



**Proposals affecting Mount Street Infants
School, Mount Street Junior School and
Cradoc C.P. School**

Draft Consultation Report



Consultation on the amalgamation of Mount Street Infants School, Mount Street Junior School and Cradoc C.P. School to establish a new primary school in Brecon

Draft

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

Consultation on the amalgamation of Mount Street Infants School, Mount Street Junior School and Cradoc C.P. School to establish a new primary school in Brecon

1. OVERVIEW OF THE CONSULTATION

Powys County Council consulted on Proposals affecting Mount Street Infants School, Mount Street Junior School and Cradoc C.P. School. The Proposals are as follows:

Phase 1

- To close Mount Street Infants School, Mount Street Junior School and Cradoc C.P. School
- To establish a new English-medium primary school for pupils aged 4-11 on the current sites of Mount Street Infants School, Mount Street Junior School and Cradoc C.P. School.

The current target date is to close the three schools on the 31st August 2022, with the new school opening on the 1st September 2022.

Phase 2

- To make a regulated alteration to transfer the new school to a new school building on a new site in Brecon.

The current target date for this phase is September 2024 at the earliest.

The consultation took place from the 25th February 2021 to the 12th May 2021.

i) Consultation methods

The Consultation Documentation was available on the Council's website throughout the consultation period, and was distributed to stakeholders, as required by the School Organisation Code (2018). A separate version for pupils was also available on the Council's website throughout the consultation period.

Consultees were invited to respond to the consultation by either completing an online consultation form, filling in a paper copy of the form and returning it to the Transforming Education Team at County Hall, or by e-mailing / writing to the Transforming Education Team.

Meetings were held virtually with the following:

- Staff of Mount Street Infants School – 16 March 2021

- Governors of Mount Street Infants School – 16 March 2021
- Mount Street Infants School Council – 23 March 2021
- Staff of Mount Street Junior School – 17 March 2021
- Governors of Mount Street Junior School – 17 March 2021
- Mount Street Junior School Council – 23 March 2021
- Staff of Cradoc C.P. School – 22 March 2021
- Governors of Cradoc C.P. School – 22 March 2021
- Cradoc C.P. School Council – 24 March 2021

ii) **Responses received**

A total of 229 respondents completed the consultation response form which was included in the Consultation Document . This included paper copies as well as responses submitted using the online response form.

In addition, 53 written responses were received from respondents, including Estyn. The response received from Estyn is provided on page 45 in-line with the requirements of the School Organisation Code.

The written responses also included an online and paper petition to 'Save Cradoc Primary School!', which received 1,275 signatures.

As well as responses from parents, prospective parents, governors, members of staff and members of the community, responses were received from the following organisations:

- Governing Body of Mount Street Infants School
- Governing Body of Cradoc C.P. School
- Brecon Town Council
- Yscir Community Council
- Merthyr Cynog Community Council
- Trallong, Penpont and Llanfihangel Nant Bran Community Council
- Cradoc Community Working Group
- Cradoc C.P. School PTA
- Cool Kids @ Cradoc
- NEU Cymru
- Powys School Forum

iii) **Summary of issues raised**

The issues raised in the consultation responses are listed in detail in section 6 on page 49. This includes the Council's response to each issue. The following is a summary of the issues raised:

1. Comments about the current schools

1. Mount Street Schools
2. Cradoc C.P. School
3. Other general comments about the current schools

2. Comments about Phase 1 of the Proposals

1. Concern about the impact on quality of provision
2. Concern about the impact on pupils
3. Concern about loss of each school's individual identity / awards
4. Concern about loss of school identity
5. Concern about loss of school awards
6. Concern about mixing rural and town schools
7. Concern about changes to leadership arrangements
8. Other comments about changes to staffing arrangements
9. Concern that Phase 1 would continue for longer than intended
10. Financial impact of Phase 1
11. Comments about buildings
12. Other concerns about Phase 1
13. Other questions about Phase 1 of the Proposals

3. Comments about Phase 2 of the Proposals

1. Funding has not yet been secured for Phase 2
2. There is insufficient information about Phase 2 therefore a separate consultation should take place
3. Comments about the impact on pupils
4. Comments about the new building
5. Comments about the size of the new school
6. Comments about the proposed site
7. Comments / queries about what would happen to the current buildings
8. Comments about the impact on the community
9. Comments about travel implications
10. Pupils would transfer to other schools
11. Queries about admissions arrangements
12. Other comments / queries

4. Other comments

1. General comments about the impact on pupils
2. General comments about the impact on staff
3. Comments about the impact on parents / families
4. Comments about the impact on protected characteristic groups
5. Comments about small / rural schools
6. Comments about other schools / Proposals

7. Financial implications
8. Comments about Council / Welsh Government strategies
9. Criticism of Powys County Council
10. Comments about the consultation process
11. Comments about the Consultation Documentation
12. Alternative options
13. Comments about the impact on Welsh
14. Comments in favour of the Proposals

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2. CONSULTATION RESPONSE FORM

167 respondents completed the English language consultation response form which was available online, and 0 respondents completed the Welsh language consultation response form which was available online. 62 respondents sent the consultation response form by email in English, and 0 respondents sent the consultation response form by email in Welsh. The consultation response form was also translated into Nepali and 0 respondents returned the consultation response form by email in Nepali.

The quantitative findings of the questionnaire are summarised below. Written comments were also provided in the consultation response forms. The issues raised in these comments are included in Section 6 of this report.

