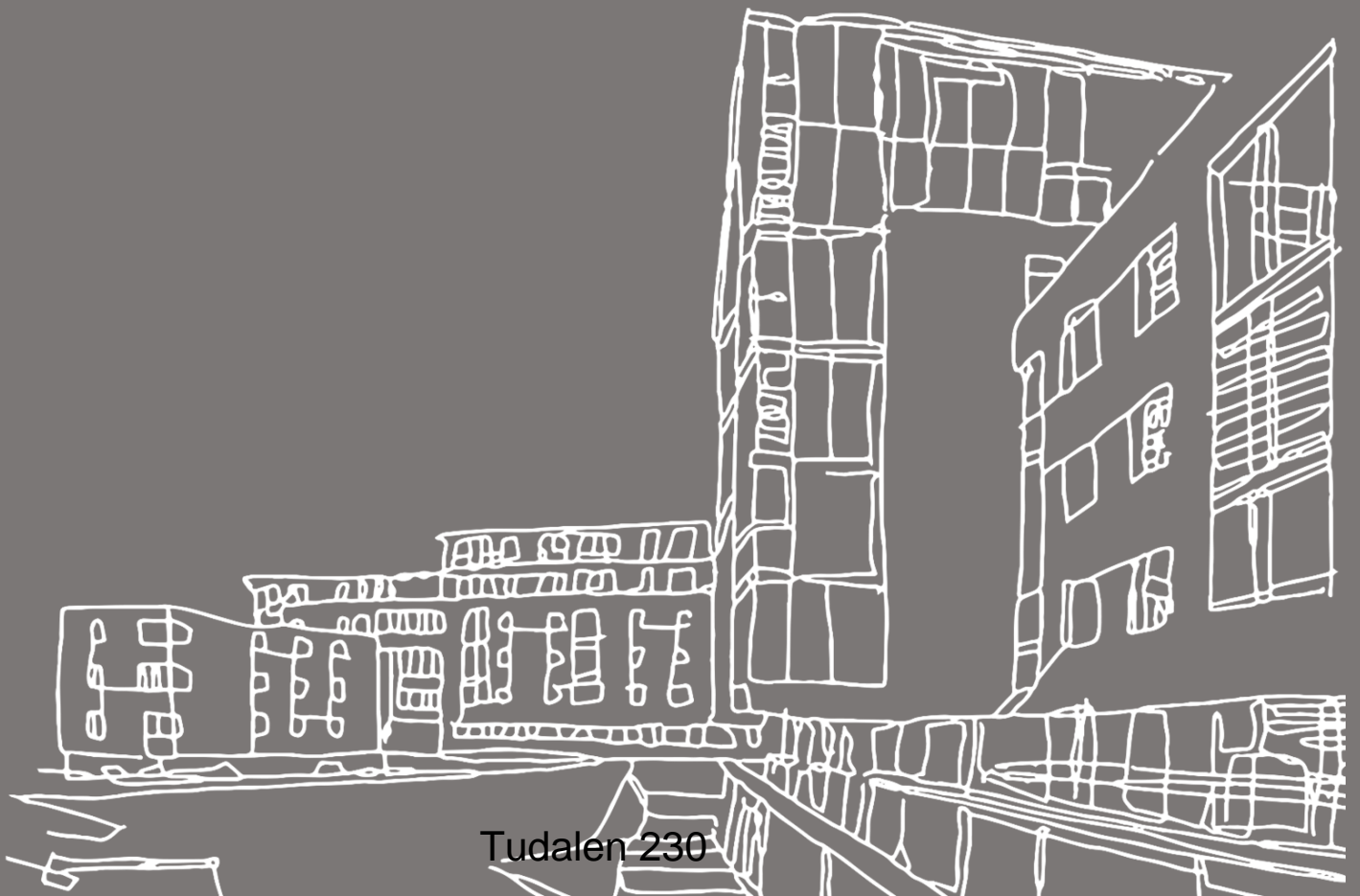
# Strategic Outline Case:

Sennybridge Strategic Outline Case

February 2022

Version 0.9





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## 0. Document Control

### 0.1 Version Control

Version	Status	Date	Author	Update
0.1	Draft	30/11/21	MH	Baseline Document Created, using the original Brecon Catchment SOC.
0.2	Draft	07/12/21	MH	Updated Option appraisals
0.3	Draft	06/01/22	MH	Various amendments as a result of information provided
0.4	Draft	10/01/22	LD/RG	Completed Economic and Financial appraisals Added in/sign-posted new WG requirements
0.5	Draft	11/01/22	RG	Added Executive Summary
0.6	Draft	16/02/22	LD	Remaining comments within document addressed
0.7	Draft	21/02/22	LD	Financial and economic tables updated
0.8	Draft	28/02/22	LD	Updates based on final feedback

# 1 Executive Summary

## 1.1 Strategic Case

### 1.1.1 Introduction

The purpose of this Strategic Outline Case (SOC) is to present the case for investment in the Brecon catchment, a new 150 Dual stream Primary school in Sennybridge.

The cost of the preferred option is estimated to be £8,437,884, excluding Optimism Bias and Risk.

The case for change in the Brecon catchment is based on the following significant issues:

1. The condition of the buildings at Sennybridge is poor;
2. Building accessibility at the school is also poor;

On 14 April 2020 Council approved the new Strategy for Transforming Education in Powys 2020-30, replacing the legacy School Organisation Policy 2018. The new Strategy sought to address a number of significant concerns raised by Estyn on the progress of the Council's school reorganisation programme, acknowledging a historical lack of political decision making and a deep scepticism amongst the teaching profession regarding the Council's political commitment to schools and to the delivery of the improvements that are needed.

In directly addressing these issues the new strategy outlines:

- a summary of the challenges faced by the education sector in Powys;
- a new vision for education in Powys;
- a final set of guiding principles;
- strategic aims and objectives;
- a programme of activity;
- a summary of the legislative process;

New governance arrangements have also been introduced to support the delivery of the new strategy.

The strategy is supported by a new Strategic Outline Programme (SOP) for capital funding for school building projects to be phased over a ten year period. The capital funding required to enable the strategy to be delivered has been estimated at £350m.

### 1.1.2 Investment Objectives

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

1. Provide a stimulating teaching and learning environment in state of the art, 21st Century facilities that will impact positively on the self-esteem and well-being of all pupils and deliver the new curriculum for Wales.

2. Remove non DDA compliant poor condition buildings, reduce backlog maintenance and provide environmentally sustainable schools incorporating zero net carbon principles which improve the building's efficiency and running costs.
3. Develop Community-focused schools that are the central point for multi-agency services to support children, young people, families and the community.
4. Provide Early Years facilities that meet the needs of all children and enable the effective delivery of the Curriculum for Wales
5. To meet and stimulate demand for Welsh-medium provision
6. To provide an optimal safeguarding environment.
7. Ensure that all pupils with SEN/ALN are placed in a provision that meets their needs, with the appropriate specialist teaching, support and facilities that enables every learner to meet their potential.

## 1.2 Economic Case

### 1.2.1 Options

Following an initial assessment of the of the scope of work required, a long list of options was developed for each project within the remit of the scope:

- Option 1 - Do nothing - Close the existing school and relocate pupils to nearest schools.
- Option 2 - Business as usual (BAU).
- Option 3 - Remodel the existing building and outside area.
- Option 4 - Build extension to the existing school.
- Option 5 - New Build school on existing site.
- Option 6 - New build School on alternative site.

Each of these options (for each project) were subjected to a review of advantages and disadvantages and an appraisal against the Investment Objectives and Critical Success Factors agreed by the Powys officers team.

During the appraisal, it was clear that Option 1 (Do Nothing) did not sufficiently meet the Investment Objectives or Critical Success Factors, but was carried forward as a baseline comparator, in line with the guidance in the HM Treasury Green Book.

As a result of this, the following options from each project were short-listed for Economic and Financial appraisal:

- Option 2: Do Nothing – Business as Usual.
- Option 5: New build 150 place 4-11 dual stream community Primary School in Sennybridge on existing site.

- Option 6: New build 150 place 4-11 dual stream community Primary School in Sennybridge on alternative site.

The short-listed options (for both projects) were assessed over a 60 year period (20 years in the case of Option 1, Do Nothing), to understand the Net Present Cost (NPC) and Equivalent Annual Cost (EAC) of each option.

As the assessment periods were not uniform, the Equivalent Annual Cost is deemed the main point of comparison between the options. The Economic Appraisal resulted in the following outcomes.

### 1.2.2 Net Present Cost

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)
<b>Option 1:</b>	Do nothing – business as usual – (BAU)	9.4	0.64	9.2	0.62
<b>Option 5:</b>	New build 5 classroom school on the grassed area of Sennybridge CP School to include Early Years facility and community room.	24.3	0.93	21.3	0.81
<b>Option 6:</b>	New build 5 classroom school on an alternative site within the area to include Early Years facility and community room.	24.8	0.95	21.8	0.83

**DCF** = Discounted Cash Flow

**NPC** = Net Present Cost

**EAC** = Equivalent Annual Cost

The options were economically appraised over different time periods, with Option 1 being appraised over 20 years, while Options 5 and 6 were appraised over 60 years. Once again, this is because Option 1 is essentially a 'Do Minimum' option where the lifespan of the asset is significantly less than the other options considered.

On that basis, the key comparator from the Economic Appraisal table is the Equivalent Annual Cost (EAC), which calculates the average annual (economic) cost to the Council. On that basis, Option 1 appears to be the best option economically, but was actually carried only forward as point of comparison and did not meet a critical mass of the Council's Investment Objectives and Critical Success Factors.

### 1.3 Commercial Case

The Council has good experience of working with contractor frameworks and has achieved positive outcomes using such frameworks. The Council has therefore concluded that the optimum procurement route will be to use the revised SEWSCAP framework that was re-launched in June 2019 (SEWSCAP 3). The benefits of utilising contractors from this existing Contractor Frameworks list are as follows:

1. Consultation and design development can be carried out by the Heart of Wales Property Services Ltd (HoWPS) , which is a 50:50 joint venture partnership between PCC and Kier. The design team will then 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 PCC during all stages of the project programme.
2. Compliant with EU procurement directives and the Public Contract Regulations (2014), offering a swift route to market and opportunities for early contractor involvement;
3. The framework is free to use, offering a variety of contracts, pricing models and the potential for further savings achieved via mini-competition;
4. The new SEWSCAP Property Construction Framework is divided into the following lots:
  - Lot 1: Provision of Construction services to include new build, extensions and refurbishment under traditional or design and build with all associated works – (£250,000 to £1,500,000) - Powys County Council and other Potential Employers based or operating in Powys or operating nearby;
  - Lot 2: Provision of Construction services to include new build, extensions and refurbishment under traditional or design and build with all associated works – (£250,000 to £1,500,000) - Torfaen County Borough Council, Blaenau Gwent County Borough Council, Monmouthshire County Council, Caerphilly County Borough Council or other Potential Employers based or operating near those areas;
  - Lot 3: Provision of Construction services to include new build, extensions and refurbishment under traditional or design and build with all associated works – (£250,000 to £1,500,000) - Rhondda Cynon Taf County Borough Council, Merthyr Tydfil County Borough Council and Bridgend County Borough Council and any Participating Authorities based or operating near those areas
  - Lot 4: Provision of Construction services to include new build, extensions and refurbishment under traditional or design and build with all associated works – (£250,000 to £1,500,000) - Vale of Glamorgan Council, The County Council of the City of Cardiff Council, Newport City Council or other Potential Employers based or operating near those areas;
  - Lot 5: Provision of Construction services, extensions and refurbishment under traditional or design and build with all associated works – (£1,500,001 to £3,000,000) - Powys County Council and other Potential Employers based or operating in Powys or operating nearby to include new build



- Lot 6: Provision of Construction services to include new build, extensions and refurbishment under traditional or design and build with all associated works – (£1,500,001 to £3,000,000) - All Potential Employers
- Lot 7: Provision of Construction services to include new build, extensions and refurbishment under traditional or design and build with all associated works – (£3,000,001 to £5,000,000) - All Potential Employers
- Lot 8: Provision of Construction services to include new build, extensions and refurbishment under traditional or design and build with all associated works – (£5,000,001 to £10,000,000) - All Potential Employers
- Lot 9: Provision of Construction services to include new build, extensions and refurbishment under traditional or design and build with all associated works – (£10,000,001 to £25,000,000) - All Potential Employers
- Lot 10: Provision of Construction services to include new build, extensions and refurbishment under traditional or design and build with all associated works – (£25,000,001 to £100,000,000) – All Potential Employers

In this instance the Council proposes to use Lot 8 (£5M - £10M)

#### **1.4 Financial Case**

A balance sheet asset addition of £7,569,575 is made for the new build school. Short term additional funding is required of the full £7,569,575 for years 0 through 3 (inclusive), excluding VAT, retained risks and optimism bias.

From the opening of the new school building in 2025 there will be a small increase in the recurring revenue cost of school, at approximately 13K per annum.

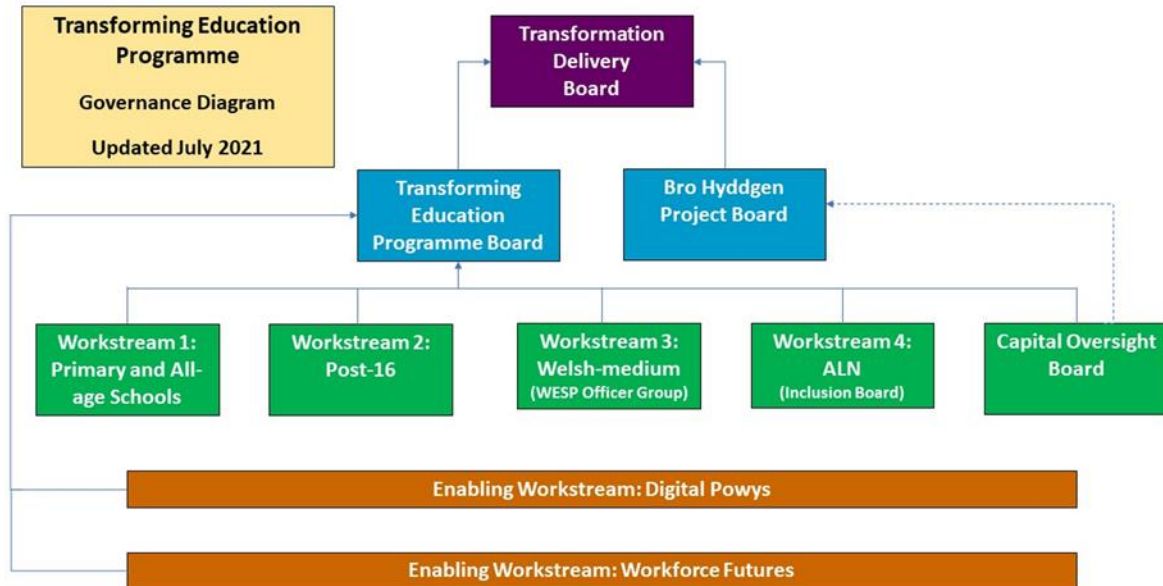
The Band B submission has been scrutinised and assessed by the Council's Section 151 Officer for affordability in light of the 65% programme intervention rate. The Council will meet the 35% contribution required to support the project through prudential borrowing.

#### **1.5 Management Case**

This scheme is a constituent of Powys County Council's Transforming Education 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 the Transforming Education Programme (formerly known as the 21st Century Schools Transformation Programme) is in accordance with the governance

arrangements for the Council's Transformation Programmes, as outlined in the following diagram:



### Outline Project Plan

Date	Actions (commencement)
03/2022	SOC to Powys CC Cabinet Submit SOC to WG
05/2022	Complete RIBA 2
06/2022	OBC to Powys CC Cabinet Submit OBC to WG
07/2022	Commence Procurement
09/2022	Award Contract
05/2023	Complete RIBA 3/4
07/2023	Planning Approval
10/2023	Submit FBC to PCC Cabinet Submit FBC to WG
01/2024	Commence Construction
01/2025	New school building opens

## 2 Strategic Case

### 2.1 Strategic Fit

#### 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 and Future Generations Act 2015;
- The Learning Country: Vision into Action 2008;
- Skills framework for 3-19 year olds in Wales 2008;
- One Wales: One planet, a new sustainable development scheme for Wales May 2009 or any successor strategy;
- Learner Travel Operational Guidance - April 2009;
- A Curriculum for all Learners 2010;
- Measuring the capacity of schools in Wales – Circular 021/2011;
- Welsh Government Welsh Medium Education Strategy 2010;
- Improving Schools National Implementation Plan 2012-15;
- A Living Language: A language for Living: Welsh Language Strategy 2012-17;
- Building a Brighter Future: Early Years and Childcare Plan 2013;
- The Curriculum for Wales;
- 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;
- Strategy for Transforming Education in Powys, which sets out Powys' approach to developing school infrastructure and the planning of school places;
- Welsh in Education Strategic Plan 2022-32 sets out the council's priorities for developing Welsh-medium provision within Powys. This plan has recently been approved by the Council's Cabinet and is being considered by Welsh Government.

The plan is due to be implemented from September 2022. This scheme is also consistent with the draft WESP (2022-2032), which is currently under consultation;

- 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

### 2.2.1 Investment Objectives

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

1. Provide a stimulating teaching and learning environment in state of the art, 21st Century facilities that will impact positively on the self-esteem and well-being of all pupils and deliver the new curriculum for Wales.
2. Remove non DDA compliant poor condition buildings, reduce backlog maintenance and provide environmentally sustainable schools incorporating zero net carbon principles which improve the building's efficiency and running costs.
3. Develop Community-focused schools that are the central point for multi-agency services to support children, young people, families and the community.
4. Provide Early Years facilities that meet the needs of all children and enable the effective delivery of the Curriculum for Wales
5. To meet and stimulate demand for Welsh-medium provision
6. To provide an optimal safeguarding environment.
7. Ensure that all pupils with SEN/ALN are placed in a provision that meets their needs, with the appropriate specialist teaching, support and facilities that enables every learner to meet their potential.

## 2.2.2 Targets and measures

The following table identifies the measures and targets that will be utilised to ensure that the identified investment objectives are SMART.

**Table 1 – Measures and Targets**

IO	Measure	Target
1.	<p>Improved motivation, engagement, attendance &amp; extracurricular involvement as evidenced by:</p> <ul style="list-style-type: none"> <li>a. School Self Evaluation</li> <li>b. School Improvement Plan</li> <li>c. Estyn inspection</li> <li>d. Local authority review</li> </ul>	<ul style="list-style-type: none"> <li>• All aspects of pupil wellbeing (as detailed in Estyn guidance) to be awarded a judgement of at least Good by September 2026</li> <li>• Local Authority core visits report improved engagement, motivation and pupil wellbeing by September 2026</li> <li>• Attendance percentage rate to increase to 95% for the academic year 2025/2026</li> <li>• To interview 10% of pupils and 5% of parents to evaluate the effectiveness of the school's policies and practices in promoting pupils' wellbeing seeking a 90% satisfaction rate (reference parental survey annexe 5 Estyn guidance)</li> </ul>
2.	<ul style="list-style-type: none"> <li>• Reduction in backlog maintenance and accessibility costs within Brecon catchment by £1.023M by September 2025</li> <li>• Both new schools are DDA compliant upon opening in September 2025.</li> <li>• Carbon Net Zero - Carbon calculator</li> <li>• Reduction in energy use and carbon emissions</li> </ul>	<ul style="list-style-type: none"> <li>• Zero backlog maintenance and accessibility costs.</li> <li>• School is DDA compliant.</li> <li>• School is Zero net carbon</li> <li>• Reduction in combined gas and electricity consumption to 32.8kwh/m2 by September 2025;</li> <li>• Reduction in CO2 emission to 25.5kg/m2 by September 2025</li> <li>• Reduction in combined OIL and electricity consumption to 32.8kwh/m2 by September 2025; Reduction in CO2 emission to 25.5kg/m2 by September 2025</li> </ul>
3.	<ul style="list-style-type: none"> <li>• Amount of community usage of facilities</li> <li>• Number of multi-agency services available from the school</li> </ul>	<ul style="list-style-type: none"> <li>• Minimum 40 hours per month community usage</li> <li>• Minimum of services that assist children, young people and the family available at the school</li> </ul>
4.	<ul style="list-style-type: none"> <li>• All children will benefit from facilities in the indoors and outdoors that meet the needs of 21<sup>st</sup> century learners</li> </ul>	<ul style="list-style-type: none"> <li>• Awarded a judgement of at least Good by September <b>2025</b></li> <li>• Available am and pm for extended child care (eg breakfast club, child care hours)</li> </ul>

IO	Measure	Target
	<ul style="list-style-type: none"> <li>Teaching and Learning – ‘improved breadth, balance and appropriateness of the curriculum’ (as detailed in Estyn guidance)</li> </ul>	
5.	<ul style="list-style-type: none"> <li>Number / % of pupils taught through the medium of Welsh at the school</li> </ul>	<ul style="list-style-type: none"> <li>Increase in the number / % of pupils taught through the medium of Welsh at the school</li> </ul>
6.	<ul style="list-style-type: none"> <li>Achieved through design from opening of new schools.</li> </ul>	<ul style="list-style-type: none"> <li>Building design meets building bulletin requirements and has appropriately designed safeguarding arrangements</li> </ul>
7.	<ul style="list-style-type: none"> <li>Range of specialist teaching and support available to ALN learners</li> <li>Range of specialist facilities available to ALN learners</li> </ul>	<ul style="list-style-type: none"> <li>ALN provision would be incorporated within the class setting</li> <li>small intervention room for withdrawal work and a wellbeing room.</li> </ul>

### 2.2.3 Existing Arrangements

Sennybridge Community Primary School is located in the village of Sennybridge, which is in the community of Maescar which has a population of 965 usual residents. Maescar has a community council with eleven locally elected or co-opted community councillors.

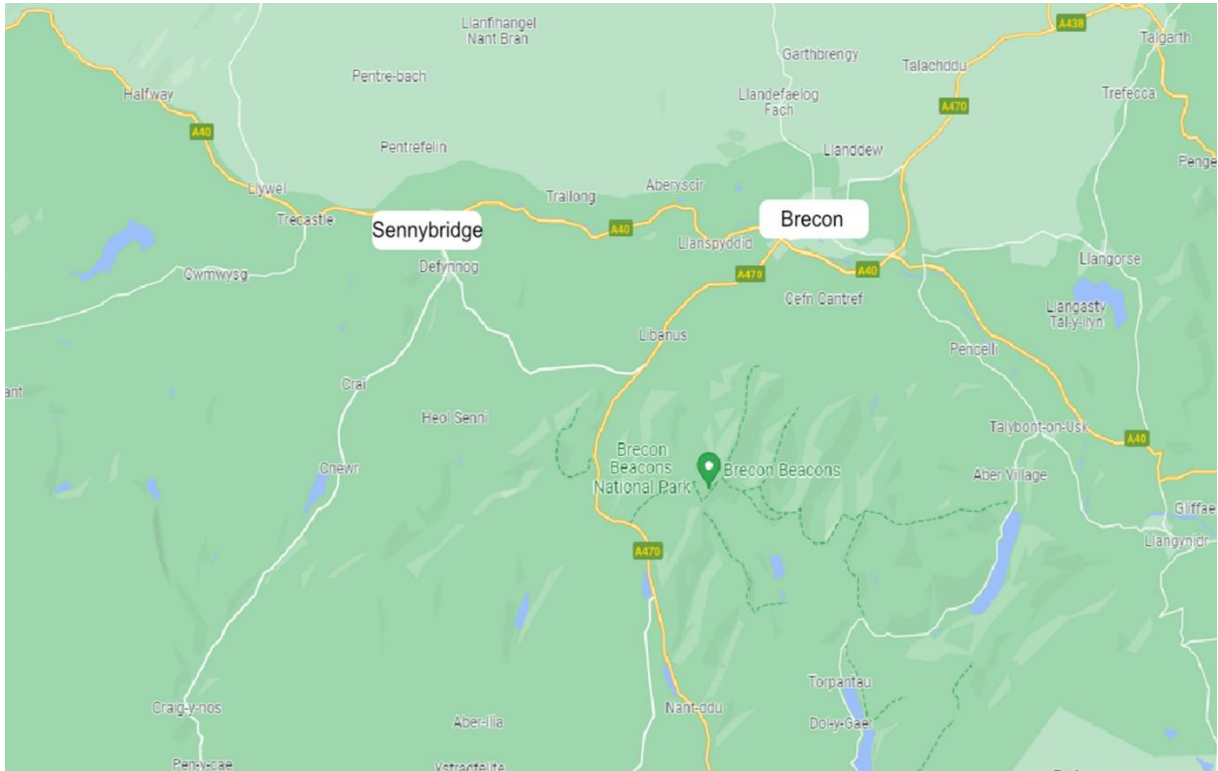
The village of Sennybridge and the site of the existing school itself lie within the boundaries of the Brecon Beacons National Park Authority. The Brecon Beacons National Park covers an area of 1,344 km<sup>2</sup>. The entire national park achieved the status of being designated an international dark sky reserve in February 2013, and is the destination for a large number of tourists throughout the year.

Sennybridge Community Primary School has a strategic location, sitting as an outlier on the Powys border, but within the Brecon catchment area. The school lies 9 miles (14 km) west of Brecon and is close to the border with Neath Port Talbot County Borough Council.

The main school building was built in 1939 and was designated until the 1980s as Defynnog Primary School. The school was originally constructed as a Secondary Modern school, with a wing of accommodation of one side of the hall for boys and the other wing for girls. Each wing had a separate entrance and toilet facilities. To the rear of the school an extension was constructed in the 1970s/80s. This has subsequently been adapted and now contains the Early years setting alongside an upper-level community gymnasium with a restricted height external store beneath. More recently the school constructed a small conservatory to the north of the KS1 accommodation. A separate canteen building was constructed to the south of the main school, this is believed to be contemporary to the main building.



**Figure 1: Sennybridge and Brecon Locations**



**Figure 2: Sennybridge Primary School**



**Table 2 – Sennybridge Primary Summary Information**

Language Category	Dual Stream
Age range	4-11
Total number of places in school	125
Number of pupils	135 (PLASC 21)
Level of surplus places	-10 (xx%)
Welsh Medium Pupils	46 (PLASC 21)
ALN/SEN Pupils	17.8% (All Stages / PLASC 21)
Free School Meals	6.7% (PLASC 21)
Pupils from ethnic minorities	3.7% (PLASC 21)
Number of Teachers	6.5 (PLASC 21)
Pupil Teacher Ratio	20.8 (PLASC 21)
National School Categorisation	Amber (2019)

**Table 3 – Learner Outcomes**

School
Sennybridge Primary
<b>Sennybridge C.P. School was last inspected by Estyn in 2017. The school's current performance and prospects for improvement were rated Good.</b>

**Table 4 – Present & forecast pupil numbers**

School	Jan 2020	Jan 2021	Jan 2022	Jan 2023	Jan 2024
<b>Sennybridge Primary</b>	126	127	124	124	120

**Table 5 – Latest condition assessments (2016)**

School	Condition	Suitability	Backlog
<b>Sennybridge Primary</b>	C	B/C	£1,023,132



## 2.2.4 Problems with the status quo – Sennybridge

Sennybridge County Primary school is currently slightly over-subscribed in numbers. The building is poor (condition C) and is not fully DDA compliant (suitability condition B/C). There is estimated backlog maintenance required of over £1M.

Substantial issues exist with the site, its access, egress and external layout. Access to the school from Defynnog Road is very narrow. It leads to a recently enlarged car park at the rear of the school but does not allow for passing places. Pedestrian access from the north is via steep and dilapidated steps adjacent to the cattle market. The surfacing of these steps is worn and uneven. Site safeguarding is a significant issue that has been raised in recent Estyn reports. Although the playing field has been fenced recently, the main school entrance is to the south of the building and visitors must cross the school playground to reach it. The entrance is not overlooked by an adjacent staff or administration room and the corresponding lack of supervision remains a significant impediment to the school's operation.

Assessment of the building shows that the current Sennybridge CP School has inadequate spaces for modern teaching. Overall the building itself is not too small, but its rooms are not the right size and they are not in the right place. Both of these issues are difficult to resolve. For example, increasing the size of a classroom by 10m<sup>2</sup> is disproportionately expensive and massively disruptive. All of the classrooms are either too large or too small. The arrangement of the school along a single corridor also restricts options for re-planning the building, which has resulted in a piecemeal series of modifications.

For Staff and Administration, the total space available is three quarters of the area recommended within BB99. The difficulties caused by this shortfall are compounded when there was an extension to the building, by the switching of the main entrance to the south of the building. The resultant layout meant that there is no adjacent office of staffroom offering easy supervision.

Substantial issues exist with many of the elements of the structure, most notably including:

- Flooring – The original terrazzo flooring and lower wall sections to the main school building have been overlaid with now dilapidated vinyl sheeting. The terrazzo itself is cracked and would require specialist repair if retained. Some areas of the school still feature the original woodblock or quarry tile flooring, which is now de-bonded and requiring replacement.
- Walls – External walls are uninsulated, and although they are in a generally sound condition the lack of insulation allows surface condensation and promotes mould growth within habitable rooms.
- Ceilings – Most classrooms have a reduced height suspended ceiling. Inspection has shown that the original cast iron heating panels remain in-situ. The hall ceiling is unimproved, and this contributes to the high reverberation time and poor acoustics.
- Roof Windows – Roof windows are generally original and dilapidated. There are several instances where high level clerestory windows remain as part of the building

fabric into rooms where a lower level suspended ceiling has been installed, meaning they no longer provide either light or ventilation to the rooms.

- Electrical Services - The amount of socket outlets distributed around the school is very limited. This leads to the use of extension leads that pose and trip hazard and fire risk. The school is long due a full rewire to bring up to modern standards and to comply with BS7671 electrical wiring regs.
- Heating - The heating system in the main school is generally in poor condition with varying heat emitters and poor controls. All pipework is aged and liable to failure. The system pipe work is in fair to poor condition and is also liable to failure.

## 2.3 Welsh Medium Education

Sennybridge C.P. School is a dual stream school, where pupils are either taught in their Welsh-medium stream or the English-medium stream.

Current pupil numbers in the school's Welsh-medium stream are as follows:

Year	Number of Welsh-medium pupils
Reception	9
Year 1	5
Year 2	10
Year 3	8
Year 4	8
Year 5	6
Year 6	10
<b>TOTAL</b>	<b>56</b>

This is 41.5% of pupils at the school. The school's Welsh-medium stream consists of two classes, one Foundation Phase class and one KS2 class.

The Welsh-medium provision at the school serves the village of Sennybridge and its surrounding areas, and is located approximately nine miles to the west of Brecon.

Welsh-medium primary provision is also available elsewhere in the catchment at Ysgol y Bannau, a Welsh-medium Primary School located on the outskirts of Brecon. The school has a current population of 117 and has a total capacity of 162 places.

Welsh-medium secondary provision is available in the catchment, at Brecon High School's Welsh-medium stream. In addition, some Welsh-medium pupils from the catchment, in particular those living in the Sennybridge area, transfer to Welsh-medium secondary provision which is located out of county, at Ysgol Gymraeg Ystalyfera Bro Dur which is located in Neath Port Talbot.

The Council has recently approved a new Welsh in Education Strategic Plan (WESP) for 2022-32, which recognises the important role the education system will play in order to increase the number of Welsh speakers in Powys and contribute towards the Welsh Government target to have a million Welsh speakers by 2050. The WESP sets out an ambitious target to increase the percentage of Year 1 pupils being taught through the medium of Welsh in Powys by 14 percentage points to 36%. To contribute to this target, the Council's aim is to see an increase in the pupils accessing Welsh-medium provision at Sennybridge C.P. School and across the Brecon catchment.

'We will improve access to Welsh-medium provision across all key stages' is also a Strategic Aim in the Council's Strategy for Transforming Education in Powys 2020-30. Under this aim, the Council sets out a Strategic Objective to 'Move schools along the language continuum'.

## **2.4 Childcare/Nursery Provision**

There is currently maintained Welsh-medium and English-medium childcare/nursery provision at Sennybridge CP school.

Powys County Council is committed to providing suitable infrastructure to enable providers to provide the 30-hour childcare scheme. Whether or not there is a need to incorporate nursery /early years provision will be a key consideration in respect of any construction project, particularly so where this includes primary provision. As this scheme proceeds, the Council will take a holistic approach based on community needs to determine whether early years provision, including nursery provision, is required as part of the scheme.

A community use strategy is also developed as part of all construction schemes, and consideration will be given in the design stages as to the need for provision such as after school, breakfast and holiday clubs.

## **2.5 Active Travel**

It is the council's view that active travel is essential to encourage staff, pupils and wider members of the community to walk and cycle to new facilities, meaning that more people can enjoy the benefits of active travel.

Any construction project taken forward based on this SOC will be developed in line with the Welsh Government Active Travel Wales Act (2013) and design guidance, with the aim of improving active travel links.

Active travel is being considered as part of RIBA 2 activities.

## **2.6 Community/Sports Facilities**

There is a small community gym in Sennybridge CP. However, the closest Community/Sports Facilities are currently provided at Brecon Leisure Centre.

Community facilities are included within the new design, to include a community room and gym storage facilities. The gym equipment is privately owned and will be brought into the community room or the school hall for use by the community weekly. The outdoor sports facilities and forest school area at the new school building will also be available for community use.

## **2.7 Equalities, Impact Assessments and Children's Rights Assessments**

An initial impact assessment will be undertaken when Cabinet considers the SOC.

The school is being designed to meet the requirements of the new Curriculum for Wales. There will be opportunities for pupil engagement as the project moves forward.

## **2.8 Net Zero Carbon and the Environment**

The Council is committed to ensuring that all projects are Net Zero Carbon with immediate effect.

The Sennybridge school design is based on Net Zero Carbon principles. This includes the following elements:

- The school will be designed on a 'fabric-first' basis, and will maximise beneficial solar gain in order to reduce heating demand;
- The concept design will be assessed by Passivhaus designers to confirm that it is can be delivered as a certified Passivhaus building;
- Heating will be provided via Air Source Heat Pumps, which will benefit from future electrical grid de-carbonisation;
- A PV array will be installed on the large, south facing roof;
- There will be no carbon fuel source used on the site;
- The school will be designed around a timber frame to reduce the embodied carbon load.

## 2.9 Main Benefits

The main benefits associated with the strategic case are outlined below.

**Table 6 – Main Benefits by Investment Objective**

Investment Objectives	Benefit
<p>1. Provide a stimulating teaching and learning environment in state of the art, 21st Century facilities that will impact positively on the self-esteem and well-being of all pupils and deliver the new curriculum for Wales.</p>	<ul style="list-style-type: none"> <li>• Improved motivation of students and teachers – less sickness absence and improved school attendance rates.</li> <li>• Improved pupil satisfaction and a reduction in the number of incidences of poor behaviour.</li> <li>• Opportunities for teachers to broaden their skill sets.</li> <li>• Delivery of the broadest curriculum.</li> <li>• Schools will be able to attract new teaching staff as a result of the breadth and depth of curriculum.</li> <li>• Improved reputation of the school.</li> <li>• Improved educational outcomes.</li> <li>• Increased numbers of learners who transfer into further and higher education.</li> <li>• Increased number of opportunities for young people to engage with technology.</li> </ul>
<p>2. Remove non DDA compliant poor condition buildings, reduce backlog maintenance and provide environmentally sustainable schools incorporating zero net carbon principles which improve the building's efficiency and running costs.</p>	<ul style="list-style-type: none"> <li>• Reduced backlog maintenance and accessibility costs.</li> <li>• School campus become DDA compliant.</li> <li>• School campus becomes Zero net carbon contributor to the environment.</li> <li>• Reduced energy costs and usage.</li> </ul>
<p>3. Develop Community-focused schools that are the central point for multi-agency services to support children, young</p>	<ul style="list-style-type: none"> <li>• Opportunities for life long learning in the Sennybridge community.</li> <li>• Improved leisure opportunities and usage in the Sennybridge community</li> <li>• Improved financial viability of leisure offerings through increased take up and use of facilities.</li> </ul>

Investment Objectives	Benefit
people, families and the community.	
4. Provide Early Years facilities that meet the needs of all children and enable the effective delivery of the Curriculum for Wales	<ul style="list-style-type: none"> <li>• Increased availability of early years places in the Sennybridge area.</li> <li>• Full and effective delivery of the Curriculum for Wales.</li> </ul>
5. To meet and stimulate demand for Welsh-medium provision	<ul style="list-style-type: none"> <li>• An increase in the number / % of pupils studying through the medium of Welsh</li> <li>• More opportunities for Welsh speaking staff.</li> <li>• Bilingual training and employees.</li> <li>• Increased availability of suitably qualified Welsh speaking employees in the Sennybridge area.</li> <li>• Promotes bilingual ethos.</li> </ul>
6. To provide an optimal safeguarding environment.	<ul style="list-style-type: none"> <li>• Reduction in the number of safeguarding incidents in the Sennybridge area;</li> <li>• Better environment (by design) to provide safe space for children in the new schools.</li> </ul>
7. Ensure that all pupils with SEN/ALN are placed in a provision that meets their needs, with the appropriate specialist teaching, support and facilities that enables every learner to meet their potential.	<ul style="list-style-type: none"> <li>• Bespoke provision for SEN/ALN pupils.</li> <li>• Increased provision of specialist teaching support.</li> <li>• Improved facilities for SEN/ALN learners.</li> </ul>

## 2.10 Main Risks

The main risks associated with the strategic case are outlined below.

**Table 7 – Strategic Risks and Countermeasures**

Main Risk	Counter Measures
<b>Business and Political Risks</b>	
1. An unexpected reduction in the level/ availability of capital or revenue funding leads to delays and reduction in the scope of the project.	1. No contractual commitments will be made until firm assurances have been given regarding the affordability and availability of funding.
2. The project requires political endorsement	2. The Council's Cabinet has given approval in principle to the project and will be kept informed as the project develops.
3. Pupil numbers fall in the short term, making it more difficult to make the case	3. Detailed (long term) strategic planning about Welsh & English Medium education in the area to underpin the business case.
<b>Service Risks</b>	
1. Legislative changes.	1. Plan flexibility into the options where possible.
2. WG policy changes	2. Plan flexibility into the options where possible.
<b>External Environmental Risks</b>	
1. Issues relating to planning permission or planning constraints	1. Early engagement with the Local Authority Planning Department on the proposed site and to identify any issues relating to planning permission or planning constraints.
2. Covid 19	2. Early engagement with contractors to establish an appropriate risk response

## 2.11 Project Constraints

The project is subject to the following constraints:

- Availability of capital funding from Welsh Government and Powys County Council for any new build required;
- Any planning consent which may be required for any new build required'
- Requirement to meet BREEAM Excellent standard;
- Requirement to meet zero net carbon standards (by Welsh Government)

- Need to minimise negative impact on current pupils.

## **2.12 Project Dependencies**

The project dependencies are as follows:

- Political support at local and national level;
- Stakeholder support – parents, governors, community, diocesan education authority;
- Capital funding from Welsh Government and Powys County Council;
- Internal officer capacity;
- Capacity of other service areas to provide support;
- Planning permission and any other statutory consents that may be required.



## 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 Wednesday 17<sup>th</sup> November 2021. The following individuals were present at this workshop:

- Marianne Evans – Senior Manager Education Services;
- Sarah Astley – Programme Manager;
- Diane Rees – Project Manager
- Eurig Towns – Service Manager for School Improvement;
- Mari Thomas – Finance Manager;
- Sharon Hughes – Senior Foundation Phase Advisor.

### 3.3 Scope Appraisal

#### 3.3.1 Options

- **Do Nothing:** 125 place 4-11 dual stream Primary School
- **Minimum Scope:** 150 place 4-11 dual stream community Primary school
- **Intermediate Scope A:** 150 place 4-11 dual stream community Primary school, plus early years provision
- **Intermediate Scope B:** 180 place 4-11 dual stream community Primary school
- **Maximum Scope:** 180 place 4-11 dual stream community Primary school, plus early years provision

#### 3.3.2 Advantages and Disadvantages

**Table 8 – Scope advantages and disadvantages**

Do Nothing: 125 place 4-11 dual stream Primary School	
Advantages	Disadvantages
<ul style="list-style-type: none"> <li>• Replicates the existing school size;</li> <li>• Provides a future proofed school, based on current pupil/population forecasts;</li> <li>• Minimises disruption to Sennybridge pupils, parents and teachers;</li> <li>• Continuation of Welsh Medium Education in the Sennybridge area.</li> </ul>	<ul style="list-style-type: none"> <li>• Does not address shortage of places at Sennybridge Primary school;</li> <li>• Does not maintain early years provision in the local community;</li> <li>• Does not enable wider integration of school within the community;</li> <li>• Does not create new opportunities for additional income streams for the schools;</li> <li>• Does not collocate early years childcare provision at the site.</li> </ul>
Minimum Scope: 150 place 4-11 dual stream community Primary school.	
Advantages	Disadvantage
<ul style="list-style-type: none"> <li>• Replicates the existing school size.</li> <li>• Provides a future proofed school, based on current pupil/population forecasts;</li> <li>• Enables the curriculum to be delivered in a continuous and coherent way from the Foundation Stage through to the end of Key Stage 2;</li> <li>• Maintains early year and primary age provision in the local community.</li> <li>• Minimises disruption to Sennybridge pupils, parents and teachers;</li> </ul>	<ul style="list-style-type: none"> <li>• Does not collocate early years childcare provision at the site.</li> </ul>

<ul style="list-style-type: none"> <li>• Enables wider integration of the school within the community;</li> <li>• Continuation of Welsh Medium Education in the Sennybridge area.</li> </ul>	
<p><b>Minimum Scope:</b> 150 place 4-11 dual stream community Primary school, plus early years provision</p>	
<p><b>Advantages</b></p>	<p><b>Disadvantages</b></p>
<ul style="list-style-type: none"> <li>• Replicates the existing school size.</li> <li>• Provides a future proofed school, based on current pupil/population forecasts;</li> <li>• Enables the curriculum to be delivered in a continuous and coherent way from the Foundation Stage through to the end of Key Stage 2;</li> <li>• Maintains early year and primary age provision in the local community;</li> <li>• Minimises disruption to Sennybridge pupils, parents and teachers;</li> <li>• Enables wider integration of the school within the community;</li> <li>• Continuation of Welsh Medium Education in the Sennybridge area;</li> <li>• Collocated early years childcare provision on the one site.</li> </ul>	
<p><b>Intermediate Scope:</b> 180 place 4-11 dual stream community Primary school</p>	
<p><b>Advantages</b></p>	<p><b>Disadvantages</b></p>
<ul style="list-style-type: none"> <li>• Provides a future proofed school, with room for growth.</li> <li>• Minimises disruption to Sennybridge pupils, parents and teachers.</li> <li>• Continuation of Welsh Medium Education in the Sennybridge area</li> </ul>	<ul style="list-style-type: none"> <li>• Introduces unnecessary surplus pupil places to the school.</li> <li>• Does not collocate early years childcare provision at the site.</li> </ul>
<p><b>Maximum Scope:</b> 180 place 4-11 dual stream Primary school, plus early years provision</p>	
<p><b>Advantages</b></p>	<p><b>Disadvantages</b></p>
<ul style="list-style-type: none"> <li>• Provides a future proofed school, with room for growth.</li> </ul>	<ul style="list-style-type: none"> <li>• Introduces unnecessary surplus pupil places at the school.</li> </ul>

- |  |  |
|--|--|
| <ul style="list-style-type: none"><li>• Enables the curriculum to be delivered in a continuous and coherent way from the Foundation Stage through to the end of Key Stage 2.</li><li>• Maintains early years and primary age provision in the local community.</li><li>• Minimises disruption to Sennybridge pupils, parents and teachers.</li><li>• Enables wider integration of the school within the community.</li><li>• Continuation of Welsh Medium Education in the Sennybridge area.</li></ul> |  |
|--|--|

### 3.3.3 Conclusion

**Table 9 – Scope appraisal summary**

Reference to:	Do Nothing	Min	Int. A	Int. B	Max
<b>Investment Objectives</b>					
Provide a stimulating teaching and learning environment in state of the art, 21st Century facilities that will impact positively on the self-esteem and well-being of all pupils and deliver the new curriculum for Wales.	✓	✓	✓	✓	✓
Remove non DDA compliant poor condition buildings, reduce backlog maintenance and provide environmentally sustainable schools incorporating zero net carbon principles which improve the building's efficiency and running costs.	✓	✓	✓	✓	✓
Develop Community-focused schools that are the central point for multi-agency services to support children, young people, families and the community.	✗	✗	✓	✗	✓
Provide Early Years facilities that meet the needs of all children and enable the effective delivery of the Curriculum for Wales	✗	✗	✓	✗	✓
To provide Welsh-medium provision that is accessible and equitable in a dual stream school	✓	✓	✓	✓	✓
To provide an optimal safeguarding environment.	✓	✓	✓	✓	✓
Ensure that all pupils with SEN/ALN are placed in a provision that meets their needs, with the appropriate specialist teaching, support and facilities that enables every learner to meet their potential.	✓	✓	✓	✓	✓
<b>Critical Success Factors</b>					
Business Need	✗	✓	✓	✗	✗
Strategic Fit	✗	✓	✓	✗	✓
Potential VFM	✗	✓	✓	✗	✗
Benefits optimisation	?	✗	✓	✗	✗
Potential achievability	✓	✓	✓	✓	✓
Supply side capability	✓	✓	✓	✓	✓
Affordability	✓	✓	✓	✗	✗
Summary	Carry Forward	Discounted	Preferred	Discounted	Discounted

### 3.4 Service Solution Appraisal

#### 3.4.1 Options

- Option 1 - Do nothing - Close the existing school and relocate pupils to nearest schools.
- Option 2 - Business as usual (BAU).
- Option 3 - Remodel the existing building and outside area.
- Option 4 - Build extension to the existing school.
- Option 5 - New Build school on existing site.
- Option 6: New build School on alternative site.

#### 3.4.2 Advantages and Disadvantages

**Table 10 – Project B: Service solution advantages and disadvantages**

Option 1 - Do nothing - Close the existing school and relocate pupils to nearest schools.	
Advantages	Disadvantages
<ul style="list-style-type: none"> <li>• No capital spend required.</li> <li>• Enables alternative use of capital funding within the programme envelope.</li> <li>• Addresses current backlog maintenance issues of £1.023m.</li> <li>• Releases site for generation of a capital receipt.</li> </ul>	<ul style="list-style-type: none"> <li>• Current school location provides education to a large rural catchment area.</li> <li>• Significant additional travel for pupils</li> <li>• Relocation to nearest schools not appropriate to the location of catchment of the school.</li> <li>• Insufficient capacity in other schools to accommodate pupils</li> <li>• Pupils may need to be educated in neighbouring county.</li> <li>• Loss of facilities to the community.</li> <li>• Would not promote access to Welsh-medium education for pupils living in Sennybridge</li> <li>• Interruption of Welsh Medium Education in Sennybridge.</li> <li>• Threat to the future viability of the Welsh Language in the Sennybridge area.</li> <li>• Statutory process would be required</li> </ul>
Option 2 - Business as usual (BAU).	
Advantages	Disadvantages
<ul style="list-style-type: none"> <li>• No additional capital funding needed.</li> <li>• No disruption to learners from large scale building works on adjacent site.</li> <li>• Continuity of education on Sennybridge School site.</li> <li>• Continuity of Welsh-medium education in Sennybridge</li> </ul>	<ul style="list-style-type: none"> <li>• Inadequate school buildings continue in poor condition and sustainability</li> <li>• Does not meet the requirements for 21st C School</li> <li>• Financially unviable due to costs of repairs and maintenance</li> <li>• Unlikely to enhance current public perception of the school.</li> <li>• Would not provide additional capacity</li> </ul>

Option 3 - Remodel the existing building and outside area.	
Advantages	Disadvantages
<ul style="list-style-type: none"> <li>• Extends the life of the building.</li> <li>• Addresses immediate issues easily.</li> <li>• Reduces the probability of disruption to service delivery.</li> <li>• Less immediate drain on Council's capital resources.</li> <li>• Removes £1.032M backlog Maintenance liability.</li> <li>• Continuity of Welsh-medium education in Sennybridge</li> </ul>	<ul style="list-style-type: none"> <li>• Inadequate school buildings continue with poor suitability and sustainability factors</li> <li>• Does not enhance current public perception of the condition of the facilities</li> <li>• Disruption to pupils</li> <li>• Does not improve the learning environment and does not provide a suitable environment</li> <li>• The works required at Sennybridge CP could severely impact the Major Improvement fund, which will decrease the amount of funding available for much needed improvements at other schools.</li> <li>• Would not provide additional capacity</li> </ul>
Option 4 - Build extension to the existing school.	
Advantages	Disadvantages
<ul style="list-style-type: none"> <li>• Less Capital cost required.</li> <li>• Would provide additional capacity</li> <li>• Continuity of Welsh-medium education in Sennybridge</li> </ul>	<ul style="list-style-type: none"> <li>• Does not address the building condition of existing school.</li> <li>• Building works funded by Major Improvement fund will still be required in future.</li> <li>• Disruption to pupils, as extension would also require elements of demolition.</li> <li>• Financially unviable.</li> <li>• Capacity of school is not an issue.</li> </ul>
Option 5 - New Build school on existing site.	
Advantages	Disadvantages
<ul style="list-style-type: none"> <li>• Delivers a new build school which extends the time horizon for the requirement for substantial future works into the long term.</li> <li>• Removes backlog maintenance of circa £1.032m.</li> <li>• Will enable energy efficiencies reducing the buildings carbon footprint and ongoing running costs.</li> <li>• Provision of appropriate number of school pupil places.</li> <li>• Addresses condition, suitability and sustainability issues in current school.</li> <li>• Reaffirms the strategy to keep Primary schools in strategic locations.</li> <li>• New building will be condition A.</li> </ul>	<ul style="list-style-type: none"> <li>• Larger capital investment required from an already over-stretched capital budget.</li> <li>• Substantial noise disruption to existing school setting during building work.</li> <li>• May require temporary relocation of School pupils during building work and associated costs of this.</li> </ul>

<ul style="list-style-type: none"> <li>• Meets BREEAM and environmental building standards.</li> <li>• Potentially attractive to local community and stakeholders.</li> <li>• Appropriate facilities for teaching and learning for 21C curriculum.</li> <li>• Provides community focussed facilities.</li> <li>• Continuity of Welsh-medium education in Sennybridge</li> </ul>	
<p>Option 6 - New Build school on alternative site.</p>	
<p><b>Advantages</b></p>	<p><b>Disadvantages</b></p>
<ul style="list-style-type: none"> <li>• Delivers a new build school which extends the time horizon for the requirement for substantial future works into the long term.</li> <li>• Removes backlog maintenance of circa £1.032m.</li> <li>• Will enable energy efficiencies reducing the buildings carbon footprint and ongoing running costs.</li> <li>• Provision of appropriate number of school pupil places.</li> <li>• Addresses condition, suitability and sustainability issues in current school.</li> <li>• Reaffirms the strategy to keep Primary schools in strategic locations.</li> <li>• New building will be condition A.</li> <li>• Meets BREEAM and environmental building standards.</li> <li>• Appropriate facilities for teaching and learning for 21C curriculum.</li> <li>• Provides community focussed facilities.</li> <li>• No relocation of pupils required during construction period.</li> <li>• No noise disruption to pupils.</li> <li>• Continuity of Welsh-medium education in Sennybridge.</li> </ul>	<ul style="list-style-type: none"> <li>• Larger capital investment required from an already over-stretched capital budget.</li> <li>• Additional capital required for land purchase of new site.</li> <li>• Availability of suitable and affordable land.</li> <li>• Potential alternative site has not yet been identified;</li> <li>• Depending on the location of the site delivery may have substantial implications on the cost of school transport.</li> </ul>



### 3.4.3 Conclusion

**Table 11 – Service Solution appraisal summary**

Reference to:	1	2	3	4	5	6
<b>Investment Objectives</b>						
Provide a stimulating teaching and learning environment in state of the art, 21st Century facilities that will impact positively on the self-esteem and well-being of all pupils and deliver the new curriculum for Wales.	x	x	x	x	✓	✓
Remove non DDA compliant poor condition buildings, reduce backlog maintenance and provide environmentally sustainable schools incorporating zero net carbon principles which improve the building's efficiency and running costs.	x	x	?	?	✓	✓
Develop Community-focused schools that are the central point for multi-agency services to support children, young people, families and the community.	x	x	?	?	✓	✓
Provide Early Years facilities that meet the needs of all children and enable the effective delivery of the Curriculum for Wales	✓	✓	✓	✓	✓	✓
To provide Welsh-medium provision that is accessible and equitable in a dual stream school	x	✓	✓	✓	✓	✓
To provide an optimal safeguarding environment.	✓	✓	✓	✓	✓	✓
Ensure that all pupils with SEN/ALN are placed in a provision that meets their needs, with the appropriate specialist teaching, support and facilities that enables every learner to meet their potential.	x	✓	✓	✓	✓	✓
<b>Critical Success Factors</b>						
Business Need	x	x	?	?	✓	✓
Strategic Fit	x	x	✓	✓	✓	✓
Potential VFM	x	x	x	x	✓	✓
Benefits optimisation	x	x	x	x	✓	✓
Potential achievability	x	✓	✓	✓	✓	✓
Supply side capability	✓	✓	✓	✓	✓	✓
Affordability	✓	✓	✓	✓	✓	?
Summary	Discouraged	Carry Forward	Discouraged	Discouraged	Preferred	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 12 – Service delivery advantages and disadvantages**

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

### 3.5.3 Conclusion

**Table 13 – Service Delivery appraisal summary**

Reference to:	LA	LA & PSP	PPP
<b>Investment Objectives</b>			
Provide a stimulating teaching and learning environment in state of the art, 21st Century facilities that will impact positively on the self-esteem and well-being of all pupils and deliver the new curriculum for Wales.	✓	✓	✓
Remove non DDA compliant poor condition buildings, reduce backlog maintenance and provide environmentally sustainable schools incorporating zero net carbon principles which improve the building's efficiency and running costs.	✓	✓	✓
Develop Community-focused schools that are the central point for multi-agency services to support children, young people, families and the community.	✓	✓	✓
Provide Early Years facilities that meet the needs of all children and enable the effective delivery of the Curriculum for Wales	✓	✓	✓
To provide Welsh-medium provision that is accessible and equitable in a dual stream school	✓	✓	✓
To provide an optimal safeguarding environment.	✓	✓	✓
Ensure that all pupils with SEN/ALN are placed in a provision that meets their needs, with the appropriate specialist teaching, support and facilities that enables every learner to meet their potential.	✓	✓	✓
<b>Critical Success Factors</b>			
Strategic Fit	✗	✓	✗
Potential VFM	?	✓	✗
Potential achievability	✗	✓	✓
Supply side capability	✗	✓	✓
Affordability	✗	✓	✗
<b>Summary</b>	<b>Discounted</b>	<b>Preferred</b>	<b>Discounted</b>

## 3.6 Implementation Appraisal

### 3.6.1 Options

- Minimum – New Schools open September 2025;
- Intermediate – New School opens Spring Term 2025;
- Maximum - New School opens September 2024;

### 3.6.2 Advantages and Disadvantages

**Table 14 – Implementation advantages and disadvantages**

Minimum: New School opens September 2025	
Advantages	Disadvantages
<ul style="list-style-type: none"> <li>• Lack of disruption to education in the short term</li> </ul>	<ul style="list-style-type: none"> <li>• Local community disruption due to extended period of works;</li> <li>• Delayed to accrual of scheme benefits</li> <li>• Immediate cohorts of learners miss out unnecessarily on 21st Century school facilities</li> </ul>
Intermediate: New School opens Spring Term 2025	
Advantages	Disadvantages
<ul style="list-style-type: none"> <li>• Immediate cohorts of learners enjoy 21st Century school facilities within a reasonable period of time</li> <li>• Minimises disruption to learners once school becomes operational;</li> <li>• Ensures Local Authority funding allocation is spent within Welsh Government timescales</li> <li>• Allows time for innovation in design but ensures completion within a reasonable time scale;</li> <li>• Minimises local community disruption.</li> </ul>	<ul style="list-style-type: none"> <li>• Partial delay to accrual of scheme benefits</li> </ul>
Maximum: New School opens September 2024	
Advantages	Disadvantages
<ul style="list-style-type: none"> <li>• Immediate cohorts of learners enjoy 21st Century school facilities within a reasonable period of time</li> <li>• Minimises disruption to learners once school becomes operational;</li> <li>• Ensures Local Authority funding allocation is spent within Welsh Government timescales</li> <li>• Ensures completion in a timely manner;</li> <li>• Minimises local community disruption.</li> </ul>	<ul style="list-style-type: none"> <li>• Potential for rushed design (lack of innovation);</li> <li>• Timescales may be unrealistic due to lead in time for sourcing materials</li> <li>• Requires additional bespoke resource for project in order to deliver upon demanding timescale.</li> </ul>

### 3.6.3 Conclusion

**Table 15 – Implementation appraisal summary**

Reference to:	Sept 25	Spring 25	Sept 24
<b>Investment Objectives</b>			
Provide a stimulating teaching and learning environment in state of the art, 21st Century facilities that will impact positively on the self-esteem and well-being of all pupils and deliver the new curriculum for Wales.	✓	✓	✓
Remove non DDA compliant poor condition buildings, reduce backlog maintenance and provide environmentally sustainable schools incorporating zero net carbon principles which improve the building's efficiency and running costs.	✓	✓	✓
Develop Community-focused schools that are the central point for multi-agency services to support children, young people, families and the community.	✓	✓	✓
Provide Early Years facilities that meet the needs of all children and enable the effective delivery of the Curriculum for Wales	✓	✓	✓
To provide Welsh-medium provision that is accessible and equitable in a dual stream school	✓	✓	✓
To provide an optimal safeguarding environment.	✓	✓	✓
Ensure that all pupils with SEN/ALN are placed in a provision that meets their needs, with the appropriate specialist teaching, support and facilities that enables every learner to meet their potential.	✓	✓	✓
<b>Critical Success Factors</b>			
Strategic Fit	✓	✓	?
Potential VFM	✓	✓	✓
Potential achievability	✓	✓	x
Supply side capability	✓	✓	✓
Affordability	✓	✓	✓
Summary	Possible	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 16 – Funding advantages and disadvantages**

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

### 3.7.3 Conclusion

**Table 17 – Funding appraisal summary**

Reference to:	WG 100%	Mix	LA 100%	MIM
<b>Investment Objectives</b>				
Provide a stimulating teaching and learning environment in state of the art, 21st Century facilities that will impact positively on the self-esteem and well-being of all pupils and deliver the new curriculum for Wales.	✓	✓	✓	✓
Remove non DDA compliant poor condition buildings, reduce backlog maintenance and provide environmentally sustainable schools incorporating zero net carbon principles which improve the building's efficiency and running costs.	✓	✓	✓	✓
Develop Community-focused schools that are the central point for multi-agency services to support children, young people, families and the community.	✓	✓	✓	✓
Provide Early Years facilities that meet the needs of all children and enable the effective delivery of the Curriculum for Wales	✓	✓	✓	✓
To provide Welsh-medium provision that is accessible and equitable in a dual stream school	✓	✓	✓	✓
To provide an optimal safeguarding environment.	✓	✓	✓	✓
Ensure that all pupils with SEN/ALN are placed in a provision that meets their needs, with the appropriate specialist teaching, support and facilities that enables every learner to meet their potential.				
<b>Critical Success Factors</b>				
Strategic Fit	✗	✓	✓	?
Potential VFM	✓	✓	✓	✓
Potential achievability	✓	✓	?	?
Supply side capability	?	✓	?	?
Affordability	✗	✓	✓	✓
Summary	Discounted	Preferred	Discounted	Possible



### 3.8 Summary of appraisals

**Table 18 – Long List Summary**

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Scope appraisal	<b>Do Nothing:</b> 125 place 4-11 dual stream Primary School	<b>Do Min:</b> 150 place 4-11 dual stream Primary School	<b>Intermediate A:</b> 150 place 4-11 dual stream community Primary school, plus early years provision	<b>Intermediate B:</b> 180 place 4-11 dual stream community Primary school	<b>Maximum:</b> 180 place 4-11 dual stream community Primary school, plus early years provision	
Service solution	Do nothing - Close the existing school and relocate pupils to nearest schools.	Business as usual (BAU).	Remodel the existing building and outside area.	Build extension to the existing school.	New Build School on existing site	New Build school on new site
Service Delivery	Minimum: LA Delivery		Intermediate: LA and Private Sector Delivery		Maximum: Private Sector partnership (PPP)	
Implementation	Minimum: New School opens September 2025		Intermediate: New School opens Spring Term 2025		Maximum: New School opens September 2024	
Funding	Minimum: Wholly LA Funded	Intermediate: Mixed LA & WG Funded		Maximum: Wholly WG Funded	Alternative: Mutual Investment Fund	

As a result of the appraisal exercise, and the comparison of each option with the Investment Objectives and Critical Success Factors, the following options have been short-listed for economic appraisal:

- Option 2: Do Nothing – Business as Usual.
- Option 5: New build 150 place 4-11 dual stream community Primary School with early years provision in Sennybridge on existing site.
- Option 6: New build 150 place 4-11 dual stream community Primary School with early years provision in Sennybridge on alternative site.



## 3.9 Economic Appraisal

The following tables summarise 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.

### 3.9.1 Net Present Cost Project

**Table 19 – Economic Appraisal**

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)
<b>Option 2:</b>	Do nothing – business as usual – (BAU)	9.4	0.63	9.2	0.62
<b>Option 5:</b>	New build 5 classroom school on the grassed area of Sennybridge CP School to include Early Years facility and community room.	24.3	0.93	21.3	0.81
<b>Option 6:</b>	New build 5 classroom school on an alternative site within the area to include Early Years facility and community room.	24.8	0.95	21.8	0.83

**DCF** = Discounted Cash flow

**NPC** = Net Present Cost

**EAC** = Equivalent Annual Cost

Option 2 was appraised over 20 years, while options 5 and 6 were appraised over 60 years. This is because Option 2 is essentially 'Do Minimum' option, where the effective life of the asset is expected to be 20 years.

On that basis, the key comparator from the Economic Appraisal table is the Equivalent Annual Cost (EAC), which calculates the average annual (economic) cost to the Council. On that basis, **Option 5 is the preferred economic choice.**

### 3.10 Qualitative Benefits Appraisal

All of the benefits from the SOC 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 20 – Benefit Group examples**

Benefit Groups	Example of Benefits (info in brackets = how achieved)	Weight
Standards and Breadth of Education	<ul style="list-style-type: none"> <li>• More pupils with higher qualifications that can provide greater opportunities for future employment, training and education.</li> <li>• More opportunities for teachers' professional and personal development (e.g. through access to a wider range of teaching materials [state of the art ICT and emerging technologies] and accessing and sharing sector leading practice via Professional Learning Communities).</li> <li>• Employers will have young people with a greater range of employability skills.</li> </ul>	10%
Standards of Facilities and Estate	<ul style="list-style-type: none"> <li>• Securing positive learning experiences.</li> <li>• Increased efficiency through school reorganisation and rationalisation.</li> <li>• Facilities which maximise the potential of both teachers and pupils.</li> </ul>	40%
Welfare of Children	<ul style="list-style-type: none"> <li>• Improved safeguarding of children.</li> <li>• Less opportunities for children to be injured/hurt during their school lives.</li> </ul>	30%
Equality of opportunity	<ul style="list-style-type: none"> <li>• Improved access to specialist ALN/SEN provision with the schools.</li> </ul>	20%

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 21 – Benefits Appraisal**

Benefit Group	Weight	Maximum Score	Raw			Weighted		
			Option 2	Option 5	Option 6	Option 2	Option 5	Option 6
Standards of Education	10	10	7	9	9	70	90	90
Facilities and Estate	40	10	3	9	9	120	360	360
Welfare of Children	30	10	3	9	9	90	270	270
Equality of opportunity	20	10	3	9	9	60	180	180
<b>Total</b>	<b>100</b>	<b>10</b>	<b>16</b>	<b>36</b>	<b>36</b>	<b>340</b>	<b>900</b>	<b>900</b>
Rank			3	=1	=1	3	=1	=1

### 3.11 Summary of Appraisals

**Table 22 – Summary of Appraisals**

Evaluation Results	Option 2	Option 5	Option 6
Economic appraisals (Equivalent Annual Cost)	1	2	3
Qualitative Benefits appraisal	3	1	1
Risk appraisal	N/A	N/A	N/A
<b>Overall Ranking</b>	<b>=2</b>	<b>1</b>	<b>=2</b>

Taking into account the combined appraisals, Option 5 ranks as the preferred option.

Risk has not been appraised at this stage, but a full risk appraisal will be completed at OBC.

## 4 Commercial Case

### 4.1 Procurement Method

#### 4.1.1 Procurement Strategy

Three procurement strategy routes were considered in Powys County Council's 21<sup>st</sup> Century Schools Strategic Outline Programme Commercial Case. Considerations included the following:

- Public/Private partnerships (including via the Mutual Investment Model);
- Joint venture with the private sector;
- Conventional procurement routes utilising framework contractors.

Consideration of these procurement routes concluded that a Joint Venture with the private sector and the Public/Private Partnerships route were unfeasible in this instance of the following reasons:

- i. There was no commitment to further commercial opportunities of significant scale that could be offered to a separate private entity. This would reduce the commercial appeal of entering into a formal partnership or joint venture with Powys County Council.
- ii. Both Private/Public Partnerships and Joint Ventures are more complex and time consuming to set up and manage. Powys only has limited major construction projects to offer, therefore it is less likely that the fixed costs involved in setting up the partnerships would be recovered through down the line savings or savings achieved through quantities of scale.
- iii. Given the scale of development required within the Council's Band A and B 21<sup>st</sup> Century Schools Programme, it is felt that the additional costs incurred by the complexities of Public/Private partnerships or a Joint Venture with the private sector will not be justified by the potential benefits from entering into these arrangements.

The Council has good experience of working with contractor frameworks and has achieved positive outcomes using such frameworks. The Council has therefore concluded that the optimum procurement route will be to use the revised SEWSCAP framework that was re-launched in June 2019 (SEWSCAP 3). The benefits of utilising contractors from this existing Contractor Frameworks list are as follows:

5. Consultation and design development can be carried out by the Heart of Wales Property Services Ltd (HoWPS) , which is a 50:50 joint venture partnership between PCC and Kier. The design team will then 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 PCC during all stages of the project programme.
6. Compliant with EU procurement directives and the Public Contract Regulations (2014), offering a swift route to market and opportunities for early contractor involvement;

7. The framework is free to use, offering a variety of contracts, pricing models and the potential for further savings achieved via mini-competition;
8. The new SEWSCAP Property Construction Framework is divided into the following lots:
  - Lot 1: Provision of Construction services to include new build, extensions and refurbishment under traditional or design and build with all associated works – (£250,000 to £1,500,000) - Powys County Council and other Potential Employers based or operating in Powys or operating nearby;
  - Lot 2: Provision of Construction services to include new build, extensions and refurbishment under traditional or design and build with all associated works – (£250,000 to £1,500,000) - Torfaen County Borough Council, Blaenau Gwent County Borough Council, Monmouthshire County Council, Caerphilly County Borough Council or other Potential Employers based or operating near those areas;
  - Lot 3: Provision of Construction services to include new build, extensions and refurbishment under traditional or design and build with all associated works – (£250,000 to £1,500,000) - Rhondda Cynon Taf County Borough Council, Merthyr Tydfil County Borough Council and Bridgend County Borough Council and any Participating Authorities based or operating near those areas
  - Lot 4: Provision of Construction services to include new build, extensions and refurbishment under traditional or design and build with all associated works – (£250,000 to £1,500,000) - Vale of Glamorgan Council, The County Council of the City of Cardiff Council, Newport City Council or other Potential Employers based or operating near those areas;
  - Lot 5: Provision of Construction services, extensions and refurbishment under traditional or design and build with all associated works – (£1,500,001 to £3,000,000) - Powys County Council and other Potential Employers based or operating in Powys or operating nearby to include new build
  - Lot 6: Provision of Construction services to include new build, extensions and refurbishment under traditional or design and build with all associated works – (£1,500,001 to £3,000,000) - All Potential Employers
  - Lot 7: Provision of Construction services to include new build, extensions and refurbishment under traditional or design and build with all associated works – (£3,000,001 to £5,000,000) - All Potential Employers
  - Lot 8: Provision of Construction services to include new build, extensions and refurbishment under traditional or design and build with all associated works – (£5,000,001 to £10,000,000) - All Potential Employers
  - Lot 9: Provision of Construction services to include new build, extensions and refurbishment under traditional or design and build with all associated works – (£10,000,001 to £25,000,000) - All Potential Employers
  - Lot 10: Provision of Construction services to include new build, extensions and refurbishment under traditional or design and build with all associated works – (£25,000,001 to £100,000,000) – All Potential Employers

In this instance the Council propose to use Lot 8 (£5M - £10M).

The Core principles of the framework are the over-riding objectives guiding the Authority and the Contractor in the operation of this Framework Agreement, and in entering into and performing Call-Off Contracts. The Authority and the Contractor hereby agree:

- To work together and with the Potential Employers, Employers and their advisers in good faith and in a spirit of mutual trust and co-operation;
- To act in a co-operative and collaborative manner so as to achieve and advance the relevant Construction Project;
- To share information honestly and openly; and
- To highlight any difficulties at the earliest possible opportunity.

The Authority and the Contractor agree to work together in accordance with the terms of this Framework Agreement and in co-operation and collaboration with the Potential Employers, Employers and their advisers, to achieve the successful delivery of a series of Construction Projects and in particular, the Core Principles.

#### 4.1.2 Award methodology

Within this framework two methods may be used by Participating Authorities to award contracts under the framework, as summarised below (Direct award applies to Lots 1-7 and 11 only):

1. Mini-tender – Contractors in the relevant Lots will be invited to tender against a range of quality and pricing criteria. This method will apply to all Lots;
2. Early Contractor Involvement mini-tender - Early Contractor Involvement allows the Employer to engage with a Contractor via a contract to carry out services such as initial design, feasibility and assisting in planning and business cases etc. This process known as a 2 stage design and build requires bidders to submit an overall price for the whole of the works including the design. This will form the basis for the ECI appointment and will be discussed and refined during ECI with the aim of agreeing prices or a contract sum within the price envelope prior to the start of the construction stage.

Under this mini tendering process, the framework contractors will be asked to price scheme specific Preliminaries and Design Costs including a capped Target Cost as a guide. All other costs would be in accordance with their (already tendered) framework submission. Under the NEC4 Professional Services Contract and NEC4 Engineering & Construction Contract – Option A: Priced Contract with Activity schedule. The interim valuations will be paid on actual invoiced costs for labour, plant, materials and sub-contractors plus overheads and profit with a gain/pain percentage share on completion.

## 4.2 Required Services

### 4.2.1 The required service streams:

The required service streams for this programme business case include:

- A new 4-11 dual stream Primary school (150 capacity, plus early years) in Sennybridge.

### 4.2.2 The specification of required outputs:

- CO2 or energy arising from site activities as deemed required by the contractor to achieve BREEAM Excellent;
- CO2 or energy arising from transport to and from site as deemed required by the contractor to achieve BREEAM Excellent;
- Water consumption arising from site activities as deemed required by the contractor to achieve BREEAM Excellent;
- Air (dust) pollution arising from the site as deemed required by the contractor to achieve BREEAM Excellent;
- Water (ground and surface) pollution occurring on the site as deemed required by the contractor to achieve BREEAM Excellent;
- 80% of site timber is responsibly sourced and 100% is legally sourced;
- Net Zero Carbon building.

## 4.3 Potential for Risk Transfer.

**Table 23 – 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	✓		
Control risks	✓		
Residual value risks	✓		
Financing risks	✓		

Legislative risks			✓
Other project risks			✓

#### 4.4 Project Bank Accounts (PBAs)

Details around the approach to PBAs will be developed as this proposal moves through the various approval gates. This will include details of:

- 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 benefits of PBAs are understood and prospective tenderers understand that they should communicate these benefits down the supply chain, to maximise sub-contractor sign up to the PBA. To support this, a briefing pack and information sheet will be provided to tenderers outlining these benefits and requirements.

#### 4.5 Community Benefits

##### 4.5.1 Agreed schedule

The inclusion of community benefits/social requirements within contracts will ensure that wider social and economic issues are taken into account when tendering construction and development work. The Council particularly considers that the works afford an ideal opportunity to the contractor to enhance employment prospects and skills through the recruitment, training and retention of economically inactive people at a disadvantage in the labour market.

##### 4.5.2 Delivery of agreed targets

Based on previous experience, for a project of this value, we anticipate that the successful contractor would:

- Deliver a Meet the Buyer Event to raise awareness of project to local supply chain;
- Use Sell2Wales to advertise opportunities;
- Complete 100% payments to sub-contractors within 23 days of receipt of invoice;
- Utilise and complete the Value Wales Measurement Tool;
- Provide weeks of employment (to be decided); training and/or work experience opportunities for unemployed people, those leaving and educational establishment or training provider; trainee's or apprentices;



- Employee apprentices on the project (numbers to be decided as the scheme develops);
- Conduct a number of pupil interactions;
- Spend a % of contract spend in Wales;
- Divert a % of waste from landfill; and
- Conduct a number of community initiatives throughout the duration of the project.

## 5 Financial Case

### 5.1 Project Summary Costs

**Table 24 – Key metrics**

Project Title and Location	New Build Primary school, Sennybridge
New Build % (Area)	1,444 sq. Metres
Refurbishment % (Area)	N/A
Extension % (Area)	N/A
Description of work & any unusual constraints	N/A
# Pupil Places	150
# SEN Places	0
Total # Places	150
# Storeys (including basement)	1
Delivered through Regional Framework?	Yes
Contract period in weeks	27 months
Anticipated Community Benefits	Subject to the outcome of procurement
# Trainee and apprenticeship opportunities	Subject to the outcome of procurement
Use of local subcontractors as a % of total cost	Not yet known

### 5.2 Breakdown of Capital Costs

**Table 34 – Breakdown of capital costs**

Project Costs	
Capital Cost	£7,569,575
Optimism Bias	£1,816,698
Risk	£868,308
VAT (only to be included where non-recoverable by applicant)	N/A
<b>Total Project Cost (inclusive of optimism bias and risk)</b>	<b>£10,254,582</b>
<b>Total (It is assumed that optimism bias and risk will be fully mitigated and that the capital build cost is the actual cost upon which the intervention rate will apply.</b>	<b>£4,920,224</b>
<b>Welsh Government Intervention Rate</b>	<b>65%</b>

### 5.3 Cost Build Up

**Table 25 – Cost build up**

£s	Total Cost	Years (years 9-59 same as year 8)								
		0	1	2	3	4	5	6	7	8
		2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
<b>Preferred way forward:</b>										
New Build Capital	£7.570	£0.616	£3.005	£3.221	£0.728					
Revenue Cost	£33.492	£0.546	£0.546	£0.546	£0.554	£0.559	£0.559	£0.559	£0.559	£0.559
<b>Total</b>	<b>£41.062</b>	<b>£1.162</b>	<b>£3.551</b>	<b>£3.767</b>	<b>£1.281</b>	<b>£0.559</b>	<b>£0.559</b>	<b>£0.559</b>	<b>£0.559</b>	<b>£0.559</b>
Funded by:										
Existing Revenue	£32.772	£0.546	£0.546	£0.546	£0.546	£0.546	£0.546	£0.546	£0.546	£0.546
<b>Additional Funding Req.</b>	<b>£8.290</b>	<b>£0.616</b>	<b>£3.005</b>	<b>£3.221</b>	<b>£0.735</b>	<b>£0.013</b>	<b>£0.013</b>	<b>£0.013</b>	<b>£0.013</b>	<b>£0.013</b>

### 5.4 Overall Affordability and Balance Sheet Impact

A balance sheet asset addition of £7,569,575 is made for the new build school. Short term additional funding is required of the full £7,569,575 for years 0 through 3 (inclusive), excluding VAT, retained risks and optimism bias. From the opening of the new school building in 2025 there will be a small increase in the recurring revenue cost of school, at approximately 13K per annum.

The Band B submission has been scrutinised and assessed by the Council's Section 151 Officer for affordability in light of the 65% programme intervention rate. The Council will meet the 35% contribution required to support the project through prudential borrowing.

## 6 Management Case

### 6.1 Programme Management Arrangements

This scheme is a constituent of Powys County Council’s Transforming Education 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.

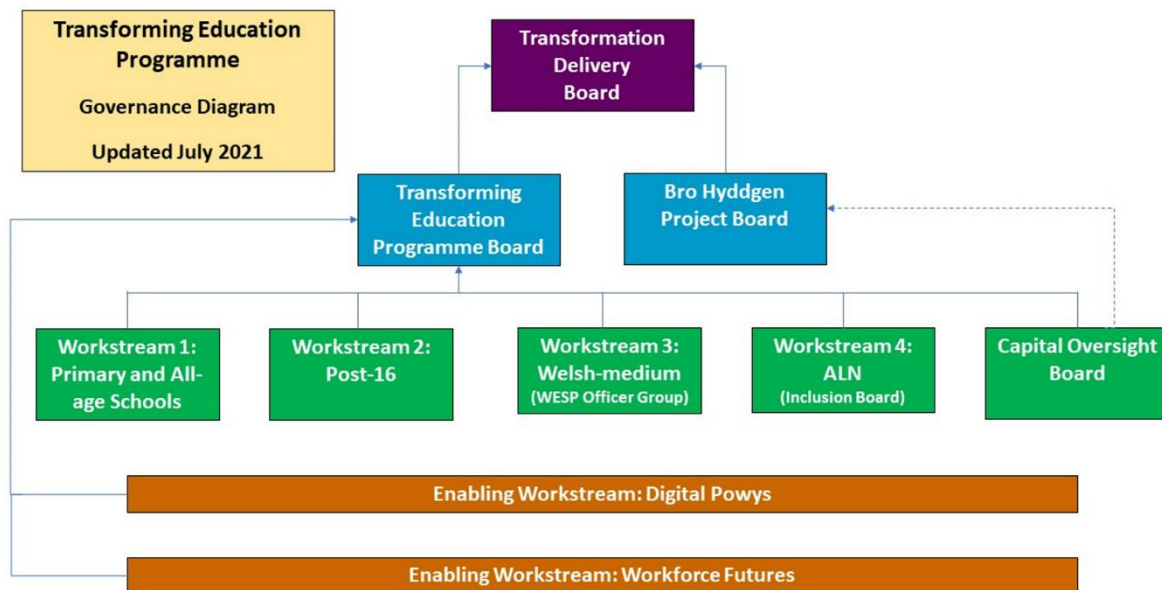
Overall corporate governance for the Transforming Education Programme (formerly known as the 21<sup>st</sup> Century Schools Transformation Programme) is in accordance with the governance arrangements for the Council’s Transformation Programmes, as outlined in the following diagram:

**Figure 2: Programme Vision**



Governance arrangements for the Transforming Education Programme are set out in the diagram below:

**Figure 3: Transforming Education Programme Governance**



## 6.2 Project Management Arrangements

### 6.2.1 Project Structure

The project will report to Enabling Workstream 1: Capital, as outlined in the diagram above, and will be managed in accordance with the general principles of PRINCE2 methodology.

### 6.2.2 Outline Project Plan

**Table 26 – Outline project plan**

Date	Actions (commencement)
03/2022	SOC to Powys CC Cabinet Submit SOC to WG
05/2022	Complete RIBA 2
06/2022	OBC to Powys CC Cabinet Submit OBC to WG
07/2022	Commence Procurement
09/2022	Award Contract
05/2023	Complete RIBA 3/4

Date	Actions (commencement)
07/2023	Planning Approval
10/2023	Submit FBC to PCC Cabinet Submit FBC to WG
01/2024	Commence Construction
01/2025	New school building opens

### 6.2.3 Benefits Realisation

The strategy, framework and plan for dealing with the management and delivery of benefits will be developed at OBC stage, but it is understood that benefits that will be realised may be either financial or qualitative (for example improvement in educational standards). A strategy and supporting plan for benefits will clearly show what will happen, where and when the benefits will occur. A full benefit realisation plan will be developed for the preferred option at Full Business Case.

## 6.3 Risk Management

### 6.3.1 Risk Workshop

All projects have an element of risk and there must be a proactive approach to risk management to balance risks against the potential rewards and plan to minimise or avoid them. It is also acknowledged that taking some amount of risk will be inevitable to the success of the project. The strategy, framework and plan for dealing with the management of risk for the preferred option follows a PRINCE2 methodology.

The register will be a 'living document' and reviewed and amended (where required) during workshops where a risk manager will be appointed to manage the identification, monitoring, updating, control and mitigation of project risks. 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 risks and issues identified within this project will be cross referenced with the risks/issues held by the Programme Board so that cross cutting issues can be mitigated safely.

### 6.3.2 Risk Identification

Risk identification can occur at all levels of the project, whether from the project teams or the project manager regarding the sub-elements of the project or from the Programme Board (where external risks are identified). Initial risks will be identified through structured workshops attended by the relevant experts and these risks will be captured in a formal project risk register document.

When a risk is identified, the project manager will be responsible for evaluating each risk in terms of the likelihood and impact. The project manager will also enter this information onto the risk register and assign a risk owner who will update the project manager on the status of the risk including the results of mitigating actions.

Risk management will be fundamental to the management of the project and as such, the project risk register will be reviewed on a weekly basis by the project manager. All risks arising from the project teams will be sent to the project manager for evaluation. The total risk score for each risk will be calculated by multiplying the probability score (between 1-4 with 4 being certain) and impact score (between 1-4 with 4 being project failure) and all risks scoring 8 and above will be referred to the Project Board for decision. The risk tolerance line for the project is illustrated in the following table.

**Figure 4: Risk Tolerance Profile**

Probability	4	4	8	12	16
	3	3	6	9	12
	2	2	4	6	8
	1	1	2	3	4
		1	2	3	4
		Impact			

The risk register will include details of the responsible owner and the required mitigation action for the risk.

### 6.4 Change and Contract Management

The main aim here is to manage proposed changes to the culture, systems, processes and people working to establish the best option for the council. Change management is not about the provision of the best option but instead focuses on those actions that are necessary to make the best option a working success.

Managers responsible for the key areas will adopt appropriate project management disciplines to meet specific responsibilities. The individual activities may be projects in their own right or be work streams within the overall project.

Planning has been developed for all activities within this change management process through the identification of key outcomes and actions required to ensure successful delivery. Timescales for carrying out such actions, the resources required, and where required, the need for additional resources, have also been determined.

## **6.5 Gateway Reviews**

The Council confirm that it is prepared to complete a Gateway review of the programme at Welsh Government convenience. Further Gateway reviews may then be undertaken during the remaining life of the programme.

## **6.6 Post Project Evaluation**

The outline arrangements for Post Implementation Review (PIR) and Project Evaluation Review (PER) have been established in accordance with best practice and are as follows.

### **6.6.1 Post Implementation Review (PIR)**

These reviews ascertain whether the anticipated benefits have been delivered and are timed to take place a year post construction, i.e. January 2026.

### **6.6.2 Project Evaluation Reviews (PERs)**

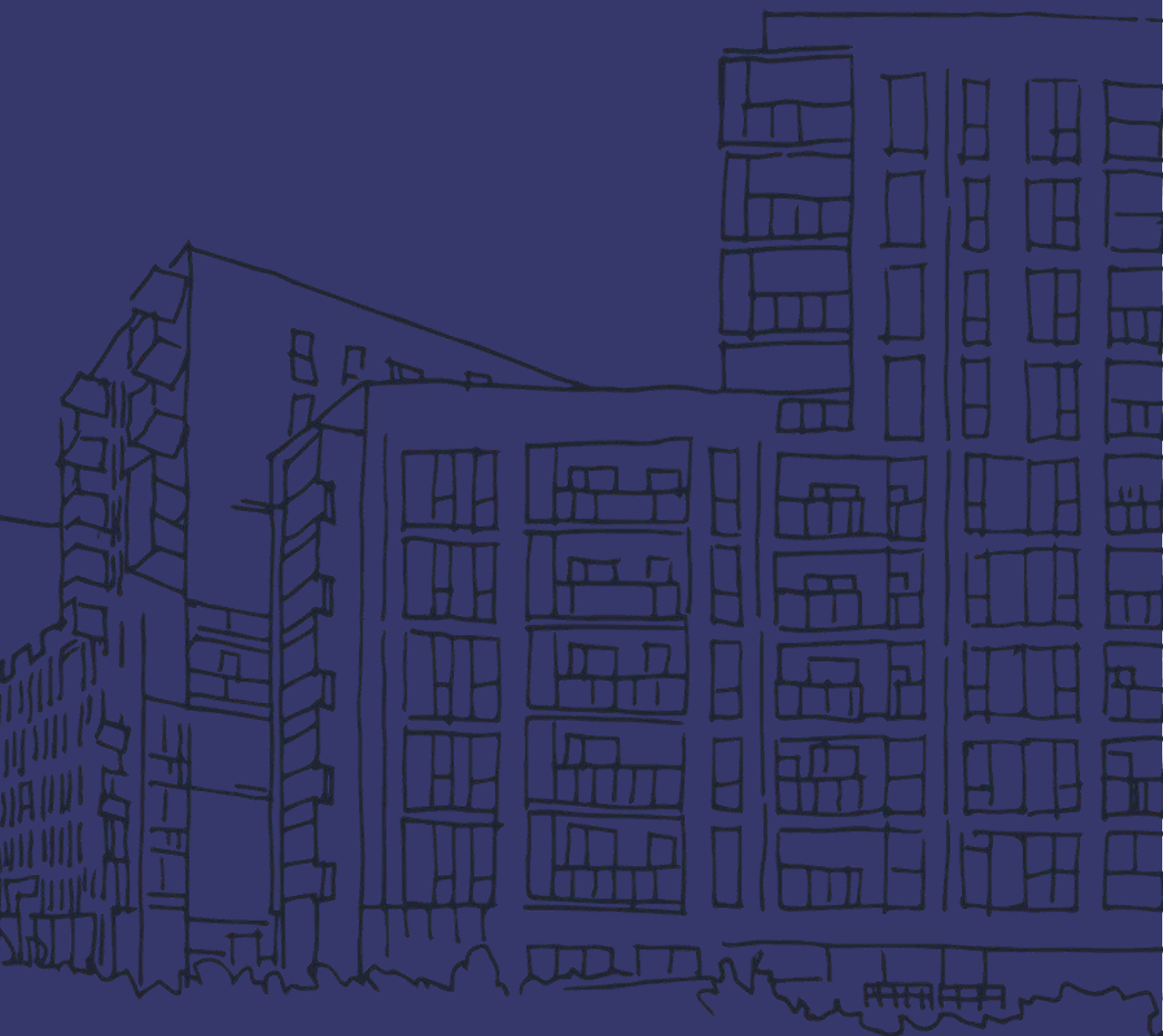
PERs appraise how well the project was managed and delivered compared with expectations and are timed to take place one-year post construction, i.e. January 2026.

## **6.7 Contingency Plans**

In the event of project failure, the existing schools will continue to operate until such time that the project can be righted.



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# 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.**

<b>Service Area</b>	Schools Service	<b>Head of Service</b>	Lynette Lovell / Emma Palmer	<b>Portfolio Holder</b>	Clr Phyl Davies
<b>Proposal</b>	Sennybridge Primary School Strategic Outline Case				
<b>Outline Summary / Description of Proposal</b>					
The Council has developed a Strategic Outline Case (SOC) in respect of Sennybridge Primary School in Sennybridge. The SOC identified the following preferred way forward:					
<ul style="list-style-type: none"> <li>To build a new 150 place dual-stream primary school to replace the current building.</li> </ul>					
The Council’s Cabinet will consider the SOC on the 8 <sup>th</sup> of March, and will be asked to approve the following:					
<ul style="list-style-type: none"> <li>To submit the SOC to the Welsh Government’s 21<sup>st</sup> Century Schools Programme for Investment</li> </ul>					
This impact assessment considers the potential impact on the preferred way forward identified.					

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

Version	Author	Job Title	Date
1	Melany Price	Project Manager	16/02/22

2. Profile of savings delivery (if applicable)

2018-19	2019-20	2020-21	2021-22	2022-23	TOTAL
£	£	£	£	£	£

3. Consultation requirements

Consultation Requirement	Consultation deadline/or justification for no consultation

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<p>No consultation required (please provide justification)</p>	<p>No public consultation is required at this stage in order to proceed with the development of a new building however as the new school is proposed to be built within the current site. Consultation would be required at the appropriate time as part of the planning process.</p>
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### 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						
Tudalen 292	Adult Services	<input type="checkbox"/>	Education	<input checked="" type="checkbox"/>	Legal and Democratic Services	<input checked="" type="checkbox"/>
	Children's Services	<input checked="" type="checkbox"/>	Finance	<input checked="" type="checkbox"/>	Property, Planning and Public Protection	<input checked="" type="checkbox"/>
	Commissioning	<input type="checkbox"/>	Highways, Transportation and Recycling	<input type="checkbox"/>	Transformation and Communications	<input checked="" type="checkbox"/>
	Digital Services	<input checked="" type="checkbox"/>	Housing and Community Development	<input type="checkbox"/>	Workforce and OD	<input checked="" type="checkbox"/>
Data Protection Impact Assessment						
<p>Will the proposal involve processing the personal details of individuals? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>Is Powys County Council the data controller? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A currently <input type="checkbox"/></p> <p>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.</p>						

### 4a Geographical Locations

What geographical area(s) will be impacted by the proposal? (Chose all those applicable)							
Powys	X	Brecon	<input checked="" type="checkbox"/>	Llandrindod and Rhayader	<input type="checkbox"/>	Machynlleth	<input type="checkbox"/>
		Builth and Llanwrtyd	<input type="checkbox"/>	Llanfair Caereinion	<input type="checkbox"/>	Newtown	<input type="checkbox"/>
North	<input type="checkbox"/>	Crickhowell	<input type="checkbox"/>	Llanfyllin	<input type="checkbox"/>	Welshpool and Montgomery	<input type="checkbox"/>
Mid	<input type="checkbox"/>	Hay and Talgarth	<input type="checkbox"/>	Llanidloes	<input type="checkbox"/>	Ystradgynlais	<input type="checkbox"/>
South	X	Knighton and Presteigne	<input type="checkbox"/>				

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5. How does your proposal impact on Vision 2025?

Council's Well-being Objective	How does the proposal impact on this Well-being Objective?	<b>IMPACT</b> 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?	<b>IMPACT AFTER MITIGATION</b> Please select from drop down box below
<b>The Economy</b> <b>We will develop a vibrant economy</b>	Implementation of the preferred way forward would result in significant capital investment in the area.	Good		Choose an item.
<b>Health and Care</b> <b>We will lead the way in providing effective, integrated health and care in a rural environment</b>	The development of a new school at Sennybridge aims to create a collaborative, multi-agency facility for supporting pupils, and provide facilities which will be available for community hire.	Good		Choose an item.
<b>Learning and skills</b> <b>We will strengthen learning and skills</b>	<p>The intention of the SOC is to address the issues identified with the current Sennybridge building, thereby improving the quality of provision and educational opportunities provided to pupils.</p> <p>The preferred way forward would provide new facilities to replace the sub-standard building currently occupied, which would improve the learning environment for pupils and staff, leading to an improvement in learning and skills.</p> <p>The preferred way forward identified in the SOC is to provide a new primary school building to replace the current school, provide a stimulating teaching and learning environment in state of the art, 21st Century facilities that will impact positively on the self-esteem and well-being of all pupils and deliver the new curriculum for Wales</p>	Very Good		Choose an item.

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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
Residents and Communities We will support our residents and communities	<p>The proposal would have a positive impact on residents of the Sennybridge area, the project would develop a community-focused school that would be a central point for multi-agency services to support children, young people, families and the community.</p> <p>Community facilities are included within the new design, to include a community room and gym storage facilities. The gym equipment is privately owned and will be brought into the community room or the school hall for use by the community weekly. The outdoor sports facilities and forest school area at the new school building will also be available for community use.</p>	Very Good	.	Neutral

Source of Outline Evidence to support judgements
Engagement with governing bodies, staff, pupils, ALN Team, School Services

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><b>A prosperous Wales:</b>                      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 preferred way forward would result in a new primary school building in Sennybridge to replace the current poor quality, inefficient building. The intention is that the new building will be BREEAM Excellent and Carbon Zero in operation, ensuring the building is as efficient as possible.</p> <p>Community benefits to include opportunities for traineeships / apprenticeships are a key requirement of 21<sup>st</sup> Century Schools projects, therefore it is anticipated that these opportunities would be available as part of implementing the preferred way forward.</p>	Very Good		Choose an item.
<p><b>A resilient Wales:</b>                      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>The intention is that the new building would be Net Zero Carbon in operation, which would be significantly more energy efficient than the current buildings. The design incorporates environmentally friendly outdoor spaces, retaining existing trees football pitch area and forest school. Further biodiversity methods would be incorporated into the scheme where practical.</p>	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 a more positive impact or to mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from drop down box below
<p><b>A healthier Wales:</b>                      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><b>Public Health (Wales) Act, 2017:</b>                      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>	Implementation of the preferred way forward would result in a new school building to replace the current Sennybridge Primary building. This would have a positive impact on the well-being and morale of both pupils and staff, and would ensure that all pupils and staff were located in an efficient and stimulating teaching and learning environment. 21st Century facilities that will impact positively on the self-esteem and well-being of all pupils and deliver the new curriculum for Wales.	Good		Choose an item.
<p><b>A Wales of cohesive communities:</b>                      Attractive, viable, safe and well-connected Communities.</p>	Implementation of the preferred way forward would result in a building which will provide a safe environment for the pupils. Community usage of the facilities will be managed by the school.	Good		Choose an item.
<p><b>A globally responsible Wales:</b>                      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><b>Human Rights - is about being proactive (see guidance)</b></p> <p><b>UN Convention on the Rights of the Child:</b>                      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 preferred way forward would provide improved, fit for purpose facilities for pupils, and additional opportunities, which will become a community hub serving the community of Sennybridge and beyond.</p> <p>Opportunities will be provided to pupils to contribute to the development of the project as the work moves forward.</p>	Good		Choose an item.