Part 1 – About you

1. Please indicate how you are associated with the schools affected by this consultation:

Response	No.	%
Parent, carer or guardian	95	41.5%
Prospective parent, carer or guardian	10	4.4%
Governor	5	2.2%
Member of staff	26	11.4%
Member of the community	60	26.2%
Organisation	4	1.7%
Pupil	0	0.0%
No association	8	3.5%
Other	20	8.7%
Not Answered	1	0.4%
Total responses	229	100.0%

2. Please specify which school you are associated with:

Response	No.	%
Mount Street Infants School	69	30.1%
Mount Street Junior School	10	4.4%
Both Mount Street Infants School and Mount Street Junior School	29	12.7%
Cradoc C.P. School	75	32.8%
Another school	4	1.7%
No association with any school	37	16.2%
Not answered	5	2.2%
Total responses	229	100.0%

3. Please provide your postcode:

Response	No.	%
Brecon	203	93.1%
Builth Wells	3	1.4%
Crickhowell	2	0.9%
Llandrindod Wells	2	0.9%
Crewkerne	1	0.5%
Barry	1	0.5%
Tring	1	0.5%
Pontyclun	1	0.5%
Hereford	1	0.5%
Leicester	1	0.5%
Newtown	1	0.5%
London	1	0.5%
Total responses	218	100.0%

Part 3 – About you

12. How old are you?

Response	No.	%
Under 16	2	0.9%
16-23	8	3.5%
25-34	36	15.9%
35-44	67	29.5%
45-54	30	13.2%
55-64	31	13.7%
65-74	15	6.6%
75-84	6	2.6%
85+	0	0.0%
Prefer not to say	10	4.4%
Not answered	22	9.7%
Total responses	229	100.0%

13. What is your gender?

Response	No.	%
Male	43	18.8%
Female	151	65.9%
Gender Fluid	0	0.0%
Non-Binary	0	0.0%
Gender neutral	1	0.4%
Prefer not to say	10	4.4%
Not answered	24	10.5%
Total responses	229	100.0%

14. Can you understand, speak or write Welsh?

Response	No.	%
Yes	65	28.4%
No	97	42.4%
Prefer not to say	40	17.5%
Not answered	27	11.8%
Total responses	229	100.0%

15. If you have school-aged children, are they entitled to receive free school meals?

Response	No.	%
Yes	10	4.4%
No	134	58.5%
Prefer not to say	21	9.2%
Not answered	64	27.9%
Total responses	229	100.0%

16. If you have school-aged children, do they have any additional learning needs?

Response	No.	%
Yes	18	7.9%
No	121	52.8%
Prefer not to say	21	9.2%
Not answered	69	30.1%
Total responses	229	100.0%

17. Do you consider yourself to be disabled?

Response	No.	%
Yes	13	5.7%
No	172	75.1%
Prefer not to say	11	4.8%
Not answered	33	14.4%
Total responses	229	100.0%

18. What is your ethnic group?

Response	No.	%
White	180	78.6%
Asian	5	2.2%
Black, African or Caribbean	0	0.0%
Mixed	1	0.4%
Gypsy/Traveller	0	0.0%
Other	2	0.9%
Prefer not to say	14	6.1%
Not Answered	27	11.8%
Total	229	100.0%

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3. CONSULTATION WITH PUPILS

Comments received from pupils are outlined below. This includes the notes of a meeting held with pupils at Mount Street Infants School, Mount Street Junior School and Cradoc C.P. School, as well as a summary of the written responses received from pupils to the consultation exercise.

i) Meeting with the School Council of Mount Street Infants School

One session was held with 7 pupils from the school council. The group were a combination of students from year 1 and 2.

The officers explained the Proposals for the merging of Mount Street Infants School, Mount Street Junior School and Cradoc C.P. School and explained the difference between other primary schools in the Brecon area compared to Mount Street Infant School and Mount Street Junior School as most primary schools educate from reception to Year 6.

The pupils were asked several questions and their responses are summarised below:

1. What do you think is good about Mount Street Infants School?

- Brilliant and everything we want is here
- Our teachers help us when we need help
- Our teachers are friendly
- Our teachers always make us smile
- This is the best school I've ever been too
- I like the forest school – we roast marshmallows and play hide and seek
- Our school has lots of amazing people
- Our school makes me very happy
- This school is awesome!

2. Is there anything you don't like about Mount Street Infants School?

- Nothing
- No it's all really really really good here

Officers explained Phase 1 of the Proposals. Pupils would continue to go to school where they are now, but with one headteacher for the new school.

3. What do you think would be different if this happened?

- There would only be one headteacher
- There would be a new name and new uniform

Officers explained there are lots of things to be decided if a new school was to be created, such as the school name, uniform and logo, which pupils usually get an opportunity to contribute to.

The session then moved onto Phase 2 of the Proposals where the school would move to a new school building, built on the site of the old Brecon High School.

5. Do you have any questions/comments about the new building?

- Will we have a swimming pool?

Officers explained the proposed features of the new building and said that there are plans for a new swimming pool.

- How long will it take to build / How old will we be when the new school is built?

Officers explained that the new building wouldn't open until September 2024 at the earliest.

- Will the new school have a new big field, a little field or no field?

Officers explained how there must be a certain amount of green space for children to play.

- Will Smarties come to our new school too?

Officers explained that the intention is that the new school will feature an early years setting (currently Smarties).

- Will we lose our green school award?

Officers explained that unfortunately yes, but as a new school there would be the chance to try for it again.

- Will teachers from Cradoc, Mount Street Infants and Mount Street Junior schools be in the new school?

Officers explained that when you establish a new school that teachers and staff are put into a pot and are able to apply for posts in the new school, but that some teachers/staff might decide to retire early and that when Proposals have happened previously, most teachers and staff have secured a job in the new school.

- Will our new school have a library?

Officers explained that a library is usually included within the designs of new school buildings.

- Do you know which headteacher will be the headteacher?

Officers explained that who will become headteacher will be down to the Temporary Governing Body, which would be set up if the Proposals were agreed by Cabinet.

- It will be too far to walk to the new building

Officers explained that if the school was built on top of the Penlan hill, and that they lived less than 2 miles away from the new school then you would be able to walk to school, if you lived more than 2 miles away then the Council would give you free transport up to the site.

- It is good for the environment to walk to school

6. Do you have any other additional comments?

- Worries about the headteachers losing their jobs

To conclude the session, the officers explained the next steps in the consultation process. It was explained that the consultation would close on the 12th May 2021, and the pupils were encouraged to send any further comments to the Transforming Education Team using the contact details on the pupil version of the Consultation Document, or to their teachers who would be able to arrange for them to be sent on.

ii) Meeting with the School Council of Mount Street Junior School

One session was held with 10 pupils from the school council. The group were a combination of students from Year 3 to Year 6.