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
<b>A Wales of vibrant culture and thriving Welsh language:</b> 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. <i>Incorporating requirements under the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards</i>				
Tudalen 297 <i>Opportunities for persons to use the Welsh language, and treating the Welsh language no less favourable than the English language</i>	<p>Sennybridge C.P. School is a dual stream school, therefore the proposal would provide improved facilities for Welsh-medium pupils.</p> <p>The Council's Welsh in Education Strategic Plan (WESP) for 2022-32 sets out an ambitious target to increase the percentage of Year 1 pupils being taught through the medium of Welsh in Powys by 14 percentage points to 36%. To reflect this, one of the Investment Objectives for this development is 'To meet and stimulate demand for Welsh-medium provision'.</p> <p>To contribute to this target, the Council's aim is to see an increase in the pupils accessing Welsh-medium provision at Sennybridge C.P. School and across the Brecon catchment, to contribute to the Council's target to increase the number of pupils taught through the medium of Welsh and to contribute towards the Welsh Government target to have a million Welsh speakers by 2050.</p>	Good		Choose an item.
<i>Opportunities to promote the Welsh language</i>	See comments above.	Good		Choose an item.

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Well-being Goal	How does proposal contribute to this goal?	<b>IMPACT</b> 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?	<b>IMPACT AFTER MITIGATION</b> Please select from drop down box below
<p><i>People are encouraged to do sport, art and recreation.</i></p>	<p>The proposal will provide a new building in Sennybridge, which would provide improved facilities for pupils to do sport.</p> <p>Community facilities are included within the new design, to include a community room and gym storage facilities.. The outdoor sports facilities and forest school area at the new school building will also be available for community use.</p>	Good		Neutral
<p><b>A more equal Wales:</b> 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).</p>				
<i>Age</i>	The proposal would provide improved educational opportunities for pupils attending the school, from early years through to year 6.	Good		Choose an item.
<i>Disability</i>	The new building would be fully DDA compliant, thereby improving the facilities available for any pupils with disabilities.	Good		Choose an item.
<i>Gender reassignment</i>	No impact.	Neutral		Choose an item.
<i>Marriage or civil partnership</i>	No impact.	Neutral		Choose an item.
<i>Race</i>	The proposal would provide equal opportunities to all pupils attending Sennybridge Primary School.	Neutral		Choose an item.
<i>Religion or belief</i>	The proposal would provide equal opportunities to all pupils attending Sennybridge Primary School.	Neutral		Choose an item.
<i>Sex</i>	The proposal would provide equal opportunities to all pupils attending Sennybridge Primary School.	Neutral		Choose an item.
<i>Sexual Orientation</i>	The proposal would provide equal opportunities to all pupils attending Sennybridge Primary School.	Neutral		Choose an item.
<i>Pregnancy and Maternity</i>	No impact.	Neutral		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 a more positive impact or to mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from drop down box below
<i>Socio-economic duty</i>	The aim of the proposal is to provide improved educational opportunities for all pupils currently attending Sennybridge Primary School. The project will adopt a Community Benefits Strategy which will give opportunities for local people to achieve accreditations and apprenticeships in construction, helping to reduce inequalities.	Good		Choose an item.

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### Source of Outline Evidence to support judgements

Initial discussions with the governing bodies, staff, pupils, ALN team, Children Services, School Services, SOC

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 a more positive impact or to mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
<b>Sustainable Development Principle (5 ways of working)</b>				
<b>Long Term:</b> <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 will provide a new building to replace the current poor quality, inefficient building currently occupied by Sennybridge Primary School. The new building will be more efficient and will ensure that money and time can be better spent on improving the quality of provision rather than on building.	Good		Choose an item.
<b>Collaboration:</b> <i>Working with others in a collaborative way to find shared sustainable solutions.</i>	Discussions with stakeholders associated with Sennybridge C.P. School have taken place when developing plans for the new school building.  Engagement meetings have been held with the following: ALN Team representatives, school staff, Children Services, Heart of Wales Property Services and Schools Service. Other Council departments will be involved in project meetings to inform and discuss options.	Good		Choose an item.
<b>Involvement (including Communication and Engagement):</b> <i>Involving a diversity of the population in the decisions that affect them including:</i> <b>Unpaid Carers:</b> <i>Ensuring that unpaid carers views are sought and taken into account</i>	Discussions with stakeholders associated with Sennybridge C.P. School have taken place when developing plans for the new school building.  These will continue as the project moves forward, as well as additional opportunities for other stakeholders associated with the school to be involved in the project.	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 a more positive impact or to mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from drop down box below
<p><b>Prevention:</b> Understanding the root causes of issues to prevent them from occurring including:</p> <p><b>Safeguarding:</b> Preventing and responding to abuse and neglect of children, young people and adults with health and social care needs who can't protect themselves.</p>	<p>The challenges relating to the current Sennybridge Primary School are identified as part of the SOC. The options appraisal exercise carried out as part of the SOC has focussed on identifying solutions which will address these issues and prevent them occurring again.</p> <p>One of the Investment Objectives identified as part of the SOC process relates to safeguarding, and ensuring appropriate safeguarding arrangements. The intention is that the emerging preferred way forward would address the issues identified and would improve the safeguarding arrangements for all pupils.</p>	Good		Choose an item.
<p><b>Integration:</b> Taking an integrated approach so that public bodies look at all the well-being goals in deciding on their well-being objectives.</p>	<p>The development is part of plans for a community hall/facility. Integration with other organisations will be key in order to ensure the success of the project.</p>	Good		Choose an item.
<p><b>Powys County Council Workforce:</b> What Impact will this change have on the Workforce?</p>	<p>Overall, the impact of this proposal on staff would be positive, as they would be moving into a new building instead of the poor quality building in which they are currently located. This would have a positive impact on staff morale, and would also provide improved opportunities.</p>	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 a more positive impact or to mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
<b>Payroll:</b> 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?	The proposal complies with Powys CC's Single Status Terms and Conditions. The proposal will have no impact on PCC staff salaries/ enhanced payments.	Neutral		Choose an item.
<b>Welsh Language impact on staff</b>	Sennybridge C.P. School is a dual stream school, therefore some of the staff who will be affected by this plan are Welsh speaking. Overall, the impact of this proposal on staff would be positive, as they would be moving into a new building instead of the poor quality building in which they are currently located. This would have a positive impact on staff morale, and would also provide improved opportunities.	Good		Choose an item.
<b>Apprenticeships:</b> Has consideration been given to whether this change impacts negatively, or positively on Apprenticeships within the service?	The project would adopt a Community Benefits Strategy and would set targets in providing apprenticeships, training, and employment opportunities for the local population.	Good		Choose an item.
<b>Source of Outline Evidence to support judgements</b>				
Initial discussions with the governing bodies, staff, pupils, ALN team, Children Services, School Services, SOC				

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

PCC: Impact Assessment Toolkit (March 2018)

<b>Communities</b>	<b>How does the proposal impact on residents and community?</b>	<b>IMPACT</b> See impact definitions in guidance document	<b>What will be done to better contribute to a more positive impact or to mitigate any negative impacts?</b>	<b>IMPACT AFTER MITIGATION</b> See impact definitions in guidance document	<b>Source of Outline Evidence to support judgement</b>
Sennybridge	The proposal would have a positive impact on residents in the Sennybridge area as it would improve the facilities and educational opportunities provided to pupils.	Minor	N/A	Choose an item.	

9. What are the risks to service delivery or the council following implementation of this proposal?

<b>Description of risks</b>			
<b>Risk Identified</b>	<b>Inherent Risk Rating</b> Impact X Likelihood (See Risk Matrix in guidance document)	<b>Mitigation</b>	<b>Residual Risk Rating</b> Impact X Likelihood (See Risk Matrix in guidance document)
No Capital funding available to fund the project	Medium	SOC to be submitted to Welsh Government and Powys County Council Cabinet in order to secure the funding.	Low

10. Overall Summary and Judgement of this Impact Assessment?

<b>Outline Assessment (to be inserted in cabinet report)</b>	<b>Cabinet Report Reference:</b>
This impact assessment suggests that the impact would be positive. The development of a new building to replace the current Sennybridge Primary School building would address many issues related to the poor condition of the current building, ensuring that future pupils would be taught in facilities that are fit-for-purpose, improving their learner entitlement and experience. The new facilities would be fully DDA compliant, supporting learners with disabilities. Further opportunities for integration between the school and other services, to have a positive impact on the health and well-being of pupils attending the school and their families.	

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

<b>What additional evidence and data has informed the development of your proposal?</b>
N/A

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.**

The impact assessment will be reviewed at each RIBA stage as the project moves forward

13. Sign Off

Position	Name	Signature	Date
Impact Assessment Lead:	Sarah Astley	Sarah Astley	18 <sup>th</sup> February 2022
Head of Service:	Lynette Lovell / Emma Palmer		
Portfolio Holder:	Cllr Phyl Davies		

14. Governance

Decision to be made by	Date required
Cabinet	8 <sup>th</sup> March 2022

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**FORM ENDS**



**CYNGOR SIR POWYS COUNTY COUNCIL.****CABINET EXECUTIVE****Date: 8<sup>th</sup> March 2022**

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

**REPORT TITLE:** Transforming Education Programme – Llanfyllin  
Schools Transformation Progress Update

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**REPORT FOR:** Information

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**1. Purpose**

1.1 This report provides a progress update following Cabinet's recommendations on 21<sup>st</sup> December 2021, as outlined below:

- *Not to proceed with the planned extension to Llansantffraid C. in W. School, based on the outcome of the Feasibility Study.*
- *Not to proceed with the existing planned consultations on the closure of Llangedwyn C. in W. School, Llanfechain C. in W. School and Ysgol Bro Cynllaith.*
- *To instruct the Transforming Education Team to bring forward proposals for Ysgol Bro Cynllaith, Llangedwyn C. in W. School and Llanfechain C. in W. School by March 2022 due to the low and reducing pupil numbers and the potential impact on the sustainability of the schools and the learner offer.*

**2. Background**

2.1 On the 29<sup>th</sup> September 2020, Cabinet approved a Programme Business Case which put forward a preferred way forward for the transformation of education in the Llanfyllin/North Welshpool catchment areas.

2.2 Following on from this, Cabinet agreed that formal consultation should commence on proposals to close Llangedwyn C.i.W Primary School and Llanfechain C.i.W Primary School. Cabinet also agreed that a feasibility study should be carried out into the possibility of building an extension at Llansantffraid C.i.W Primary School to provide sufficient Church in Wales places in the area.

2.3 Cabinet also approved proceeding to formal consultation on a proposal to close Ysgol Bro Cynllaith.

2.4 The outcome of the initial feasibility study was that there were significant challenges in providing an extension to Llansantffraid C.i.W

Primary School. There would also be a need to decant the school to a temporary location whilst the building work took place, at a cost. Cabinet considered a report about the position on the 21<sup>st</sup> December 2021 and agreed the recommendations outlined in 1.1. above.

### **3. Progress Update**

- 3.1 Initial informal discussions have now started with schools in the area – specifically Ffederasiwn Dwy Afon (Llanfechain C.i.W Primary School and Llangedwyn C.i.W Primary School) and Llansanffraid C.i.W Primary School. An initial discussion is planned to take place soon with Ysgol Bro Cynllaith. The purpose of these initial discussions is to gain a greater understanding of local issues and pressures on the schools, as well as to begin to consider possible options that may address challenges faced by the schools as they are three very small schools located within a relatively geographic area, with two of the schools already operating as a formal federation. The future strategic provision of Church in Wales places in the area is a key factor for consideration and dialogue will also take place with the Diocese of St. Asaph.
- 3.2 Officers were also able to observe the significant capacity issues at Llansanffraid C.i.W Primary School, within classrooms, early years setting and outdoor areas, and further investigations will now be carried out into possible solutions which will include discussions with other local stakeholders, as well as consideration of possible alternative sites.
- 3.3 It has, however, not been possible to bring any new proposals to Cabinet by March as requested, due to officers workload and the need to focus on other proposals that are further progressed. It is expected that proposals will be brought back to Cabinet later this year.

### **4. Resource Implications**

- 4.1 N/A

### **5. Legal implications**

- 5.1 N/A

### **6. Comment from local member(s)**

- 6.1 N/A

### **7. Impact Assessment**

- 7.1 N/A

### **8. Recommendation**

8.1 It is recommended that Cabinet notes the progress update.

Contact Officer: Marianne Evans

Tel: 01597 826155

Email: [Marianne.evans@powys.gov.uk](mailto:Marianne.evans@powys.gov.uk)

Head of Service: Emma Palmer, Head of Transformation and Communications

Corporate Director: Lynette Lovell, Director of Education

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

**CYNGOR SIR POWYS COUNTY COUNCIL.****CABINET EXECUTIVE****Date March 8<sup>th</sup>, 2022**

**REPORT AUTHOR:** County Councillor Myfanwy Alexander  
Portfolio Holder for Adult Social Care, Welsh Language,  
Housing and Climate Change

**REPORT TITLE** Powys Housing Support Programme (HSP) Strategy  
2022-2026

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**REPORT FOR:** Decision

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**1. Purpose**

- 1.1 The purpose of this report is to request Cabinet approval for the adoption of Powys County Council's Housing Support Programme (HSP) Strategy 2022-2026, as the key strategic framework for delivering the Council's Housing priorities and Homelessness prevention objectives in Powys.
- 1.2 The HSP Strategy provides a strategic overview of the Council's approach to homelessness prevention and housing support services. It includes both statutory homelessness functions, funded through the Council's General Fund, and non-statutory preventative services funded through Housing Support Grant (HSG), and the roles to be played by the Council and other housing and support providers working in Powys.
- 1.3 Adoption of the HSP Strategy 2022-2026 will make sure that the Council complies with its statutory obligations in respect of homelessness and housing support. It will also underpin the importance of strengthening working relationships between statutory and non-statutory providers of support and accommodation to both prevent and reduce homelessness across Powys.

**2. Background**

- 2.1 Powys County Council, like all local authorities in Wales, is required to develop a Housing Support Programme (HSP) Strategy every four years, with a with a mid-point review every two years. The purpose of the strategy, provision for which is included in the Housing Support Grant (HSG) guidelines published by the Welsh Government, is to set out the strategic direction of the Council for providing and enabling housing support services.

- 2.2 This includes, in support of Section 50 of the Housing (Wales) Act 2014, providing an overarching framework to:
- Prevent homelessness.
  - Make sure that suitable accommodation is and will be available for people who are or may become homeless.
  - Make sure that satisfactory support is available for people who are or may become homeless.
- 2.3 The development of the Powys HSP Strategy has involved close collaboration with Mid and West Wales Regional partners in reviewing regional housing related support strategic objectives. Partner agencies and the Regional Housing Support Collaborative Group (RHSGCG)<sup>1</sup> have agreed to work closely together to develop the Rapid Re-Housing<sup>2</sup> Homelessness strategy delivery plan due to be completed by September 2022, a tangible outcome from the Powys HSP Strategy.
- 2.4 To develop the Powys HSP strategy, there has been:
- A detailed and thorough consideration of Local Housing Related Support<sup>3</sup> strategic objectives.
  - A comprehensive HSG needs assessment and homelessness review, the findings of which included
  - Consideration of the impact of Covid-19, including the ‘Everyone In’<sup>4</sup> approach mandated by the Welsh Government during the pandemic and now to be mainstreamed as part of the Welsh approach to homelessness
- 2.5 The Council has made sure that the Powys HSP Strategy satisfies the statutory requirements for a homelessness strategy, provided for under Part Two of the Housing (Wales) Act 2014. There is no requirement to produce a separate homelessness strategy if the HSP Strategy is compliant with all applicable requirements, set out in law.
- 2.6 The Powys HSP Strategy is attached to this report as Appendix A. The strategy:
- Considers how the Council can move towards the Rapid Re-housing and Housing First<sup>5</sup> initiatives to enhance the resolution of homelessness.

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<sup>1</sup> Regional Housing Support Collaborative Group: Cross regional working group to provide a forum for collaborative working and to improve service delivery.

<sup>2</sup> Rapid Re-housing: Rapid Rehousing takes a housing led approach to rehousing people that are experiencing homelessness, making sure they reach settled housing as quickly as possible to avoid prolonged stays in temporary accommodation.

<sup>3</sup> Local Housing Related Support: Support to help people who may be homeless or at risk of homelessness due to a range of issues or vulnerabilities to access housing and/or maintain their tenancies.

<sup>4</sup> Everyone In: Welsh Government emergency scheme to help keep rough sleepers off the streets in response to the Covid 19 pandemic.

<sup>5</sup> Housing First: An approach that focuses on providing permanent housing to people experiencing homelessness, to provide a base from which they can then work to attain their goals and aspirations.

- Clearly references 'Vision 2025', including the Council's commitment to improve the availability of affordable, secure, and sustainable housing.
- Will be supported by the new housing development programme led by Housing Services and the Empty Property Enforcement Action Plan to bring into productive use – including as housing - long term empty properties.
- Is underlined by the Council's Corporate Improvement plan's equality objective that includes: 'helping people to get the support they need to prevent homelessness.'
- Will be supported by, and provides support for, several of the Council's other objectives, including for example the Transformation Pathway to develop housing options for people with special accommodation needs, including young people, those with learning disabilities, people experiencing domestic or sexual abuse and people with disabilities and sensory impairment.
- Satisfies the statutory requirements for a homelessness strategy, as set out in Part 2 of the Housing (Wales) Act 2014.

2.7 The four priorities of the Powys HSP Strategy are:

1. All necessary steps are taken to maximise the housing stock available to address homelessness – which includes increasing the net number of affordable, secure homes available for people in Powys, with a particular emphasis on smaller homes for smaller households
2. The homeless persons assessment process is delivered promptly and efficiently, and applicants have their support needs assessed by a multidisciplinary team – which includes developing the Case Management approach to the delivery of homelessness and housing advice, providing stable and well-informed one-on-one support to prevent or resolve homelessness
3. Time spent in temporary accommodation is minimised, whilst ensuring support needs are met – which include developing a Business Case to introduce statutory 24/7 homeless supported/triage accommodation service which will include provision for young people.
4. Powys County Council and its partners commission an appropriate range of support services to ensure that in future homelessness is prevented, or where it occurs it is rare, brief and unrepeatable – which includes further developing joint commissioning approach to optimise impact and use of resources available and build sustainability of providers and Develop links between the (RHSCG) and the Powys Regional Partnership Board and Public Services Board, to embed a cross-service approach to housing support.

2.8 There is a high level of confidence that the priorities detailed in the Powys HSP Strategy, if acted upon, will ensure substantial ongoing improvement in Powys County Council's delivery of homelessness prevention and resolution outcomes.

### **3. Advice**

- 3.1 Based on review of evidence and information from people who use HSG and homelessness services, and other stakeholders, and Welsh Government directives, the most feasible option is for the Council to adopt the Powys HSP Strategy. Failing to adopt the Strategy may put the Council in breach of its statutory obligations and duties in respect of homelessness, including the requirement of the Housing (Wales) Act 2014, to have a Homelessness Strategy.

### **4. Resource Implications**

- 4.1 Adopting the Powys HSP Strategy does not require any commitment at this stage to increase the resources the Council allocates to homelessness activity. However, the strategy includes a wide range of actions, initiatives, and proposals, some of which may need further resources to take forward. In such cases, should additional Council funding be considered beneficial for achieving improved outcomes, bespoke reports will be presented to Cabinet for consideration.
- 4.2 The Head of Finance (Section 151 Officer) notes the comment above and can support the recommendation on that basis.

### **5. Legal implications**

- 5.1 The Principal Solicitor for Housing supports this report and its recommendation as it will assist the Council in carrying out its statutory duty regarding Homelessness under the Renting Homes (Wales) Act 2014.
- 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 The proposals and recommendations contained in this report do not involve the processing of personal data.

### **7. Comment from local member(s)**

- 7.1 The adoption of the proposal, as a strategy to improve housing support and reduce homelessness, will impact across all wards in Powys.

### **8. Integrated Impact Assessment**

- 8.1 An Integrated Impact Assessment has been prepared for the Powys HSP Strategy.

### **9. Recommendation**



9.1 It is recommended that:

9.1.1 Cabinet adopts the Powys HSP Strategy 2022-2026.

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

## Powys Housing Support Programme (HSP) Strategy 2022-26

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## 1. Purpose of the Strategy

This strategy sets out the strategic priorities of Powys County Council and its partner agencies for **homelessness prevention and housing related support services over the coming 4 years (2022-26)**. It refreshes earlier priorities that were included in the Council's former homelessness strategy, which was reviewed in 2018, and the HSG Delivery Plan for 2021-22. Development of the priorities was informed by a comprehensive need assessment exercise which included direct engagement with stakeholders within the Council and providers of support services. More information on the needs assessment process and findings is provided in Section later in the Strategy.

The Housing Support Grant (HSG) forms a key element of the overall strategy. This is an early intervention grant programme to support activity which prevents people from becoming homeless, stabilises their housing situation or helps potentially homeless people to find and keep accommodation. The grant is designed to augment, complement and support statutory services, thus ensuring that the overall local offer helps people into the right homes, with the right support to succeed. It makes a significant contribution to the implementation of Part 2 of the Housing Act (Wales) 2014 which focuses on homelessness prevention. Services supported through the HSG should be person centred and address multiple problems vulnerable people who are homeless or likely to become homeless often face (for example debt, employment, substance misuse, violence against women, domestic and sexual abuse and mental health problems). The services should ultimately reduce the need for costly intervention in these areas by other public services.

Strategic planning is key to ensuring appropriate alignment of the HSG and broader homelessness services and the effective commissioning HSG services. This will help ensure that homelessness is prevented and that people needing services are supported appropriately. This will also help ensure value for money is achieved in deploying the grant. Welsh Government requires a single strategy incorporating a local authority's homelessness prevention and support and covering the statutory homeless duty funded through the revenue settlement and non-statutory, preventative services funded through the HSG. The strategy should recognise the inter-dependency between these elements and more widely with other public services providing support to vulnerable people.

## 2. Legislative and Policy Context

### National Context

Welsh Government has maintained a consistent focus on tackling homelessness in the context of the long-term impact of UK Government policy, in relation to austerity and welfare support, and also other non-devolved policy areas that have an impact on homelessness such as the work of the Police and Prisons. Under Part 2 of the **Housing (Wales) Act 2014**, Local authorities have a **new and strengthened duty to prevent and relieve homelessness through collaborative approaches**, which has led to a strengthening of local partnership arrangements.

The guiding principle remains one of preventing homelessness, but where this is not possible, ensuring it is brief and non-repeated. There is a renewed commitment to fundamentally reform homelessness services to focus on prevention and rapid

rehousing. Understanding what works, what is promising, and what isn't effective will be crucial to Welsh Government in delivering its policy goals.

In turn, several key principles underpin the Welsh Government approach to homelessness prevention, and these should be enshrined across public and commissioned services. They are as follows:

- The earliest preventions are most effective and most cost effective and should always be the interventions of first choice.
- Tackling and preventing homelessness is a public services matter – rather than a 'housing matter'.
- All services should place the individual at the centre and work together in a trauma informed way.
- The duties in Part 2 of the Housing (Wales) Act 2014 should be the last line of defence – not the first - and all services should work to the spirit not simply the letter of the law.
- Policy, service delivery and practice should be informed and shaped in a co-productive manner and by those with lived experience.

Under this broad approach, housing and homelessness policy and practice has continued to evolve in the period since the Housing Act, and new duties for local authorities in relation to homelessness, came into force. This evolving landscape includes:

- The **Social Services and Wellbeing (Wales) Act 2014**
- The **Wellbeing of Future Generations (Wales) Act 2015**
- The **Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015**
- **'Preventing Homelessness and Promoting Independence' 2016**
- **Care Leaver Accommodation and Support Framework 2016**
- **End Youth Homelessness Cymru Campaign 2018**
- The Welsh Government's **'Housing First' approach** introduced in 2018
- The **Substance misuse delivery plan: 2019 to 2022**
- Welsh Government's **Phase 2 Planning Guidance** issued in response to the Covid-19 pandemic
- **Phase 3 planning guidance 2020**
- Additional Welsh Government **investment to address youth homelessness**
- **'Ending homelessness: A high-level action plan: 2021-2026'**, issued by the Homelessness Action Group in 2020
- Requirement for local authorities to produce a **Rapid Rehousing Action Plan** by September 2020
- Commitments within the **Welsh Government's Programme for Government (2021)** and the **Cooperation Agreement between Labour and Plaid Cymru (November 2021)** which impact on housing and homelessness

More information on these legislative and policy arrangements is provided in **Annexe 1**.

Further significant changes will be introduced in July 2022 when the Welsh Government enacts the provisions of its **Renting Homes (Wales) Act 2016**. Key changes, which strengthen the rights and protections of tenants include:

- Replacement of current tenancies and licences, including assured shorthold, assured and secure tenancies with secure occupation contracts (generally issued by community landlords – local authorities and housing associations) and standard occupation contracts (generally issued by private landlords)
- Increased duties on landlords to set out respective duties of the landlord and contract holder (tenant)
- Minimum notice period for termination of a contract where there is no fault to 6 months and requirement for at least 6 months to have elapsed since the start of a contract before any such notice is issued
- Increased protection for contract holders from break clauses, which can only be issued by landlords where certain conditions are met
- Requirement that all rented properties are fit for human habitation and that landlords keep the structure and exterior of the property in good repair
- Protection for remaining tenants subject to a joint contract where one contract-holder leaves the property
- Enhanced contract succession rights for certain groups, including some carers

These changes will have obvious implications for local authorities and other agencies with duties to prevent and relieving homelessness, in terms of existing tenants or contract holders having enhanced protection from the risk of becoming homeless, but also potentially on the availability of suitable properties in an area and private landlords willing to rent.

It is also appropriate to note the requirements of the **Equalities Act 2010** when planning services to prevent homelessness and housing support. This Act brought together a range of former legislation and covers the whole of the UK. It provides protection for people discriminated against because they are perceived to have, or are associated with someone who has, a protected characteristic and places associated duties on service providers.

The protected characteristics are:

- Age
- Disability
- Gender reassignment
- Marriage or civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

In addition, a new Socio-Economic Duty was added in Wales in 2020 which requires public bodies, when making strategic decisions such as deciding priorities and setting objectives, to consider how their decisions might help reduce the inequalities associated with socio-economic disadvantage

## Local/regional Context

### Powys: The County

Geographically, Powys is the largest local authority in Wales with a land area of over 5,179 square kilometres. It is the most sparsely populated authority in Wales and the majority of its residents live in small villages and towns. The largest towns in the County are Newtown, Ystradgynlais, Brecon and Welshpool. Powys encompasses a rigid, mountainous landscape which makes travel and transportation from north to south difficult.

According to the 2019 mid-term estimate, Powys has a population of 133,030 of which 27.6% are aged 65+ (this figure is the second highest among Welsh counties and highest among neighbouring local authority areas). Projections for 2030 are 132,905 and 32.1% respectively<sup>1</sup>.

56.5% of the population are of working age, which is lower than in neighbouring authority areas.

2020 data indicates that 19,845 of 60,240 (33%) of households in the County were single person households. Most migrants to the area were aged between 15 and 29, although between 2015 and 2019 the number of people within this age group leaving Powys exceeded inward migration. Overall, net migration rose more steeply in 2019-20 than at any time since 2003-04.

Economic well-being is above the Welsh average but there are pockets of hidden poverty, associated particularly with rural communities. Areas of Ystradgynlais, Newtown and Welshpool score highly in the Welsh Index of Multiple Deprivation.

More information is provided within the **Needs Assessment** document.

A range of existing **local policies and strategies** are relevant to this Strategy and have informed its development. These include:

- **Powys County Council's Corporate Plan 'Vision 2025'**
- **Powys Wellbeing Plan 'Towards 2040'**
- **Powys Housing Strategy (2016-20)**
- **Delivery Plan to implement the Dyfed Powys Regional Homelessness Strategy within Powys**
- **Powys Homelessness Review 2018**
- **Housing Support Grant Annual Delivery Plan for 2021-22**
- **Regional priorities of the Mid and West Wales Regional Housing Support Collaborative Group (RHSCG)**
- **Joint Health and Care Strategy**
- **Regional Violence Against Women, Domestic Abuse and Sexual Violence Strategy**
- **Substance Misuse Plan**

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<sup>1</sup> <https://en.powys.gov.uk/article/11139/Wellbeing-Information-Bank-View-information-about-Powys-population>



Further details on the above are provided in **Annexe 2**.

### 3. Vision and Principles

The Strategy is underpinned by a local Vision which reflects both the national objective of the HSG of securing 'A Wales where nobody is homeless and everyone has a safe home where they can flourish and live a fulfilled, active and independent life' and broader corporate commitments of the County Council.

Our **vision** is as follows:

***'Statutory, third and private sector partners work effectively together to make sure that people in Powys have access to suitable housing and can stay within their local communities. The right support is available within local communities, to prevent those at risk of becoming homeless from losing their homes. We strive to secure appropriate accommodation as swiftly as possible for those that have become homeless, along with the right kind of personalised support, helping them to a secure future and optimising their wellbeing. Ultimately, we want a Powys where homelessness is prevented or rare, brief and unrepeated.'***

### 4. Needs Assessment

#### Needs Assessment process

A comprehensive needs assessment was undertaken to inform this Strategy, in line with the requirements set out in Welsh Government guidance for the HSG. This has informed a statement of need which provides a distinct picture of what is known and covers the statutory homeless element and housing support.

The needs assessment was undertaken by Figure 8 Consultancy Services Ltd on behalf of the Council. The research used a range of qualitative and quantitative methods, as follows:

- Review of local and national strategic policy and practice documentation, and other relevant reports and statistical data
- 25 Semi-structured interviews with relevant staff from statutory and third sector organisations
- 7 focus groups with service managers and staff
- Focus groups with people with Lived Experience of homelessness
- A survey of people with Lived Experience of homelessness or the threat of homelessness (to be completed)
- A survey of staff who have experience of supporting people who have been homeless or at risk of homelessness.

The full needs assessment is provided in an accompanying document.

#### Key findings

The needs assessment informed the collation of Strengths, Weaknesses, Opportunities and Threats (SWOT) analyses of key areas. These are included in the full assessment. Key findings in relation to each area were as follows:

**Joint working:**

- Positive spirit of collaboration and active joint working at managerial and operational levels – although there is less compelling evidence of this being present at Local Authority elected Member or Health Board non-executive Member level
- Need to improve coordination across agencies to assess need jointly and provide complex, person-centred support effectively
- Different cultures across partner organisations can stymie effective joint working
- Lack of strategic agreement regarding resources
- Lack of coordination in supporting people with mental health needs

**Temporary accommodation:**

- Wide range of dispersed temporary accommodation without reliance on large-scale hostels
- Lack of triage facility for people in temporary accommodation
- Under-occupancy due to placing of single people in larger temporary accommodation (reflecting the fact that just 6% of homes in Powys across tenures are one bedroomed properties.
- High and lengthening average stay in temporary accommodation
- Need to ensure new build development programme is aimed at preventing and tackling homelessness. Current new build programmes will continue to address this, by freeing up existing properties for those currently, or at risk of being homeless, and as the focus shifts to smaller new homes to reflect identified need across the County

**Current provision to support people who are homeless or threatened with homelessness:**

- Scale and diversity of low-level support is a positive, although some agencies are forced to operate beyond their remit and competence
- Constructive relationship between landlords and low-level support providers
- Complex case officers coordinating support (although without genuinely multi-disciplinary assessment)
- 'Gap in the middle' of provision for people whose needs exceed low level provision but do not warrant specialist support
- Difficulties in staff recruitment by some providers
- Repeat applications for accommodation and support
- Risk of stigmatisation and community opposition to developments for homeless individuals

**Sustainable mainstream housing for people who are homeless or threatened with homelessness:**

- Effective contribution by social housing in Powys to homelessness prevention
- Severe constraints in housing supply
- Lack of one-bedroomed properties within housing stock
- Over-reliance on private rented sector which leads to a market-led approach in relation to rents and risks of potential contraction of the market

- Opportunity for the Council and housing association partners to redress the balance through the new build development programme, spot or block purchase of properties and where appropriate, participation on a case-by-case basis in the Welsh Government's leasing initiative.

## 5. Strategic Priorities

A number of high-level, strategic priorities have been derived from:

- Conclusions of and recommendations from the needs assessment undertaken to inform this strategy (these have been considered by relevant stakeholders and priority areas identified)
- Duties incumbent on the Council under the Housing Act and subsequent policy drivers
- The core aim of preventing homelessness and supporting people to have the capability, independence, skills and confidence to access and/ or maintain a stable and suitable home and the suggested mechanisms for achieving this as stated in the Welsh Government's HSG Guidance
- Assessment of existing regional and local priorities for preventing homelessness and supporting people under the HSG
- Evidence of the impact of emergency response provision brought in during the pandemic, many of which should be maintained and consolidated if long-term demand is to be met effectively
- Findings of the 2018 homelessness review

The priorities are set out below, with high level commitments from the Council and its partners about how these will be taken forward. Detailed actions in support of these commitments are included in the **Action Plan in Annexe 3**.

Additional actions relating to housing support services will be included in the forthcoming HSG Delivery Plan, which will be completed in March 2022 and will align with the findings of the needs assessment and priorities identified within this Strategy.

<p><b>Strategic Priority 1: Take all necessary steps to maximise the housing stock available to address homelessness and take forward requirements in relation to Rapid Rehousing</b></p>
<ul style="list-style-type: none"> <li>• Powys County Council and Housing Association partners will expand their property acquisition and development activity, with particular focus on one-bedroom properties in housing high pressure areas. It should be noted here that this is effective as a solution only in certain instances and other options such as conversion of existing non-residential units need to be pursued in parallel (this reflects the recommendations of a Task and Finish Group of housing providers which reported in May 2021).</li> <li>• We will reflect greater demand being placed on the private rented sector and allocate extra resources accordingly through providing appropriately targeted resources to improve advice and support to households who may need to rent</li> </ul>

privately provided accommodation and supporting the expansion into Powys of the Ceredigion social lettings agency.<sup>2</sup>

- We will actively develop Mortgage to Rent and Mortgage to Shared Ownership Schemes.
- We will consider leasing accommodation, including where appropriate drawing on support from the Welsh Government's leasing initiative, on a case-by-case basis.
- We will consider spot or block purchase of unoccupied properties by the Council and housing associations, making use of the end of restrictions on the Prudential Borrowing capability of Local Authorities.
- We will support those brought into temporary accommodation during the pandemic into long-term, secure accommodation.
- We will provide suitable mainstream accommodation to homeless people as a means of establishing and maintaining contact with range of support providers and delivering essential services more effectively.
- We will conclude County Council's review of the 'Homes in Powys' Common Housing Register's allocation policy and make suitable adjustments to maximise allocations to those currently temporarily accommodated, including redesignating temporary accommodation as permanent accommodation where this can minimise disruption and speed case resolution.
- Powys County Council and Housing Association partners will expand their property acquisition activity, with particular focus on one-bedroom properties in housing high pressure areas.

**Strategic Priority 2: Deliver the homeless persons assessment process promptly and efficiently, ensuring applicants have their support needs assessed by a multi-disciplinary team**

- We will develop multi-disciplinary approach to assessment as a basis for improved, holistic support for individuals, quantification of level, nature and complexity of need.
- We will continue to develop the Case Management approach to the delivery of homelessness and housing advice, providing stable and well-informed one-on-one support to prevent or resolve homelessness.
- We will develop an IT solution to record and manage homelessness applications.<sup>2</sup>

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<sup>2</sup> Taken from priorities identified within 2018 homelessness review

- We will establish a temporary multi-disciplinary homelessness and support needs assessment team to address all new presentations and to reappraise the support needs of those already in temporary accommodation.
- As part of the assessment process, we will offer all those that need it a housing support plan and monitor delivery in collaboration with support providers.

**Strategic Priority 3: Minimise time spent in temporary accommodation is minimised, whilst ensuring support needs are met**

- We will introduce statutory 24/7 homeless supported/triage accommodation service which will include provision for young people. A business case for this is being considered by the Council.
- We will develop sustainable plans and securing resources for enhanced support made available during the pandemic.
- We will develop intensive and assertive support services for those most difficult to house.<sup>2</sup> Action to address this is already underway, through an amendment to the Homes in Powys allocation policy. This approach also aligns with delivery of 'Housing First' and Rapid Rehousing.
- We will enhance digital facilities to enable support to be provided effectively where there is restriction on face-to-face contact; this can also help address challenges of face-to-face provision across a rural area, recognising that physical interaction will always be the preference for some service users including those that do not have access to digital connections.

**Strategic Priority 4: Commission an appropriate range of support services to ensure that in future homelessness is prevented, or where it occurs it is rare, brief and unrepeated**

- We will further develop joint commissioning approach to optimise impact and use of resources available and build sustainability of providers. Specifically, put in place a Strategic Commissioning Framework, with clearly articulated roles and responsibilities, to implement agreed service developments, accompanied by a Resourcing Statement.
- We will build on multi-agency working to provide appropriate floating support, delivered to communities through locality-based hubs, potentially with clusters providing more localised support where needed. Priority areas are likely to include:
  - Substance misuse
  - VAWDASV
  - Mental health
  - Non-violent relationship breakdown
  - Youth homelessness
- We will ensure housing involvement in the recommissioning and ongoing development of key support such as for substance misuse and VAWDASV

- We will develop a Partnership approach between agencies funded through the Grant, Housing Options Officer (HMOOs), Housing Officers (Interim Accommodation), Homelessness Support Officers, Complex Needs Co-ordinators.<sup>3</sup>
- We will develop links between the RCC and Powys Regional Partnership Board and Public Services Board, to:
  - Further embed a cross-service approach to housing support
  - Agree protocols between services for delivery of joined up support in key areas, drawing on experience during the pandemic and ensuring that respective actions complement rather than frustrate each other
  - Review housing support roles in the light of the above
  - Optimise resources available to augment statutory funding
- We will use data from the multi-disciplinary assessment team and combine this with information from other sources about the prevalence of support needs in the community, an aggregate picture is established that can inform business cases for, and commissioning of, specific services and accommodation that will fulfil the requirements of Rapid Rehousing Transition Plans.

Further commitments setting out how the Council and partners will approach **programme planning, implementation, monitoring and review** are set out below.

- We will develop robust outcomes for the HSG programme and broader strategy, reflecting national, regional, and local priorities and providing a comprehensive picture of impact.
- We will monitor needs of groups with protected characteristics, engage with them to ensure these are met in appropriate ways, and include appropriate measures within outcomes and performance framework to assess their experience.
- We will establish appropriate mechanisms for securing continuous engagement with relevant stakeholders to (1) monitor delivery of the Strategy, (2) assess impact, (3) identify where changes are necessary and (4) develop future priorities.

Work will be undertaken to ensure full alignment of the strategic priorities with other commitments across a range of Council services, for example but not exclusively, care and support and youth services and thereby provide for holistic, joined up services for all sections of the population. As well as optimising outcomes for the individual, this will help ensure best use of available resources.

Particular attention will be given to the recent request from Welsh Government for all local authorities to examine their corporate parenting response in relation to care experienced children and young people and their future accommodation needs. Specifically, Councils will need to respond to the need for:

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<sup>3</sup> Taken from priorities identified within 2018 homelessness review

- An active identification process to ensure care experienced young people presenting as homeless can access all the support they are entitled to in cooperation with children's services
- Multi-agency reviews to be undertaken to identify any gaps within the system or interventions that could have taken place to ensure future similar cases are prevented for care experienced young people presenting as homeless
- Granting 'local connection' status for care experienced young people who are placed out-of-county, when moving on
- Extending Personal Adviser support up to the age of 25

Implementing some of these commitments will require long-term action; whilst tangible impact is expected as implementation progresses, full benefits will often take longer to be realised. This needs to be reflected when allocating funding and monitoring impact.

## 6. Stakeholder Engagement

The following stakeholders were engaged with through the needs assessment process:

### 1:1 Interviews: (25)

- Powys County Council – Housing and Housing Support (7)
- POBL – (5)
- Money saviour (1)
- Brecon mind (1)
- Mid and North Powys Mind (1)
- Calan (1)
- Family Crisis (1)
- PAVO (1)
- Ponthafren (1)
- Sense (1)
- Severn Wye (1)
- Kaleidoscope (1)
- Powys Teaching Health Board (2)
- NHS Wales (1)
- Newydd (1)

### Stakeholder sessions (3)

- Housing providers – 6 social housing provider reps and 1 Powys Council representative
- Support providers – (6)
- POBL (3)
- Powys County Council (1)
- Money saviour (1)
- Ponthafren (1)

- Sense (3)<sup>4</sup>

### Staff focus groups (4)

- POBL – 4 sessions / 24 participants

### Stakeholder Feedback

Details of feedback from providers and service users will be included in final needs assessment due at the end of the month. This will be updated after the initial submission.

## 7. Impact Assessments

### Impact Assessment Process

A comprehensive Integrated Impact Assessment (IAA) has been undertaken in support of the HSP Strategy, which has entailed drawing upon data collated through multi-agency and joint working approaches that have been embedded over the past few years, regular engagement with residents, landlords and tenants and ‘assertive outreach’ efforts targeted at people who have difficulty engaging with services for whatever reason.

We provide a summary below of the anticipated impact of this Strategy on residents and communities. We are developing mitigating actions to address areas assessed as neutral. Our full Impact Assessment is available on request.

### Summary findings

Powys County Council wellbeing objectives	How does the Strategy impact on this objective?	Impact
Health and Care – We will lead the way in providing effective, integrated health and care in a rural environment	Improved alignment between HSG, Adult Social Care, Health and third sector	Good
Learning and skills – We will strengthen learning and skills	Strategy commits to digital inclusion projects and to supporting development of coping and resilience mechanisms	Good
Residents and communities – We will support our residents and communities	Strategy aims to protect people from homelessness and integrate provision across the County including in rural areas	Good
Welsh Government’s wellbeing goals	How does the Strategy contribute to this goal?	Impact
A prosperous Wales	Strategy commits to providing support close to home reducing the need to travel	Good

<sup>4</sup> Sign- language interpreted



	It will provide employment opportunities in relation to provision of support Support will help people to stay connected	
A resilient Wales	Appropriate housing enhances community resilience Removing threat to people's housing enhances mental health and wellbeing and encourages people to contribute to society at large	Good
A healthier Wales	The Strategy brings housing and health-related streams together, including the Powys Common Housing Allocations Policy, Mental Health services and disability services with the aim of helping residents lead happy and healthy lives Expansion of 'Housing First' approach will reduce homelessness for 'hard to house', 'non-engagers' and people repeatedly homeless	Good
A Wales of cohesive communities	Availability of high-quality homes and sustainable tenancies contributes to cohesive communities	Good
A globally responsible Wales	Strategy aims to provide good housing which is a human right The County Council commits to working with partners to lead a coordinated programme to increase availability of housing Housing related support will improve wellbeing of recipients	Good
A Wales of vibrant culture and thriving Welsh language	Support will be provided through the medium of Welsh as far as possible Providers will be supported in promoting the Welsh language Secure, appropriate -long term housing can encourage people to engage with their communities and participate in leisure activities  Recruitment of Welsh speaking staff is a requirement to fully deliver our commitments	Neutral
A more equal Wales	Age:	Good

	Older people will benefit from enhanced local support	
	Disability: Strategy commits to appropriate support to people with a disability Links will be developed with specialist support for people with learning disabilities, mental health problems, sensory disabilities, autistic spectrum disorder and dementia	Good
	Gender reassignment: Strategy aims to impact positively on people with protected characteristics in terms of their health and wellbeing. Specific training on gender reassignment will improve staff understanding of the experiences of people who have undergone gender reassignment of are exploring it	Neutral
	Marriage or civil partnership: No direct impact Strategy Action Plan commits to monitoring needs of groups with protected characteristics, engaging with communities and monitoring impact of services provided	Neutral
	Race: The Strategy aims to provide appropriate support to vulnerable people regardless of race. Providing support through first or preferred language of choice needs to remain a focus	Good
	Religion or belief: No direct impact Strategy Action Plan commits to monitoring needs of groups with protected characteristics, engaging with communities and monitoring impact of services provided	Neutral
	Sex: Strategy aims to support people regardless of gender Commissioned services will be available to makes and females subject to appropriate safety considerations (some services such as women's and men's	Good

	domestic abuse services) are gender-specific	
	Sexual orientation: No direct impact Strategy Action Plan commits to monitoring needs of groups with protected characteristics, engaging with communities and monitoring impact of services provided	
	Pregnancy and maternity: Strategy aims to improve access to support for those affected by domestic abuse and vulnerable families, both groups where there is likely to be a comparatively large proportion of mothers or expectant mothers and provide crisis support	Good
	Socio-economic duty: Strategy emphasises the importance of secure housing, aligned with employment opportunities, in the development and promotion of safe, thriving communities Strategy promotes education, training and employment Delivery of the HSP will result in greater numbers living independently and contributing to the economy	Good

## 8. Implementing, Monitoring and Reviewing the Strategy

### Working with Partners

As the Public Policy Institute for Wales summarises in its Tackling Homelessness, A Rapid Evidence Review 2015 report:

‘The evidence shows that homelessness is a complex problem. It often has multiple causes that interact with one another in ways that vary at the individual level and require engagement with multiple policy areas’.

The root causes that lead to homelessness and/or evident housing support needs among vulnerable individuals and households are profoundly interconnected. Therefore, the successful implementation of this Strategy fundamentally depends on co-ordination, joint planning, commissioning, and delivery of services (by both internal local authority departments, statutory partners and the housing sector).