The officers explained the Proposals for the merging of Mount Street Infants School, Mount Street Junior School and Cradoc C.P. School.

The pupils were asked a number of questions, and their responses are summarised below:

1. What do you like about Mount Street Junior School? What's good about the school?

- Really fun and cool learning
- Jungle gym play equipment
- ICT rooms
- Chromebooks and iPads
- Library
- School dinners
- The school and everyone in it
- Teachers, pupils and friends
- PE lessons
- Playtime
- School trips

2. Is there anything you don't like about Mount Street Junior School?

- Have longer breaktimes
- Arguments
- Disagreements
- Have bigger portions for school dinners

3. What do you think about the idea to merge Mount Street Juniors, Mount Street Infants and Cradoc C.P. Schools?

- Keep the schools separate for memories for past pupils
- Big classrooms and more children, some children won't get the attention they need
- Jobs are going to be lost

The School Council had discussed the Proposals with their classes and had prepared questions. The Chair of the School Council introduced all the members and asked questions to officers.

4. Questions from the School Council

- Will we still be in the same class with our friends?

Officers explained that in the first part of the Proposals, that pupils would remain in their classes, and in the second part of the Proposals that pupils could then be in same classes as other pupils.

- How long would it take to build?

Officers explained that the new building wouldn't open until September 2024 at the very earliest.

- Will we have a football pitch?

Officers explained that there would be a big field and additional areas such as Multi Use Games Areas.

- How big will the playground be?

Officers explained that the playground will have to be big enough to accommodate 360 pupils.

- Will there be a jungle gym?

Officers asked pupils if they would like a jungle gym to be incorporated into the new design – pupils said they would like one.

- Will Smarties be coming over as well?

Officers explained that there would be early years provision within the new school building.

- What will happen to this building?

Officers also explained that there are currently no plans for the existing building, and that it is usually offered to the community first, before being sold.

- How long have you been thinking of this idea?

Officers explained that the Council started thinking about Brecon early last year, after the adoption of the plan [Strategy for Transforming Education in Powys 2020-2030].

- Will some teachers and staff lose their jobs?

Officers explained that when you establish a new school that teachers and staff are put into a pot, and can apply for jobs in the new school, but some teachers/staff might decide to retire early and that when Proposals have happened previously, most teachers and staff have secured a job at the new school.

- How will our school keep its good reputation?

Officers explained that the new school would need to be as good, if not better than the current school is.

- Will the school day change?

Officers explained that this decision would be for the new headteacher and Temporary Governing Body.

- Will we lose our school awards?

Officers explained that it would be a new school and that the new school would have to try for all school awards.

- Will there be a new school council?

Officers explained that there would be a new school council and that under the first part of the Proposals, the new school council would be made up of pupils from the three sites and then when part two of the Proposals went live a new school council would then be formed under the one building.

- What will the new school uniform look like and will there be a new logo?

Officers explained that, if Cabinet was to approve the Proposals, then a Temporary Governing Body would be setup, which would make decisions around the new school name, uniform and logo, but usually pupils have an opportunity to contribute to these items.

- What will the layout of the new school be? How many classes?

Officers explained that the Council had not yet started looking at the design, but had recently built a new school in Welshpool for the same capacity. There would be classrooms, a hall, kitchen, wide open spaces for group work, one-to-one rooms, early years spaces, staff room, headteachers office, library and outside facilities.

- What will happen to the headteachers and how do you choose a new headteacher?

Officers explained that the Temporary Governing Body also decides who will be headteacher of the new school.

- Will there be a bus to get there?

Officers asked pupils if they walked, used a car or a bus to get to school. No pupils used a bus currently. Officers explained that if the school was built on top of the hill, and lived less than 2 miles away from the new school then you could walk to school, if you lived more than 2 miles away then the Council would give you free transport up to the site. Officers asked pupils if they thought it would be a problem to walk up the hill. The pupils responded that probably not for Mount Street Junior pupils, but it would be a problem for

Cradoc C.P. School pupils and that Mount Street Junior pupils might have to get up a bit earlier.

- What will happen to the Mount Street Junior School Tree?

Officers asked about the tree. Pupils thought it was over 100 years old. Officers did not know what would happen to the tree.

- How much is it going to cost and where will the money come from?

Officers explained that the funding for the new building is from the Council and through the Welsh Government's 21st Century Schools and Colleges programme and will cost around £9 million.

- Will there be one big playground or separate playgrounds for infants and juniors?

Officers explained that there would probably be a big playground, but that the infant spaces are separate from the junior spaces.

- Will the old high school be there?

Officers explained that the new high school is coming down and being demolished as it is not safe and is empty.

- What technology will we have access to in the new school?

Officers explained that there would be Clevertouch screens, lots of iPads and laptops.

- How much budget will the new school have?

Officers explained that the budget for the new school has not yet been worked out and would be set when the Temporary Governing Body is established as the budget follows the number of pupils in the school.

- Will there be a specialist centre for the infants and juniors if the school merged?

Officers explained that the expectation is that the new building would contain facilities to meet the needs of children with ALN.

- At the moment we have nurture workshops – will we still have that in the new school?

Officers explained that there would be provision within the new school for nurture workshops.

5. Officers asked pupils for their questions and thoughts on the new school building

- It's not fair for those who have to drive a long way
- Larger classes means it will be harder to plan school trips and cost more money for equipment
- Leave Cradoc alone and merge just the Infants and the Juniors
- It would be cramped if we all merged
- If someone just moved to Brecon and they wanted to go to Cradoc, they wouldn't have a choice of which school to go to
- What would happen to the other two headteachers – would they lose their jobs?
- Will there be a pool in the new school?
- Our headteacher knows all our names, will the new headteacher know all our names?
- Will we have new books?

Officers explained the proposed features of the new building and how there must be a certain amount of green space for children to play.

To conclude the session, the officers explained the next steps in the consultation process. It was explained that the consultation would close on the 12th May 2021, and the pupils were encouraged to send any further comments to the Transforming Education Team using the contact details on the pupil version of the Consultation Document, or to their teachers who would be able to arrange for them to be sent on.

iii) Meeting with the School Council of Cradoc C.P. School

One session was held with 12 pupils from the school council. The group were a combination of students from Year 1 to Year 6.

The officers explained the Proposals for the merging of Mount Street Infants School, Mount Street Junior School and Cradoc C.P. School.

The pupils were asked a number of questions, and their responses are summarised below:

1. What do you like about Cradoc C.P. School? What's good about the school?

- Lots of outdoor space and outside playground
- Learning new things and doing lots of activities

- Good community and really nice hills and views
- Teachers are really nice and the lessons are fun
- Seeing my friends in reception class
- After school, breakfast club and holiday club
- School dinners are nice and lush – best part of the school day
- Fishfinger Fridays
- The teachers are really nice and they support you with problems in and outside of school
- Going to a bigger school might lose your sense of family
- Going to a school in town means I might not be able to see my friends in reception

2. Is there anything you don't like about Cradoc C.P. School?

- Lessons can a little bit boring
- Recently we've had boiler problems in our classroom and the carpet was wet
- There are computers glitches sometimes
- Lots of people boss me around when playing
- We don't have enough computers and iPads

Officers outlined the Proposals and the phasing of the Proposals.

3. What do you think about the idea to merge Mount Street Juniors, Mount Street Infants and Cradoc C.P. Schools in the current buildings (Phase 1)?

- If we move schools we might not know the teachers and the younger pupils might lose their friends
- We've just had a huge lockdown and education has been affected and we came back to school and now we find out our school will be knocked down
- We might lose some of the teachers we like and might have to get to know them in a new school
- The Welsh Government set guidelines about saving rural schools and shutting our school will mean there is no rural schools left in our area

Officers asked pupils to describe the area they live in.

- There are lots of hills, hill forts, farming, fields, forests and beautiful landscapes
- Lots of pupils come from a farming background so we love to run around and play farming and in town, we wouldn't be able to look at the tractors passing the school
- Some pupils already travel a long way and feel sad about traveling further
- I want to bring up my children to attend a rural school
- Everything is lovely here and we don't want it to change

4. Question and answer session with officers

- If this goes ahead, what will the old site be used for?

Officers explained that the Council would have discussions with everyone in the community about the building, such as making it a community hall, if that can't happen then the Council could possibly sell the site.

- What made you come to this decision?

Officers explained that the Council has been looking at the whole Brecon catchment and one of the big issues facing the catchment, is that the buildings are not in a good condition. Officers explained if the Council built a new school for Mount Street Infants, Juniors and Cradoc C.P. School then this will ensure that pupils from the three schools will go to a new school building. Officers also explained that Mount Street Infants and Juniors is the last remaining infant/junior split in Powys.

- Have you considered other options? / Can we just build a new school in Cradoc?

Officers explained that a lot of options were considered. Any options submitted to the Council during the consultation process would be considered.

- Could Mount Street Infants and Junior Schools be merged and Cradoc re-built and what would the budget be?

Officers explained that the whole budget for the Proposals is between £9m and £10m. Officers explained that they would have to compare what it would cost to build a new school for Mount Street Infants, Juniors and Cradoc C.P. Schools and what it would cost for two new schools for Mount Street Infants & Juniors and a separate new school for Cradoc C.P. School.

- What will the new uniform be like?

Officers explained there are lots of things to be decided if a new school was to be created, such as the new school name, uniform and logo, which pupils usually get an opportunity to contribute to.

- Have you considered how it will affect the mental health of students, especially young children?

Officers agreed it had been a difficult time for students and that the Council had considered this before making these Proposals.

5. Officers asked pupils for their questions and thoughts on the new school building

- We might go swimming and do more sports if we are closer to the leisure centre
- At the moment I have to travel far to Rugby and if I went to the new school it would be quicker
- In town there will be more noise with traffic and this will affect the environment and it will be harder to concentrate
- When we picked our forever home we picked here because it was close to Cradoc school
- Chance to make new friends, see old friends and there will be more equipment
- The Council has already closed Battle School and other rural schools and now is proposing to close Cradoc – history is repeating itself
- The school is the heart of the community
- If the school was sold and became houses nobody would buy the houses – Cradoc would turn into a ghost town
- We wouldn't be able to have a forest school in the middle of town and we wouldn't be able to see the wildlife
- The community has volunteered to help us learn about nature
- In town it wouldn't be a proper forest
- It is so important that we are in the country and rural area
- A lot more pollution and big carbon footprint when the new school was built due to more people traveling.

Officers explained that when the Council designs the new school that a forest school area would be looked at being incorporated into the design and layout.

To conclude the session, the officers explained the next steps in the consultation process. It was explained that the consultation would close on the 12th May 2021, and the pupils were encouraged to send any further comments to the Transforming Education Team using the contact details on the pupil version of the Consultation Document, or to their teachers who would be able to arrange for them to be sent on.

iv) Summary of other comments made by pupils

In addition to the meetings with the School Councils, 14 written responses were received from pupils attending Cradoc C.P. School. Here is a summary of the issues raised in these responses:

- Cradoc C.P. School should remain open
- Keep Cradoc C.P. School early years provision running
- Cradoc C.P. School 21st Century Schools funding should be applied for to construct a new school building

- The Welsh Government has mentioned a presumption against closing rural schools such as Cradoc C.P. School
- There would be a significant impact on Cradoc's community
- Wildlife at the current Cradoc site could be harmed
- Other schools do not have the same quality of green space/play space
- Concern that teachers in alternative schools may not be of the same quality as current staff at Cradoc
- Current staff at Cradoc C.P. School may lose their jobs
- Concern that historical sites local to Cradoc will not be visited as part of education at other schools
- Travel implications may result in pupils of Cradoc C.P. School transferring to multiple different schools
- Large class sizes in other schools may discourage Cradoc pupils from coming to school
- Concern that Cradoc pupils may not be accepted easily in other schools
- Concern that there will be less community support for schools other than Cradoc C.P. School
- Proposed new school may be cramped with a large number of students
- Infant pupils may not be comfortable being transported on buses
- The increase in people driving to school would create more pollution
- Reduced choice of schools for pupils and parents
- Concern about a lack of forest school at the new build
- The larger proposed new school may be overwhelming for some pupils

4. CONSULTATION MEETINGS WITH STAFF AND GOVERNORS

Consultation meetings were held with the staff and governors at Mount Street Infants School, Mount Street Junior School and Cradoc C.P. School.