We will continue to work with a range of partners including, of course, Housing Associations and the Private Rented Sector. In practice, wider collaboration across services is required and this is achieved in Powys through participation in the Mid

and West Wales RHSCG which covers the Powys and Hywel Dda University Health Board areas. Whilst the County Council is not directly accountable to the RHSCG, the regional structures provide a forum for practice sharing, spreading proven effective practice, and addressing common opportunities and challenges. This has included joint working on the development of local HSP strategies across the region and the RHSCG will also oversee delivery of regional priorities emerging from local plans.

Similarly, the Powys Regional Partnership Board (RPB) provides an obvious mechanism for engaging with health, social care and other partners responsible for the delivery of care and support in the County. It provides an ideal forum for collaboration, for example in the commissioning of services which promote wellbeing of citizens through the provision of appropriate housing and related support. Current strengthening of RPBs in response to the recent White Paper 'Rebalancing Care and Support' (2021) presents an opportunity for further development of these links, ensuring that health and care services align with housing support and supporting a person-centred approach. This is reflected in the identified strategic priorities supporting actions.

Existing links will also continue with the Area Planning Board for Substance Misuse Services and the VAWDASV Strategic and Delivery Groups, to ensure alignment of services and approaches to support as well as optimisation of available resources.

### Funding Sources

Implementation of this Strategy and delivery against the identified strategic priorities will require significant investment. This comes from a variety of sources, including:

- The HSG allocation to the region, which totalled £6.9m in 2021-22 and in respect of which indicative allocations of the same amount are in place for the coming three financial years
- The Council's Housing Revenue Account
- The Social Housing Grant
- Phase 1 and 2 of the Economic Resilience Fund and the Hardship Fund, both established in the wake of the Covid-19 pandemic

Allocation of resources to support specific actions will be finalised at implementation stage and, for Housing Support Services, reflected in the forthcoming HSG Delivery Plan.

### Monitoring, Reviewing and Evaluation Arrangements

The HSP Strategy is framed over a 4-year period and implementation will be subject to ongoing review, including a formal mid-point review after 2 years.

Implementation will be overseen by the Homelessness and Housing Support Grant Management Board, which has responsibility for delivery of the HSG programme and associated resources within the wider housing and homelessness context. The Board will monitor delivery of the priorities and receive reports on outcomes and impact. It meets quarterly and is chaired by Powys County Council's Cabinet Member for Housing.



## Annex 1: National legislation and policy

Details of legislation (both housing-related and more general), policy drivers and other strategic developments affecting the context in which this Strategy operates are set out below.

- The **Social Services and Wellbeing (Wales) Act 2014**

The Act provides the power to create a coherent legal framework for Social Services in Wales.

It intends to reform and integrate social services law for people and make provision for:

- Improving the well-being outcomes for people who need care and support, and carers who need support;
- Co-ordination and partnership by public authorities with a view to improving the well-being of people.

There are 6 strategic priorities outlined in the Act:

- Maintaining and enhancing the wellbeing of people in need.
- A stronger voice and real control for citizens.
- Strong Direction and Local Accountability.
- Safeguarding and Protection.
- Regulation and Inspection.
- Services (Adoption and Transition).

The Act recognises the increase in the number of people accessing social services. In order to help meet and reduce the demand it outlines the need for increased comprehensive early intervention and intensive support services. There is a duty for local authorities to maintain and enhance the wellbeing of people in need in areas such as education, training and recreation, social and economic wellbeing and physical, mental health and emotional wellbeing.

The Act also included 'When I'm Ready' arrangements which enable young people in foster care to remain with their carers beyond the age of 18

- The **Wellbeing of Future Generations (Wales) Act 2015**

The Act seeks to strengthen existing governance arrangements for improving the social, economic and cultural wellbeing of Wales to ensure that present needs are met without compromising the ability of future generations to meet their own needs. Public bodies listed in the Act need to think about the long term, work better with people and communities and each other and look to prevent problems and take a more joined up approach.

For the first time public bodies listed in the Act must do what they do in a sustainable way. Public bodies need to make sure that when making decisions they take into account the impact they could have on people living their lives in Wales in the future.

It will expect them to:

- Work together better
  - Involve people reflecting the diversity of our communities
  - Look to the long term as well as focusing on now
  - Take action to try and stop problems getting worse – or even stop them happening in the first place
- The **Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015**

The Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act aims to:

- Improve the public sector response in Wales to such abuse and violence.
  - Improve arrangements to promote awareness of, and prevent, protect and support victims of gender-based violence, domestic abuse and sexual violence
  - Introduce a needs-based approach to developing strategies which will ensure strong strategic direction and strengthened accountability
  - Ensure strategic level ownership, through appointment of a Ministerial Advisor who will have a role in advising Welsh Ministers and improving joint working amongst agencies across this sector
  - Improve consistency, quality and join up of service provision in Wales
- Publication in 2016 of **‘Preventing Homelessness and Promoting Independence’** – essentially a pathway to economic independence for young people through housing advice, options and homelessness prevention
  - Publication in 2016 by Barnardos of the **Care Leaver Accommodation and Support Framework** aimed at supporting effective planning and provision of housing and support for young people and care leavers
  - A series of focused campaigns including the **End Youth Homelessness Cymru Campaign 2018**, focusing on the needs of the LGBT+ community, supporting those with mental health issues and reducing links between homelessness and educational disengagement and the care system
  - Introduction by Welsh Government in 2018 of the **‘Housing First’** recovery-orientated approach to ending homelessness that centres on quickly moving people experiencing homelessness into independent and permanent housing and then providing additional support and services as needed.
  - The **Substance misuse delivery plan: 2019 to 2022 (Wales)**

A national Delivery Plan to address substance misuse was published in October 2019 setting out the Welsh Government’s key policy and operational priorities for the coming years in this area. The Plan has since been reviewed to consider where it needs to be updated in light of COVID-19 - particularly to meet the new challenges ahead.

The review considered the evidence highlighted by Area Planning Boards (APBs) and wider partners. It concluded that the original priority areas for the next three

years remain relevant and have been reinforced during the pandemic. These priority areas are:

- Responding to co-occurring mental health problems which are common in substance misuse.
  - Ensuring strong partnership working with housing and homelessness services to further develop the multi-disciplinary approach needed to support those with substance misuse issues who are homeless or at risk of homelessness.
  - Ensuring that all prisons in Wales (and HMP Eastwood Park, women's prison) have a coordinated, transparent and consistent service for those with substance misuse problems in prison.
  - Providing further support for families and carers of people who misuse substances.
  - Improving access to services and ensuring people get the support and treatment when they need it. • Strengthening our multiagency working and care planning to meet people's needs
  - Tackling dependence on prescription only medicines (POM) and over the counter medicines (OTC).
  - Ensuring that appropriate and responsive alcohol misuse services are in place following the implementation of the Public Health (Minimum Price for Alcohol) (Wales) Act 2018 on 2 March 2020.
- A renewed emphasis, in response to the Covid-19 pandemic on reducing street homelessness by providing temporary accommodation solutions, leading to publication by Welsh Government of **Phase 2 planning guidance** requiring local authorities and their partners to plan to ensure that all those brought into temporary accommodation are supported into long term accommodation, that the emphasis remains on prevention and keeping homelessness a rare, brief and non-repeated experience. Much of what is in this Phase 2 guidance is now signalled to become standard practice for years to come, with clear implications for housing providers, those providing support services and the levels of resources that will be required. At its heart is the concept of 'Rapid Rehousing' - providing homeless people with long-term housing and, if necessary, intensive support to help them retain their accommodation and thrive. All local authorities are required to develop a move on protocol for rehousing individuals in temporary accommodation into permanent accommodation, based on personal need.
  - **Phase 3 planning guidance (2020)** supporting the design and development of resilient, sustainable services for the future
  - **Significant additional investment by Welsh Government**, notably £10m in 2019-20 to tackle youth homelessness through enhancing current provision and developing new services; and launch of a £4.8m innovation fund in 2019-20 supporting 26 projects across Wales to new and innovative approaches to housing support
  - A report to Welsh Government from the Homelessness Action Group in 2020 providing a holistic policy perspective to ending homelessness and the Government's response in the form of a consultation document entitled '**Ending homelessness: A high-level action plan: 2021-2026**', building on Phase 2 planning guidance.



- A requirement on Local Authorities to finalise a **Rapid Rehousing Transition Plan** by the end of September 2022.
- Specific strategic commitments within Welsh Labour's **Programme for Government (2021)**, as follows:
  - Fundamentally reform homelessness services to focus on prevention and rapid rehousing.
  - Building 20,000 new low carbon social homes for rent over the period 2021 to 2026.
  - Support co-operative housing, community-led initiatives, and community land trusts.
  - Develop a national scheme restricting rent to local housing allowance levels for families and young people who are homeless or are at risk homelessness.
  - Ensure Rent Smart Wales landlords respond quickly to complaints of racism and hate crime and offer anything appropriate support.
- Further commitments within the **Labour/ Plaid Cymru Cooperation Agreement (November 2021)**, as follows:
  - Take immediate and radical action to address the proliferation of second homes and unaffordable housing, using the planning, property and taxation systems
  - Establish Unnos, a national construction company, to support councils and social landlords to improve the supply of social and affordable housing.
  - Publish a White Paper to include proposals for a right to adequate housing, the role a system of fair rents (rent control) could have in making the private rental market affordable for local people on local incomes and new approaches to making homes affordable.
  - End homelessness through reform of housing law, enacting the Renting Homes Act to give renters greater security and implementing the Homeless Action Group recommendations

## Annex 2: Local policy and strategies

A number of existing policies and strategies, at local and regional level, have informed this Strategy. Summary details of these are provided below.

**Powys County Council's Corporate Plan 'Vision 2025'** which commits to:

- Improving the availability of affordable and sustainable housing, so that people have greater variety of where to live and stay within their communities
- Ensuring that by 2024 people get the right help and support they need to prevent homelessness. This will be achieved through (1) expanding and improving the effectiveness of locality-based support to help prevent homelessness and social isolation; (2) developing housing options for people with special accommodation needs including young people, people with learning disabilities, people experiencing domestic or sexual abuse and people with disabilities and sensory impairment; and (3) improving services to help people whose well-being and tenancy sustainability is at risk as a consequence of hoarding behaviours impairment.

The **Powys Wellbeing Plan 'Towards 2040'**, published in 2018 in response to the Wellbeing Assessment, which:

- Identifies 12 wellbeing steps which include implementing more effective structures that enable a multiagency, community focused response to wellbeing, early help and support
- Sets out a series of Wellbeing Local Objectives including (1) a strong and stable economy improving wages, reducing poverty and disadvantage and improving people's overall health and wellbeing; and (2) people in Powys being healthy, socially motivated and responsible, with people having more choice and being able to access the types of home they want

The corporate commitments of the Council and its partners sit alongside a number that relate specifically to housing. These include:

- **A Housing Strategy** (2016-20) which sets an agreed vision and direction of travel that the Council and its key partners have developed to address the main housing and housing-related challenges it faces. Under a stated vision of 'Ensuring a secure future in suitable housing for everyone in Powys', the Strategy contains the following aims and objectives:

**Aim: To identify and meet the housing needs of Powys**

- To identify the housing needs of Powys
- Meeting the housing needs of the citizens of Powys by developing new homes
- Re-modelling housing and support services to meet the needs of identified populations

**Aim: To maximise the impact of housing expenditure on the economy of Powys**

- Home Grown Homes in Powys
- Recognising the impact of housing investment on the local economy

**Aim: To ensure that housing contributes to the delivery of stronger communities in Powys**

- Improving the quality of existing housing and neighbourhoods
- Improving the management of the housing stock
- Tackling fuel poverty
- Promoting financial and digital inclusion

Under the objective of re-modelling housing and support services to meet the needs of identified populations, the Strategy commits to an outcome of developing seamless early intervention and prevention services for the citizens of Powys. The key mechanism for this is identified as the Supporting People Programme Grant (now the Housing Support Grant).

- **A Delivery Plan to implement the Dyfed Powys Regional Homelessness Strategy within Powys**, addressing the following priorities:
  - Continue to evolve and harness community-based services to assist in the prevention of homelessness
  - By utilising intelligence, explore how we can focus support to households in those localities which are producing the highest proportion of homelessness cases
  - Utilise IT systems and technology to prevent homelessness by ensuring systems are in place which flag up issues early to trigger help and advice as early as possible
  - In partnership with key agencies explore how a multi-agency case management approach can evolve to meet the needs of households who revolve around the homeless system and place demands on a variety of services
  - In partnership with local stakeholders and other statutory services, explore whether a 'Housing First' approach can be developed to support those with the most complex needs
  - To explore with Housing Association and private landlord partners how to develop affordable and sustainable housing options for single people
  - Develop close partnership working with DWP/Job Centre+ to mitigate any impact the introduction of Universal Credit may have on household's ability to retain their tenancies
- **Findings from a Homelessness Review** conducted in 2018 which considered statutory duties and a range of policy drivers, the existing response of the Council and its partners to homelessness duties and the broader local policy context and identified a series of priorities to consider moving forward. These are currently being considered for progression and are reflected in the strategic priorities listed in Section x and in the accompanying action plan. They are as follows:
  - Development of an IT solution to record and manage homelessness applications
  - Development of a Partnership approach between agencies funded through the Grant, Housing Management Options Officers (HMOOs), Homelessness

Prevention Options Officers (HPHOOs), prevention hubs and community connectors

- Reflecting greater demand being placed on the private rented sector and allocating extra resources accordingly
- Development of intensive and assertive support services for those most difficult to house
- Critically, the **Housing Support Grant Annual Delivery Plan for 2021-22** which sets out clear priorities for the programme and underpinning principles reflecting national guidance (for example focus on prevention and early intervention; supporting those directly affected by homelessness and those for whom social isolation impairs enjoyment of their home; person-centred services; accessibility; effective collaboration between commissioners and providers; continuous improvement through self-evaluation and innovation; and measuring effectiveness through qualitative and quantitative indicators.

Priorities within the Plan are framed around the ultimate aim of ending homelessness in Powys and combatting the specific problems caused by Covid-19. They are as follows:

- Locality-based support, through the establishment of support bases across the County and outside of the main towns
- Specialist support for people suffering from mental ill health, experience of domestic abuse, those with a sensory impairment, people with learning disabilities and people facing homelessness due to debt or threat of eviction through multi-agency working and increased use of digital solutions
- Therapeutic initiatives for people who hoard, provided by RSLs, private landlords and available for owner occupiers and enhanced by improved coordination across support and housing management networks
- Support for older and disabled people, including the provision of free community alarms where needed
- Building community resilience in Builth Wells through multi-agency support provided via a community hub
- The Powys HSG Annual Delivery Plan also reflects regional priorities adopted by the **Mid and West Wales Regional Housing Support Collaborative Group (RHSCG)** which comprises representatives from statutory housing services alongside landlord and provider organisations. HSG officers' work is closely aligned with statutory housing services, with officers integrated into housing options teams, enabling sustainable solutions to be identified for households threatened with homelessness or already homeless wherever possible.
- In addition to these corporate and housing-specific policies and strategies, the Council and its partners have other strategies in place which are relevant and provide important mechanisms for tackling homelessness and providing effective, person-centred housing support. Key among these is the **Joint Health and Care Strategy** for the County designed to improve health and wellbeing across three life stages – 'start well', 'live well' and 'age well'. The Strategy reflects the value placed on prevention within the Social Services and Wellbeing (Wales) Act in seeking to ensure that people are supported as soon as possible to have their care and support needs met. The Strategy is based on core principles which

include using public services wisely so that health and care services focus on the things they should be doing, and people and individuals and communities taking responsibility as equal partners for their health and wellbeing. It also prioritises addressing mental health issues, stating that ‘Improving mental health is a critical issue for people of all ages and its impact is cross cutting, affecting life chances; learning, home life, employment, safety, physical health, independence and life expectancy’.

There are other regional strategies reflecting the national drivers listed in the previous section which also have a bearing on the Council’s Housing Support approach. These are supported by local delivery plans and are listed below.

- In response to the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015, partners adopted a **Regional Violence Against Women, Domestic Abuse and Sexual Violence Strategy** in 2018. Known as ‘Safer Lives Healthier Relationships’, the strategy commits to a *‘one public sector’ commissioning model rather than commissioning in silo; a consistent, collaborative and integrated approach to the commissioning of Violence against women, Domestic Abuse and Sexual Violence [VAWDASV] services across the region; maximising resources available from a range of public service commissioners including Local Authorities, Health, Police and Police and Crime Commissioners and determining who is best placed to lead the commissioning of different service elements as part of an integrated, collaborative commissioning model.*”

Subsequently partners across Mid and West Wales agreed an outline Service Specification Framework for Domestic Abuse services in the region. Alongside general awareness raising activities, programmes aimed at perpetrators and specific services for children and young people, the framework also incorporates accommodation-based services, including refuges, safe houses, dispersed units and supported accommodation and community-based support such as floating support, outreach, counselling and mediation services. A series of underpinning principles are designed to ensure services provided are person-centred; co-produced; promote independence; are accessible to people from all communities, focus on preventative support; provide value for money; and optimise wellbeing outcomes for individuals.

A core element of the Service Specification Framework is protection and support. Here partners commit to ensuring support is tailored to the individual; is coordinated through a key worker model; and includes one to one and peer support. Specifically, support should include:

- Accommodation including refuges, safe houses, dispersed units and supported accommodation
- Floating support for victims, regardless of accommodation type.

Within this context, Powys County Council set out a local service specification, part-funded through the Housing Support Grant, for the development and implementation of a ‘holistic model for preventing Domestic Abuse and supporting those on whom Domestic Abuse directly impacts both male and female survivors and their families’.

This includes:

- Providing women with **access to safe and appropriate accommodation** through developing a clear and robust interface with a range of accommodation options
- **Delivering crisis support** which include facilitation of safe 'crisis/ emergency' accommodation or alternative accommodation
- Providing **recovery support** to women or men fleeing abuse in need of refuge/ safe accommodation and to help them move on from crisis accommodation to permanent, safe and appropriate accommodation at the earliest opportunity and live independently and safely
- Supplying **preventative services** such as working with individuals and families to help them stay safely on or reclaim their homes without risk
- **Services specifically for children and young people** affected by Domestic Abuse, such as ensuring that that are made homeless continue to have their accommodation needs met alongside others relating to health and wellbeing, social care and education
- **General awareness raising services** including working with locality housing related support to improve intelligence and early intervention
- **Substance misuse plan** - An independent needs assessment for substance misuse services in Powys was commissioned by the Powys APB in 2021. This assessment involved close engagement with a range of stakeholders. The conversations undertaken as part of the assessment identified an important link between substance misuse and homelessness or lack of sustainable accommodation and highlighted the critical contribution of housing staff in supporting people involved in substance misuse.

A specific recommendation, amongst others identified to ensure appropriate future services for people who experience problems with alcohol and/ or drugs across Powys, is for the APB to focus on '**ensuring strong partnership working with housing and homelessness services to further develop the multi-disciplinary approach needed to support those with substance misuse issues who are homeless or at risk of homelessness**'.

## Annex 3: Action Plan

***This Action Plan is under development and will continually evolve as a dynamic action plan.***

***Final actions will be designed to align with those being taken forward by other Council services, for example, but not exclusively, care and support and youth services, thereby providing for holistic, joined up services for all sections of the community and optimising outcomes for individuals.***

Priority	Action required to deliver the priority	Timescales/By When	Lead Person	Outcome/Outputs
<b>Strategic Priority 1: Take all necessary steps to maximise the housing stock available to address homelessness</b>				
Powys County Council and Housing Association partners will expand their property acquisition and development activity, with particular focus on one-bedroom properties in housing high pressure areas	Encourage through the Programme Delivery Plan and Empty Homes Action Plan provision or the planned provision of a net increase in smaller, secure accommodation.	March 2023	Service Manager– Housing Resources	Increased supply of suitable social housing for single person homeless applicants.
We will reflect greater demand being placed on the private rented sector and allocate extra resources accordingly through providing appropriately targeted resources to improve advice and support to households who may need to rent privately provided accommodation and supporting the expansion into Powys of the Ceredigion social lettings agency	To introduce a Social Letting Agency covering the whole of Powys (Partnership with Barcud)?	March 2023	Service Manager– Resources	Increased supply of suitable Private Rented Sector accommodation
We will actively develop Mortgage to Rent and Mortgage to				





<b>Priority</b>	<b>Action required to deliver the priority</b>	<b>Timescales/By When</b>	<b>Lead Person</b>	<b>Outcome/Outputs</b>
Borrowing capability of Local Authorities				
We will support those brought into temporary accommodation during the pandemic into long-term, secure accommodation				
We will provide suitable mainstream accommodation to homeless people as a means of establishing and maintaining contact with range of support providers and delivering essential services more effectively	To enable single homeless applicants to actively be considered for limited demand 2 bedroom social housing through implementation of proposed 'Homes in Powys' Allocation Policy amendment.	September 2022	<b>Service Manager - Housing Communities</b>	Increased supply of suitable social housing for single person homeless applicants.
	To further develop the Council's 'Housing First' model	September 2022	<b>Service Manager - Housing Communities</b>	Targeted wrap around intensive support that enables individuals with chaotic lifestyles to sustain their tenancies
We will conclude County Council's review of the Common Housing Register's allocation policy and make suitable adjustments to maximise allocations to those currently temporarily accommodated, including redesignating temporary accommodation as permanent accommodation where this can minimise disruption and speed case resolution				

Priority	Action required to deliver the priority	Timescales/By When	Lead Person	Outcome/Outputs
Powys County Council and Housing Association partners will expand their property acquisition activity, with particular focus on one-bedroom properties in housing high pressure areas				
<b>Strategic Priority 2: Deliver the homeless persons assessment process promptly and efficiently, ensuring applicants have their support needs assessed by a multi-disciplinary team</b>				
We will develop multi-disciplinary approach to assessment as a basis for improved, holistic support for individuals, quantification of level, nature and complexity of need	To further develop a rigorous approach to homeless case management.	June 2022	Area Manager – Housing Communities	Timely, appropriate discharge of homeless duties
We will continue to develop the Case Management approach to the delivery of homelessness and housing advice, providing stable and well-informed one-on-one support to prevent or resolve homelessness	To introduce regular quality assurance checks centred on personal housing plans which reflected individual circumstances.  Assessment placements (24/7 accommodation) for vulnerable young people to assess their ability to live independently and the extent of their support needs	June 2022	Homeless Strategy & Housing Support Manager  Housing / Health / Youth Service /Children’s Services	Person centred, partnership approach to both homeless prevention and alleviation.  Assessment placements available within 24/7 supported schemes for vulnerable young people
We will establish a temporary multi-disciplinary homelessness and support needs				

Priority	Action required to deliver the priority	Timescales/By When	Lead Person	Outcome/Outputs
assessment team to address all new presentations and to reappraise the support needs of those already in temporary accommodation				
As part of the assessment process, we will offer all those that need it a housing support plan and monitor delivery in collaboration with support providers				
<b>Strategic Priority 3: Minimise time spent in temporary accommodation is minimised, whilst ensuring support needs are met</b>				
We will introduce statutory 24/7 homeless supported/triage accommodation service which will include provision for young people. A business case for this is being considered by the Council	Progress development of 24-7 Instant Access Triage Centres project.  16/17 year olds and other vulnerable young people 18-25 to be supported in 24/7 supported accommodation instead of isolating temp accommodation and B&B which exacerbates issues, increasing likelihood of perpetual homelessness	March 2023	<b>Service Manager– Housing Resources</b>  Housing / Children’s Services / Youth Service	Early assessment of needs to tailor both temporary and then permanent accommodation to resolve and reduce the risk of homelessness  24/7 supported placements
We will develop sustainable plans and securing resources for	To monitor both the take up of support referrals to partner	March 2023	<b>Homeless Strategy &amp; Housing Support Manager</b>	Timely support provided and reduced time spent in

Priority	Action required to deliver the priority	Timescales/By When	Lead Person	Outcome/Outputs
enhanced support made available during the pandemic	organisations and impact on move-on from temporary accommodation			temporary accommodation.
We will develop intensive and assertive support services for those most difficult to house. Action to address this is already underway, through an amendment to the Homes in Powys allocation policy. This approach also aligns with delivery of 'Housing First' and Rapid Rehousing	To give additional preference to Section 75 (Final Duty) Homeless Applicants through implementation of proposed 'Homes in Powys' Allocation Policy amendment.	September 2022	<b>Service Manager – Housing Communities</b>	Increased access to suitable social housing; Reduced time spent in temporary accommodation.
	To off-set use of Bed & Breakfast through different households sharing currently under-occupied temporary accommodation.	September 2022	<b>Area Manager – Housing Communities</b>	Reduced use of B&B accommodation and overall temporary accommodation provision.
We will enhance digital facilities to enable support to be provided effectively where there is restriction on face to face contact; this can also help address challenges of face to face provision across a rural area, recognising that physical interaction will always be the preference for some service users including those that do not have access to digital connections				
<b>Strategic Priority 4: Commission an appropriate range of support services to ensure that in future homelessness is prevented, or where it occurs it is rare, brief and unrepeated</b>				
We will further develop joint commissioning approach to optimise impact and use of resources available and build	Housing first capacity to be increased in the Housing First for Youth project and an equivalent designated and		Youth Service /HSG Lead / Housing	More Housing First packages of support available Appropriate capacity to manage Housing First effectively with sufficient and

Priority	Action required to deliver the priority	Timescales/By When	Lead Person	Outcome/Outputs
<p>sustainability of providers. Specifically, put in place a Strategic Commissioning Framework, with clearly articulated roles and responsibilities, to implement agreed service developments, accompanied by a Resourcing Statement</p>	<p>specialist team to be created for the 25+ scheme            Early Intervention and prevention – identification of those at risk of future homelessness and targeted family mediation and youth support via Youth Service / Early Help            Strategic and operational links to Start Well board in order that service developments and interventions and maximise support for young people at risk of future homelessness</p> <ul style="list-style-type: none"> <li>• Strategic alignment of support services across Health, PCC and 3<sup>rd</sup> Sector provision</li> </ul> <p>Training and upskilling of staff in vital areas such as trauma informed approaches and neurodiversity including ASD and ADHD</p>		<p>Youth Service</p> <p>Housing / Youth Service</p> <p>Housing / Health / Youth Service</p> <p>HSG lead?</p> <p>Youth Service / Children's Services</p>	<p>necessary support for staff            An Early Identification mechanism for those at risk of future homelessness            Family mediators and youth targeted support            Risk of future homelessness cited and prioritised in relevant service development plans</p> <p>Aligned and joined up strategic policy around tackling homelessness            Improved transition pathway for 16-25 year olds</p> <p>Mandatory training matrix            All relevant staff upskilled</p> <p>Independent Living Skills programmes accessed by young people transitioning to independent living.</p>

Priority	Action required to deliver the priority	Timescales/By When	Lead Person	Outcome/Outputs
	<p>which all have significant impact on the ability to manage independent living and tenancies successfully</p> <p>Independent Living Skills programmes to be developed in partnership with Children's Services, Detached Youth and third sector partners</p>			
<p>We will build on multi-agency working to provide appropriate floating support, delivered to communities through locality-based hubs, potentially with clusters providing more localised support where needed. Priority areas are likely to include:</p> <ul style="list-style-type: none"> <li>• Substance misuse</li> <li>• VAWDASV</li> <li>• Mental health</li> <li>• Non-violent relationship breakdown</li> <li>• Youth homelessness</li> </ul>	<p>To explore feasibility of current supported housing provision to meet individuals with high support needs.</p>	<p>June 2022</p>	<p><b>Service Manager – Housing Communities</b></p>	<p>Supported housing provision fully aligned</p>
	<p>To set up mental health wellbeing support for homeless people.</p>	<p>March 2023</p>	<p><b>Service Manager – Housing Communities</b></p>	<p>Meet increased demand for mental wellbeing support for individuals below threshold for statutory services.</p>
<p>We will ensure housing involvement in the recommissioning and ongoing development of key support such as for substance misuse and VAWDASV</p>				

Priority	Action required to deliver the priority	Timescales/By When	Lead Person	Outcome/Outputs
We will develop a Partnership approach between agencies funded through the Grant, Housing Options Officer (HMOOs), Housing Officers (Interim Accommodation), Homelessness Support Officers, Complex Needs Co-ordinators				
<p>We will develop links between the RCC and Powys Regional Partnership Board and Public Services Board, to:</p> <ul style="list-style-type: none"> <li>• Further embed a cross-service approach to housing support</li> <li>• Agree protocols between services for delivery of joined up support in key areas, drawing on experience during the pandemic and ensuring that respective actions complement rather than frustrate each other</li> <li>• Review housing support roles in the light of the above</li> <li>• Optimise resources available to augment statutory funding</li> </ul>	To review information provided by Housing Services relating to partner organisation to ensure it is both current and correct.	September 2022	<b>Homeless Strategy &amp; Housing Support Manager</b>	Improved quality of advice for households threatened with homelessness.
We will use data from the multi-disciplinary assessment team and combine this				

Priority	Action required to deliver the priority	Timescales/By When	Lead Person	Outcome/Outputs
with information from other sources about the prevalence of support needs in the community, an aggregate picture is established that can inform business cases for, and commissioning of, specific services and accommodation that will fulfil the requirements of Rapid Rehousing Transition Plans				
<b>Programme planning, implementation, monitoring and review</b>				
Develop robust outcomes for the HSG programme and broader Strategy, reflecting national, regional and local priorities and providing a comprehensive picture of impact				
Monitor needs of groups with protected characteristics, engage with them to ensure these are met in appropriate ways, and include appropriate measures within outcomes and performance framework to assess their experience				
Establish appropriate mechanisms for securing continuous engagement with relevant stakeholders to (1) monitor delivery of the Strategy, (2) assess impact, (3)				



Priority	Action required to deliver the priority	Timescales/By When	Lead Person	Outcome/Outputs
identify where changes are necessary and (4) develop future priorities				

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

**CYNGOR SIR POWYS COUNTY COUNCIL.****CABINET EXECUTIVE**

March 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 (HRA) Thirty Year  
Financial Business Plan Starting 2022-2023.

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**REPORT FOR:** Decision

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**1. Purpose**

- 1.1 The purpose of this report is to present for approval the Housing Revenue Account (HRA) Thirty Year Financial Business Plan Starting 2022-2023 as set out in the HRA Business Plan Narrative (attached to this report as Appendix A).

**2. Background**

- 2.1 All councils in Wales in their role as the Strategic Housing Authority have the responsibility to plan for the housing needs of their population. Powys is one of the eleven stock retaining local authorities in Wales, providing 5,433 affordable, secure homes across the county, as well as an ongoing programme to develop a further 250 new homes, scheduled for completion by the end of 2025, with plans to expand that programme further in future years.
- 2.2 Landlord councils in Wales are required to present an “acceptable” HRA Business Plan, including a thirty-year financial model, to the Welsh Government each year. The Plan must conform to a structure and Business Plan parameters set out by the Welsh Government. This is to allow the Welsh Government to assess the progress of local authorities in maintaining the Welsh Housing Quality Standard (WHQS) to be eligible for the annual Major Repairs Allowance (MRA) Grant (for Powys £3,732,000 in 2022-2023). Powys achieved WHQS compliance in December 2018.
- 2.3 The HRA borrows to fund capital works such as the new build and improvement programmes. The level of borrowing is closely monitored as this is related to annual capital financing costs. The Council is required by regulation to have regard to the Prudential Code when carrying out its duties under Part 1 of the Local Government Act 2003. Any borrowing undertaken for the HRA Business Plan is ‘unsupported’, in so much as there is no financial support from the Welsh Government for the cost of such borrowing. Schemes, such as development of new homes, may however benefit from grants to help cover cost of such projects.
- 2.4 This means that the Council is able to borrow additional resources without statutory limit to fund investment in both existing and new homes, as long as

the income generated by the HRA from rents and other charges is able to cover the cost of servicing and repaying the debt.

- 2.5 On February 8<sup>th</sup>, 2022, Cabinet approved an increase in rents and other charges levied by the HRA in line with the Welsh Government's policy for social housing rents, which calculates rent levels using a number of factors including economic and housing market data.
- 2.6 The impact of changes to the social security system has been taken into account in developing the Business Plan. Financial modelling has been carried out to account significant risks of increasing rent arrears and the additional resources needed to make sure that rent due to the Council is paid promptly.
- 2.7 The HRA Thirty Year Business Plan starting 2022-23 for Powys:
  - Makes sure the HRA treasury management strategy is prudent and complies with the Council's approach to borrowing.
  - Sets a balanced budget with minimum reserve of £1,000,000 (or 3% of expenditure).
  - Allows the Council to maintain WHQS for current homes.
  - Supports the development of at least 250 new homes by 2025.
  - Balances the need to keep rents affordable with making sure that homes are maintained and kept in good condition.
  - Maximises revenue and expenditure efficiencies.
  - Complies with the Prudential Code

### **3. Advice**

- 3.1 To make sure that the Council continues to make efficient use of its housing assets and operates a sustainable landlord service, the HRA Business Plan, as proposed for approval, has been informed by a long-term approach to important investment programmes.
- 3.2 Detailed proposals are set out in the HRA Business Plan narrative, attached as Appendix A to this report, for the five-year period starting in 2022-2023. This allows for a strategic approach to be taken to investment decisions and planning and allows for more informed consultation and communication with residents and tenants. A summary of the current proposals, for the five years beginning 2022-2023, is presented below. The figures for 2022-2023 will form the basis of the budgets for that particular year.
- 3.3 New Homes for Powys (Capital Programme)
  - 3.3.1 There were 4,053 (December 2021) people registered with Homes in Powys for affordable, rented homes. A new build housing programme is underway which will deliver at least 250 new council homes by 2025. Further schemes are being developed to expand this programme. Provision has been made in the HRA Business Plan to fund a potential increase to 529 homes both newly built (509) and acquired (20) (subject to land and development opportunities and any planning, regulatory and environmental consents being secured) by 2026. Developing homes available for let at social rents or sale at below market prices is not usually possible without direct grant support from the Welsh Government. This is to offset such expenditure as land acquisition and construction costs, which reflect open-market property values and rents. Such

grant support is not available to fund core HRA borrowing. At a time of rising land and construction costs, the scale and pace of continued development of homes available for accommodation at sub-market rates will depend upon the availability of grant from the Welsh Government. If grant falls and land and construction costs continue to increase, the Council will need to consider alternative financial models which subsidise the continued development of new homes by the HRA.

Table 3.3.1: New Homes for Powys Financial Summary 2022-23 to 2026-2027

Financial Year	HRA Business Plan Investment <sup>1</sup> (Acquisitions)	Number of New Homes Completed (+ acquisitions)	Notes
2022-2023	£10,321,729 (£800,000)	118 (4)	Investment planned for each year will cover completing earlier schemes, progressing current developments and preparing for future projects. Completions will be dependent upon securing all necessary planning, environmental and other regulatory consents, securing viable development sites and where needed Social Housing Grant.
2023-2024	£20,980,093 (£800,000)	33 (4)	
2024-2025	£23,563,151 (£800,000)	134 (4)	
2025-2026	£15,695,771 (£800,000)	154 (4)	
2026-2027	£12,955,518 (£800,000)	70 (4)	
<b>Total</b>	<b>£83,516,262 (£4,000,000)</b>	<b>509 (20)</b>	

### 3.4 WHQS (Capital Programme)

3.4.1 This programme is designed to make sure the Council's homes continue to meet the WHQS. The programme has been structured to smooth the peaks and troughs of funding and investment needs, with the focus on those components where replacement is most needed. Lower level of new resources will be needed between 2023-2024 and 2027-2028 because the focus is now on maintaining rather than reaching the WHQS – the benefits of past investment will reduce the need for future expenditure. However, the age of the Council's housing is reflected in the need to invest in re-roofing works to reduce damp and increase thermal comfort. Many roofs are those originally installed when the properties were built. Investment in estates, including boundaries and fences, is considered to be an important part of the next phase of WHQS, which is to focus on the external environment of homes. Some of the investment activity within the WHQS programme also contributes to the objectives of the Green Powys and Compliance One Hundred programmes (see sections 3.5 and 3.6).

Table 3.4.1: WHQS Programme Financial Summary 2022-23 to 2026-2027

Investment	2022-2023	2023-2024	2024-2025	2025-2026	2026-2027
Kitchens	£600,000	£420,000	£400,000	£600,000	£800,000
Bathrooms	£472,500	£200,000	£200,000	£0	£400,000

<sup>1</sup> Gross expenditure, excluding Social Housing Grant or other grants that may be available.

Rewiring	£90,000	£120,000	£60,000	£100,000	£45,000
Windows and Doors	£649,000	£500,000	£100,000	£0	£200,000
Roofing	£1,500,000	£1,000,000	£400,000	£400,000	£400,000
Walls	£650,000	£650,000	£650,000	£650,000	£650,000
Estate Works (contribute to Love Where You Live)	£1,100,000	£1,200,000	£1,300,000	£1,200,000	£1,200,000
Heating (contributes to Green Powys)	£1,500,000	£1,400,000	£1,500,000	£1,400,000	£1,400,000
Energy Efficiency (contributes to Green Powys)	£240,000	£150,000	£300,000	£150,000	£150,000
Asbestos Management (contributes to Compliance One Hundred)	£150,000	£150,000	£150,000	£150,000	£150,000
Management Fees	£770,000	£777,700	£785,480	£793,330	£801,260
Miscellaneous WHQS	£430,000	£250,000	£250,000	£250,000	£250,000
<b>Total</b>	<b>£8,151,500</b>	<b>£6,817,700</b>	<b>£6,095,480</b>	<b>£5,693,330</b>	<b>£6,446,260</b>

### 3.5 Compliance One Hundred

3.5.1 The Compliance One Hundred programme is designed to make sure that all of the Council homes and associated assets are one hundred per cent compliant with all relevant and applicable legislation and regulation. The investment schemes detailed below are in addition to those included within the WHQS programme, detailed above in section 3.4 and Day-to-Day Repairs and Maintenance which includes all inspections and servicing of safety-critical components and assets, such as heating systems and lifts.

Table 3.5.1: Compliance One Hundred Programme Financial Summary 2022-23 to 2026-2027

Investment	2022-2023	2023-2024	2024-2025	2025-2026	2026-2027
Fire Safety Works	£200,000	£200,000	£100,000	£100,000	£100,000
Water Supply and Sewerage Works	£250,000	£250,000	£200,000	£100,000	£100,000
Legionella	£50,000	£50,000	£50,000	£50,000	£50,000
WHQS Contributions to Compliance One Hundred	£150,000	£150,000	£150,000	£150,000	£150,000
Day-to-day Repairs Contribution to	£510,000	£400,000	£310,000	£310,000	£225,000

Compliance One Hundred					
<b>Total Compliance One Hundred Investment Programme</b>	<b>£1,160,000</b>	<b>£1,050,000</b>	<b>£810,000</b>	<b>£710,000</b>	<b>£625,000</b>

### 3.6 Green Powys

3.6.1 The Green Powys programme is designed to increase fuel efficiency, reduce fuel poverty for tenants of the Council and make tangible improvements to the wider environment, with a particular emphasis on increasing planting of trees, shrubberies and other actions to promote bio-diversity, encourage appreciation of the natural world and give a greener feel to our communities.

3.6.2 As the 'Green Heart of Wales' Powys County Council is working to improve the thermal comfort of its Council-owned homes and at the same time helping to reduce the carbon footprint of the county. The cost of decarbonising all homes currently owned by the Council is difficult to quantify. However, a broad-brush estimate based on research undertaken by Inside Housing suggests a possible investment of £108,000,000 will be needed for Powys. The Council is exploring sustainable heating systems, such as replacing gas-fired boilers with ones than can easily be converted to use hydrogen.

3.6.3 A particular focus of the Green Powys programme will be the 400 municipal properties that have an Energy Performance Certificate rating of E, F or G, the lowest ratings. A 'whole house' approach, which looks at heat loss, heat retention, ventilation and the most efficient way to provide heating as and when it is necessary, is to be developed for these properties, with investment starting in 2023 as 'Project E, F, G'.

Table 3.6.3: Green Powys Programme Financial Summary 2022-23 to 2026-2027

<b>Investment</b>	<b>2022-2023</b>	<b>2023-2024</b>	<b>2024-2025</b>	<b>2025-2026</b>	<b>2026-2027</b>
Damp Prevention	£250,000	£250,000	£250,000	£250,000	£250,000
Photo-voltaic (Solar Panels)	£75,000	£75,000	£75,000	£75,000	£0
Decarbonisation and Energy Efficiency	£90,000	£100,000	£250,000	£250,000	£250,000
WHQS Contributions to Green Powys	£1,650,000	£1,550,000	£1,550,000	£1,550,000	£1,550,000
Day-to-day Repairs Contribution to Green Powys	£540,000	£569,540	£579,000	£588,950	£874,000
<b>Total Green Powys Investment Programme</b>	<b>£2,605,000</b>	<b>£2,544,540</b>	<b>£2,704,000</b>	<b>£2,713,950</b>	<b>£2,924,000</b>

### 3.7 Fit for Life

3.7.1 The Fit for Life programme is designed to make the Council's homes better suited to the needs of older people and those with health-related needs that impair or adversely affect their mobility.

Table 3.7.1: Fit for Life Programme Financial Summary 2022-23 to 2026-2027

<b>Investment</b>	<b>2022-2023</b>	<b>2023-2024</b>	<b>2024-2025</b>	<b>2025-2026</b>	<b>2026-2027</b>
Fit for Purpose	£1,700,000	£1,400,000	£1,200,000	£0	£0
Adaptations - Capital	£250,000	£250,000	£250,000	£250,000	£250,000
Adaptations - Revenue	£590,000	£602,390	£615,040	£641,140	£654,600
<b>Total Fit for Life Investment</b>	<b>£2,540,000</b>	<b>£2,252,390</b>	<b>£2,065,040</b>	<b>£891,140</b>	<b>£904,600</b>

### 3.8 Love Where You Live

3.8.1 The Love Where You Live tenancy sustainability strategy is designed to make the homes and estates managed by the Council places where people can enjoy their lives and we improve the wellbeing of our residents. The investment schemes detailed below are in addition to those included within the WHQS programme, detailed above in section 3.4.

Table 3.8.1: Love Where You Live Programme Financial Summary 2022-23 to 2026-2027

<b>Investments</b>	<b>2022-2023</b>	<b>2023-2024</b>	<b>2024-2025</b>	<b>2025-2026</b>	<b>2026-2027</b>
Brecon Area Estate Improvements	£20,000	£20,000	£20,000	£20,000	£20,000
Newtown Area Estate Improvements	£20,000	£20,000	£20,000	£20,000	£20,000
Welshpool Area Estate Improvements	£20,000	£20,000	£20,000	£20,000	£20,000
Wye Valley Estate Improvements	£20,000	£20,000	£20,000	£20,000	£20,000
Ystradgynlais Estate Improvements	£20,000	£20,000	£20,000	£20,000	£20,000
Car Parking	£75,000	£75,000	£75,000	£75,000	£75,000
Communal Area Improvements	£75,000	£50,000	£50,000	£50,000	£50,000
Garage Strategy	£300,000	£400,000	£400,000	£400,000	£0
Pen-y-bryn Regeneration	£700,000	£700,000	£300,00	£0	£0
Play Area	£25,000	£25,000	£25,000	£25,000	£25,000



Improvements					
WHQS Contributions to Love Where You Live (Estate and Boundary Works)	£1,100,000	£1,200,000	£1,200,000	£1,200,000	£1,200,000
Day-to-day Repairs Contribution to Green Powys	£540,000	£569,540	£579,000	£588,950	£874,000
<b>Total Love Where You Live Investment</b>	<b>£3,435,000</b>	<b>£3,669,080</b>	<b>£2,988,000</b>	<b>£3,007,900</b>	<b>£3,178,000</b>

### 3.9 Community Alarms (Capital Programme)

3.9.1 In autumn 2021, a review started of the options available for future provision of the community alarm services for tenants of the Council. The review has been prompted by:

- The need to replace the current equipment, which is of an age that it is beyond economical maintenance and repair. An earlier programme to replace the equipment was put on hold due to the restrictions on home visits imposed as part of the Covid pandemic.
- The development of alternative delivery models, including use of a wider range of new and emerging technology, for example greater access to the internet, mobile telephony and the development of telecare systems.
- The needs and aspirations of residents and tenants.

3.9.2 The HRA Business Plan for 2022-2023 includes a one-off provision of £600,000 for the necessary capital investment to replace the Careline equipment with up-to-date kit, if the review recommends that the existing model of provision remains appropriate for the Council.

### 3.10 Repairs and Maintenance (Revenue Programme)

3.10.1 Repairs and maintenance covers day-to-day repairs and cyclical maintenance to the Council's homes. Until the end of June 2022, the majority of this work will be undertaken for the Council by its joint venture with Kier, Heart of Wales Property Services (HoWPS). HoWPS will receive a pro-rata payment of the annual sum to undertake these works, as set out in a Service Agreement between itself and the Council. Any day-to-day works not covered in the agreement are funded on an as-needs basis by the Council.

3.10.2 From July 2022, the work currently undertaken by HoWPS will be provided by Housing Services, using a mix of directly employed colleagues and where specialist skills and expertise are needed, appropriate external contractors employed directly by Housing Services.

Table 3.10.2: Repairs and Maintenance Programme Financial Summary 2022-23 to 2026-2027

<b>Investments</b>	<b>2022-2023</b>	<b>2023-2024</b>	<b>2024-2025</b>	<b>2025-2026</b>	<b>2026-2027</b>
HoWPS Service Agreement	£1,353,620	£0	£0	£0	£0
HoWPS Service Contingency	£0	£0	£0	£0	£0
Housing Quality Repairs and Maintenance Service	£3,931,245	£5,190,957	£5,119,801	£5,227,320	£5,337,090
Vehicle Financing (Revenue)	£129,625	£176,463	£180,169	£0	£0
ICT	£137,000	£120,000	£124,000	£0	£0
Day-to-day and Cyclical Repairs (not covered by HoWPS Service Agreement)	£0	£0	£0	£0	£0
Day-to-day and Cyclical Repairs	£1,813,110	£1,460,960	£1,399,593	£1,556,936	£1,535,947
External Painting	£450,000	£459,450	£469,100	£478,950	£764,010
Estate and Grounds Maintenance	£865,300	£865,300	£865,300	£865,300	£865,300
Miscellaneous Expenditure	£311,130	£317,170	£323,337	£329,634	£336,063
<b>Total Repairs and Maintenance Investment</b>	<b>£8,991,030</b>	<b>£8,590,300</b>	<b>£8,481,300</b>	<b>£8,458,140</b>	<b>£8,838,410</b>

*Please note: Includes contributions from each Housing Quality Repairs and Maintenance Service, Day-to-day and Cyclical Repairs and Miscellaneous Expenditure towards the Green Pows, Love Where You Live and Compliance One Hundred programmes.*

### 3.11 Housing Management System (Capital Programme)

3.11.1 The Council's current housing management system, QL, does not include provision for the direct provision and management of repairs and maintenance. Following a competitive tendering exercise, QL has been appointed to working alongside the Council's own ICT experts to put in place by June 2022 a fully operational repairs and maintenance system. Financial provision has been made in the HRA Business Plan to cover this investment.