The issues raised at these meetings are summarised below:

i) Consultation meeting with Staff of Mount Street Infants School

- Powys' strategy includes an ambitious vision statement, for '*children and young people in Powys to experience a high quality, inspiring education to help develop the knowledge, skills and attributes that would enable them to become healthy, personally fulfilled, economically productive, socially responsible and globally engaged citizens of the 21st century.*' In January 2020 Estyn's inspection report on Mount Street Infants School included the following summary:

'The excellent quality of the school's care, support and guidance for pupils results in outstanding levels of wellbeing. The school has an exceptionally happy family atmosphere where nearly all pupils thrive. It provides an extensive range of imaginative learning experiences, both in class and in the stimulating outdoor environment, which results in nearly all pupils having very positive attitudes to learning and achieving well. A united team of committed teachers and support staff share the headteacher's enthusiastic and inspiring vision for the school, which has best foundation phase practice at its heart. They work very effectively together for the good of their pupils. As a result, nearly all pupils, including those learning English as an additional language and those with SEN, make good progress and achieve expected or better outcomes by the end of the foundation phase.'

They also state that our pupils have a good understanding of healthy living, demonstrate high levels of empathy, exceptional understanding of equality and fairness, are developing very well as ethical, informed citizens with a superb understanding of environmental issues and use highly developed entrepreneurial skills all before the age of 7.

We feel that the school is already achieving so much of Powys' ambitious vision statement and what we want is for our children to continue to have the very best options, the very best outcomes that we can provide for them. We just want some clarity about how what we are providing is going to be improved going forward, especially in this interim time where potentially we might have no head on the site and who knows if we will ever get to a new building. We feel we have an awful lot to lose and our pupils have an awful lot to lose.

- On page 28 it says when it is talking about the impact on the quality and standards of education, it states that all schools are good. That is not true though, because in the appendix it says that we have got excellent. Another school is good, and another school is adequate. Why did you make a summative statement saying that all areas are good when they are not? And

how can one headteacher be able to improve provision for all the children in the new school when the three sites are starting from different points? If people only read the first bit (of the consultation report), they think everybody is good and it is only if they go on for 40 odd pages that they realise that is not actually true.

- I have no doubt our head is more than capable of doing that. But it would mean she would not be in our school because obviously if you want the others to come up to our standards, not the other way round our head is not going to be with us. And the reason we are so good is because we have Shan with us. I have got another quote from Estyn which says that professional learning opportunities for the staff are excellent.
- Nearly all teachers have visited other countries. We have been to Finland. We have been to Iceland. We have been to Romania. We have been to observe best practice in earliest childhood education, and we have been able to come back and share that with other schools in our area and beyond as sector leading schools. The only reason we could do that is because we had a very supportive head. In fact, it was Shan's idea that we do it, and we could only do that because she was there with us all the time and she would take our classes for us to be able to go.
- If we have got a head teacher looking after other schools and they are looking after other schools who are not as good as ours, we are not going to see her. So how are we going to maintain those standards? She is important and you are proposing that she is not with us. How can the headteacher visiting a school only once, maybe twice a week, maintain those current standards or never mind improve them just maintain them when she is not with us?
- I do not think any of us are convinced that this process truly values the head's role, the vision, the input of leadership of an excellent school, or that it can be spread across three sites for what is apparently an unprescribed period of time. We are talking about at the earliest 2024, and I do not think we can put it in strong enough terms how utterly diabolical we feel as the staff team about the interim Proposals. Destabilising three schools with no final destination or time scale is not fulfilling your duty of care. I am going to make that as a comment, and I want it recorded.
- Having already been through staff reorganisation last year, and losing a class and staff, we as a staff team are extremely anxious around the security of our job. Can you clarify whether all jobs, management, teaching, teaching assistant, support staff, admin, and the three year plus setting will be ring fenced? And if so, will they stay as they are? Or will we be required to apply for those positions? Will staff be required to work across the three sites or indeed move to work at different sites? Will there be opportunities for voluntary redundancies if staff do not want to work in the new school or with a different head teacher?
- On page 18, in the section marked advantages it says that the merger will be fairer to staff. All staff at the three schools would have the opportunity to secure positions in the new school. How is this an advantage when we already have a job in our present school? Would it only be an advantage if our

positions were not secure by keeping the status quo? What will happen to staff with permanent contracts? What will happen to staff with temporary contracts for that matter?

- The position here is that we are talking about interim arrangement with a possible completion of 2024. We have not got capital funding for the new school and we have not got a plan site, or a time scale, and I think that is what is destabilising in this whole process.
- How is this (the effect of the Proposals on staff) an advantage when we already have a job in our present school? Would it only be an advantage if our positions were not secured by keeping the status quo? And what will happen to staff contracts?

It says in the document that between us and the Junior School we have £1.7 million in backlog across both sites and I just wonder for transparency whether we could have some information regarding what those backlogs are. If we are not talking about the new school being built until at least 2024 at the very earliest, is there some commitment from the LA to look at the £50 million the Welsh Government have pledged now for building works for school? Because we're still looking at our children being in that building for potentially at least three years, potentially much longer, and I think you know as an LA, when you're saying a building isn't fit for purpose, that's why we need to move on, so there is an opportunity because we might be there for a considerable amount of time and I just think that would be the right and fair thing to do.

- I have a few queries around practical elements that I am finding it difficult to get our head around, such as running the school with three sites potentially for two to four years. Things like how admissions are going to run as we are transient school, so are pupils applying to the new school, or are they applying to a site within the school? As you know, we are quite often at our capacity of a number, so we could have a child that may be able to have a place at the Junior School because they have a class that is under capacity, but a younger sibling cannot come to our school, but in the new school there is a place at Cradoc. So, this new school is not full, but our site is full, and I think it is important that we really need to think about the big picture of how this works. If you were running a federated school and they are in different villages, that is very different. Nobody is going to want to go to the neighbouring villages 10 miles away, but they are real issues for us, and I think we need to acknowledge that they could be real issues, especially in a transient community like we are.
- The document states that the provision currently on Mount St Infant and Mount St Junior will continue in phase one. However, the detail regarding specialist ALN provision for phase two is unclear. What assurances can you give to the school at the setting and the parents of the children who attend that there will be provision at the new school if it is built?
- Is there going to be one setting leader for each three-year-old setting or will there be a team leader in each setting?
- How would that (discussing staffing structures for the Early Years if the proposal goes ahead) work? Because governing bodies do not have control of

three plus settings, so it would be a slightly different situation there. Our governing body oversee it and I am RI, but it is not actually the governing body that would be in control.

- There's very little detail about how the three plus setting will fit into the new build. Between the 2 settings, we can presently offer 75 places. This would need to be a substantial building to allow for the space required to meet CIW regulations. How is this being considered into the build cost or planning of the new building?
- It clearly says that the impact of not obtaining capital spending is high and the likelihood is medium. I think the authority is really acknowledging that it is a substantial risk. If we do not obtain capital funding, obviously in the current economic crisis there is not going to be a lot of spare money, but the authority has said that it could consider utilising alternative funding. Realistically what would be the option of that?
- Our outdoor area has been nurtured and developed over a 20-year period. This was not funded by Powys County Council, but through our strong community links that we have encouraged. We have these with the Army, the PTA, the national parks, etc. A quote from our Estyn report reads an *"excellent feature of the school's provision over many years is expert use of the outdoor environment to inspire and motivate pupils. Pupils work in the outdoor area in the extensive grounds and forest school has a powerful impact on their wellbeing and attitude to learning."* Our question is, how can you replicate this provision on a barren site that has been proposed in phase two, and how can you guarantee that the powerful impact on wellbeing will be safeguarded and the community link will be maintained?
- I think you know for us a lot of our partners; the MOD especially have invested heavily in our school. We have been able to achieve so much of the excellence we have because of their support. Lots of the things that they have funded heavily in the outdoors will be lost because we will not be able to transport them with us and there are big issues. Lots of our children live in the military camp, they walk to school. We are taking the school out of the community. It is in the middle of the town. People come to work, they walk their children to school, and putting it up on the top of the hill is like putting it in an out of town campus.
- A lot of our community links are established because we walk our children to the dementia centre. We can walk them to the old people centre. Our links are made because we can take our children out and about and that will not be the case if we move to a new site.
- We can walk to the theatre. We can walk into the library. We can walk into museum. All that will be taken away from us because we will have to have travel costs.
- I think an issue as well for us is we are talking about a significant amount of people going into one part of the town. So, we will have the college up there, we have got Brecon High School, we have got Ysgol y Bannau. We are talking about a 360 pupils school now but the pupils at the three schools is 400 pupils.

- We've got a huge new housing estate that is being put on the opposite side of the road. We have got a swimming pool. We have got 75 pupils coming to a pre-school setting. We are talking about a huge amount of people coming into one part of the town, and potentially lots of people walking as well. So, the safety of young children walking on the sides of roads. There are so many issues. I think we really need to think about that site. It is becoming like an out-of-town complex, it is not really in the town. If you know Brecon the site is not in Brecon, it is out of the town. And I think those are issues that we really need to think about.
- We've talked about Powys' plan to get rid of infant and junior schools and that that is the plan across Wales. I get that, I understand that, but we've been very fortunate in our school to visit lots of countries who deem foundation phase education in the way we like to think we do in our school who do keep those younger children separately who are sector leading in education, because they do they give their children that start in education there on separate sites. We like to think that we're aspiring to do that, and I get that this is the global plan and in the document it says there is evidence that it causes disruption to our pupils and families to move to the Junior School from our school. Did you ask our pupils, and did you ask our families about that? Because most of them think it is a strength of the school because their children are in a school where foundation phase is embraced and the whole approach is what you would get in Finland with that immersion in early years. Children get responsibilities at year 2 that they would not have in primary school which was picked up with the inspector who said that she hadn't seen children with the confidence, children with entrepreneurial skills that they would not have in a primary school, because that will be given to children in year five and six.
- I do think there's an opportunity for the authority to maybe to look outside the box a little bit and say, this is something that's really exciting, this is something that is sector leading and to see if that maybe is a strength that could be built on instead of that we must all look the same.

ii) Consultation meeting with Staff of Mount Street Junior School

- I understand three headteachers will be going into one. If one was not interested in taking up any opportunity to apply for the post, is there an option with re-deployment?
- Is the proposed time scale around the appointment of a new headteacher summer 2022?
- With regards to the specialist staff, we are working with two specialist centres, one in the infants and one in the juniors, what would be the proposal for the situation if the new school goes ahead? We have two separate specialist centres, one in the Juniors and one in the Infants. Would this carry on? We are a centre not just for the Brecon catchment, but for the Gwernyfed area too.