### 3.12 Acquisition of Properties (Capital Programme)

3.12.1 The Council has between 2019 and the end of December 2021 purchased 39 homes on the open market, the majority of which have been ex-municipal homes. In determining which properties to purchase there has been a focus on those in areas of high demand and where the new build programme is unlikely or due to planning and land restrictions, unable to meet the need. All such purchases are subject to the same viability criteria as new build, with additional allowances made for any works needed to bring the properties up to WHQS. The programme will continue to be a significant part of the work undertaken by the Council to increase the availability of genuinely affordable, secure rented homes across Powys.

3.13 Other expenditure within the HRA Business Plan includes Supervision and Management Costs, which cover the costs of managing the service, for example staff, support services and office costs, and the cost of funding debt taken on when the HRA became self-financing in 2014 and any additional borrowing secured to fund investment programmes.

#### 4. Resource Implications

4.1 The HRA Business Plan submission to the Welsh Government sets out how the Council will fund the service, aggregating certain categories of expenditure within generic headings set by the Welsh Government to help manage the allocation of MRA. Councils are however free to allocate investment across programmes of their own choosing. Table 4.1 sets out how Powys County Council proposes to invest in and fund the HRA Business Plan for next five years. All data is sourced from the HRA Thirty Year Financial Business Plan 2022-2023.

Table 4.1: HRA Business Expenditure, Income and Financing Summary 2022-2023 to 2026-2027

	2022-2023	2023-2024	2024-2025	2025-2026	2026-2027
<b>Capital Expenditure</b>					
WHQS Improvements & Maintenance	£8,151,500	£6,817,700	£6,095,480	£5,693,330	£6,446,260
Community Alarms	£300,000	£300,000	£0	£0	£0
Compliance One Hundred	£500,000	£500,000	£350,000	£250,000	£250,000
Fit for Life	£1,950,000	£1,650,000	£1,450,000	£250,000	£250,000
Green Powys	£415,000	£425,000	£575,000	£575,000	£500,000
Love Where You Live	£1,275,000	£1,350,000	£650,000	£650,000	£250,000
Rapid Response	£100,000	£100,000	£100,000	£100,000	£100,000
New Vehicles	£1,037,000	£0	£0	£0	£0
New Build	£10,321,729	£20,980,093	£23,563,151	£15,695,771	£12,955,518
Acquisitions	£800,000	£800,000	£800,000	£800,000	£800,000
Other Capital Expenditure	£770,000	£770,000	£770,000	£770,000	£770,000
<b>Sub Total</b>	<b>£25,620,229</b>	<b>£33,692,793</b>	<b>£34,353,631</b>	<b>£24,784,101</b>	<b>£22,321,778</b>

<b>Capital Funding</b>					
Major Repairs Allowance	£3,732,000	£3,732,000	£3,732,000	£3,732,000	£3,732,000
Capital Receipts	£0	£1,000,000	£1,000,000	£0	£0
Borrowing	£9,174,747	£21,015,680	£22,152,911	£12,527,116	£9,757,484
Other Funding Sources (WG Social Housing Grant)	£2,100,000	£2,100,000	£2,100,000	£2,100,000	£2,100,000
Capital Expenditure funded by HRA	£5,800,000	£5,800,000	£5,800,000	£5,800,000	£5,800,000
<b>Sub Total</b>	<b>£20,806,747</b>	<b>£33,647,680</b>	<b>£34,784,911</b>	<b>£24,159,116</b>	<b>£21,389,484</b>
<b>Revenue Expenditure</b>					
Management Costs	£6,582,020	£4,089,790	£4,130,690	£4,172,000	£4,213,720
Repairs & Maintenance	£8,991,030	£8,590,300	£8,481,300	£8,458,140	£8,838,410
Contribution To Capital Funding	£5,800,000	£5,800,000	£5,800,000	£5,800,000	£5,800,000
Interest payments	£3,814,320	£3,814,320	£3,814,320	£3,814,320	£3,814,320
<b>Sub Total</b>	<b>£25,187,370</b>	<b>£22,294,410</b>	<b>£22,226,310</b>	<b>£22,244,460</b>	<b>£22,666,450</b>
<b>Revenue Funding</b>					
Gross Rental Income	£27,475,660	£27,475,660	£27,475,660	£27,475,660	£27,475,660
Garages Income	£746,410	£769,550	£793,410	£818,010	£843,370
Service Charges	£250,635	£258,400	£266,410	£274,670	£283,180
Other Commercial Rental Income	£22,080	£22,760	£23,470	£24,200	£24,950
Voids	-£1,051,595	-£1,030,337	-£991,459	-£876,167	-£620,887
Bad Debts	-£788,696	-£686,892	-£686,892	-£627,919	-£667,454
WG Affordable Housing Grant (AHG)	£202,655	£202,655	£202,655	£202,655	£202,655
Other Income	£1,000	£1,030	£1,060	£1,090	£1,120
<b>Sub Total</b>	<b>£26,857,149</b>	<b>£27,011,797</b>	<b>£27,083,255</b>	<b>£27,291,109</b>	<b>£27,541,474</b>
<b>HRA Financing WG Business Plan</b>					
Borrowing Opening Balance	£106,826,413	£114,922,390	£134,618,448	£154,944,919	£165,109,820

Loan repaid from MRP	£1,078,770	£1,319,623	£1,826,440	£2,362,215	£2,683,681
Additional Borrowing	£9,174,747	£21,015,680	£22,152,911	£12,527,116	£9,757,484
Borrowing Carried Forward	£114,922,390	£134,618,448	£154,944,919	£165,109,820	£172,183,622
<b>Balance Carried Forward (HRA Reserve)</b>	<b>£1,000,000</b>	<b>£1,041,000</b>	<b>£1,078,285</b>	<b>£1,110,294</b>	<b>£1,143,603</b>

- 4.2 The financial model includes many assumptions, the primary ones being detailed below in section 4.3. Due to the long-term nature of the forecasts within the Business Plan, the uncertainty of the economic climate and the demands on the housing environment generally, these assumptions are extremely sensitive to change.
- 4.3 The primary assumptions made to inform the HRA Business Plan are:
- Rental income will increase by CPI + 1% per year, the maximum allowed by the Welsh Government's Rent Policy, with the exception of 2022-2023 when rent increases have been limited by the Welsh Government to CPI only.
  - Service charges are increased for future years in line with inflation for full cost recovery.
  - The Welsh Government will in future years allocate grant to support the development of social and low-cost housing on a scheme-by-scheme basis. For the purposes of forward planning, an average grant rate of 35% has been assumed.
  - The Welsh Government Major Repairs Allowance receivable is assumed to remain at previous levels of £3,732,000 per year.
  - Void loss and bad debt have been assumed at 7% (4% voids and 3% bad debt). Work continues to reduce void turnaround times, with substantial improvements already made in the time taken to let a property once it has been returned to the Council, fit to let. This assumption also takes account of growing challenges collecting income from people reliant upon the social security system for all or part of their income.
  - Prudential borrowing interest rates have been assessed at 2.9% per annum.
  - General inflation at 4.9% for RPI in 2021-2022 and 3.8% afterwards and 3.1% for CPI in 2021-2022 and 2.55% annually afterwards
  - A minimum balance of £1,000,000 will be maintained over the medium term to mitigate against any future risks.
- 4.4 The Business Plan is subject to regular review to make sure new expenditure, to be paid for by borrowing, is for essential improvements or for schemes that have an element of pay back, such as the development of new homes. This is to make sure that there are no long-term issues of affordability and sustainability in respect of borrowing.

- 4.5 The Business Plan process requires the Council to assess the impact of a number of key variables and how changes in these may impact on priorities both in capital investment and for revenue budgets.
- 4.6 It should be noted that the HRA is ring fenced. This means it can only draw income from rental income, self-generated income and approved grants from the Welsh Government. It cannot benefit in any way from General Fund income. By the same token, the HRA can only be used to fund services and investment of direct benefit to domestic tenants of the Council. It cannot be used to fund General Fund services or investment. Welsh Government will later this year be issuing a revised HRA guide detailing what the HRA can and cannot fund.
- 4.7 The Head of Finance (Section 151 Officer) notes the content of this report and is satisfied that the HRA business Plan is acceptable, that the assumptions contained within the report are appropriate but noting the sensitivity to change in the current economic climate. This will need to be kept under review. The plan conforms to the structure and business plan parameters set out by Welsh Government. The plan is therefore viable and be supported from a financial perspective.

## **5. Legal implications**

- 5.1 There are no direct legal implications but the requirement for a plan is set out in this report. The approval of the Business Plan is an executive function which does not have to be referred to full Council.
- 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 The proposals and recommendations contained in this report do not involve the processing of personal data.

## **7. Comment from local member(s)**

- 7.1 This matter has equal effect across the Council.

## **8. Integrated Impact Assessment**

- 8.1 An Impact Assessment has been completed in respect of this report.
- 8.2 The Impact Assessment shows that the proposals for the HRA Thirty Year Business Plan 2022-2023 set out in this report contribute positively to maintaining and developing the Council's role as responsive and viable social landlord. A balanced approach has been taken between maintaining and improving existing homes and increasing the range of affordable housing options available for the people of Powys. Risks arising from changes by the Welsh Government to rent and affordable housing grant policy and inflationary construction costs are well mitigated. The Powys HRA Thirty Year Business Plan makes a substantial contribution towards making Vision 2025 a reality, which includes Affordable Housing as one of its top priorities.

- 8.3 The impact on the Council of not approving the proposed HRA Thirty Year Business Plan, set out in this report, will be considerable. There will be a high risk of the Council not being to comply with the Welsh Government's requirement for the Council to have in place by April 1<sup>st</sup>, 2022, a sustainable and viable HRA Thirty Year Business Plan. This may result in the loss of MRA (£3,732,000 per annum) and direct intervention by the Welsh Government in the management of the landlord service.

## **9. Recommendation**

9.1 Cabinet is recommended to:

- 91.1. Approve the Housing Revenue Account (HRA) Thirty Year Business Plan 2022-2023, as set out in the HRA Business Plan Narrative (attached to this report as Appendix A).

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





# At **Home** in **Powys**

## Housing Revenue Account Thirty Year Business Plan 2022-2023

March 2022

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## At Home in Powys

'Vision 2025', which is Powys County Council's strategic plan for improving the quality of life for everyone in Powys, includes Affordable Housing as one of its top six priorities. The Council provides flats, houses and bungalows for one in ten of all households so that they can make a good home in Powys. Making sure that the Council is able to continue to manage and develop a financially viable landlord service is essential to help people to be at home in Powys.

In March 2022, Powys County Council approved its Housing Revenue Account (HRA) Thirty Year Business Plan for 2022-2023. The Business Plan, which operates on a rolling thirty-year basis, sets out all the information and activity that together allows the Council to successfully and sustainably approach manage and provide social housing for the people of Powys.

'At Home in Powys' highlights the most significant elements of the full Business Plan:

-  How the Business Plan supports 'Vision 2025'.
-  Information on the housing needs in Powys.
-  How the Council works with tenants and other stakeholders to develop and monitor the HRA Business Plan.
-  How the Council will increase for the people of Powys, the range and choice of Council-owned homes.
-  How the Council will finance and operate the HRA Business Plan to make sure the Council's landlord service is responsive and meets the expectations of tenants and residents.

Housing Services in addition has adopted an approach that majors on liveability, maintainability and longevity in determining the way homes are designed maintained and refurbished. The Powys HRA Thirty Year Business Plan 2022-2023 contributes positively to maintaining and developing the Council's role as responsive and viable social landlord, focusing on helping people find, keep and enjoy their home. A balanced approach has been taken between maintaining and improving existing homes and increasing the range of affordable housing options available for the people of Powys. The Powys HRA Thirty Year Business Plan makes a substantial contribution towards making Vision 2025 a reality, which now includes Affordable Housing as one of its top priorities and support for the Mid Wales Growth Deal. It also contributes to the national outcomes the Welsh Government has for housing across Wales.

## Vision 2025

The HRA Business Plan is designed to make sure the Council's landlord service contributes to the priorities agreed in 'Vision 2025', which is the Council's Corporate Improvement Plan to improve the quality of life for everyone in Powys. 'Vision 2025' also contributes towards the outcomes agreed in the Powys Regional Partnership Board's 'A Healthy, Caring Powys' which is the health and care strategy for Powys and runs until 2027.

'Vision 2025' provides an important framework for involving residents, councillors, staff and other stakeholders, such as regulators, in improving public services in Powys. It focuses on the things that matter most for local people.

'Vision 2025' majors on four important themes in everyone's life:

- Economy: developing a vibrant economy.
- Health and care: leading the way in effective, integrated rural health and care.
- Learning and skills: strengthening learning and skills.
- Residents and Communities: supporting our residents and communities.

Supporting 'Vision 2025' is the Powys Public Service Board's 'Towards 2040' which is the Well-being Plan for Powys. 'Vision 2040' sets out the way Powys will contribute to the aspirations of the Well-being of Future Generations (Wales) Act 2015. The Act puts in place seven well-being goals to make sure public bodies in Wales are working towards improving the social, economic, environmental and cultural well-being of their areas.

## Looking Ahead

The HRA faces many challenges in the years to come.

### *Maintaining the quality of homes*

- 👉 The Council's housing stock is aging and in need to investment to make sure it can continue to provide homes now and in the future. Considerable high-cost investment is needed in many homes – for example new roofs and damp proofing. This is in addition to maintaining the Council's compliance with the Welsh Housing Quality Standard (WHQS) across all homes.

### *Developing new homes*

- 👉 There are 4,190 households registered with 'Homes in Powys' as of February 2022 for a social rented home in Powys. This compares to 3,493 households in February 2021. The development of new secure, affordable homes – including by the Council - is the only long-term way to meet this demand and avoid people being homeless or having to live in crowded, poor condition, high cost privately owned rented accommodation. Vision 2025 includes a commitment by the Council to once again be a major provider of new homes in Powys.

### *Environmental sustainability*

- 👉 Increasing the environmental sustainability of all the Council's homes is likely to require substantial investment, including support for the Welsh Government's policy of 'decarbonisation' of existing and new homes. This is in support of the British government's objective to have a 'net-zero' carbon economy and society by 2050. The average cost of making existing homes 'zero-carbon' remain best estimates – for Powys a total of £108,000,000 would be needed, based on research undertaken by Inside Housing<sup>1</sup>. That equates to £20,000 per Council-owned home or over ten years, £38 per week per property.

### *Love Where You Live*

- 👉 Improving the quality of life includes the estates where Council home are located. Greater investment is needed in estate management, maintenance and improvements to make sure that people can really love where they live.

These challenges mean that every aspect of the HRA needs to be considered for impact and efficiency. A zero-budget approach has been taken to the HRA Thirty Year Business Plan 2022-2023.











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<sup>1</sup> 'The cost of net zero: social landlords' decarbonisation plans revealed' – Inside Housing (November 23<sup>rd</sup>, 2020).

## Outcomes and Services

### Outcomes

Powys County Council's Housing Services have a Top Ten of outcomes for the work it does to help people to be at home in Powys, all of which are to help people find, keep and enjoy a secure home. The HRA Business Plan contributes in some way to all these outcomes.

-  Increase our customer satisfaction ratings to be among the best in Wales.
-  Build at least 250 new council owned and managed homes by 2025, and to continue and grow our new build programme making the Council a major force in the housing market of Powys.
-  Increase the value for money we receive from our investment in repairing and maintaining our homes.
-  Maintain WHQS for all our homes, with a particular focus on improving energy efficiency and reducing damp.
-  All our homes to be one hundred per cent compliant with all health and safety requirements.
-  At least 99.65% of rent due collected every year.
-  Void rent loss reduced to 1.9% of the rent roll.
-  Speedy response to reduce and resolve homelessness.
-  Quick and user-friendly investment in homes for people who need aids, adaptations and disabled facilities to improve the quality of their lives.
-  A balanced housing market, offering desirable housing choices for people who live in Powys.

How well the Council is doing in making those outcomes a reality for people is measured and reported using a range of performance indicators, with targets set for each year.

- ✓ Number of new Housing Revenue Account homes completed: for 2022-2023 – 118 new homes and a further 33 in 2023-2024.
- ✓ Four homes acquired in 2022-2023 for social rent.
- ✓ Overall tenant satisfaction with the housing services provided by the Council: for 2022-2023 - 75%.
- ✓ Percentage of tenants satisfied with major programmes of repair and improvement: for 2022-2023 - 85%.
- ✓ Percentage of customer call backs satisfied with the responsive repairs service: for 2022-2023 - 95%.
- ✓ Percentage of heating appliances serviced in the previous 12 months: for 2022-2023 - 100%.
- ✓ Average end to end time for responsive repair: for 2022-2023 - 9 days.
- ✓ Percentage of rent collected: for 2022-2023 - 99.65%.
- ✓ Percentage of rent lost to empty properties: for 2022-2023 - 4%.

In 2022-2023, a new, improved Quality of Accommodation Standard – which sets out what new tenants can expect from their new home - will be introduced, providing for a better balance between aspirations of tenants, especially those moving to their first Council-provided home, the time taken to re-let empty properties and the financial resources available within the HRA Business Plan.

## **Services**

Housing Services is part of the Council's Housing and Community Development division which itself is part of the Council's 'Economy and Environment Directorate'. Housing Services remains one of the best in Wales for collecting rent, has started building council homes again for the first time in forty years and is well on the way to being a compliance leader. Housing Services has more than met the challenges posed by Covid-19.

To build on the past successes of Housing Services and to be better able to meet the challenges faced by the Council as both a landlord and strategic housing authority, a new structure for Housing Services has been developed. Called 'Moving on Up', the new delivery model will be rolled out ready for 2022-2023.






'Moving on Up' has been designed around the rurality and geography of Powys, the largest county in Wales. A strong network of area-based housing management and maintenance teams will offer day-to-day services for our tenants and communities, working as much as possible out and about in our communities.

The new approach to service delivery will also take advantage of the opportunities revealed by the Council's response to Covid-19 to work more efficiently. This will include replacing fixed-base office-based working with a neighbourhood-focused mix of working out on estates and developing and using local services and community hubs.

'Moving on Up' has created within Housing Services three teams – Housing Communities, Housing Quality and Housing Resources.

## **Housing Communities**

*Rationale for the Housing Communities division...*

-  Clear focus across all aspects of finding, keeping and enjoying a home.
-  All homelessness services managed and delivered locally to facilitate closer client-council-service provider liaison.
-  Strong local understanding of communities and people to enhance, through local knowledge and local provision of estate and tenancy management services.
-  High visibility of the Council in neighbourhoods.
-  Teams to work with a mix of home working, hubs and drop-in centres to increase visibility and contact with communities and support the Council's New Ways of Working.

- 🏠 Close working links between housing and tenancy management, homelessness, Housing Support and agencies able to help people increase their incomes and quality of life.

#### *Housing Communities service responsibilities...*

- 🏠 'Homes in Powys' including allocation and letting of social homes, void management, understanding local housing markets (including highlighting acquisition and development needs).
- 🏠 Homelessness and housing advice services (including Housing First, Rapid Rehousing, temporary accommodation, enabling move-on options).
- 🏠 Supported housing services (including 'Housing Support').
- 🏠 'Rent First' - front-line income recovery.
- 🏠 'Love Where You Live' (including estate and neighbourhood management).
- 🏠 Tenancy management (including anti-social behaviour).
- 🏠 'Keeping in Touch'
- 🏠 Gypsy and traveller site management.
- 🏠 Encouragement of high management standards by private sector landlords.
- 🏠 Crime and anti-social behaviour.
- 🏠 UK Resettlement Scheme.
- 🏠 Homelessness Strategy.

## **Housing Quality**

#### *Rationale for the Housing Quality division...*

- ✂ Expertise shared and able to be deployed more efficiently across all aspects of asset management and construction activity.
- ✂ Capacity and capability to provide and manage works in a variety of ways, each tailored to the outcome required (including direct provision and use of external providers where appropriate).
- ✂ Single approach to the provision of more places for people to live by embracing acquisition and new development.
- ✂ Strong health, safety and compliance capacity and capability for the benefit of all housing clients and services.
- ✂ Flexibility of resource deployment across all aspects of asset management to meet service needs.
- ✂ New build and improvement programme specifications continuously informed ongoing and current knowledge and intelligence about maintenance liabilities.
- ✂ Link aids, adaptations and disabled facilities grant work with wider asset management strategy and services to better inform works and development programmes.

#### *Housing Quality service responsibilities...*

- ✂ Acquisition and development of new homes by the Council - social rent, low-cost home ownership, market housing.
- ✂ Repair, maintenance and improvement of municipal homes.
- ✂ Maintaining the Welsh Housing Quality Standard for municipal homes (including WHQS Compliance Policy).



- ✘ Aids and adaptations (including disabled facilities grants, Fit for Life).
- ✘ Compliance across all municipal housing assets.

## **Housing Resources**

### *Rationale for the Housing Resources team...*

- 📌 Single resource for services, projects and policies that impact on and support all Housing Services.
- 📌 A co-ordinated insight into all housing markets, needs and aspirations across Powys informing investment and policy decisions on the provision, maintenance and management of homes.
- 📌 Environmental sustainability expertise and drive applied across all aspects of housing services.
- 📌 Focused and robust approach to income collection (including 'Rent First', support for Housing Officers, efficient and robust to managing rechargeable repairs, full recovery of Temporary Accommodation charges).
- 📌 Strong market research capacity and capability that understands all aspects of the way people experience their homes and neighbourhoods.
- 📌 Driving force for constant improvements in customer care.
- 📌 Coherent and clear messaging for all aspects of Housing Services.
- 📌 Performance management and co-ordination in one place providing the ability to understand and share all the experiences people have of the impact of our services on the quality of their homes and neighbourhoods.
- 📌 Expert approach to market research and client surveys.
- 📌 Ability to quality assure all services with a critical but friendly eye.
- 📌 Recognition that skilled administrative support is essential for all services to focus on their technical and professional outcomes.
- 📌 Co-ordinated and capable ICT support that is able to capture the needs of all service users and shape ICT support around Housing Services outcomes.

### *Housing Resources service responsibilities...*

- 📌 Policy and practice development, co-ordination and continuous review.
- 📌 Housing market intelligence.
- 📌 Housing standards in the private sector (including enforcement of standards - HH&SRS, home improvement and town centre loans).
- 📌 Increasing the availability of homes and contributing to economic development by bringing empty homes and properties into use.
- 📌 Environmental sustainability including driving forward Green Powys, increasing energy efficiency and environmental sustainability across Housing Services, encouraging sustainable activity in the way services are designed and delivered and the way assets are built and maintained.
- 📌 Maximum income collection to maintain service viability.
- 📌 Gathering and sharing client experiences to improve, expand or reduce services according to market needs and demands.
- 📌 Customer Care programme co-ordination and quality assurance.
- 📌 Communication with communities to make sure there is clear understanding of housing's opportunities and constraints.

- ✎ Quality assurance to make sure all services are to a high standard (including audits, client research, member and tenant engagement).
- ✎ Administration and dissemination of STAR survey.
- ✎ Up to date, accurate performance management - administration, reporting, sharing and challenge.
- ✎ Efficient, service friendly ICT systems.
- ✎ Co-ordination, quality assurance, analysis and submission of all service, corporate and national performance indicator, statistical and data returns.
- ✎ Archiving and records.

### ***Divisional Responsibilities within Housing Services***

<b>Housing Communities</b>	<b>Housing Quality</b>	<b>Housing Resources</b>
<i>Helping people to find, keep and enjoy a home</i>	<i>Providing maintaining and improving homes</i>	<i>Understanding the way people experience their homes and communities</i>
Housing advice across all tenures	Building and acquiring new homes	Continuous market engagement to drive forward improvements in all the work we do
Homelessness prevention and resolution	Bringing empty properties into use as homes	Customer relationship management
Allocation of social homes in Powys	Repairs, maintenance and improvements to homes owned by the Council	Effective and interactive communications
Tenancy management of Council-owned homes	Encouraging higher maintenance standards by private property owners	Provision of information technology and data systems
Estate management	Compliance and health and safety across all Housing Services	Quality assurance and performance management
Management of gypsy and traveller sites	Aids, adaptations and disabled facilities work to increase the well-being of people in Powys	Income management
Love Where You Live	Welsh Housing Quality Standard	Environmental sustainability
Rent First	Asset Management Strategy	Housing market research and policy development

Housing Services has excellent working relationships with colleagues in and clients of Adult Social Care, Children’s Services and Powys Teaching Health Board and this, coupled with the integration of health and social care in Powys, means the housing service better understands how to address the housing needs of vulnerable people in Powys.

Allocation of all social housing in Powys is managed through ‘Homes in Powys’, a common allocation scheme that also offers a one-stop shop for people looking for a home. It is an on-line system making it easy for people to apply and amend their

applications as and when needed. One application is all that is needed for someone to be considered for all social housing provided in Powys by the Council and eight housing associations.

For the first three months of 2022-2023, a joint venture company called Heart of Wales Property Services (HoWPS) which is jointly owned by the Council and Kier, will continue to provide repairs and maintenance services, as it has since July 2017. In 2020-2021, the Council undertook a detailed review of the service provided by HoWPS, taking account of performance and value for money. The conclusion was that direct service provision would improve the quality of services to tenants. In 2021, the Council made the decision to end the contract with HoWPS. From July 2022, repairs and maintenance to all Council-owned homes will be delivered directly by Housing Services.

The Council is creative and innovative in making effective use of HRA housing to meet the most pressing of housing needs. One example includes the measured deployment of HRA homes to provide higher quality emergency and temporary accommodation for people who are homeless. This creates savings for the Council's General Fund, as it reduces the Council's use of bed and breakfast accommodation in emergency situations. There are moreover no negative impacts on the HRA Business Plan. This approach has proven to be particularly helpful during the Covid-19 event in helping the Council to accommodate an increased number of homeless households.

## The Powys Housing Market

The Powys Housing market is extremely diverse. That is only to be expected in a county that accounts for a quarter of the land mass of Wales. The distance from one end of Powys to the other is greater than the distance from London to Bristol. Powys has the lowest population density of all the principal areas of Wales. The sheer size of the county, and its remoteness from major conurbations, presents many challenges for developing, managing and maintaining homes.

Every planning authority in Wales is expected to produce a Local Housing Market Assessment (LHMA) once every five years. The most recent LHMA for Powys covered the period 2016-2020 and therefore a new assessment has been developed for the period 2021 onwards.

The LHMA makes an important contribution to the Council achieving the outcomes set out in Vision 2025. It provides the Council with a strategic understanding of the housing need in Powys and provides an evidenced basis on which to plan strategically for meeting current and future housing. The LHMA also provides essential evidence for the formulation of the Local Development Plan (LDP), the principal planning guide required to be produced by every Planning Authority.

To have a complete picture of how housing markets function across local authority boundaries, it was decided to commission a regional LHMA in conjunction with seven other planning authorities. These are Ceredigion, Carmarthenshire, Pembrokeshire, Swansea and Neath Port Talbot along with the Brecon Beacons and Pembrokeshire Coast National Parks. This approach was supported by the Welsh Government.

Such a collaborative approach represented an opportunity to achieve efficiencies and sharing of resources in undertaking this important piece of research. Opinion Research Services (ORS) of Swansea was appointed to complete the LHMA. ORS was initially asked to provide a final report in the first half of 2020. This date had to be postponed until 2022, to take account of the impact of the demands and operational limitations created by the Covid 19 pandemic impacting on both ORS and the commissioning authorities and the availability of updated data population projections

Initial findings of the LHMA confirm Housing Services' understanding of need, from 'Homes in Powys' registrations, homelessness demand and ongoing interaction with tenants and residents:

- An ageing demographic with higher requirement for specifically age-related housing.
- A reduction in household size.
- An increase in overall household numbers.

With the Homes in Powys data, the information is being used to inform the future of the Council's programme to build new council homes. This is co-ordinated through the Powys Strategic Housing Partnership with the plans of other social landlords to

make sure that all developments complement each other to meet the needs of the greatest number of households.





Rural Housing Enabler (RHE) funding from Welsh Government is used to support a resource in the Housing Development team to inform the new build programme.

### Local Housing Strategy for Powys

In September 2020, the Powys Strategic Housing Partnership agreed the Local Housing Strategy for Powys for 2021 through 2025. The vision adopted by the Partnership is:

- ✓ *In line with the Well-being of Future Generations (Wales) Act 2015 and other appropriate legislation, the Powys Local Housing Strategy will contribute positively to a healthier, more equal and cohesive Wales (by achieving its aims and objectives)*

The Powys Local Housing Strategy will support Vision 2025 and contribute positively to a healthier, more equal and cohesive Wales by...

-  Strengthening our relationship with residents and communities through a greater understanding of their housing aspirations and needs (Vision 2025 – Residents and Communities)
-  Providing a balanced housing market across Powys through developing more affordable homes, both to rent and to buy (Vision 2025 – Vibrant Economy)
-  Making sure that homes are there to meet people’s lifetime needs. (Vision 2025 – Health and Care)
-  Encouraging investment in the homes and services Powys needs. (Vision 2025 – Vibrant Economy)

### Homes in Powys

At the end of December 2021, 4,053 people were registered with ‘Homes in Powys’. The table below shows the number of applicants registered in each band at the end of December 2021. Bands One to Three (2,352 applicants) are applicants with a housing need and are who ready to move. During the first three quarters of 2021-221 all social landlords providing homes in Powys let 518 properties.

#### Households Registered with Homes in Powys - by Band (December 2021)

	Band 1	Band 2	Band 3	Band 4	Band 5	Total
<b>Number of Households</b>	37	101	2,214	1,381	320	4,053

Household size is reducing in Powys. The table below shows a breakdown of the applicants registered at the end of December 2021 by the bedrooms they require. This indicates a need to increase across Powys considerably the availability of smaller social homes. One-bedroom general needs homes currently make up just 20.4% of total social housing in Powys and just 6% of all homes regardless of tenure.

***Households Registered with Homes in Powys - Minimum Bedroom Size  
(December 2021)***

Minimum bedroom size	Number of Households
One	2,274
Two	1,114
Three	520
Four	133
Five	11
Six	1
<b>Total</b>	<b>4,053</b>

The table below shows the tenure of applicants registered with Homes in Powys at the end of December 2021. The highest number of applicants are currently renting private sector accommodation, suggesting a clear desire for the security of tenure and affordable rents offered by social landlords.

***Households Registered with Homes in Powys - Current Tenure (December 2021)***

Tenure	Band One	Band Two	Band Three	Band Four	Band Five	Total
Renting from a private landlord	5		635	448	92	1,180
Powys County Council Tenancy	15	65	228	166	43	517
Living with parents	2	1	234	154	22	413
Other	4		212	123	27	366
Staying with friends/relatives	1		220	49	33	303
Other Social Landlord		2	106	122	28	258
Owner Occupier	1		138	93	19	251
Barcud	2	14	79	68	8	171
Wales & West Housing		7	58	60	2	127
Temporary Accommodation	3		93	4	9	109
Rough Sleeper	2		61	9	5	77
Clwyd Alyn Housing Association		10	24	28	9	71
Lodging	1		42	15	6	64
Newydd Housing Association Tenancy			16	11	5	32
Gwalia Housing Tenancy	1		15	11	1	28
In home provided by employer			13	4	2	19
Living in care			15	3	1	19
Adult Placement		1	10	4	3	18
Grwp Cynefin Tenancy			7	2	2	11
Melin Homes Tenancy		1	2	6	1	10
HM forces accommodation			6	1	2	9
<b>Grand Total</b>	<b>37</b>	<b>101</b>	<b>2,214</b>	<b>1,81</b>	<b>320</b>	<b>4,053</b>

Applicants who join Homes in Powys are asked to say why they require housing. Households can have more than one reason - for example a prison leaver may also be

threatened with homelessness. The table below shows the housing need reason declared by applicants. The highest housing need is 'Other Reason', the details of which will be recorded in the applicant's notes. Of the categorised housing needs 'Medical need or have a disability and my existing home is not appropriate for my needs' is the highest at 973 applicants followed by 'Homeless, or about to become homeless' at 888 applicants. There are significant numbers of applicants who cannot afford private sector accommodation, need to move due to care issues or their current accommodation is overcrowded or too large.

***Housing Needs of Households Registered with Homes in Powys (December 2021)***

<b>Housing Need</b>	<b>Tenure (social landlord)</b>	<b>Tenure (private and other)</b>	<b>Total</b>
Other Reason	336	1,028	1,364
Medical need or have a disability and my existing home is not appropriate for my needs	302	671	973
Homeless or about to become homeless within the next 56 days	42	846	888
Existing home is overcrowded	203	429	632
Experiencing anti-social behaviour or harassment	226	327	553
Current home is unaffordable	59	477	536
Need to move to give or receive support and proven level of support is required and can be given	145	385	530
Existing house is too large for my needs	120	259	379
Housing for older people required	61	296	357
Experiencing domestic violence	32	144	176
Found employment in the area and need to move closer to work or will otherwise lose that employment	32	123	155
Current home planned to be demolished or needs major repairs	17	135	152
Current home has disabled adaptations which are no longer required	9	12	21
Leaving prison	0	18	18
<b>Grand Total</b>	<b>1,584</b>	<b>5,150</b>	<b>6,734</b>

*N.B. An applicant may choose more than one housing need reason.*


Powys housing markets are as diverse as the county itself. The north-west of Powys, in and around Machynlleth, is close to the Snowdonia National Park and the university town of Aberystwyth which is also the administrative centre of the county Ceredigion. Housing demand is strong, especially for affordable housing. The north-east of Powys is dominated by Newtown and Welshpool, towns with relatively good rail and road links to the West Midlands and the towns and conurbations serving the Merseyside area. Housing demand is high, with Welshpool in particular experiencing high demand for homes. The centre of the county is home to Llandrindod Wells, the

county town for Powys. South of Builth Wells is Brecon, which is part of the Brecon Beacons National Park. Like all national parks, property prices are high leading to very high demand for affordable housing in and around the town. The southernmost point of Powys is Ystradgynlais, a town with a proud industrial heritage and now on the edge of the Swansea commuter belt. The housing market is relatively balanced with pockets of low demand housing that no longer meets the needs and aspirations of today's households.


The risk of continued migration away from Powys by younger people, including those in their 20s and 30s, makes it more important than ever that there are affordable homes available not only to rent but also to buy. This makes the county's housing market more attractive and encourage younger and economically active households to stay in local communities. It will also help attract more young families move to the area and be at home in Powys. The shortage of affordable housing of all tenures in many parts of Powys mean that it is increasingly difficult for people who work in low wage sectors of the economy to remain living in the County. This will have a significant impact on the ability of employers to recruit to posts. The Council is developing a range of low-cost home ownership options for direct delivery itself and in partnership with housing associations.

The focus for social and affordable rented housing demand, which the HRA Business Plan is designed to contribute towards meeting, is for three main types of housing.


### ***Specialist Housing for Older People***

 Powys has an ageing population and a growing need to provide appropriate homes for the elderly. The largest increase in the elderly population is projected to be in and around Welshpool and to a lesser extent also in the Brecon, Talgarth, Hay, Newtown and Llanidloes areas. Such housing may include sheltered housing/retirement accommodation extra care housing. Given commitments to care in the community, hybrid versions of these such as 'extra care lite' may also evolve. The provision of such a wide variety of housing will help older people to live independently for longer and release general needs housing for younger people.

### ***Homes for Smaller Households***

 Household sizes in Powys are getting smaller. In 1991, the average household size was approximately 2.5 people, in 2001 it had fallen to 2.3 persons and in 2011 was 2.25. The household projections indicate that household sizes are likely to reduce to an average of around 2.1 by 2031. The falling household size may result in the number of households remaining relatively steady or increasing despite the reducing population.

### ***Accessible Housing***

 An aging population means that to make sure its homes remain useable by older people the Council will need to adapt or extend existing – and sometimes aging - accommodation or may have to buy and remodel properties to provide



homes for people who cannot access or live successfully in un-adapted dwellings.

## Investment Strategy

Over the next thirty years, Powys County Council has the capacity to invest £403,433,000 in maintaining the WHQS and £487,616,000 in other major capital improvement programmes. The responsive and cyclical maintenance programmes will benefit from investment of £520,272,000.

The investment programme includes £83,516,262 (excluding grant support) over the next five years alone in the development of new homes and the acquisition of existing properties for conversion to social housing. All borrowing for both new homes and buying and converting existing properties will only be for schemes that are financially viable and able to pay back the full cost of all borrowing incurred in bringing them to market. In this way, the Council is able to continue to expand the housing options available to the people in Powys while safeguarding the financial viability of the HRA.

The HRA investment programme represents a massive injection of resources into the local economy of Powys. Wherever practicable the Council will invest in ways that secure the benefits to the local economy.

A comprehensive Asset Management Strategy is being developed for all the assets held within the HRA. In 2018-2019, the first stage was finished - mapping all the open spaces and green areas held in the HRA. In 2019-2020, a garage review has been completed looking at the most effective way of making use of HRA's garage estate, which includes more than directly owned garages and assorted garage sites leased to individuals. Further work on the strategy in 2020-2021 and in 2021-2022 was put on hold due to the impacts of Covid-19. This restricted access to properties and required a clear focus of all Council resources on supporting work to mitigate and manage the impacts of the pandemic. In 2022-2023, this work will resume, with a focus on understanding the energy efficiency of our homes.

### **New Homes for Powys**

The Welsh Government expects local authorities to significantly increase the rate of municipal house building. Land has been identified across Powys with the potential to develop another 1,000 Council homes. A total of 39 new Council-owned homes will be completed by March 2022. Further schemes are being developed to expand this programme. Provision has been made in the HRA Business Plan to support up to 439 homes by 2025 (with a further 70 for 2026-2027) – raising the very real possibility of new development comprehensively exceeding the Council's target of 250 new homes by 2025. Progressing all new developments is dependent upon securing all necessary planning and other regulatory consents and securing viable development sites. In addition, a resolution will need to be found to the challenges to new development posed by the need to mitigate phosphate discharges.

The scale and pace of continued development will also depend upon the availability of grant from the Welsh Government to allow for the homes to be let at social rents. If grant falls and construction costs continue to increase, the Council will consider how

it can develop homes for open market sale to generate surplus funds to underpin the affordable housing programme. The Council will also be exploring the options for increasing the range of low-cost home ownership options that can be offered in Powys.


Further additions to the social housing available to people living in Powys will be secured through continuing the programme of property acquisitions. The numbers to be bought will depend upon the opportunities presented by the housing market, the availability where needed of social housing grants and how available properties match local housing needs and represent long-term value for money. Particular attention will be given to acquiring smaller homes as these are those most in demand by households registered with 'Homes in Powys'. In 2018-2019, 21 homes were bought, followed by four in 2019-2020, three in 2020-2021 and between April and December 2021, a further eleven.

### *New Homes for Powys - Financial Summary 2022-23 to 2026-2027*

Financial Year	HRA Business Plan Investment <sup>2</sup> (Acquisitions)	Number of New Homes Completed (+ acquisitions)	Notes
2022-2023	£10,321,729 (£800,000)	118 (4)	Investment planned for each year will cover completing earlier schemes, progressing current developments and preparing for future projects. Completions will be dependent upon securing all necessary planning, environmental and other regulatory consents, securing viable development sites and where needed Social Housing Grant.
2023-2024	£20,980,093 (£800,000)	33 (4)	
2024-2025	£23,563,151 (£800,000)	134 (4)	
2025-2026	£15,695,771 (£800,000)	154 (4)	
2026-2027	£12,955,518 (£800,000)	70 (4)	
<b>Total</b>	<b>£83,516,262 (£4,000,000)</b>	<b>509 (20)</b>	



### **Welsh Housing Quality Standard (WHQS)**

Powys achieved the WHQS standard in December 2018. The focus has moved towards targeting 'acceptable fails'<sup>3</sup> and maintaining WHQS over the next five years by:

-  Reviewing support and working methods for residents concerned about disruption.

<sup>2</sup> Gross expenditure, excluding Social Housing Grant or other grants that may be available.

<sup>3</sup> Acceptable Fails: Acceptable Fails are circumstances where it is either impossible or not cost effective for a property to be brought up to WHQS or where a tenant refuses to have the work carried out. Currently Powys has 2221 properties that have acceptable fails. Acceptable Fails fall into four categories: Resident Choice; Physical Constraint; Cost of Remedy; Timing of Remedy. The majority of Powys Acceptable Fails are due to Cost of Remedy with 1514 elements falling beneath cost effectiveness to replace as opposed to affordability and 594 properties through Resident Choice.

-  Tackling damp properties and targeting improvements to improve thermal comfort and reduce fuel poverty.
-  Effective management of component replacement lifecycles.

This programme is therefore designed to make sure the Council's homes continue to meet the WHQS. Some of the investment activity within the WHQS programme also contributes to the objectives of the Green Powys and Compliance One Hundred programmes.

### **WHQS Financial Summary 2022-23 to 2026-2027**

<b>Investment</b>	<b>2022-2023</b>	<b>2023-2024</b>	<b>2024-2025</b>	<b>2025-2026</b>	<b>2026-2027</b>
Kitchens	£600,000	£420,000	£400,000	£600,000	£800,000
Bathrooms	£472,500	£200,000	£200,000	£0	£400,000
Rewiring	£90,000	£120,000	£60,000	£100,000	£45,000
Windows and Doors	£649,000	£500,000	£100,000	£0	£200,000
Roofing	£1,500,000	£1,000,000	£400,000	£400,000	£400,000
Walls	£650,000	£650,000	£650,000	£650,000	£650,000
Estate Works (contribute to Love Where You Live)	£1,100,000	£1,200,000	£1,300,000	£1,200,000	£1,200,000
Heating (contributes to Green Powys)	£1,500,000	£1,400,000	£1,500,000	£1,400,000	£1,400,000
Energy Efficiency (contributes to Green Powys)	£240,000	£150,000	£300,000	£150,000	£150,000
Asbestos Management (contributes to Compliance One Hundred)	£150,000	£150,000	£150,000	£150,000	£150,000
Management Fees	£770,000	£777,700	£785,480	£793,330	£801,260
Miscellaneous WHQS	£430,000	£250,000	£250,000	£250,000	£250,000
<b>Total</b>	<b>£8,151,500</b>	<b>£6,817,700</b>	<b>£6,095,480</b>	<b>£5,693,330</b>	<b>£6,446,260</b>

### **Compliance One Hundred**

The Compliance One Hundred programme is designed to make sure that all of the Council homes and associated assets are one hundred per cent compliant with all relevant and applicable legislation and regulation. With increased expectations by tenants and residents, this is a top priority for the service. A Housing Compliance Board was established in December 2019 to drive forward a focused approach to

compliance. A dedicated team of skilled officers has been drawn from across the service to form a Compliance One Hundred Project team, which will become a permanent part of the service under 'Moving on Up'. This team is now delivering all that needs to be done to make sure that the Council's homes are always fully compliant with all relevant health and safety related legislation.

The investment schemes detailed below are in addition to those included within the WHQS programme and Day-to-Day Repairs and Maintenance which includes all inspections and servicing of safety-critical components and assets, such as heating systems and lifts.

### ***Compliance One Hundred Financial Summary 2022-23 to 2026-2027***

<b>Investment</b>	<b>2022-2023</b>	<b>2023-2024</b>	<b>2024-2025</b>	<b>2025-2026</b>	<b>2026-2027</b>
Fire Safety Works	£200,000	£200,000	£100,000	£100,000	£100,000
Water Supply and Sewerage Works	£250,000	£250,000	£200,000	£100,000	£100,000
Legionella	£50,000	£50,000	£50,000	£50,000	£50,000
WHQS Contributions to Compliance One Hundred	£150,000	£150,000	£150,000	£150,000	£150,000
Day-to-day Repairs Contribution to Compliance One Hundred	£510,000	£400,000	£310,000	£310,000	£225,000
<b>Total Compliance One Hundred Investment Programme</b>	<b>£1,160,000</b>	<b>£1,050,000</b>	<b>£810,000</b>	<b>£710,000</b>	<b>£625,000</b>

### **Green Powys**

The Green Powys programme is designed to increase fuel efficiency and reduce fuel poverty for tenants of the Council and make tangible improvements to the wider environment, with a particular emphasis on increasing planting of trees, shrubberies and other actions to promote biodiversity, encourage appreciation of the natural world and give a greener feel to our communities.

For 2022-2023, the Welsh Government asked all local authority landlords to estimate the costs of 'decarbonisation' of all municipal homes. Estimating such a figure is challenging, because of many factors outside the control of the Council or households themselves. For example, the way energy is produced and supplied to homes may make a major contribution towards 'decarbonisation' – the roll out of hydrogen availability produced by electrolysis using green electricity generated by wind, solar and nuclear power and increased grid capacity to supply more green electricity directly to homes. The increased use of recycled, long-life materials and products and components sourced locally within Wales and Great Britain, reducing environmental

transport costs, may also contribute towards a more environmentally friendly – and economically beneficial - approach to the construction and refurbishment of homes.

The current estimates for the lifecycles of components such as heat pumps and solar panel inverters and the currently higher maintenance costs of the new technologies being promoted as making a contribution to ‘decarbonisation’, when balanced against the long life of such improvements as additional insulation. mean that a prudent approach of spreading the initial costs over ten years has been adopted. This allows scope for replacement systems, where necessary, to be funded from 2033-2034 onwards and to account for any additional maintenance costs of more complex heating, ventilation and water management systems.

Powys has adopted a ‘decarbonisation’ figure of £20,000 per home, based on research undertaken in 2020 by Inside Housing magazine<sup>4</sup>. The total cost for the initial investment to ‘decarbonise’ all 5,433 homes owned by the Council over the period 2022-2023 through 2032-2033, excluding borrowing costs, amounts to £108,000,000. The cost per property per week over ten years, excluding inflation, is £38 which if external grant funding is not sourced, may need to be added to the rent paid by tenants.

To address high energy costs, special attention is to be paid to those Council-owned homes that have an Energy Performance Certificate rating of ‘E’, ‘F’ or ‘G’. A ‘whole house’ approach – called ‘Project E, F, G’ - is to be developed during 2022-2023 for work to start during 2023-2024 to reduce the need for energy in these properties, reducing the cost of living for those living in these homes as well as improving environmental sustainability. Funding for these properties will be prioritised within existing programme.