- As part of the specialist centre if the proposal was to go ahead would we have to reapply for our jobs?
- If this goes ahead and we become one school from September 2022, currently we have 3 admin staff and 3 deputy heads over the three sites. If this does go ahead, would that be sustained until the opening of the new school? And then on the reopening of the new school, the same thing would happen similar to the headteacher roles? How would this be managed?
- It is just that the needs of each individual even though you have become one school, the needs across the three sites will stay the same. In principle, we are talking about the same process for the new school with regards to the deputy head position and the admin positions, potentially that structure in the new school will not require that level of admin support? Are the same principles in place with regards to redeployment opportunities for these roles?
- On the current projected number of a 360 place capacity school, I know there are thousands of houses which are planned for development in the area. This may suggest the proposed capacity wouldn't be sufficient in years to come. Would this be further considered as part of this process?
- At the moment you haven't secured funding for the building. Should the funding not get approved and we don't get the new building, are there any long term plans for the three schools, taking into account what would happen for the three schools in terms of funding for building improvements?
- At what point in the process will we find out if we have secured that funding?
- If Welsh Government don't fund it, Powys will be funding?
- Hopefully when we get funding for the new building, will staff members, parents and students be consulted on the design of the building, will we be able to give our own opinions and ideas?
- With regards to the staffing structure, if you are consulting on a new structure which would align with the stage dates?
- Starting in September 22, things will probably remain similar for most the staff and the administrator, what would be the timescale then before consulting on anything different? The new structure.
- Just considering the proposal that the PRU will be built on the same site as the school. We all know that inclusion is central to everything we do so there is no issue with that, but there are a few things I would like to query. Is the suggestion that the PRU would be a building on the same site, or contained within the new school building itself? Because my thought process is predominantly the PRU provision is Key Stage 4 dominant, and very little Key Stage 2 provision. So, what would be the provision for Key Stage 2 learners?
- With regards to capacity and our admission numbers with a new school, when we become a new school on three sites before the new building, would those numbers still stand when still on three sites?
- Children are at the heart of what we do, but moving into a new Curriculum and the new ALN transformation, there is a lot of work going on behind the scenes creating plans and a vision for our school. As per guidance we have revisited our vision several times, and are busy working and aiding the staff in developing an understanding of the characteristics which sit under the four purposes that drive the curriculum. We are on that journey but come

September 2022, the vision which we have developed, and design will be scrapped? My concern is for the well-being for the staff which have invested so much time into that. There will be a new vision needed for the new school. This work needs to carry on as we need to move towards the curriculum, but I'd like to hear your thoughts on this.

- A few of us are on temporary contracts, where do we stand in the recruitment process please?
- If the proposals fall through, would there be a new proposal for the infants and juniors to merge?
- A lot of our pupils walk to school. The site of Brecon High School has been mentioned, are there any other sites that have been looked at?
- I think being very much part of the community we use the town a lot, and the church. I feel being further away from town would have those challenges to use those facilities, with walking down from the hill but obviously that's something we would discuss with the staff.
- We have set out a parental questionnaire, which asks about the disadvantages and advantages for pupils, the wider community and any general comments. I have to be careful, but my own personal views don't matter it is all about the children. My main concerns are, developing a world class building with facilities for children to take them forward. The second thing is, there are a lot of staff here who have had to deal with a lot and it has been extremely challenging over the past year. I have taken a personal decision to keep this under the radar, I just feel from our feedback on what has been shared with us from other schools it doesn't at the moment feel like there has been great support for this proposal and there has to be a very strong argument why this is going to benefit children? We are all sat here thinking what is this going to do for the children, I see a lot of benefits for the children but also a lot of things that need to be ironed out. As for the adults, my main concern is that having gone through a process it is people like HR that are really going to earn their corn at this time as it can be a stressful time for those adults wanting to work in the new school.

iii) Consultation meeting with Staff of Cradoc C.P. School

- How confident are you that you are going to reach phase 2? I noticed in the Consultation Document that it is a medium risk. How likely is it that we are going to reach phase 2? That is one of the major concerns.
- Leading on from that, how can you possibly make a final decision on the first stage if you can't guarantee that there is going to be money to go into the second stage? Does that then mean we have a school across three sites indefinitely?
- What happens if we do not get the money? What is the plan if we are on our site with one Headteacher that we might see once a week over three really different schools? You said 2024 at the earliest, how long are we going to be sat in our school in that situation if we do not get the money?
- So the new school is going to bring more jobs rather than losing jobs?

- What about the staffing structure, will there be more jobs for staff? Will the new school be large enough to accommodate more children?
- What about if heads and deputies have a teaching role (relating to setting up a new staffing structure for the proposal)?
- If a head has a teaching role 4 days a week. If you are looking at redundancy situations, would that teaching position be ring fenced?
- On behalf of the children, I am wondering how far your consultation with them is going? I am wondering if they decided they wanted to keep their school where it is, what would your options be there?
- I think there is a very strong argument to have an impact statement for each school. Cradoc School is a very different school compared to the other two in the proposal. Can I ask why the impact assessment has been written for all three schools together please, and is there a possibility that we could have an individual impact assessment for Cradoc?
- Are you saying there can't be three assessments, or at the moment there isn't?
- Ok, but there is no reason why it couldn't be three separate impact assessments under one proposal?
- Thinking back to a question earlier, as a team you have obviously been through this process before so you have experience that we lack. Based on your experience, how heavily has the pupils voice affected the decisions that have been made up until this point? Where children have whole-heartedly come out and said no, has that had an impact on the decisions?
- Why is the proposal not the same as the preferred way forward?
- I am very well aware that parents are confused that this consultation is purely Phase 1, all three schools to merge and phase 2 to move to the new building, whereas the stuff that is coming out in the preferred way forward is talking about Swimming Pools etc which is confusing the issue hugely for parents. I appreciate that this is not what you are consulting on now, but parents still have that in their head?
- The consultation isn't clear for these parents, and it is actually confusing the consultation. They think although the legal documentation is stating what it is, that is three schools ultimately merging on one site, but because of the preferred way forward they have in their head that the consultation is including that and that means they don't understand what they are responding to. Parents are clearly responding to what they think is the consultation when it clearly isn't.
- I would just like that clearly minuted, that parents are responding to what they think is the consultation, but it isn't.
- Going back to the staffing again, it is an obvious situation that SLT are in. It is very likely that there are going to be job losses, is there going to be any severance schemes like we have had previously? You talked earlier about how people might volunteer to go for various reasons, have you thought about anything like that for the staff who are going to suffer from this merger?
- With regards to three year old provision, we have very successful three year old provision here. The proposal currently only talks about the school, and

nothing to do with the three year old provision. Can you tell us about what will happen to those three year olds?