The Council has taken part in the initial phases of the Welsh Government’s Optimised Retrofit initiative. Powys engaged with the Sero pilot project to develop a methodology to make sure that whole-house solutions to increase the environmental efficiency of homes are specified and introduced in a way that does not disadvantage residents or counteract each other.

The Council is paying particular attention to how it can efficiently and effectively replace gas-fired boilers with ones than can easily be converted to use hydrogen.

The investment schemes detailed below are in addition to those included within the WHQS programme.

### **Green Powys Financial Summary 2022-23 to 2026-2027**

<b>Investment</b>	<b>2022-2023</b>	<b>2023-2024</b>	<b>2024-2025</b>	<b>2025-2026</b>	<b>2026-2027</b>
Damp Prevention	£250,000	£250,000	£250,000	£250,000	£250,000

<sup>4</sup> The cost of net zero: social landlords’ decarbonisation plans revealed’ – Inside Housing (November 23rd, 2020).

Photo-voltaic (Solar Panels)	£75,000	£75,000	£75,000	£75,000	£0
Decarbonisation and Energy Efficiency	£90,000	£100,000	£250,000	£250,000	£250,000
WHQS Contributions to Green Powys	£1,650,000	£1,550,000	£1,550,000	£1,550,000	£1,550,000
Day-to-day Repairs Contribution to Green Powys	£540,000	£569,540	£579,000	£588,950	£874,000
<b>Total Green Powys Investment Programme</b>	<b>£2,605,000</b>	<b>£2,544,540</b>	<b>£2,704,000</b>	<b>£2,713,950</b>	<b>£2,924,000</b>

Powys County Council continues to lead the ‘Home Grown Homes’ initiative. This is a partnership project between housing associations, the Welsh Local Government Association (WLGA), Community Housing Cymru (CHC), Welsh Government and Natural Resources Wales. The aim is to increase the use of domestically grown and processed timber in the provision of new homes. This will help support local economic activity and contribute positively towards a more sustainable environment and economic growth and resilience. The project is delivered by a consortium of Wood Knowledge Wales, Cardiff Metropolitan University and Coed Cymru.

As part of its commitment to the ‘Home Grown Homes’ project the Council has in place a Wood Encouragement Policy to encourage the use of timber in construction work, where timber is the most suitable material for the job in hand.

### Fit for Life

The Fit for Life programme is designed to make the Council’s homes better suited to the needs of older people and those with health-related needs that impair or adversely affect their mobility.

#### *Fit for Life Financial Summary 2022-23 to 2026-2027*

Investment	2022-2023	2023-2024	2024-2025	2025-2026	2026-2027
Fit for Purpose	£1,700,000	£1,400,000	£1,200,000	£0	£0
Adaptations - Capital	£250,000	£250,000	£250,000	£250,000	£250,000
Adaptations - Revenue	£590,000	£602,390	£615,040	£641,140	£654,600
<b>Total Fit for Life Investment</b>	<b>£2,540,000</b>	<b>£2,252,390</b>	<b>£2,065,040</b>	<b>£891,140</b>	<b>£904,600</b>

The adaptations budget of covered by between capital and revenue budgets, acknowledging that a number of larger adaptations should be treated as capital expenditure.

## Love Where You Live

The ‘Love Where You Live’ tenancy sustainability strategy is working to make the homes and estates managed by the Council places where people can enjoy their lives. It includes such investment as improvements to our garage sites, additional parking where needed, investment in walls, fencing and security to properties and improved garden areas, footpaths and estate lighting. ‘Love Where You Live’ is closely linked to ‘Green Powys’. The investment schemes detailed below are in addition to those included within the WHQS programme.

### *Love Where You Live Financial Summary 2022-23 to 2026-2027*

<b>Investments</b>	<b>2022-2023</b>	<b>2023-2024</b>	<b>2024-2025</b>	<b>2025-2026</b>	<b>2026-2027</b>
Brecon Area Estate Improvements	£20,000	£20,000	£20,000	£20,000	£20,000
Newtown Area Estate Improvements	£20,000	£20,000	£20,000	£20,000	£20,000
Welshpool Area Estate Improvements	£20,000	£20,000	£20,000	£20,000	£20,000
Wye Valley Estate Improvements	£20,000	£20,000	£20,000	£20,000	£20,000
Ystradgynlais Estate Improvements	£20,000	£20,000	£20,000	£20,000	£20,000
Car Parking	£75,000	£75,000	£75,000	£75,000	£75,000
Communal Area Improvements	£75,000	£50,000	£50,000	£50,000	£50,000
Garage Strategy	£300,000	£400,000	£400,000	£400,000	£0
Pen-y-bryn Regeneration	£700,000	£700,000	£300,00	£0	£0
Play Area Improvements	£25,000	£25,000	£25,000	£25,000	£25,000
WHQS Contributions to Love Where You Live (Estate)	£1,100,000	£1,200,000	£1,200,000	£1,200,000	£1,200,000



and Boundary Works)					
Day-to-day Repairs Contribution to Green Powys	£540,000	£569,540	£579,000	£588,950	£874,000
<b>Total Love Where You Live Investment</b>	<b>£3,435,000</b>	<b>£3,669,080</b>	<b>£2,988,000</b>	<b>£3,007,900</b>	<b>£3,178,000</b>

### Penybryn Regeneration

In Penybryn, Ystradgynlais, the Council has a cluster of flats, for which there is erratic housing demand and which are in poor condition. Proposals have been developed and shared with the local community to resolve what was seen by local people as a problem adversely affecting their lives. The flats were empty, unsightly and attracted anti-social behaviour. On-site construction works have been delayed by two years, due to the impact of the Covid-19 event. However, over the next three years, some of the flats will be demolished, others reconfigured into high-quality apartments for single people and couples and the centre of the estate greened as an attractive open space.

### Community Alarms

During 2019-2020, a review looked at the future of the Careline service for tenants of the Council. The review was prompted by the need to replace the current equipment, which is of an age that it is beyond economical maintenance and repair. Plans to replace the equipment in 2020-2021 were put on hold due to service restrictions introduced to manage the impact of the Covid-19 pandemic. The HRA Business Plan for 2021-2022 includes a one-off provision of £600,000 for the necessary capital investment to replace the Careline equipment with up-to-date kit that will be more reliable, less costly to maintain and able to offer a greater range of services.

### Day-to-day Repairs and Cyclical Maintenance

For the first three months of 2022-2023, a joint venture company called Heart of Wales Property Services (HoWPS) which is jointly owned by the Council and Kier, will continue to provide these services, as it has since July 2017. In autumn 2020, the Council undertook a detailed review of the service provided by HoWPS, taking account of performance and value for money. The conclusion was that direct service provision would improve the quality of services to tenants. In 2021, the Council made the decision to end the contract with HoWPS. From July 2022, repairs and maintenance to all Council-owned homes will be delivered directly by Housing Services.

### *Repairs and Maintenance Financial Summary 2022-23 to 2026-2027*

<b>Investments</b>	<b>2022-2023</b>	<b>2023-2024</b>	<b>2024-2025</b>	<b>2025-2026</b>	<b>2026-2027</b>
HoWPS Service Agreement	£1,353,620	£0	£0	£0	£0
HoWPS Service Contingency	£0	£0	£0	£0	£0
Housing Quality Repairs and Maintenance Service	£3,931,245	£5,190,957	£5,119,801	£5,227,320	£5,337,090
Vehicle Financing (Revenue)	£129,625	£176,463	£180,169	£0	£0
ICT	£137,000	£120,000	£124,000	£0	£0
Day-to-day and Cyclical Repairs (not covered by HoWPS Service Agreement)	£0	£0	£0	£0	£0
Day-to-day and Cyclical Repairs	£1,813,110	£1,460,960	£1,399,593	£1,556,936	£1,535,947
External Painting	£450,000	£459,450	£469,100	£478,950	£764,010
Estate and Grounds Maintenance	£865,300	£865,300	£865,300	£865,300	£865,300
Miscellaneous Expenditure	£311,130	£317,170	£323,337	£329,634	£336,063
<b>Total Repairs and Maintenance Investment</b>	<b>£8,991,030</b>	<b>£8,590,300</b>	<b>£8,481,300</b>	<b>£8,458,140</b>	<b>£8,838,410</b>

*Please note: Includes contributions from each Housing Quality Repairs and Maintenance Service, Day-to-day and Cyclical Repairs and Miscellaneous Expenditure towards the Green Powys, Love Where You Live and Compliance One Hundred programmes.*

## **Housing Management ICT Systems**

During 2021-2022, a fully mobile approach has been developed for housing management and maintenance officers. This means they will be able to access all management systems for housing no matter where they are in Powys – subject of course to cell phone reception being available which is not always the case in an area as deeply rural as Powys. This will speed up the response to customer enquiries and mean that officers will be able to spend more time working out in Powys neighbourhoods and communities. The new ‘total mobile’ system is to be introduced in 2022-2023, earlier roll-out having been held back by it not being possible to complete field testing within the confines of Covid-19 working restrictions.

## **Acquisition of Properties**

The Council has between April 2019 and March 2021 purchased 28 homes on the open market, with a further eleven between April and December 2021, the majority of which have been ex-municipal homes. In determining which properties to purchase there has been a focus on those in areas of high demand and where the new build programme is unlikely or due to planning and land restrictions, unable to meet the need. All such purchases are subject to the same viability criteria as new build, with additional allowances made for any works needed to bring the properties up to WHQS. The programme will continue to be a significant part of the work undertaken by the Council with £800,000 set aside over each of the next five years to increase the availability of genuinely affordable, secure rented homes across Powys.

Other expenditure within the HRA Business Plan includes Supervision and Management Costs, which cover the costs of managing the service, for example staff, support services and office costs, and the cost of funding debt taken on when the HRA became self-financing in 2014 and any additional borrowing secured to fund investment programmes.

## Rents and Service Charges

The Council is the largest social landlord in Powys with 5,433 properties under its management, as of March 31<sup>st</sup>, 2022. The breakdown of homes owned by the Council...

- 39.4% are three bedroomed properties.
- 42.6% are two bed properties - this includes a substantial number of older persons' accommodation and 30.7% of these two bed homes are houses.
- 18.8% are flats.
- 25.5% are bungalows.
- 36.1% are designated for older persons.

### General Needs Properties - by Type and Number of Bedrooms

Property Type	Bedrooms						Totals
	1	2	3	4	5	6	
Bungalow	21	22	1	-	-	-	44
Double House	-	-	-	-	1	-	1
First Floor Flat	56	158	7	-	-	-	221
Ground Floor Bedsit	5	-	-	-	-	-	5
Ground Floor Flat	53	143	1	-	-	-	197
House	14	709	2079	124	7	3	2936
Maisonette	-	25	40	-	-	-	65
Second Floor Flat	13	18	-	-	-	-	31
Third Floor (or higher) Flat	3	4	-	-	-	-	7
<b>Totals</b>	<b>165</b>	<b>1079</b>	<b>2128</b>	<b>124</b>	<b>8</b>	<b>3</b>	<b>3507</b>

### Properties Designated for Older Persons

Property Type	Bedrooms						Totals
	1	2	3	4	5	6	
Bungalow	434	895	7	1	-	-	1337
Double House	-	-	-	-	-	-	-
First Floor Flat	86	140	1	-	-	-	227
Ground Floor Bedsit	9	-	-	-	-	-	9
Ground Floor Flat	141	191	1	-	-	-	333
House	-	-	2	-	-	-	2
Maisonette	-	-	-	-	-	-	-
Second Floor Flat	8	9	-	-	-	-	17
Third Floor (or higher) Flat	-	-	-	-	-	-	-
<b>Totals</b>	<b>678</b>	<b>1235</b>	<b>11</b>	<b>1</b>	<b>-</b>	<b>-</b>	<b>1925</b>

Since 2017-2018, the Council has used a rent setting model which takes account of property type, property size and fuel type (fuel type is being used as a proxy indicator for SAP rating and will be replaced when complete data on SAP ratings of individual

homes is available). In 2022-2023, the Council will be reviewing its rent setting model to take account of changing factors such as the increasing energy efficiency of newly built and substantially refurbished homes.

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 for 2022-2023 of 3.1%, the CPI figure for September 2021, is appropriate to make sure that the Housing Services is sustainable and able to provide homes and services for both current and future tenants. Such an increase allows rents to remain affordable and so does not contribute excessively to any increase in the cost of living for the Council's tenants.

The Council has therefore approved a recommendation that with effect from April 2022 the average rent in Powys will increase by 3.1% (£2.55 on average per week) for all 5433 Council owned homes. Tables below show the average rent in 2020-21 and 2021-22 and also shows the rent of the properties which will experience the greatest increase. It should be noted that the figures show rents over a 52-week rent year. In Powys rents are charged over a 48-week rent year with two 'rent free weeks' at Christmas and two 'rent free weeks' at Easter.

#### ***HRA Rents for 2021-22 and 2022-23***

	<b>Rent 2021-2022</b>	<b>Rent - 2022-2023</b>	<b>Weekly Increase</b>
<b>Average HRA Rent</b>	£93.82	£96.37	£2.55

The Council has during the Covid-19 pandemic taken a proportionate and pragmatic approach to the collection of rent. This approach will remain as the nation emerges from the pandemic. While the 'Rent First' ethos remains the guiding principle, tenants who have faced and many continue to face unavoidable financial challenges linked to the Covid-19 event will benefit from additional support to secure additional income, including for example submitting claims for claims for housing benefit and universal credit, and accessing advice via the Councils money advice team. The Financial Support Officers and the Housing 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.

#### **Powys Service Charges for 2021-2022 and 2022-2023**

<b>Service Charge</b>	<b>Highest Weekly Service Charge</b>		<b>Lowest Weekly Service Charge (where a charge is made)</b>		<b>How the Service Charge is Calculated</b>
	<b>2021-2022</b>	<b>2022-2023</b>	<b>2021-2022</b>	<b>2022-2023</b>	

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

### Garage and Garage Plot Rents for 2021-22 and 2022-23

	Rent - 2021-22	Rent 2022-23
Garage Rents	£12.50 per week	£12.89 per week
Rent for Garage Plots (not subject to a fixed rate at time of letting)	£159.00 per annum	£163.93 per annum

### Resourcing the Powys HRA Business Plan

The thirty-year Powys HRA Business Plan has been produced in accordance with the model supplied by the Welsh Assembly Government and is attached with the electronic version of this document. The financial assumptions in resourcing the Business Plan are sensitive to changes in forecast income and expenditure, investment and inflation rates. Accordingly, a number of assumptions have had to be made in planning ahead for our programme of investment in existing and additional municipal homes for the people of Powys.

#### ***Powys HRA Business Plan Assumptions***

- ↳ Rental income will increase by CPI + 1% per year, the maximum allowed by the Welsh Government's Rent Policy, with the exception of 2022-2023 when rent increases have been limited by the Welsh Government to CPI only.
- ↳ Service charges are increased for future years in line with inflation for full cost recovery.
- ↳ The Welsh Government will in future years allocate grant to support the development of social and low-cost housing on a scheme-by-scheme basis. For the purposes of forward planning, an average grant rate of 35% has been assumed.
- ↳ The Welsh Government Major Repairs Allowance receivable is assumed to remain at previous levels of £3,732,000 per year.
- ↳ Void loss and bad debt have been assumed at 7% (4% voids and 3% bad debt). Work continues to reduce void turnaround times, with substantial improvements already made in the time taken to let a property once it has been returned to the Council, fit to let. This assumption also takes account of growing challenges collecting income from people reliant upon the social security system for all or part of their income.
- ↳ Prudential borrowing interest rates have been assessed at 2.9% per annum.
- ↳ General inflation at 4.9% for RPI in 2021-2022 and 3.8% afterwards and 3.1% for CPI in 2021-2022 and 2.55% annually afterwards

- ↳ A minimum balance of £1,000,000 will be maintained over the medium term to mitigate against any future risks.

### ***Income from Asset Sales***

We do not anticipate any substantial income from land or asset sales, as Right-to-Buy (RtB) sales have ended. In the event that Council decides to sell HRA land or other assets, such as properties beyond economical repair or for which there is no social housing demand, at anything more than nominal cost then this would have a positive impact on funding by allowing the Council to reduce borrowing. However, any beneficial effects will to some extent be tempered by reductions in income.



## Listening to Powys Communities

Powys County Council takes a comprehensive approach to involving, engaging and understanding our tenants and communities. This includes:

- 🔗 Tenant Scrutiny Panel (TSP) with a number of focused sub-groups –including the Investing in Your Homes (WHQS) Group, and a Repairs Group.
- 🔗 Love Where You Live tenancy sustainability strategy.
- 🔗 Housing Repairs Surgeries.
- 🔗 Publication twice a year of our Open House newsletter.
- 🔗 Publication twice a year of our Welsh Housing Quality Standard newsletter.
- 🔗 Regular use of questionnaires and surveys.
- 🔗 Housing Services Group 100 consultative forum.
- 🔗 Extensive use of social media, including the Powys County Council website and bespoke Facebook pages for housing services.
- 🔗 Affordable Housing engagement events and housing need assessments.

### Tenant Scrutiny Panel

The Tenant Scrutiny Panel (TSP) is a countywide, tenant led panel and has a considerable impact on Council decisions about the housing service. Membership includes tenant representatives to provide experience and knowledge from a tenants' perspective, four County Councillors and the Cabinet Member with the portfolio responsibility for Housing. The TSP is chaired by a tenant and the panel members agree the agenda items for scrutiny and discussion. Joint decisions are made at the TSP meetings between the Council and tenants. Guest speakers also attend the meetings as requested by the tenant representatives.



The Investing in Your Homes Group (WHQS) sub-group of the TSP is a small group of tenants, elected members and contract management staff that meet once a month. They monitor the progress of investment work being carried out to tenants' homes, review the feedback from and responses to tenant questionnaires, are involved in discussions for environmental works, help produce newsletters and attend Open Days and Community Events.

The Repairs Sub-group is a group of tenants, elected members, engagement officers, repairs staff and representatives from HoWPS. The group meets monthly to discuss the repairs service, make sure that tenant experiences are understood by the Council and HoWPS and drive forward service improvements.





### Love Where You Live

In 2018, the Council launched its Tenant Sustainability Strategy 'Love Where You Live'. Love Where You Live focuses on how tenancy and estate management can help people enjoy their homes and neighbourhoods. It has three themes:



- 🏠 Understanding. To continually improve we need to know what to improve by understanding how our services and estates are experienced by tenants and residents.

-  People. To help people be able to enjoy their homes and communities, we can support, encourage and help people to play an active part in their communities and economy as well as improve their own personal well-being.
-  Place. To give people reasons to love where they live, we need to make sure that the environment is green and thriving, clean and tidy – in short, a pleasant place to be.

As part of Love Where You Live the Council has:

-  Improved the speed and impact of how the Council responded to tenant and resident concerns about the quality of their environment, including for example the quality of grass cutting, maintenance of shared spaces and day-to-day estate management. A full caretaker service is in place across the County along with two dedicated, directly managed in-house grounds and estate maintenance teams.
-  ‘Pop-up Powys’ which takes services out into the community, using a mobile office vehicle will become part of Housing Services in 2022-2023. This follows a successful trial of the concept, which was extremely popular in rural areas, improving the Council’s understanding of how people experience its services and what type of homes they and their communities need now and in the future.
-  Introduced a fresh approach to dealing with anti-social behaviour, which streamlined the process to make sure that the right agency with the powers to deal with problems was involved as soon as possible. A more robust approach has been taken to cases where there are clear breaches of tenancy conditions, with injunctions and other legal action being deployed where they are the only reasonable solutions.
-  A strategic approach in place for investment in play areas located on housing estate land.

In 2022-2023, Love Where You Live’ will:

-  Pilot the ‘Keeping in Touch’ initiative for every tenant, who will once every three years receive a personal visit from their local Housing Officer. This will encourage and support closer relationships between the Council and our tenants, helping us to work together to respond promptly to any requests for help and support to sustain tenancies and encourage financial independence.
-  Introduce a new approach to helping people maintain and manage their gardens, which will include a mix of more robust enforcement of tenancy conditions, direct intervention where necessary and support for people to gain gardening skills.

## **Housing Repairs Surgeries**

Fifteen area-based Housing Repairs Surgeries, usually held twice a year throughout the County at a time, date and location to suit the needs of the tenants who want to attend the meetings, had to be suspended during 2020-2021 and 2021-2022 due to the restrictions placed on meetings and events arising from the Covid-19 event. A new approach to engaging with tenants is being planned for when Covid-19 restrictions are

completely lifted and to support the new direct provision of repairs and maintenance to be introduced in July 2022.

### **‘Open House’ Newsletter**












The ‘Open House’ newsletter is produced twice a year (summer and winter) and is distributed to all Council tenants in Powys. The newsletter contains housing news, information and articles. The newsletter is available to view on the Powys County Council website.

### **‘Investing in Your Homes’ Newsletter**

The ‘Investing in Your Homes’ newsletter is produced twice a year (spring and autumn) and is distributed to all Council tenants in Powys. The newsletter contains news about works completed under the WHQS programme, the contractors carrying out the works and general news about WHQS in Powys.

### **Questionnaires and Surveys**

In 2021, the Council undertook a STAR survey of tenants. The survey showed:

-  Overall satisfaction with Powys County Council as a landlord is 71%.
-  Satisfaction with the neighbourhood is 88%.
-  Tenants feeling safe and secure in their home is 87%.
-  Tenants considering their rent as value for money (VFM) is 78%.
-  Tenants considering service charges as VFM is 77% of those paying service charges.
-  Satisfaction with the overall quality of accommodation is 74%.
-  Satisfaction with repairs and maintenance was 63%.
-  Satisfaction with the way that the Council listens to and acts on tenants’ comments is 55%.
-  Satisfaction with the way Housing Services deals with anti-social behaviour is 51%.
-  Satisfaction with opportunities to participate in decision making processes is 44%.
-  Having a say in how services are managed is rated at 42%.

All of these results are an improvement over the 2019 STAR survey results except for perception of the overall quality of the home, which shows a decrease in satisfaction of 4%.

Housing Services has identified two important areas for deeper research, based in the lowest satisfaction ratings. These can be summarised as:

- ↳ What is it that our tenants consider we do not listen to? How do we improve this perception?
- ↳ There appears to be a decline in trust on delivery. We need to understand why trust is lacking and what needs to be done to secure the trust of tenants in the Council.

The findings of the STAR survey will be shared with the Tenant Scrutiny Panel, which will be engaged in the work to determine what needs to be done to address these areas of concern.

The Council regularly carries out surveys with tenants after their homes have been improved through the WHQS programme. These surveys are carried out either by post or telephone. All comments are considered by the Investing in Your Homes (WHQS) Sub-group with recommendation for changes being forward to the teams responsible for managing the work. The latest surveys show that **xx%** of tenants are currently happy with the improvements made to their homes.

### **Housing Services One Hundred Group**

Housing Services Group 100 is a group of active tenants who act as sounding board and consultative panel for the Council. They are consulted (by telephone, email or questionnaire) according to their preference on the area of Housing Services they would like to be consulted about (allocations, repairs, tenant participation, etc.) The views, opinions and suggestions are used by the Housing Service to inform the way policy and practice are developed. Feedback is sent to the members on the outcomes of the consultations and how their views have influenced decisions made by Housing Management. Members also receive an annual newsletter.

### **Social Media**

An increased amount of information about the Housing Services is available electronically via the internet and social media. All information is published in both Welsh and English.

## Sustainable Commissioning and Procurement

Sustainable Commissioning and Procurement is a thread which runs through the Council's Commissioning and Procurement Strategy. The Council's Regeneration Strategy and Statement of Intent is committed to ensuring that major investment opportunities of the kind afforded by the HRA Business Plan can benefit the local economy and provide the widest possible community benefits.

For WHQS, the Council will either award three-year Contracts with the option of extending these for up to a further twelve months or tenders on a scheme-by-scheme basis, depending on the nature of the works being purchased. The Council will continue to use sustainable development criteria in determining value for money including assessing the impact of economic, environmental and social factors when tendering for housing related goods, services and works.

Suppliers and contractors are encouraged to embrace sustainability through the application of contract award criteria which will take into account not only financial factors but also whole life cost and the implications for society, the economy and the environment. There will be opportunities to expand this further, to the benefit of local industry and enterprise, as the United Kingdom develops its own trade and public procurement policies following the nation's departure from the European Union on January 31<sup>st</sup>, 2020.

The Council will, wherever possible, work with suppliers to realise the benefits of sustainable procurement. Examples include:

- Adopting whole-life costs and community benefits as the contract award criteria.
- Adopting our own financial standing orders to establish criteria of "economically most advantageous" as the optimum combination of whole life costs and benefits as the best value contract award criteria.
- Implementing sustainable design and procurement strategies, and building sustainability into procurement processes and contracts, where relevant.
- Inviting proposals for the delivery of community benefits (economic, social and environmental) that are relevant to the contract and that add value to the Powys One Plan, including targeted recruitment and training and enterprise opportunities.
- Reducing the cost of doing business with the Council by reducing the costs of tendering, for example through E-tendering.
- Working with the Welsh Government to assist local small to medium enterprises (SMEs) and micro-businesses with the public sector tendering process.
- Involving tenants more closely in the procurement process and in evaluating the effectiveness of contractors.

## **Risk Management and Monitoring & Evaluation**

### **Housing Improvement and Assurance Board**

In October 2020, the Housing Improvement and Assurance Board begin working to assist and provide advice to the Council to support and drive forward improvement in the Council's Housing Services, with particular regard to governance, asset management, compliance and quality assurance.

The Housing Improvement and Quality Assurance Board provides strategic support by:

- Enabling corporate focus and support to make sure that all relevant corporate activity supports the changes needed to improve the quality of Housing Services and the experience of tenants and residents.
- Driving forward corporate activity to unblock constraints that are identified as blocking or hindering improvements.
- Providing review, challenge and creative input for the improvements being developed by Housing Services, making sure improvement are robust and sustainable.
- Support Housing Services to be able to make continuous improvement part of good business practice.
- Apply the Council's Performance Management and Quality Assurance Framework as quality control for the improvements being taken forward by Housing Services and the Council as a whole.

The Housing Improvement and Quality Assurance Board has general responsibilities for:

- Providing challenge and support to Housing Services in pursuit of improving service standards and achievement, with particular regard to governance, asset management, compliance and quality assurance.
- Oversee a well-documented Housing Improvement and Quality Assurance Action Plan, to be endorsed by the Housing Improvement and Quality Assurance Board, with clear milestones and targets for improvement.
- Overseeing, monitoring and supporting the progress made by Housing Services in taking forward the Action Plan.
- Advising the Chief Executive Officer, Corporate Director and Portfolio Holder monthly on progress and make, if necessary, recommendations for further support or modification to the existing support arrangements.
- Considering any recommendations that the Corporate Improvement Board and Scrutiny Committee may make to drive forward Housing Services improvements with particular regard to governance, asset management, compliance and quality assurance.

### **Risk Management**

The risks to the HRA Business Plan are included and managed using the Council's Risk Management Procedure. This is regularly reviewed and updated as necessary to reflect

changing risk profiles and scenarios, by the Council's Executive Management Team as well as Housing Services senior managers. The Risk Register considers all HRA project risks including new build, WHQS, income recovery, repairs and maintenance services and compliance.

### *Housing Services Risk Register 2022-2023*

Risk	Consequences	Mitigations
<p>Phosphate Restrictions - Rivers Wye and Usk Catchment areas affecting new Council Housing developments.</p>	<ul style="list-style-type: none"> <li>• Housing developments will be required to mitigate phosphates., as required by Natural Resources Wales (NRW) at the end of March 2021.</li> <li>• The policy and mitigations available are currently unclear as no policy/procedure has been agreed between planning authorities and NRW.</li> <li>• Planning permissions will require phosphate mitigation, there will be additional costs in either offsetting mitigations or installing additional plant/systems to mitigate phosphate. Mitigations required will affect the financial viability of schemes.</li> <li>• Development schemes in affected areas cannot be progressed until policy and procedure is agreed between planning authorities and NRW.</li> </ul>	<ul style="list-style-type: none"> <li>• Regular liaison with Planning, NRW and Welsh Government regarding mitigations and policy.</li> </ul>
<p>Import-export barriers imposed or tolerated by the EU</p>	<ul style="list-style-type: none"> <li>• Reduced exports leading to instability in exporting businesses.</li> <li>• Reduced employment opportunities.</li> <li>• Reduction in supply of products imported from the EU, reducing economic and construction activity.</li> </ul>	<ul style="list-style-type: none"> <li>• Encourage exporting business to find new non-EU markets.</li> <li>• Encourage and support domestic business to develop products for import substitution.</li> <li>• Training and development for people to take advantage of changing economic opportunities.</li> <li>• Increase focus on local (Powys&gt;Wales&gt;Britain) sourcing by the Council (and other bodies) of materials, goods and services (taking advantage of proposed changes to public procurement rules).</li> </ul>

<p>Insufficient financial resources to deliver Housing Services (both Housing Revenue Account - HRA and Housing General Fund - HGF)</p>	<ul style="list-style-type: none"> <li>• Service outcomes not delivered (HGF and HRA).</li> <li>• Health &amp; safety implications of not consistently meeting statutory requirements (HRA).</li> <li>• Deterioration in standard of homes and assets (HRA).</li> <li>• Limited capacity to provide additional affordable homes (HRA).</li> <li>• Undermining of quality of life, community sustainability and cohesion (HGF and HRA).</li> <li>• Inability to maintain Welsh Housing Quality Standard (HRA).</li> <li>• Reduced repairs and maintenance service contributing to adverse customer outcomes and landlord-tenant relationship (HRA).</li> <li>• Council unable to meet statutory duties to homeless households (HGF).</li> <li>• Council unable to maintain payments on loans (HRA).</li> <li>• Reduced services to those needing aids, adaptations and disabled facilities to maintain quality of life (HRA and HGF).</li> </ul>	<ul style="list-style-type: none"> <li>• Continuous and robust financial monitoring and treasury management (HGF and HRA).</li> <li>• Zero budget-based approach for HRA Thirty Year Business Plan Review (HRA).</li> <li>• Value engineering to reduce improvement and new build home programmes cost (HRA).</li> <li>• Void management changes to minimise rental loss (HRA).</li> <li>• Maintain 'Rent First' approach, including pro-active tenancy support and rigorous performance management, to income recovery (HRA).</li> <li>• Reprofile services, standards and expenditure to bring in line with income (HRA and HGF).</li> <li>• Develop alternative sources of income (HRA and HGF).</li> <li>• Reprofile asset base to match available resources (HRA).</li> </ul>
<p>Failing to meet all applicable statutory requirements providing for the health and safety of the occupants in the home.</p>	<ul style="list-style-type: none"> <li>• Increased risk of death &amp; serious injury.</li> <li>• Reputational risk.</li> <li>• Failure to support well-being and peace of mind of residents and tenants</li> </ul>	<ul style="list-style-type: none"> <li>• Continued delivery of Compliance One Hundred project to drive up compliance and quality assurance with clear focus on... <ul style="list-style-type: none"> <li>○ Fire Safety; Asbestos Management; Fixed Electrical Installations; LOLER; Water Systems; Heating Systems.</li> </ul> </li> </ul>
<p>Tenants and residents not effectively involved in strategic decision making, service monitoring and shaping service delivery and outcomes.</p>	<ul style="list-style-type: none"> <li>• Poor customer satisfaction ratings.</li> <li>• Ineffective service delivery that is not able to define, deliver and demonstrate value for money.</li> <li>• Increased risk of challenge that services are not delivered in an equitable and fair way.</li> </ul>	<ul style="list-style-type: none"> <li>• Active, evidenced, continuous and representative tenant involvement.</li> <li>• Tenant Scrutiny Panel actively involved providing oversight, challenge and proposals for service improvements.</li> <li>• Introduction of new Quality of Accommodation standard to reflect quality of home expected by tenants at the start of their tenancy.</li> <li>• Roll-out of regular 'Keeping in Touch' for every Council home to capture individual views &amp; identify any issues impacting on tenancy sustainability.</li> <li>• Implementation of 'Love Where You Live' Strategy which is</li> </ul>



		<p>centred on a clear understanding of individual tenant's expectations.</p> <ul style="list-style-type: none"> <li>Continuously and routinely capture and respond to tenants' views and service experiences.</li> </ul>
Allocation and lettings not effectively contributing to meeting housing demand.	<ul style="list-style-type: none"> <li>Failing to use housing assets effectively can contribute to homeless issues, overcrowding and social dislocation – all of which will adversely impact on the well-being of communities.</li> <li>Social and economic disruption experienced by people living in homes and communities that hinder their ability to participate in work and community life.</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing quality assurance of allocation and letting performance to identify how effective housing demand is being met, identify service improvements and inform the development of new homes.</li> <li>Ongoing focus to make sure that investment in homes is matched to housing needs.</li> <li>Working with individuals to help them take the lead in resolving their housing needs providing appropriate support as and when needed.</li> <li>Collaborative working with all social landlords, housing developers and other accommodation providers to better match supply with demand.</li> </ul>
Unable to secure and/or fund viable opportunities for the development and acquisition of new social housing	<ul style="list-style-type: none"> <li>Failure to meet Vision 2025 objective to deliver 250 homes by the end of 2025.</li> <li>Increased waiting lists and homelessness arising from a reduced ability to meet housing needs.</li> <li>Community stability undermined by reduced housing opportunities for as wide a range of households as possible.</li> <li>Financial viability of HRA Business Plan undermined by reduce ability to increase income through increase income from increased stock numbers.</li> </ul>	<ul style="list-style-type: none"> <li>Value engineering of design and construction to increase value-for-money.</li> <li>Identify opportunities for cross subsidy from market housing to increase resources for investment in social housing.</li> <li>Increase collaborative working with economic development team and agencies to be better placed to take advantage of commercial-to-residential conversion opportunities.</li> <li>Identify alternative funding sources for investment in social homes.</li> </ul>
Repairs and maintenance service and improvement programmes failing to deliver high quality services and outcomes.	<ul style="list-style-type: none"> <li>Customer satisfaction falls, reducing confidence by tenants in the Council.</li> <li>Properties fall into disrepair, increasing future maintenance liabilities.</li> <li>Excess costs are generated by remedial work to put right poor-quality repairs.</li> <li>Safety standards are compromised by poor quality or non-delivered repairs.</li> </ul>	<ul style="list-style-type: none"> <li>Continuous quality assurance of work for example post-inspections and tenant surveys informing changes in policy and process.</li> <li>Amend delivery model to address performance failings and improve services.</li> <li>Value engineer specifications.</li> </ul>

<p>Technical and cost challenges of making substantial environmental improvements to housing assets</p>	<ul style="list-style-type: none"> <li>• Failure to improve long term environmental sustainability across all aspects of the environment (for example use of unsuitable materials or systems for house construction and improvement) will hinder contributions towards a better environment for everyone.</li> <li>• Long term maintenance liabilities (including for example increased costs and shorter or increased number of component replacement cycles) that may increase costs and harm the environment.</li> <li>• Reduced consumer appeal of municipal housing.</li> <li>• Unfunded design requirements reducing provision of additional affordable and secure housing opportunities for households with low and middle incomes.</li> <li>• Financial insecurity for private home-owners arising from unfunded changes to systems and components (for example heating systems).</li> </ul>	<ul style="list-style-type: none"> <li>• Continuous review and research of all systems, components and materials to identify those which contribute positively and cost effectively to long term environmental sustainability.</li> <li>• Increased use of locally sourced (Powys &gt; Wales &gt; United Kingdom &gt; Global) materials and components.</li> <li>• Increased use of recycled materials.</li> <li>• Increased involvement of communities in designing and approving materials, systems and components.</li> <li>• Reconfiguration of grants and loans programmes to support home-owners to make proven and effective changes to reduce any negative environmental impact of their homes.</li> <li>• Increased greening of estates to improve overall well-being and environmental quality.</li> </ul>
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## Monitoring and Evaluation

The Council continually monitors and evaluates the impact on the HRA Business Plan of service requirement and financial variables and how changes in these may impact on priorities both in capital investment and for revenue budgets. Monthly meetings of a group of senior housing and financial specialists make sure that budget profiles are maintained and that costs are kept under control.

Financial and managerial control measures include:

- 👉 Assessing the validity and sustainability of different sources of funding such as the use of prudential borrowing to support housing provided outside of but complementary to the HRA.
- 👉 Correct deployment of capital and revenue funding.
- 👉 Keeping under review all HRA revenue expenditure to make sure that the Council identifies and makes, wherever possible, meaningful revenue savings.
- 👉 Continued development of the QL housing management system. This now has enhanced property features reporting allowing for an expanded asset management register to not only capture the information from stock condition surveys but also capture details of compliance components such as asbestos and smoke detectors.
- 👉 Progressing self-sufficiency in the ability to generate mid- and long-term lifecycle forecasting, so the Council does not have to rely on outsourced providers for this critical intelligence about our housing assets.




- 👉 Use of a Dynamic Purchasing System to increase the speed of delivery of Estate works and Cyclical Decoration Programmes.

The HRA Business Plan assumptions and performance against targets and expectations are regularly subject to scrutiny. A monthly budget report is produced by the Council's finance team, which details the monthly status of the HRA. A group of senior officers meet each month to manage progress on the HRA Business Plan with the authority to make operational changes to make sure that investment programmes are managed effectively. 'New Homes for Powys' is overseen by the New Development Project Board, chaired by the Council's Portfolio Holder for Housing, Planning & Economic Regeneration. During 2022-2023, a report on progress on the HRA Business Plan will be submitted to the TSP for scrutiny and comment.

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

**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.**

<b>Service Area</b>	Housing Services	<b>Head of Service</b>	Nina Davies	<b>Director</b>	Nigel Brinn	<b>Portfolio Holder</b>	Cllr Myfanwy Alexander
<b>Proposal</b>	Housing Revenue Account Thirty Year Business Plan 2022-2023						
<b>Outline Summary / Description of Proposal</b>							
<p>The Housing Revenue Account (HRA) is the means by which all municipal landlords in Wales are expected to manage the financing of their landlord services. It 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.</p> <p>All local authorities in Wales have the responsibility to plan for the housing needs of their population in their role as Strategic Housing Authority. However only 11 of the 22 authorities in Wales have, like Powys, retained their council housing stock and consequently play a role in the direct provision of affordable, good quality homes as a social housing landlord. The 11 stock remaining authorities in Wales are required to present an ‘acceptable’ HRA Business Plan (including a thirty-year financial model) to the Welsh Government each year for the Welsh Government to assess the progress of local authorities towards meeting and/or maintaining the WHQS to be eligible for the Major Repairs Allowance (MRA) Grant (currently for Powys £3,732,000). Powys achieved WHQS in December 2018. The HRA Business Plan must conform to a structure and Business Plan parameters as set out by the Welsh Government. However, the associated narrative can be in a format determined by each local authority.</p> <p>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.</p> <p>The HRA Thirty Year Business Plan 2022-2023 for Powys:</p> <ul style="list-style-type: none"> <li> Sets out the Council’s vision as a social housing landlord, with the objectives and standards needed to make that vision a reality;</li> <li> Plans investment against the availability of finance;</li> <li> Communicates the Council’s housing plans to its tenants, members, the Welsh Government, other stakeholders, partners and the wider community.</li> </ul>							

Tudalen 413

# 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	February 4 <sup>th</sup> , 2022

2. Profile of savings delivery (if applicable)

2021-22	2022-23	2023-24	2024-25	2025-2026	2026-27
£ 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>The Council will, in the interests of open governance, advise the following groups of its intentions for the HRA Thirty Year Business Plan:</p> <ul style="list-style-type: none"> <li>• Strategic Housing Partnership</li> <li>• Tenant Scrutiny Panel</li> </ul>

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
Financial Services – financial management of loans and revenue and capital financial income and expenditure

5. How does your proposal impact on the council's strategic vision?

Council Priority	How does the proposal impact on this priority?	<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
<b>The Economy</b> <b>We will develop a vibrant economy</b>	Social housing let at genuinely affordable rents, lower than for example those charged by private landlords, allows households to keep more of their income for their own use and expenditure the wider Powys economy.	Good	Maintaining a viable and sustainable HRA Thirty Year Business Plan, as set out in this proposal, will allow the Council to support the development of more affordable, social rented homes, supporting the economy by allowing people to have more money to spend in the wider economy. It will allow more homes to be let at rents that are genuinely affordable, below that charged by private rented accommodation providers. 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
<b>Health and Care</b> <b>We will lead the way in effective, integrated rural health and care</b>	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.	Good	The Council will with the investment programmes 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.	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?	<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
<b>Learning and skills</b> <b>We will strengthen learning and skills</b>	Homelessness, which is rising across Powys and has been exacerbated by the Covid-19 pandemic, 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. Maintaining the Council's ability to increase the provision of accessible, secure and affordable homes will positively impact on the learning opportunities of many children.	Good	The investment programmes set out in this proposal will allow the Council to continue 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.	Good
<b>Residents and Communities</b> <b>We will support our residents and communities</b>	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'.  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.	Good	The HRA Business Plan sets out clear investment plans to support the 'Love Where You Live' tenancy sustainability strategy. This will allow the housing service to continue to positively support the well-being of neighbourhoods and communities through the Estate Maintenance Service, developing the Caretaker Service and supporting the provision and improvement of play areas on municipal housing estates.	Good



# Cyngor Sir Powys County Council

## Impact Assessment (IA)

The integrated approach to support effective decision making



### Source of Outline Evidence to support judgements

Welsh Government Rent Policy (December 2019); Welsh Government Rent Notification December 2021; Powys HRA Business Plan (2022); STAR Survey of Tenant Satisfaction (December 2021); WHQS Compliance Policy for Powys; Homeless Review and Strategy (2018); Compliance One Hundred Board Reports (January 2020 through January 2022); 'Love Where You Live' Tenancy Sustainability Strategy (2018); WHO 12<sup>1</sup> 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
<p><b>A prosperous Wales:</b> 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>Social rents, which are provided by Council-owned homes, allow households to keep more of their income for their own use rather than it going to private landlords.</p> <p>Maintaining the ability of the Council to fund new affordable homes will enhance the ability of Powys to attract and retain the employees needed to contribute towards prosperous Wales. The benefits of this investment increases in the high housing cost areas of Powys.</p>	<p>Good</p>	<p>Providing the opportunity for the Council to support the development of more affordable, social rented homes by having in place a balanced and sustainable HRA Thirty Business Plan 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, below that expected by private rented accommodation providers. 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'.</p>	<p>Good</p>
<p><b>A resilient Wales:</b> 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>Maintaining the ability of the Council to fund 'Love Where They Live' and 'Green Powys' will result in a improving natural environment in and around council owned homes.</p>	<p>Good</p>	<p>Investment in 'Love Where They Live' and 'Green Powys' is designed to increase planting and improve maintenance of the natural environment on housing estates.</p> <p>The HRA Business Plan includes provision for increasing the thermal efficiency of council homes, reducing environmental damage and reducing running costs for residents.</p>	<p>Good</p>

<sup>1</sup> 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*



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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><b>A healthier Wales:</b>                      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><b>Public Health (Wales) Act, 2017:</b>                      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. 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>Insufficient social rented housing of the type provided by the Council means that many people are compelled to find accommodation that may have higher rents, less tenure security and poorer housing conditions, all of which contribute to poor mental and physical health.</p> <p>Homelessness, which is currently rising across Powys, can significantly affect the health of affected households. One 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>Having in place a balanced and sustainable HRA Thirty Business Plan, 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>

**Cyngor Sir Powys County Council**  
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*The integrated approach to support effective decision making*



Tudalen 419

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><b>A Wales of cohesive communities:</b>                      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>Maintaining the ability of the Council to fund new affordable homes, by making sure that the HRA Thirty Year Business Plan carefully manages the resources available to it, will enhance the ability of Powys 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 by maintaining a balanced, sustainable and long term HRA Thirty year Business Plan 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>

# Cyngor Sir Powys County Council

## Impact Assessment (IA)

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Tudalen 420

Well-being Goal	How does proposal contribute to this goal?	<b>IMPACT</b> Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	<b>IMPACT AFTER MITIGATION</b> Please select from drop down box below
<p><b>A globally responsible Wales:</b> 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><b>Human Rights - is about being proactive (see guidance)</b></p> <p><b>UN Convention on the Rights of the Child:</b> 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>With social housing in Powys not being able to meet growing demand for safe and secure homes that are affordable to people with modest incomes, maintaining a strong and balanced HRA Business Plan will help reduce the risk of the county having more homelessness with consequential 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.</p>	<p>Good</p>	<p>The pragmatic investment proposals 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><b>A Wales of vibrant culture and thriving Welsh language:</b> 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>Maintaining a viable HRA Business Plan will allow Housing Services 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><b>A more equal Wales:</b> A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio economic background and circumstances).</p>				

# Cyngor Sir Powys County Council

## Impact Assessment (IA)

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Tudalen 421

Well-being Goal	How does proposal contribute to this goal?	<b>IMPACT</b> Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	<b>IMPACT AFTER MITIGATION</b> Please select from drop down box below
<i>Age</i>	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.	Good	A balanced and sustainable HRA Business Plan 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.	Good
<i>Disability</i>	Funding set aside in the HRA Business Plan for aids and adaptations works improve the quality of homes for people who need help to better enjoy their home and cope with disabilities.	Good	The HRA Business Plan will allow the Housing Service to continue to support a comprehensive programme of aids and adaptations. Provision has been made for the 'Fit for Life' programme will help improve access to homes for those with mobility needs.	Good
<i>Gender reassignment</i>	No impact expected	Choose an item.		Choose an item.
<i>Marriage or civil partnership</i>	No impact expected	Choose an item.		Choose an item.
<i>Race</i>	No impact expected	Choose an item.		Choose an item.
<i>Religion or belief</i>	No impact expected	Choose an item.		Choose an item.
<i>Sex</i>	No impact expected	Choose an item.		Choose an item.
<i>Sexual Orientation</i>	No impact expected	Choose an item.		Choose an item.
<i>Pregnancy and Maternity</i>	No impact expected	Choose an item.		Choose an item.

Source of Outline Evidence to support judgements
Source of Outline Evidence to support judgements
Welsh Government Rent Policy (December 2019); Welsh Government Rent Notification December 2021; Powys HRA Business Plan (2022); STAR Survey of Tenant Satisfaction (December 2021); WHQS Compliance Policy for Powys; Homeless Review and Strategy (2018); Compliance One Hundred Board Reports (January 2020 through January 2022); 'Love Where You Live' Tenancy Sustainability Strategy (2018); WHO 12 <sup>2</sup> 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?

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
<b>Sustainable Development Principle (5 ways of working)</b>				
<b>Long Term:</b> <i>Looking to the long term so that we do not compromise the ability of future generations to meet their own needs.</i>	A housing service with the foundation of a sustainable, financially viable HRA Thirty Year Business Plan is better able 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 following the HRA Thirty Year Business Plan set out in this proposal.	Good
<b>Collaboration:</b> <i>Working with others in a collaborative way to find shared sustainable solutions.</i>	The service currently collaborates with a number of organisations and agencies.	Good	A sustainable and adequately resourced HRA Thirty Year Business Plan 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.	Good

<sup>2</sup> 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



Principle	How does the proposal impact on this principle?	<b>IMPACT</b> Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	<b>IMPACT AFTER MITIGATION</b> Please select from drop down box below
<b>Involvement (including Communication and Engagement):</b> <i>Involving a diversity of the population in the decisions that affect them.</i>	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.	Good	The Housing Service will be better able, with a solid and sustainable HRA Thirty Year Business Plan, 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
<b>Prevention:</b> <i>Understanding the root causes of issues to prevent them from occurring.</i>	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.	Good	A solid and sustainable HRA Thirty Year Business Plan, 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
<b>Integration:</b> <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 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.	Good	The HRA Business Plan, as proposed, 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

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# Cyngor Sir Powys County Council

## Impact Assessment (IA)

*The integrated approach to support effective decision making*



Tudalen 424

Principle	How does the proposal impact on this principle?	<b>IMPACT</b> Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	<b>IMPACT AFTER MITIGATION</b> Please select from drop down box below
<b>Preventing Poverty:</b> 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 for example to private landlords, 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. Maintaining a sound municipal landlord service helps combat all of these problems.	Good	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 having place a sustainable and adequately resourced HRA Thirty Year Business Plan will support the economy by allowing people to have more money to spend in the wider economy. This will help reduce poverty.	Good
<b>Unpaid Carers:</b> Ensuring that unpaid carers views are sought and taken into account	No impact expected	Unknown		Unknown
<b>Safeguarding:</b> 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.	Good	A sustainable and adequately resourced HRA Thirty Year Business Plan, 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.	Good
<b>Impact on Powys County Council Workforce</b>	Well planned and adequately financed deployment of HRA resources and capacity in the Housing Service will reduce pressures on Childrens and Adults Services particularly where lack of suitable, sustainable and secure accommodation could, if there is no social housing available, be a contributory factor to the need for interventions by social services.	Good	A solid and sustainable HRA Thirty Year Business Plan, 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 support the work of Childrens and Adults Services, where housing changes can contribute to an overall improvement is the quality of life for vulnerable clients.	Good
<b>Source of Outline Evidence to support judgements</b>				



# Cyngor Sir Powys County Council Impact Assessment (IA)

The integrated approach to support effective decision making



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
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Source of Outline Evidence to support judgements

Welsh Government Rent Policy (December 2019); Welsh Government Rent Notification December 2021; Powys HRA Business Plan (2022); STAR Survey of Tenant Satisfaction (December 2021); WHQS Compliance Policy for Powys; Homeless Review and Strategy (2018); Compliance One Hundred Board Reports (January 2020 through January 2022); 'Love Where You Live' Tenancy Sustainability Strategy (2018); WHO 12 quarterly returns; 'Homes in Powys' housing waiting list data; Housing Service performance data.

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

Severity of Impact on Communities	Scale of impact	Overall Impact
High	High	High
Mitigation		
<p>Making sure the Council's Housing Service has financially robust HRA Thirty Year Business Plan, set as part of this proposal means that it will be able to:</p> <ul style="list-style-type: none"> <li>👉 Operate a viable and sustainable HRA, maintain WHQS and securing inward funding from the Welsh Government.</li> <li>👉 Maintain the current housing stock to a habitable standard, increasing health and well-being problems for residents.</li> <li>👉 Continue the development programme for new homes, enhancing the choice and options open to people looking for a safe, secure and affordable place to live in Powys.</li> <li>👉 Provide tangible support to other Council services to help provide a balanced and coherent range of services to the people of Powys, reducing risks to the well-being of those who are vulnerable.</li> </ul>		

9. What are the risks to service delivery or the council following implementation of this proposal?

Successful implementation of this proposal will support service delivery in other areas of the Council's work, including for example establishing accommodation options for young people and families. There are risks that may arise if the HRA Business Plan cannot be delivered if, for example, income falls short of expectations due to the impact of the Covid-19 pandemic. A robust and rigorous approach to income recovery is already mitigating the risks presented by Covid-19. These include a reduction of housing opportunities and a slow down in the ability of the Council to maintain and improve the quality of municipal homes.

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)
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# Cyngor Sir Powys County Council

## Impact Assessment (IA)

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Rent and charges increases assumed in the Business Plan are not possible due to changes in local and national rent and charging policy	8	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
Grants for new homes are reduced by the Welsh Government	8	This can be mitigated by considering the development of open market homes for sale, to generate profits to cross subsidise the development of affordable homes. Smarter procurement, with careful specification of homes, may also be able to contribute to reductions in costs without compromising user-experience and longevity of the homes to be built.	4
Construction costs continue to rise	12	This can be mitigated by considering the development of open market homes for sale, to generate profits to cross subsidise the development of affordable homes. Smarter procurement, with careful specification of homes, may also be able to contribute to reductions in costs without compromising user-experience and longevity of the homes to be built.	6
Welsh Government pursues with vigour its de-carbonisation proposals for existing homes without sufficient funding being made available to fund the necessary changes.	12	Mitigation of this risk will require additional investment beyond that available to the HRA. Social landlords in Wales are discussing with the Welsh Government options for funding this national objective.	6

### 10. Overall Summary and Judgement of this Impact Assessment?

Outline Assessment (to be inserted in cabinet report)	Cabinet Report Reference:
Section 8	
<p>The Impact Assessment shows that the proposals for the HRA Thirty Year Business Plan 2022-2023 set out in this report contribute positively to maintaining and developing the Council's role as responsive and viable social landlord. A balanced approach has been taken between maintaining and improving existing homes and increasing the range of affordable housing options available for the people of Powys. Risks arising from changes by the Welsh Government to rent and affordable housing grant policy and inflationary construction costs are well mitigated. The Powys HRA Thirty Year Business Plan makes a substantial contribution towards making Vision 2025 a reality, which now includes Affordable Housing as one of its top priorities.</p> <p>The impact on the Council of not approving the proposed HRA Thirty Year Business Plan, set out in this report, will be considerable. There will be a high risk of the Council not being to comply with the Welsh Government's requirement for the Council to have in place by April 1<sup>st</sup>, 2022, a sustainable and viable HRA Thirty Year Business Plan. This may result in the loss of MRA (£3,732,000 per annum) and direct intervention by the Welsh Government in the management of the landlord service.</p>	

# Cyngor Sir Powys County Council

## Impact Assessment (IA)

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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?**

All HRA budgets and investment programmes are reviewed on a monthly basis.

**Please state when this Impact Assessment will be reviewed.**

December 2021 (to help inform and shape the HRA Thirty Year Business Plan proposals for 2022-2023).

13. Sign Off

Position	Name	Signature	Date
Impact Assessment Lead:	Andy Thompson	<i>Andy Thompson</i>	04.02.22
Head of Service:	Nina Davies		
Director:	Nigel Brinn		
Portfolio Holder:	Clr Myfanwy Alexander		

14. Governance

Decision to be made by	Date required
Cabinet	March 8th, 2022

# FORM ENDS

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

## CYNGOR SIR POWYS COUNTY COUNCIL.

## CABINET EXECUTIVE

8<sup>th</sup> March 2022

**REPORT AUTHOR:** County Councillor Myfanwy Alexander  
Portfolio Holder for Adult Social Care, Welsh Language,  
Housing and Climate Change

**REPORT TITLE:** STAR Survey of Powys County Council Housing  
Tenants

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**REPORT FOR:** Information

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**1. Purpose**

- 1.1 The purpose of this report is to inform Cabinet of the results of the STAR<sup>1</sup> survey of the Council's housing tenants, undertaken in November 2021. It sets out the findings of the research and the response by Housing Services to the information gathered.

**2. Background**

- 2.1 The Welsh Government (WG) requires all social landlords, both local authorities and housing associations, to undertake a survey of tenant satisfaction every two years.
- 2.2 The survey methodology to be used is the Housemark<sup>2</sup> STAR survey, including a number of core questions set by WG. This is to allow comparisons to be made between different landlords, to help encourage better performance and sharing of good practice and expertise. Landlords are able to add their own questions, selected from a suite of options provided by Housemark, to allow a focus on areas of local interest.
- 2.3 Powys Housing Services last undertook a STAR survey in 2019, meaning another survey was due in 2021. A total of fourteen questions were agreed for the survey, of which two were chosen by Housing Services to reflect local interest in the areas of repairs and maintenance, and of staff friendliness and approachability. Appendix One sets out the questions used in the Powys survey.
- 2.4 The research was undertaken in quarter three of 2021-2022 on behalf of the Council by Beaufort Research of Cardiff, with completion scheduled for December 2021.

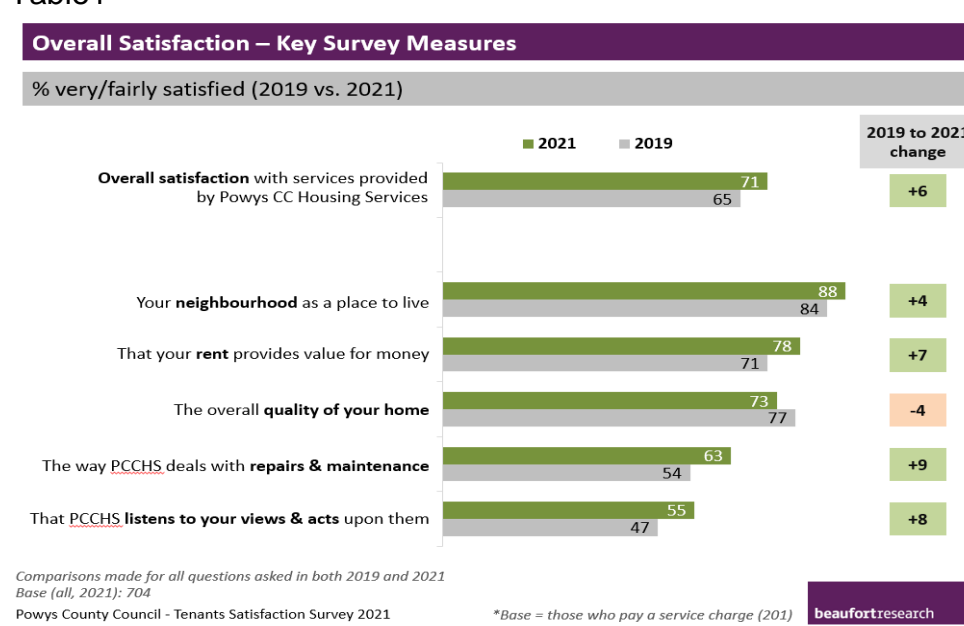
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<sup>1</sup> 'STAR': Survey of Tenants and Residents

<sup>2</sup> 'Housemark' is the leading data and insight company for the British housing sector, providing research and comparative intelligence for housing providers on the quality of their services. It is jointly owned by the National Housing Federation and the Chartered Institute for Housing.

- 2.5 Just over 700 tenants were contacted during November 2021, and care was taken to make sure that the sample was representative of all tenants with regard to area, age, length of tenure and type and size of home. This means that there is reasonable statistical security to the results.
- 2.6 A report of the results prepared by Beaufort Research is attached as Appendix Two. In summary, the survey shows:

Table1



- 2.7 The results show an improvement over the 2019 results, except for the *overall quality of the home* measure, which shows a decrease in satisfaction of 4%.
- 2.8 In summer 2022, WG will be publishing the most recent STAR surveys from landlords across Wales, allowing landlords and tenants to compare and contrast performance and findings.

### 3. Advice

- 3.1 Housing officers are currently studying the detail behind the headline data, including the extensive detailed responses supplied by Beaufort Research, to highlight those areas where further work is needed to understand both the causes and possible solutions to the areas of work where performance can be improved. Beaufort Research have been asked to share any further commentary or background information to help Housing Services complete this activity and so be able to consider how best to improve services.
- 3.2 Housing Services has identified two important areas for deeper analysis, based on the lowest satisfaction ratings. These can be summarised as:

- What is it that our tenants consider we do not listen to? How do we improve on this?
- There appears to be a decline in trust on delivery. We need to understand why trust is lacking and what needs to be done to secure the trust of tenants in the Council.

3.3 The findings of the STAR survey will be shared with the Tenant Scrutiny Panel, which will be engaged in the work to determine what needs to be done to address these areas of concern.

#### **4. Resource Implications**

4.1 There are no immediate resource implications of this report as understanding customer and tenant experiences is an integral part of the work of the Housing Resources division of Housing Services.

4.2 The Head of Finance (Section 151 Officer) notes the content of the 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. Data Protection**

6.1 No personal data is involved and there are no data protection requirements.

#### **7. Comment from local member(s)**

7.1 This report affects all wards equally.

#### **8. Integrated Impact Assessment**

8.1 Since the STAR survey in and of itself does not involve new ways of working there is no need for an Impact Assessment on the survey itself.

#### **9. Recommendation**

9.1 It is recommended that Cabinet accept this report, and all appendices, for information.

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Head of Service:	Nina Davies
Corporate Director:	Nigel Brinn

## Appendix One: STAR Survey 2021 Questions

- Questions 1 to 11 were questions, mandated by the Welsh Government. Questions 12 and 14 were selected by Housing Services.
1. **Taking everything into account, how satisfied or dissatisfied are you with the service provided by Powys County Council Housing Service?**  
Very satisfied / Fairly satisfied / Neither satisfied nor dissatisfied / Fairly dissatisfied / Very dissatisfied
  2. **Thinking specifically about the building you live in, how satisfied or dissatisfied are you that Powys County Council Housing Service provides a home that is safe and secure?**  
Very satisfied / Fairly satisfied / Neither satisfied nor dissatisfied / Fairly dissatisfied / Very dissatisfied
  3. **How satisfied or dissatisfied are you with the overall quality of your home?**  
Very satisfied / Fairly satisfied / Fairly dissatisfied / Very dissatisfied
  4. **How satisfied or dissatisfied are you with your neighbourhood as a place to live?**  
Very satisfied / Fairly satisfied / Neither satisfied nor dissatisfied / Fairly dissatisfied / Very dissatisfied
  5. **How satisfied or dissatisfied are you that your rent provides value for money?**  
Very satisfied / Fairly satisfied / Neither satisfied nor dissatisfied / Fairly dissatisfied / Very dissatisfied
- (Do you pay a service charge? – Ideally this should be automated from data.**  
Yes / No / Don't know)
6. **How satisfied or dissatisfied are you that your service charges provide value for money?**  
Very satisfied / Fairly satisfied / Neither satisfied nor dissatisfied / Fairly dissatisfied / Very dissatisfied
  7. **How satisfied or dissatisfied are you with the way Powys County Council Housing Service deals with anti-social behaviour?**  
Very satisfied / Fairly satisfied / Fairly dissatisfied / Very dissatisfied
  8. **How satisfied or dissatisfied are you that Powys County Council Housing Service listens to your views and acts upon them?**  
Very satisfied / Fairly satisfied / Neither satisfied nor dissatisfied / Fairly dissatisfied / Very dissatisfied



9. **How satisfied or dissatisfied are you with opportunities given to you to participate in Powys County Council Housing Service's decision making processes?**  
Very satisfied / Fairly satisfied / Neither satisfied nor dissatisfied / Fairly dissatisfied / Very dissatisfied
10. **How satisfied or dissatisfied are you that Powys County Council Housing Service gives you a say in how services are managed?**  
Very satisfied / Fairly satisfied / Neither satisfied nor dissatisfied / Fairly dissatisfied / Very dissatisfied
11. **How satisfied or dissatisfied are you with the way Powys County Council Housing Service deals with repairs and maintenance generally?**  
Very satisfied / Fairly satisfied / Neither satisfied nor dissatisfied / Fairly dissatisfied / Very dissatisfied

If dissatisfied:

**Could you please tell us why you are dissatisfied? (dialogue)**

**To what extent do you agree or disagree with the following?**

12. **Powys County Council Housing Service has friendly and approachable staff**  
Agree strongly / Agree / Neither agree nor disagree / Disagree / Disagree strongly
13. **I trust Powys County Council Housing Service**  
Agree strongly / Agree / Neither agree nor disagree / Disagree / Disagree strongly
14. **What could Powys County Council Housing Service do better?**  
Open question

#### **Administrative Questions**

***Your answers are currently confidential. It may be useful for your name to be attached to your responses and passed to Powys County Council Housing Service. Would that be ok?***

Yes / No

***Are you happy for Powys County Council Housing Service to contact you in connection with your feedback, if they wish to do so?***

Yes / No

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

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# Tenants Satisfaction Survey

Powys County Council 2021

Survey Findings

Tudalen 435



Prepared for:  
Powys County Council

Prepared by:  
Beaufort Research



## Contact Details

Agency contact: Owen Knight

Project: B02124

Date: December 2021

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# Background & Methodology

Powys County Council's Housing Service is committed to continuous improvement of the way it works. In order to do this the Council needs to know what to improve by understanding tenants experience and how they feel about the service they receive. The Council therefore commissioned Beaufort Research - an independent research company - to conduct a survey of tenants in regard to satisfaction with services.

The survey was required by the Welsh Government to use a core set of 'Star Survey' questions, to allow like for like comparisons with other Local Authorities in Wales. In addition to this, questions were added to inform specific areas of interest to the Council. Where possible, findings from this survey, undertaken in 2021, are compared with a baseline survey undertaken in 2019.

## Research Method

Tudalen 437



- The research universe consisted of tenants of all (c.5,100) council housing units in Powys.
- Interviews conducted **by telephone** utilising CATI (Computer Aided Telephone Interviewing).
- **Quotas** were set on area, housing type and number of occupants, to reflect the overall tenant profile.
- An overall sample size of **704 interviews** were achieved.
- No more than one person was interviewed in each household.
- **Fieldwork** for the survey took place between 27 October and 30 November 2021.

# Sample Profile

The interviewed sample profile closely matched that of the universe

Tudalen 438

Rent	Universe %	Survey %	Survey No.
Less than £100	34	36	253
£100 to £109	28	28	200
£110+	38	36	251
Area			
Montgomery	48	45	317
Radnor	24	26	180
Brecknock	29	29	207
Tenancy Length			
Less than 1 year	9	9	63
1 to 2 years	15	16	110
3 to 5 years	17	15	106
6 to 9 years	17	18	125
10 to 19 years	21	20	142
20+ years	21	22	158
<b>Total</b>	<b>100</b>	<b>100</b>	<b>704</b>

Housing type	Universe %	Survey %	Survey No.
Bungalow	27	28	196
Flat / maisonette	19	19	131
House	55	54	377
No. of occupants			
1	51	53	371
2	24	26	182
3 or more	25	21	151
No. of bedrooms			
1	15	16	114
2	43	43	302
3 or more	42	41	288
<b>Total</b>	<b>100</b>	<b>100</b>	<b>704</b>

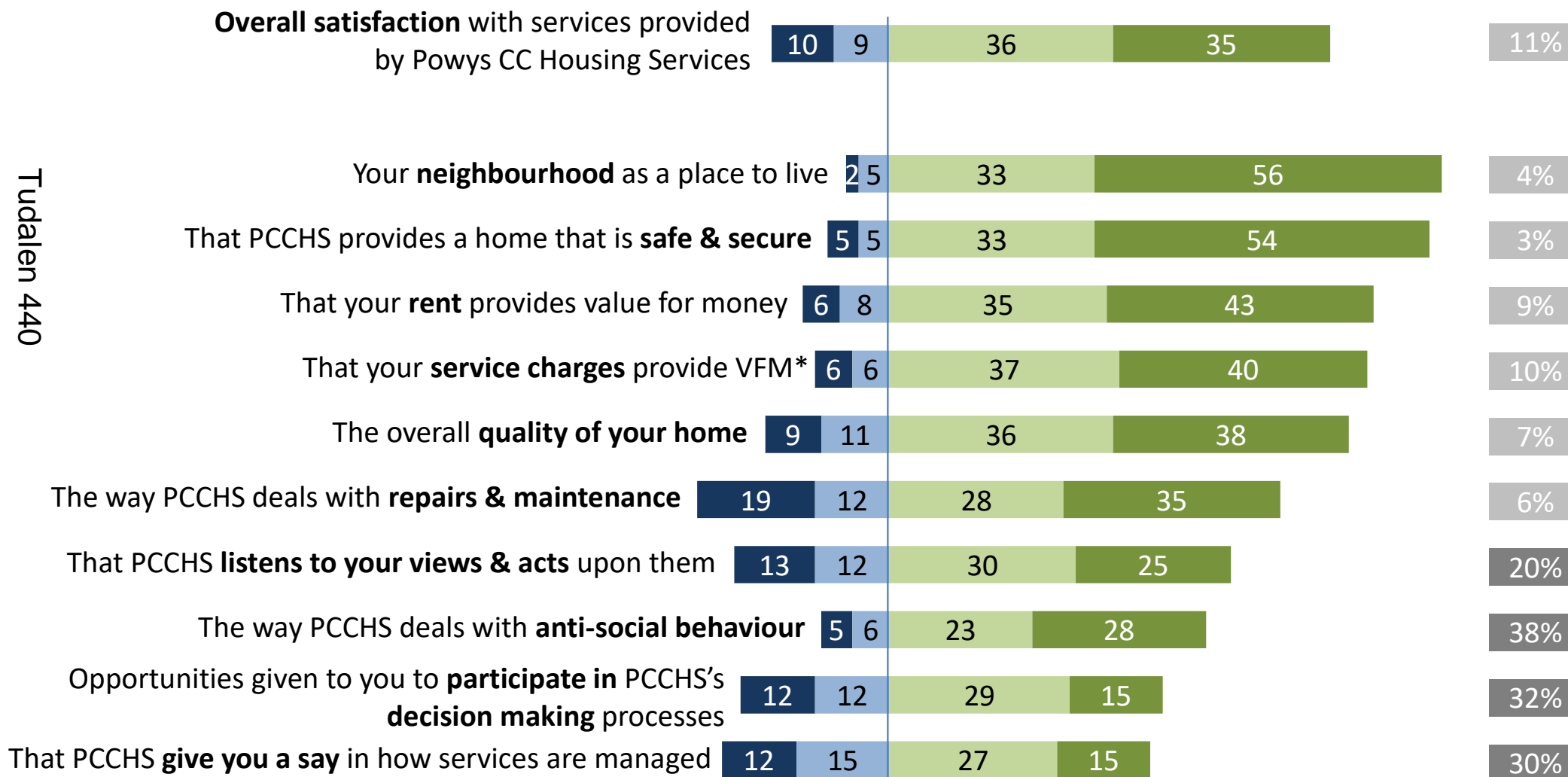
# Key Findings

# Overall Satisfaction – Key Survey Measures

Extent satisfied/dissatisfied (%)

■ Very dissatisfied  
 ■ Fairly dissatisfied  
 ■ Fairly satisfied  
 ■ Very satisfied  
 Neither

Tudalen 440



Base (all, 2021): 704

Powys County Council - Tenants Satisfaction Survey 2021

\*Base = those who pay a service charge (201)

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# Overall Satisfaction – Key Survey Measures

## Extent satisfied/dissatisfied (%)

- Seven in ten (71%) of tenants were either very or fairly satisfied with services provided by Powys County Council Housing Services. However, almost one in five (19%) were dissatisfied.
- The highest levels of satisfaction were evident for their ‘neighbourhood as a place to live’ (89% satisfied, of which 56% were ‘very satisfied’), followed by ‘Powys County Council Housing Services provides a home that is safe and secure’ (87% satisfied, of which 54% were ‘very satisfied’).
- Tenants were also 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, although, one in five (20%) said they were dissatisfied.
- Lower levels of satisfaction were apparent for ‘the way Powys County Council Housing Services deals with repairs and maintenance’ (63% satisfied), although levels of satisfaction still outweighed dissatisfaction (32%). Four fifths (83%) of those dissatisfied said this related to a repair they had don or requested in the last year.
- Although a majority (55%) were satisfied that ‘Powys County Council Housing Services listened to their views and acted upon them, a quarter (25%) were dissatisfied in this respect.

Tudalen 441

# Overall Satisfaction – Key Survey Measures

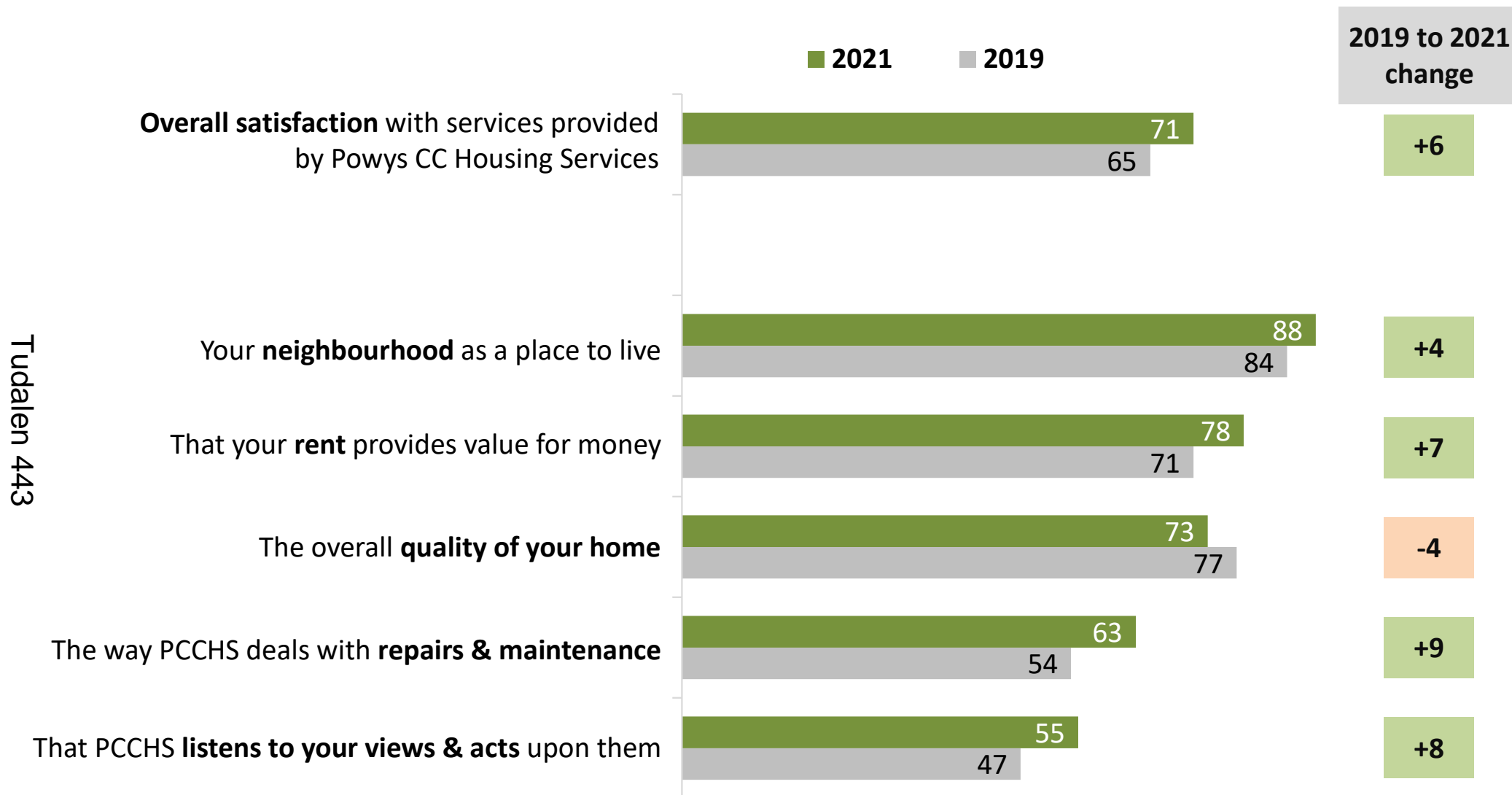
## Extent satisfied/dissatisfied (%)

- Almost two fifths (38%) were neither satisfied nor dissatisfied with the way Powys County Council Housing Services deals with anti-social behaviour, but half (51%) were satisfied, and one in ten (11%) were dissatisfied.
- Lower levels of satisfaction were evident for ‘opportunities to participate in Powys County Council Housing Service’s decision making processes’ (44% satisfied) and ‘Powys County Council Housing Services give you a say in how services are managed’ (42% satisfied), although levels of satisfaction still outweighed dissatisfaction. A sizeable proportion of around three in ten (32% and 30% respectively) were neither satisfied nor dissatisfied with these service dimensions.

Tudalen 442

# Overall Satisfaction – Key Survey Measures

% very/fairly satisfied (2019 vs. 2021)



Comparisons made for all questions asked in both 2019 and 2021  
 Base (all, 2021): 704

# Overall Satisfaction – Key Survey Measures

## % very/fairly satisfied (2019 vs. 2021)

- A notable improvement in overall satisfaction with services provided by Powys County Council Housing Services in apparent since 2019, with the proportion either very or fairly satisfied increasing from 65% to 71% in 2021.
- Satisfaction with numerous other service dimensions also increased, including their neighbourhood as a place to live (+4 percentage points), rent providing value for money (+7), Powys County Council Housing Services listening to views and acting upon them (+7) and most notably, the way Powys County Council Housing Services deals with repairs and maintenance (+9).
- The only measure to see a slight decline, was in relation to ‘the overall quality of their home’ (-4).

# Overall Satisfaction – Additional Measures

Extent agree/disagree with statements (%)

■ Disagree strongly 
 ■ Disagree 
 ■ Agree 
 ■ Agree strongly 
 Neither/DK

Tudalen 445

*“My housing service has friendly and approachable **staff.**”*

2021



8%

2019



13%

*“I **trust** PCC Housing Services.”*

2021



11%

2019



14%

Base (all): 713

Powys County Council - Tenants Satisfaction Survey 2021

## Overall Satisfaction – Additional Measures

### Extent agree/disagree with statements (%)

- The majority of tenants agreed with positive statements relating to the friendliness and approachability of Powys County Council Housing Services staff (84% agreeing – an increase of 6 percentage points since 2019), and having trust in Powys County Council Housing Services (72% agreed - as was the case in 2019). Tenants were more likely to ‘agree’ with both of three of these statements, than ‘agree strongly’.
- Fewer than one in ten (8%) gave a negative response in relation to staff, while one approaching one in five (17%) disagreed that they trusted Powys County Council Housing Services.

Tudalen 446

## Satisfaction:

### Differences by sub-groups

- The following section illustrates differences in satisfaction among sub-groups.
- In general, the largest differences in satisfaction were evident when examining the data by age of tenant, with younger tenants tending to be less satisfied. For example, there was a 22 percentage point difference between the proportion of 16 to 34 year olds and those aged 75+ stating they were satisfied overall with services provided by Powys County Council Housing Services. The difference between age groups was most marked in relation to 'the way Powys County Council Housing Services deals with repairs and maintenance' and 'Powys County Council Housing Services listens to your views and acts upon them', where a 32 and 29 percentage point difference between these age groups existed.
- Perhaps reflecting tenant age profile, those in houses, with more rooms, more occupants and paying more rent also tended to be less satisfied on almost all dimensions.

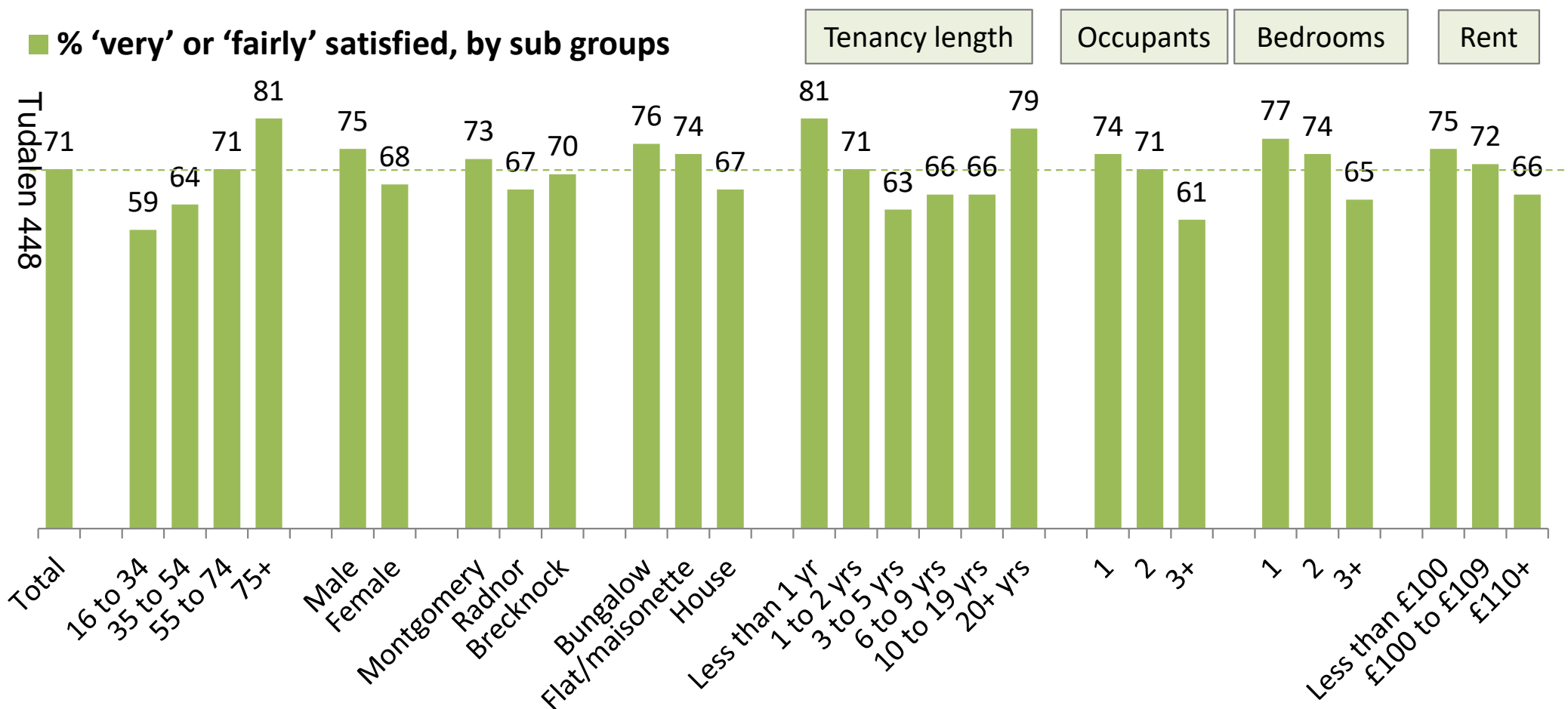
Tudalen 447

# 1. Overall satisfaction with services provided by Powys CC Housing Services

■ Very dissatisfied  
 ■ Fairly dissatisfied  
 ■ Fairly satisfied  
 ■ Very satisfied



■ % 'very' or 'fairly' satisfied, by sub groups



Base (all): 704

Powys County Council - Tenants Satisfaction Survey 2021



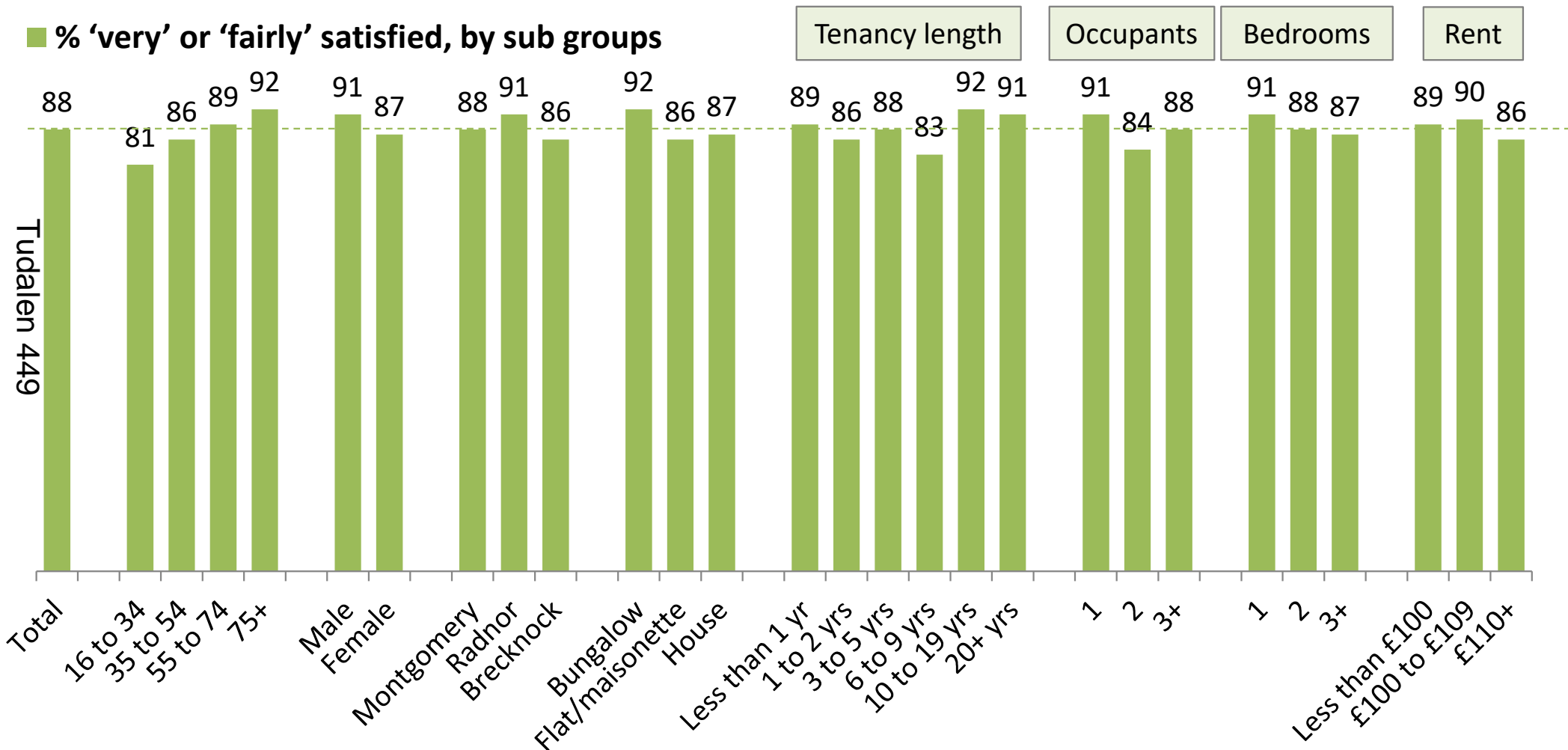
## 2. Your neighbourhood as a place to live

■ Very dissatisfied 
 ■ Fairly dissatisfied 
 ■ Fairly satisfied 
 ■ Very satisfied

Neither/  
DK  
= 4%



■ % 'very' or 'fairly' satisfied, by sub groups



Base (all): 704

Powys County Council - Tenants Satisfaction Survey 2021

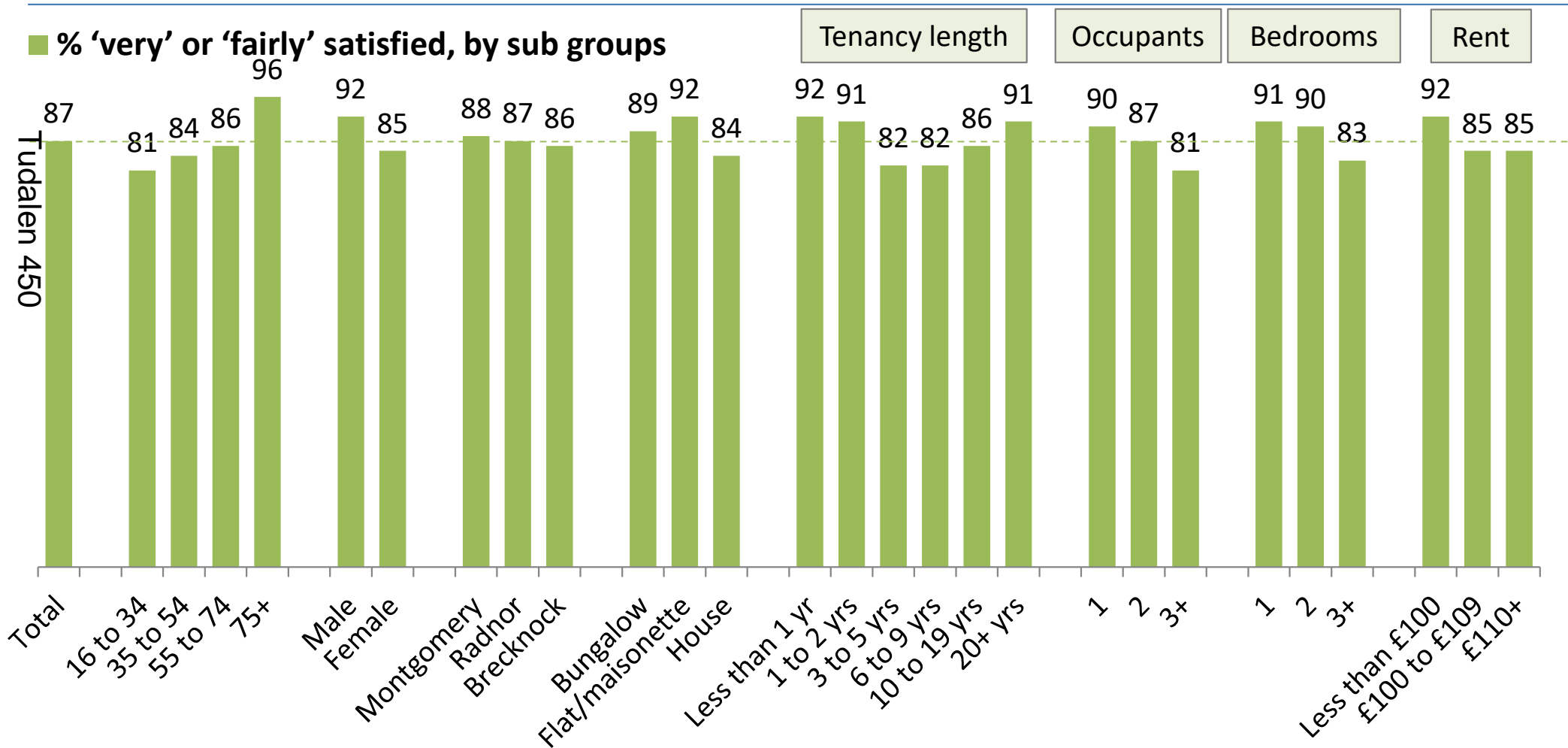
### 3. That PCCHS provides a home that is safe and secure

■ Very dissatisfied  
 ■ Fairly dissatisfied  
 ■ Fairly satisfied  
 ■ Very satisfied

Neither/  
DK  
= 3%



■ % 'very' or 'fairly' satisfied, by sub groups



Base (all): 704

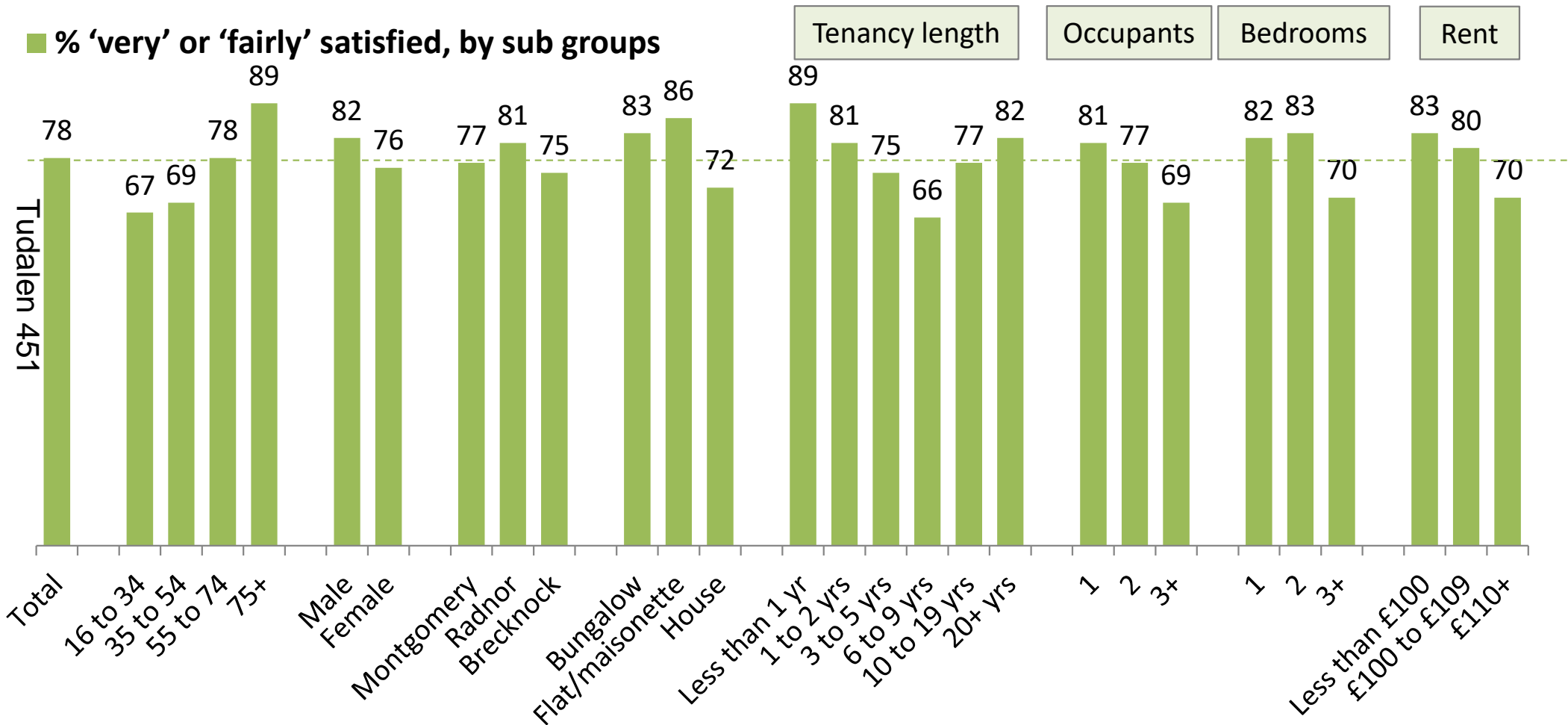
Powys County Council - Tenants Satisfaction Survey 2021

# 4. That your rent provides value for money

■ Very dissatisfied  
 ■ Fairly dissatisfied  
 ■ Fairly satisfied  
 ■ Very satisfied



■ % 'very' or 'fairly' satisfied, by sub groups



Base (all): 704

Powys County Council - Tenants Satisfaction Survey 2021

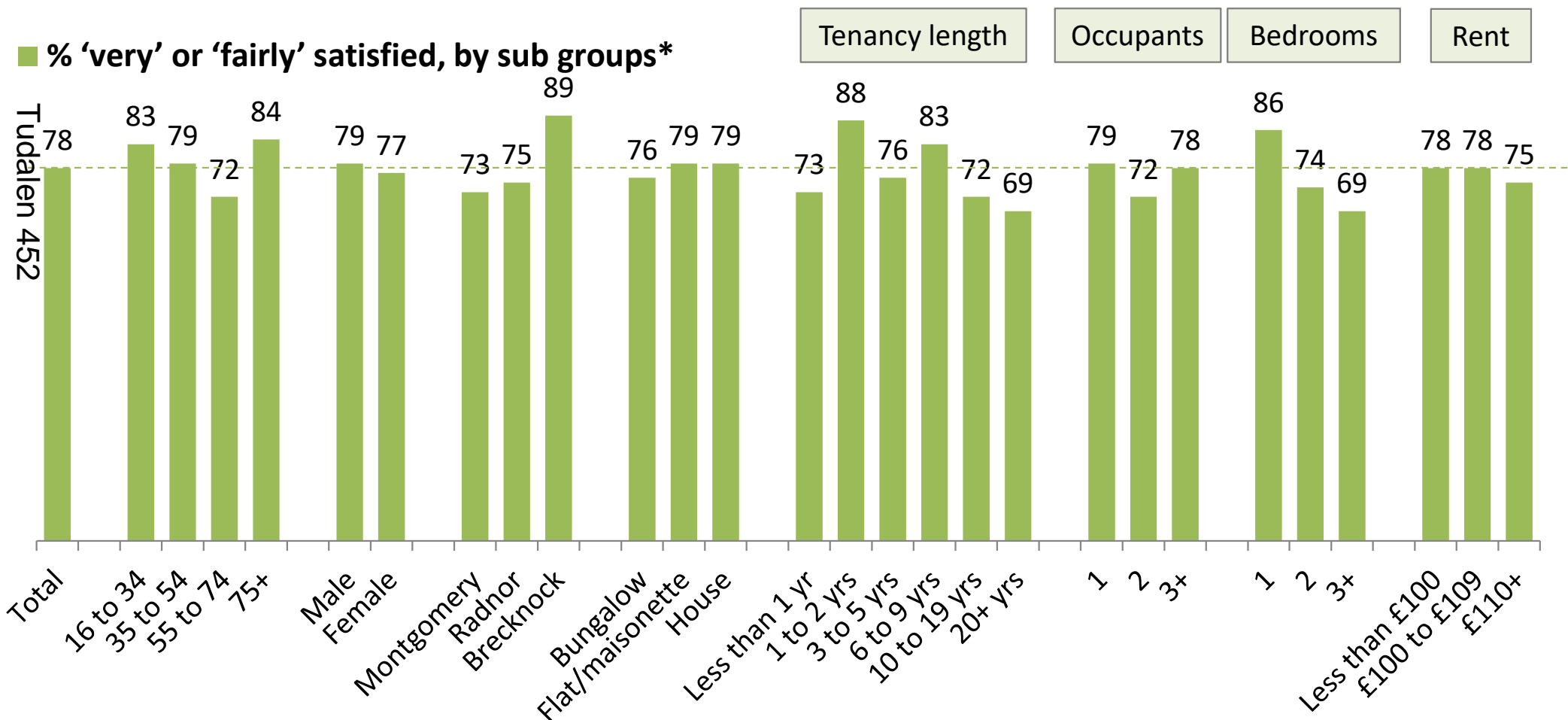
# 5. That your service charges provide VFM\*

■ Very dissatisfied  
 ■ Fairly dissatisfied  
 ■ Fairly satisfied  
 ■ Very satisfied



Neither/DK = 10%

■ % 'very' or 'fairly' satisfied, by sub groups\*



Base (those who pay a service charge): 201  
 Powys County Council - Tenants Satisfaction Survey 2021

*\*Care should be taken when interpreting the data in relation to this measure, due to the small sub-group sample sizes involved.*



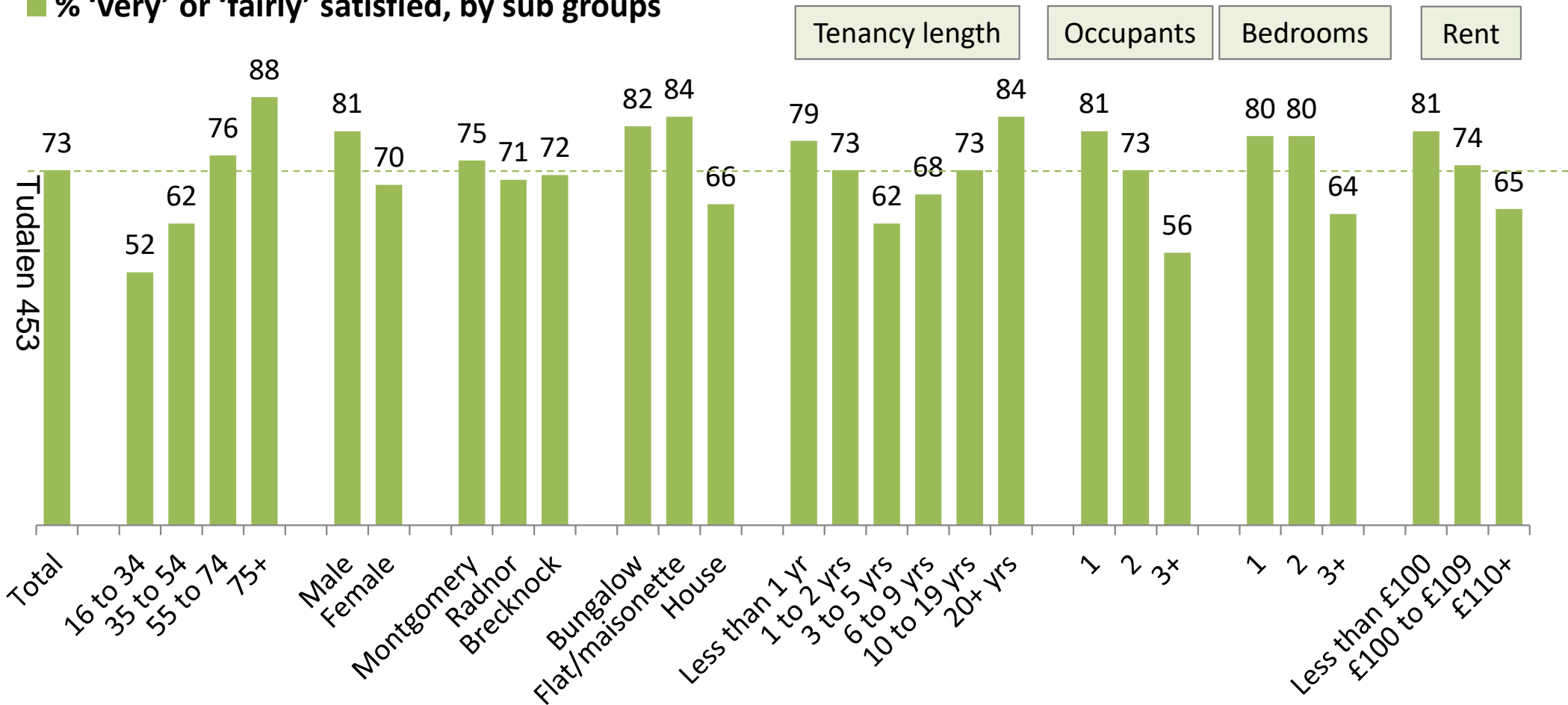
# 6. The overall quality of your home

■ Very dissatisfied  
 ■ Fairly dissatisfied  
 ■ Fairly satisfied  
 ■ Very satisfied



Neither/DK = 7%

■ % 'very' or 'fairly' satisfied, by sub groups



Base (all): 704

Powys County Council - Tenants Satisfaction Survey 2021

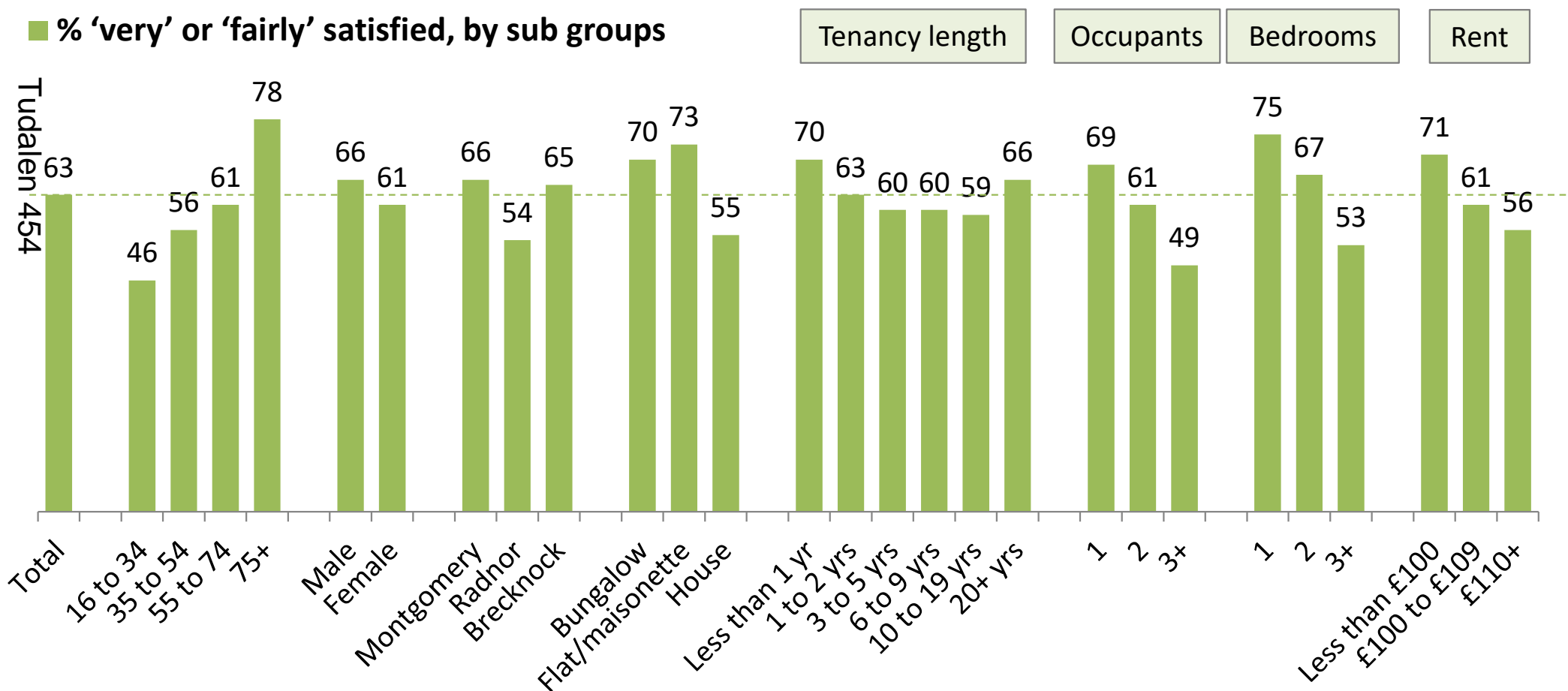
# 7. The way PCC Housing Services deals with repairs and maintenance

■ Very dissatisfied  
 ■ Fairly dissatisfied  
 ■ Fairly satisfied  
 ■ Very satisfied



Neither/DK = 6%

■ % 'very' or 'fairly' satisfied, by sub groups

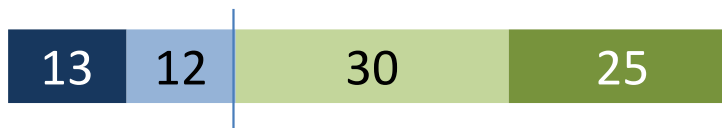


Base (all): 704

Powys County Council - Tenants Satisfaction Survey 2021

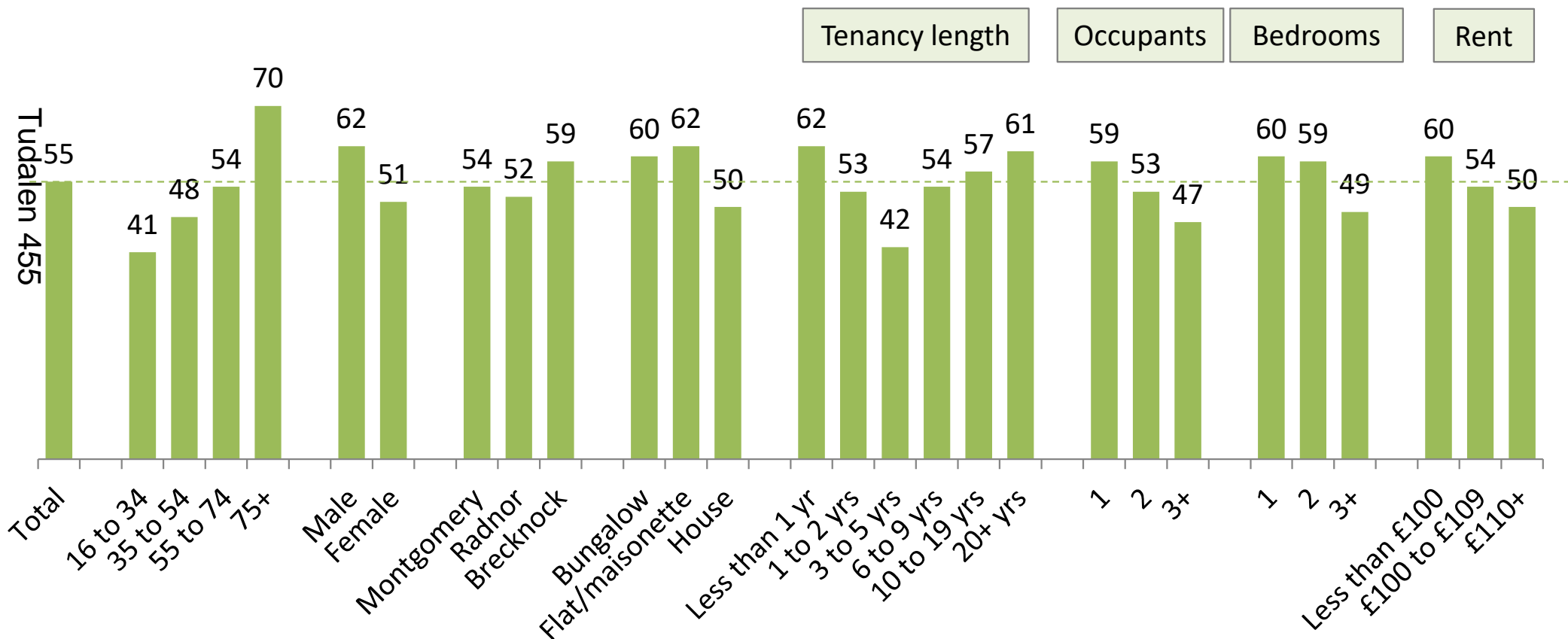
## 8. That PCC Housing Services listens to your views and acts upon them

■ Very dissatisfied  
 ■ Fairly dissatisfied  
 ■ Fairly satisfied  
 ■ Very satisfied



Neither/DK = 20%

### ■ % 'very' or 'fairly' satisfied, by sub groups



Base (all): 704

Powys County Council - Tenants Satisfaction Survey 2021

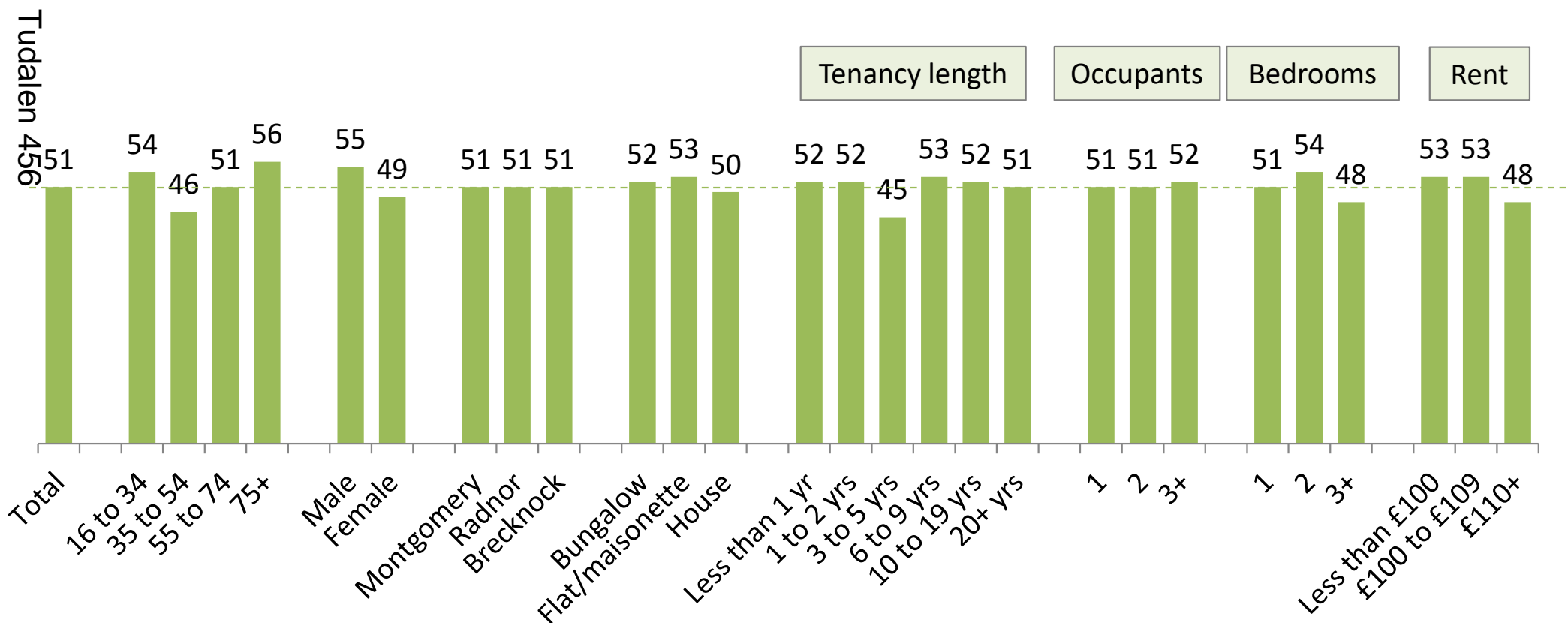
# 9. The way PCC Housing Services deals with anti-social behaviour

■ Very dissatisfied  
 ■ Fairly dissatisfied  
 ■ Fairly satisfied  
 ■ Very satisfied



Neither/DK = 38%

■ % 'very' or 'fairly' satisfied, by sub groups



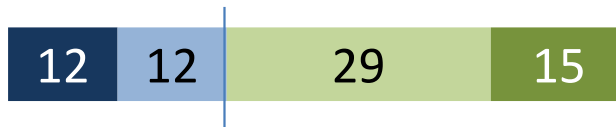
Base (all): 704

Powys County Council - Tenants Satisfaction Survey 2021



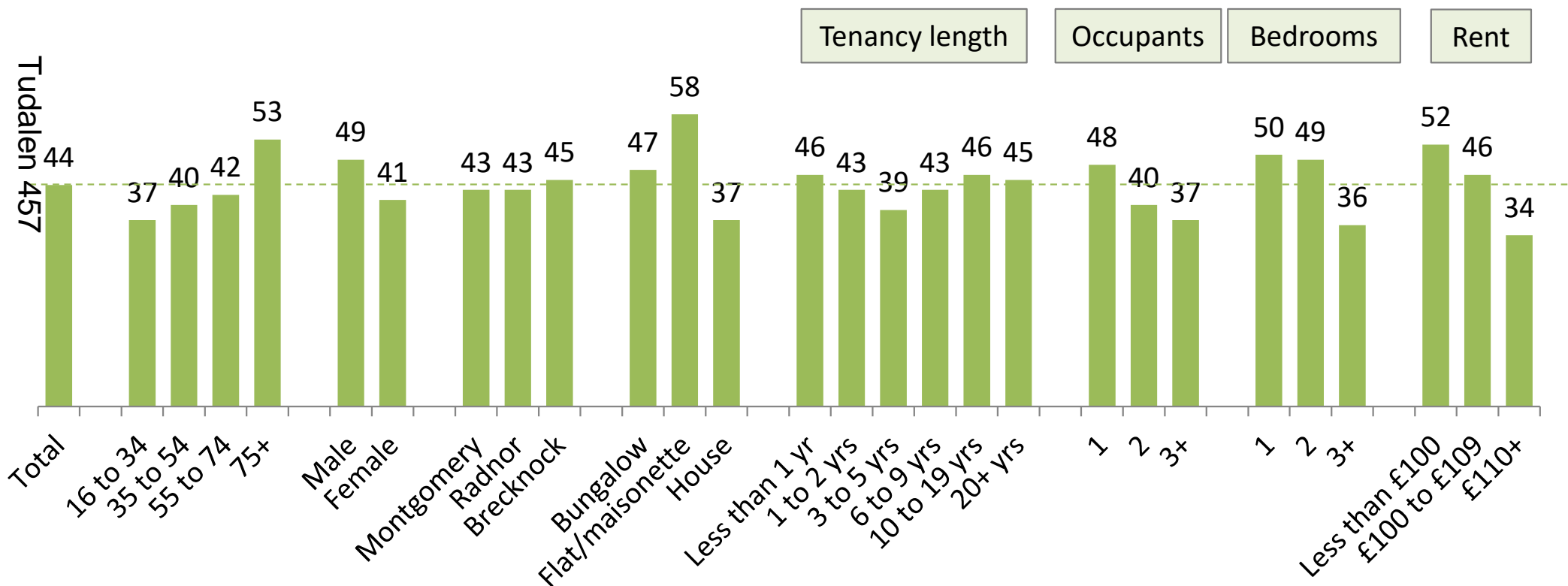
# 10. Opportunities to participate in PCC Housing Service's decision making

■ Very dissatisfied  
 ■ Fairly dissatisfied  
 ■ Fairly satisfied  
 ■ Very satisfied



Neither/DK = 32%

## ■ % 'very' or 'fairly' satisfied, by sub groups



Base (all): 704

Powys County Council - Tenants Satisfaction Survey 2021

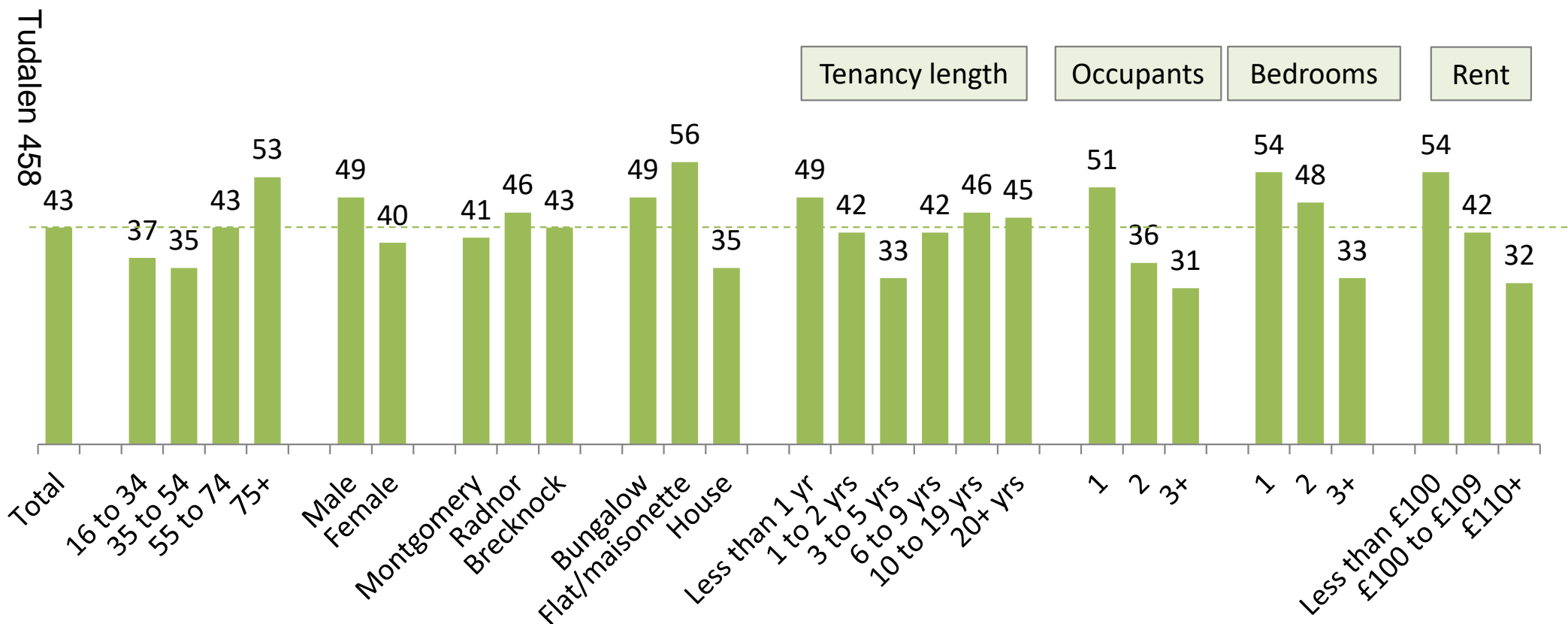
# 11. That PCC Housing Services give you a say in how services are managed

■ Very dissatisfied  
 ■ Fairly dissatisfied  
 ■ Fairly satisfied  
 ■ Very satisfied



Neither/DK = 30%

## ■ % 'very' or 'fairly' satisfied, by sub groups



Base (all): 704

Powys County Council - Tenants Satisfaction Survey 2021

## Additional Measures: Differences by sub-groups

- The following section illustrates differences in levels of agreement with the additional statements regarding Powys County Council Housing Services among sub-groups.
- Agreement that Powys County Council Housing Services staff were friendly and approachable was broadly consistent across all sub-groups.
- Trust in Powys County Council Housing Services tended to be highest among those aged 75+, but was somewhat lower among 35 to 54 year olds and those with three or more bedrooms/occupants and paying more rent.

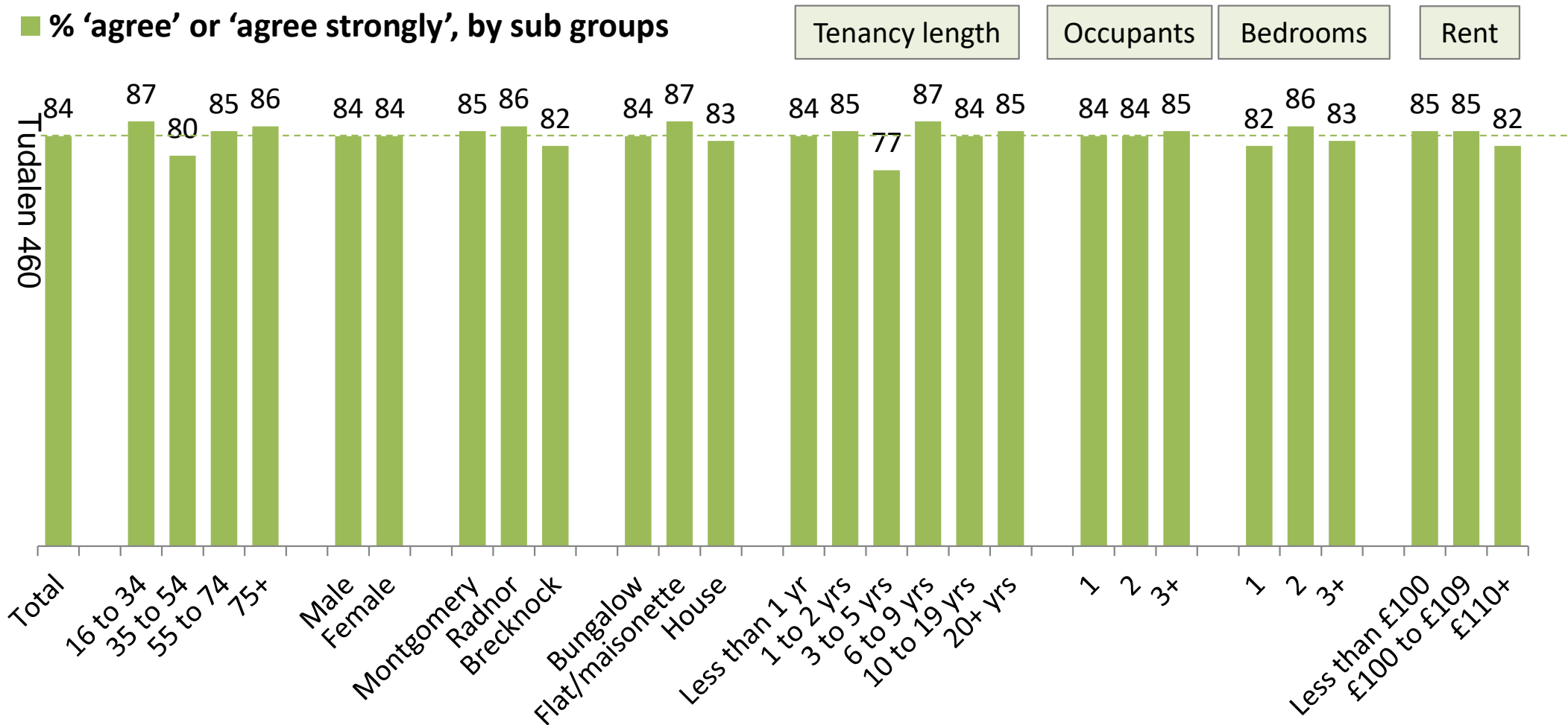
Tudalen 459

# A. "My housing service has friendly and approachable staff."

■ Disagree strongly   
 ■ Disagree   
 ■ Agree   
 ■ Agree strongly



■ % 'agree' or 'agree strongly', by sub groups



Base (all): 704

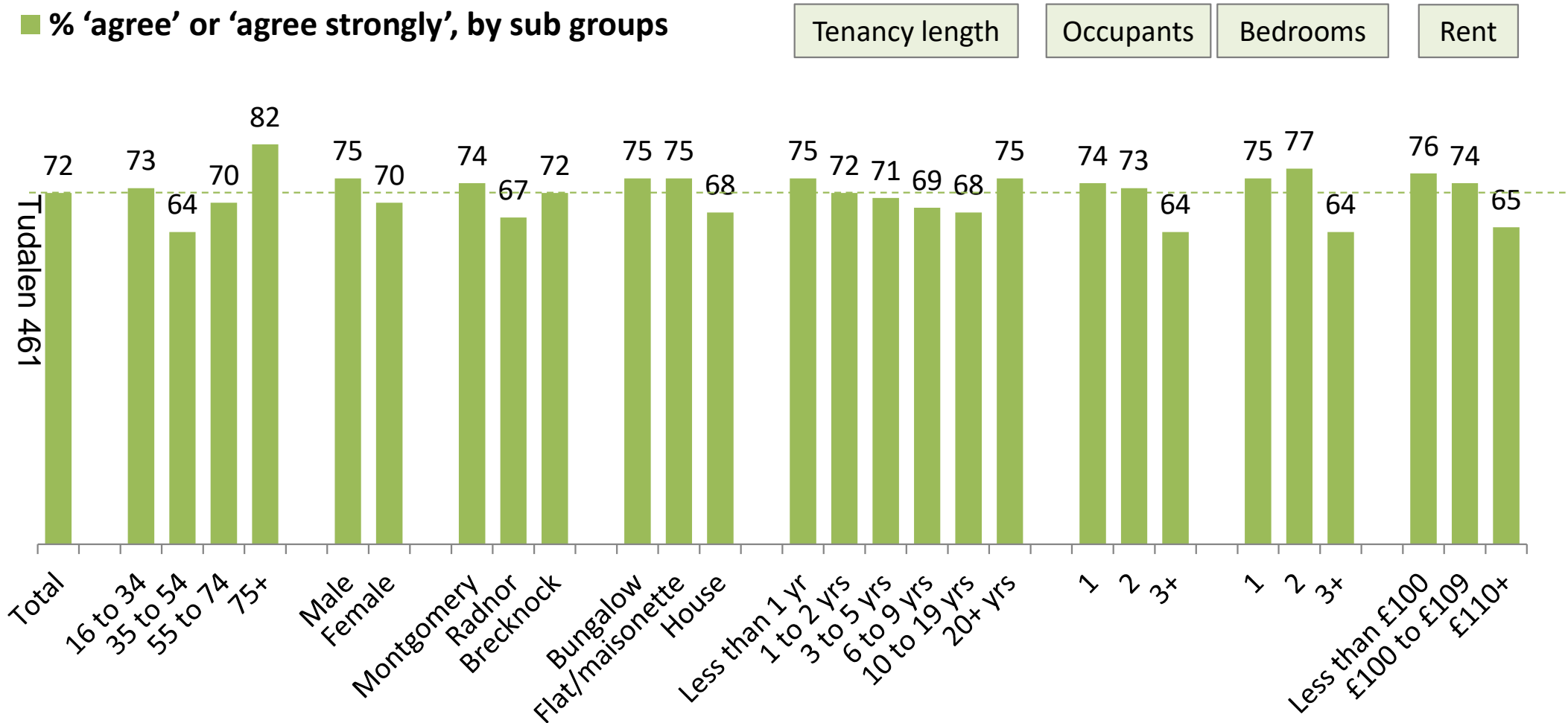
Powys County Council - Tenants Satisfaction Survey 2021

## B. "I trust PCC Housing Services."

■ Disagree strongly   
 ■ Disagree   
 ■ Agree   
 ■ Agree strongly



■ % 'agree' or 'agree strongly', by sub groups



Base (all): 704

Powys County Council - Tenants Satisfaction Survey 2021

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Tudalen 462

# Tenants Satisfaction Survey

Powys County Council 2021

## Survey Findings



Prepared for:  
Powys County Council

Prepared by:  
Beaufort Research

**CYNGOR SIR POWYS COUNTY COUNCIL.****CABINET EXECUTIVE****March 8th, 2022**

**REPORT AUTHOR:** County Councillor Myfanwy Alexander  
Portfolio Holder for Adult Social Care, Welsh Language,  
Housing and Climate Change

**REPORT TITLE:** Community and Economic Benefits from the Council  
Housing Development Programme

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**REPORT FOR:** Information

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**1. Purpose**

- 1.1 The Council is building new homes in Brecon (32 units completed), Sarn (7 units completed), Newtown (26 units in build), Llanidloes (22 units in build), Red Dragon (18 units in build) and Clyro (13 units in build). These homes will help address the rising demand across the county for affordable homes.
- 1.2 Housing construction brings wider economic and social benefits to communities in Powys. The Council expects those building homes to contribute to community and economic development. This report informs Cabinet about the way the house building programme is contributing to the wider outcomes set out in Vision 2025, highlighting the importance of continuing to support the construction of new Council homes.

**2. Background**

- 2.1 Vision 2025 includes the objective to deliver 250 new Council homes by the end of 2025. The housing new development programme now includes 227 units (subject to securing appropriate planning, environmental and regulatory consents), with 118 homes already under construction.
- 2.2 The development of new Council homes in Powys has been widely publicised. A series of 'Meet the Buyer' events took place during 2019-2020, to encourage local enterprises to consider participating in the programme. No Powys based main contractors successfully tendered for the contracts, but local communities in Powys are still benefiting from the developments, including Powys based sub-contractors.
- 2.3 In February 2020, work began at Cradoc Close/Heol y Ffynnon in Brecon, followed in July 2020 by the scheme in Sarn. Both these schemes are now completed and occupied. 'In build' are the Bowling Green site in Newtown, a small estate on the site of former livestock

market in Llanidloes, a scheme in Clyro and the Red Dragon in Newtown site. This amounts to a total works value of £20,193,053.

- 2.4 The Bowling Green site in Newtown, Llanidloes and Clyro are scheduled to be completed by the end of March 2022 and the Red Dragon project by June 2022.

### **3. Advice**

- 3.1 The economic and community benefits for each of the housing schemes under construction are detailed in Appendix A. Highlights include:
- The appointment of a high number of Welsh and Powys-based sub-contractors.
  - Employment created for more than 70 persons.
  - A high number of training and educational opportunities offered including for apprentices.
  - A wide range of community engagement and benefits delivered in respect of each development.
- 3.2 The community and economic benefits will continue to be monitored as construction phases develop on both existing and new sites. The Housing Services Development Team will continue to report every month to the New Project Development Board the benefits of the development programme.
- 3.3 A summary of the benefits that communities are gaining from the house building programme, in addition to the increase in housing choices for local households, will also be reported to the Transformation Delivery Board.

### **4. Resource Implications**

- 4.1 The Council's Thirty Year HRA Business Plan is able to continue to support the development by the Council of more new homes. This will allow more communities and local businesses the opportunities to gain wider socio-economic benefits from a continuing, long term development programme.

### **5. Legal Implications**

- 5.1 There are no legal implications arising directly from this report.
- 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 No comments have been sought as the report is for Information.



## **7. Integrated Impact Assessment**

7.1 An Impact Assessment is not required for this report as the Council Housing Development Programme has been included in the Impact Assessment for the Housing Revenue Account Business Plan and an impact assessment has been provided for the appropriate Vision 2025 objective.

## **8. Recommendation**

8.1 Cabinet is recommended to:

8.1.1 Note the contribution the Council's Housing Development Programme is making to Vision 2025 and the social and economic wellbeing of communities in Powys.

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Head of Service:	Nina Davies
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Corporate Director:	Nigel Brinn
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## Appendix A

### **Council Housing Development Programme** *Delivering Benefits for Local Businesses and Communities*



#### **Scheme: Heol-y-Ffynnon, Brecon**

**Contractor: Hale**

**Construction Start Date: February 2020**

**Completion Date: Aug 2021**

**Total Contract Value: £5,200,000**

#### Sub-contractors

- ✓ Eight Subcontractors - 100% Welsh, with two being Powys Based

#### Site workers and connected staff

- ✓ Forty-eight persons in total – 100% Welsh, with sixteen being Powys residents

#### Community Engagements and Initiatives – completed

- ✓ ‘Meet the Buyer’ event held in Castle Hotel, Brecon
- ✓ Hale and subcontractors raised £500 for the Brecon food bank in response to the unprecedented needs of the local community during the Covid-19 pandemic
- ✓ Engaged with the Maendu Well conservation group to enhance pathways to the Crug.

#### Targeted Recruitment, Training and Education

- ✓ Careers Fayre - Hale had a stall at careers event at Builth Wells, engaging with several students regarding the opportunities within the construction industry.
- ✓ Four local labourers engaged, two of which were previously long term unemployed.
- ✓ Provided thirteen weeks of relevant work experience for a local student who had returned from university.
- ✓ Engaged with the local Jobcentre offering placements for work experience.
- ✓ Three apprentices appointed by Hale supply chain, as a result of the work for the Council.

#### **Scheme: Sarn**

**Contractor: Pave Aways**

**Construction Start Date: June 2020**

**Completion Date: April 2021**

**Contract Value: £1,447,201**

#### Sub-contractors

- ✓ Fifteen sub-contractors, with 13 Welsh (86.67%) of which six were Powys based.

### Site workers

- ✓ Site manager and assistant visiting site manager were from Powys as was the apprentice carpenter.

### Community Engagements and Initiatives - completed

- ✓ Two site visits conducted for the Focus School.
- ✓ A £1,200 donation made to Sarn Village Hall.
- ✓ Repairs to slates and flashing on the Focus School roof.
- ✓ Repainting works to external doors and other white woodwork at Sarn Village Hall.
- ✓ Repairs to slabs at Sarn Village Hall.

### Targeted Recruitment, Training and Education

- ✓ Joinery apprentice employed on permanent contract, and who achieved L2 NVQ Site Carpentry.
- ✓ Site Manager completed NVQ6 Site Management.
- ✓ Site Manager completed First Aid at Work.
- ✓ Telehandler training (training was on site at Sarn).
- ✓ Construction Skills workshop (Build a Bench).
- ✓ Two persons registered to do Site Assessed NVQs.

### **Scheme: Bowling Green, Newtown**

**Contractor: Pave Aways**

**Construction Start Date: June 2020**

**Expected Completion Date: March 2022**

### Sub-contractors

- ✓ Eight sub-contractors, with six Welsh (75%) of which six were Powys based.

### Community Engagement and Initiatives – completed

- ✓ A meet the buyer event held specifically for the Bowling Green and Sarn schemes.
- ✓ A £2,000 donation to local charity 'Bike to the Future', a local charity which provide bikes to those who do not own one to encourage healthy activities.

### Community Engagement and Initiatives – planned

- ✓ £2,000 donation to Newtown Scout Group.
- ✓ Possible sponsorship and repairs to Newtown Bowling Club.
- ✓ Possible local event for local residents.
- ✓ Work for Wildlife Trust £750 labour equivalent – tree planting and hedgerow/scrub clearance.

### Targeted Recruitment, Training and Education

- ✓ Site manager took part in a video for Careers Wales on site at Bowling Green. This has been shared with all schools in Powys.
- ✓ Apprentice Carpenter carried out work on the building's timber frame.
- ✓ Two office staff supported to achieve professional qualifications.

**Scheme: Former Livestock Market, Llanidloes**

**Contractor: J Harper and Sons**

**Construction Start Date: September 2020**

**Expected completion date: March 2022**

Sub-contractors

- ✓ Four sub-contractors, with four Welsh\* (100%) of which three Powys based.  
(\* Two contractors in SY postcode area which is deemed to be in Wales for WG employment assessment purposes).

Site workers

- ✓ Majority of site workers from Powys.

Community Engagement and Initiatives - Completed

- ✓ Meet the buyer event held.
- ✓ Contractor met with two local headmasters to discuss options for school visits.
- ✓ Defibrillator provided for the town.
- ✓ Financial contribution of £1500 provided to Dial a Ride.
- ✓ Financial contribution of £1500 provided to the Sports Partnership.

Targeted Recruitment, Training and Education

- ✓ Discussions with sub-contractors regarding support for apprenticeships.
- ✓ Site Manager renewed Site Supervisor Safety Training Scheme (SSSTS) training.

<b>Summary of Benefits of Powys County Council New Housing Developments</b>				
<b>Value of Completed Schemes</b>	<b>Total no. of sub-contractors</b>	<b>No. of Welsh sub-contractors</b>	<b>No. of Powys-based sub-contractors.</b>	<b>Apprenticeships supported</b>
£6,647,201	35	31 (88.6%)	17 (48.6%)	5

## CYNGOR SIR POWYS COUNTY COUNCIL.

## CABINET EXECUTIVE

8<sup>th</sup> March 2022**REPORT AUTHOR:** Alison Bulman, Corporate Director (Children and Adults)**SUBJECT:** Corporate Safeguarding 6 Monthly Update

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**REPORT FOR:** Information

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Cabinet is asked to note this report and update from the Corporate Safeguarding Group. The group has met twice since the last update to Cabinet and met on the 9<sup>th</sup> September and 7<sup>th</sup> December 2021.

This report provides an oversight of the assurance sought and the actions which have been taken to address the concerns discussed.

- Care Director (WCCIS): This continues to be a problematic system with unreliable performance. BetterGov have been commissioned by IT colleagues to look at an option/s appraisal. This work has now concluded, and IT colleagues will bring forward proposals regarding the way forward. Cllr Rachel Powell and Cllr Myfanwy Alexander have twice written to the Minister escalating the concerns in relation to the poor performance of the system.
- Home Educated Children: the group heard from Education Services that they planned to recruit 2 workers to ensure regular visits are carried out to home educated children. This was welcomed by the group and the appointments of 2 workers followed. These posts are currently funded until the end of March 2022 but is included in the budget proposals for Education Services. Cllr Myfanwy Alexander urged colleagues to have a proactive approach asking families how they could help. Cllr Myfanwy reminded colleagues of the importance of hearing the voice of the child.
- DoLS: A bid has been submitted and approved by Welsh Government to boost capacity within the Service as well as to assist in the transition to Liberty Protection Safeguards. The demand for DoLS continues to be higher than the capacity within the system to respond to them. The group were advised that the service is prioritising applications as appropriate. The Service continues to wait for the draft Code of Practice for Liberty Protection Safeguards, due to go live on 1<sup>st</sup> April 2022.
- Young People and Housing: The group were informed that there were 7 seventeen-year-olds currently homeless. The young people were being accommodated in temporary accommodation. 3 of those were either being supported by their parents, or the parents of their partners.

The Group also received a report and update on Violence Against Women, Domestic Abuse and Sexual Violence (VAWDASV). We were informed that 163 staff had now received the group 2 training and that group 3 training would commence in November 2021. All Service areas are requested to ensure that level 1 training is up to date for their officers.

<b>Recommendation:</b>	<b>Reason for Recommendation:</b>
Cabinet receives this briefing as an update from the Chair of the Corporate Safeguarding Group.	To ensure Cabinet are fully sighted on work to date.

<b>Relevant Policy(ies):</b>	Corporate Safeguarding Policy		
<b>Within Policy:</b>	<b>Y</b>	<b>Within Budget:</b>	<b>Y</b>

<b>Relevant Local Member(s):</b>	All elected members
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<b>Person(s) To Implement Decision:</b>	<b>N/A</b>
<b>Date By When Decision To Be Implemented:</b>	<b>N/A</b>

<b>Is a review of the impact of the decision required?</b>	<b>N</b>
<b>If yes, date of review</b>	<b>N/A</b>
<b>Person responsible for the review</b>	<b>N/A</b>
<b>Date review to be presented to Portfolio Holder/ Cabinet for information or further action</b>	<b>N/A</b>

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21 February	Portfolio Holder for Education and Property	Approved the appointment of school governors.
25 February	Portfolio Holder for Education and Property Portfolio Holder for Adult Social Care, Welsh Language, Housing and Climate Change	Approved the transfer of Arlais Day Centre to Housing Services for £130,000 to enable the development of secure, affordable housing, to help meet the housing needs in Llandrindod Wells and support the Council in meeting its Vision 2025 housing priorities.
1 March	Portfolio Holder for Education and Property	Approved the transfer of the freehold of the former Gungrog playing field.

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