- That is my question and exactly my point, if there is no school in Cradoc there is no school in Mount Street so it is exactly the same for them. You said there is provision for early years, but is there provision for the three plus setting all the way to year 11 on the new site?
- I know there is discussion at the moment about a Flying Start setting going on Cradoc road, but would our children that would feed into our setting have provision at the new site guaranteed if it goes ahead?
- And that (Early Years) would be in addition to the 360 pupils in the school?
- Obviously we have wrap around care provision here which is being used as a beacon of good practice by various governing bodies and we will lose that if we lose the school. What provision is intended for those families that have wrap-around care currently?
- It is undeniable that Cradoc children need a new build, can you explain clearly why a new build in Cradoc is not on the table please?
- I think that probably proves why it is very important to have an impact assessment for Cradoc specifically, not just for the children who attend here but the extremely strong community built around Cradoc school and how this change will impact them.
- At that point can I just say how difficult it is to be in a situation where we can't engage with our community at the moment, because of Covid, as usually we would have a public meeting but we cannot do that at the moment. In terms of where we are, we know we are at a greater disadvantage as the one valley has huge internet problems, and there are people in our community who still do not know that this consultation is going on, not because we aren't trying to spread the word but because their internet is not working and they aren't attending community events. Our involvement with our community is affected because it is happening now, whereas if we were out of lockdown that would be a hugely different situation. There is particular concern for the older generation who are currently shielding, and they aren't planning to go out anywhere soon, even when shielding ends. It is important that this is noted and it is the wrong time to be doing this.
- Those are the people who have internet access and are able to respond, and do know about it, but it is the people who haven't got internet access that we can't reach and so they are not aware of the consultation.
- You just explained there has been a change in perspective from a place where schools the same size as Cradoc were being rebuilt and investigating this idea of larger schools. In your opinion, is this idea completely compatible with Welsh Government's guidelines of protecting rural schools, bearing in mind Powys is Wales' biggest rural area?
- Just to clarify, in terms of the Welsh Government guidelines you are happy that these Proposals are compatible and would be seen as good practice? In terms of the Welsh Government guidelines you are happy that these Proposals are compatible and would be seen as good practice?
- Going back to the pupil's voice, in this situation in particular it seems we don't know what the pupil voice is and it would be very easy to imagine the pupil

voice at Mount Street could be very different to the voice at Cradoc. So the link between that and the single impact assessment, when it comes to making a decision on the pupil voice, how much differentiation will be taken into account to listen to the separate voices from the separate schools, or will the responses all be amalgamated together? Without having separate impact assessments, is that even possible?

- But, if (the impact assessment) went ahead as three separate impact assessments each one would be in their own?
- Is there legalities behind why we couldn't have a separate impact assessment right now?
- The difficulty we have got is that on the impact assessment that has gone out previously, it is saying there is medium risk, i.e. in the middle, whereas in fact the two different responses are poles apart. If you have got a 10 and 1, which will average out at 5 but that doesn't take into account the 10.
- And you are guaranteeing that (reporting on the impact of the proposal on the 3 different schools separately in the consultation report) is what it is going to happen?
- Ok, so if we can have your reassurances then that (reporting on the impact of the proposal on the 3 different schools separately in the consultation report) is going to happen and we can have that minuted as it is very important for our children and families.
- Just on the impact assessment, I am wondering what the precedence are in terms of other school mergers across Powys and is it always the case that there is only one impact assessment with all schools involved or are there other cases where there has been more than one?
- In Llanfyllin, although primary and secondary were separate they were all the same families, in the same location with the same issues, so it was not quite the same scenario as in our situation here.
- I was just wondering if it's been taken into consideration at all the impact that it will have on our current intake rates? The uncertainty with the Phase 1 and 2, as a parent I think 'well do I want to send her to one of those schools with that uncertainty?' We know it is already affecting our school now.
- With regards to the impact and effect on travel for our children, as we have quite a few children that travel 9-10 miles to school and will need to go further, and with four year olds, what is the situation with increased travel distances?
- There has been discussion somewhere about children going over to Builth? If you look at the terrain, going over the Epynt to Builth there aren't any families that will be doing that as sometimes winter months it is impassable. So I feel that is something you need to look at when you are looking at numbers too.

iv) Consultation meeting with Governors of Mount Street Infants School

- Will parents be given a formal opportunity to engage with the Local Authority? There is also a struggle with interpreting the information which is being provided for some of the ethnic minority children, in particular the Nepalese community, in the current format.

- My question is, the Welsh Government has earmarked an extra £50 million in funding for large scale maintenance projects, will Powys CC apply for this spending now for Mount Street Infants in case you are not successful in receiving the bid for the new build?
- My next question is, Mount Street Infants is an excellent school as previously reflected in the Estyn report. Why is Powys County Council proposing to close three Schools with an average of 127 pupils per school, and are only proposing to close 6 of the schools with less than 50 pupils? Why are you not following the principles in the strategy put out in Transforming Education in Powys for 2020-2030, and concentrate on closing more of the small schools?
- RCT still has over 15 infants schools and it appears it's a political decision, one which is based on actual outcomes for the children. I am going back to Covid now as children have had a years-worth of disruption due to the pandemic. The preferred option from Powys County Council is going to provide further disruption to the pupils and staff if schools close and further down the line when they move to a new school building. They are also facing perhaps losing a very much loved and very well respected Headteacher. The process of amalgamating three schools is surely going to have an impact on how the children are taught, how the children benefit from the brilliant education they are used to. What research has Powys undertaken to make sure and evaluate the impact of the schools re-organisation during this pandemic, and how it is going to impact on the educational standards of the children and the well-being of the school community?
- The Welsh Government's non-statutory guidance does mention that considering lengthening the consultation period can be done and this has been done in Carmarthenshire. This would be useful for parents and difficulties of meetings. There is a duty of care for us as school governors to ensure staff mental health and well-being is being considered as well. My next question is concerns having one head covering 3 sites, against a background of possibly continued Covid. All usual things will need to be done, such as ALN provision, new Curriculum, 3 plus setting which isn't really mentioned at all – there's a thriving one at the infants and it's something that's crucial to the school. The military families are having difficulty during the Pandemic. We have got grants that have been awarded to the infants and we need to make sure these are spent on our children at the school, so I am unsure how that works going forward? How would you envisage, if Covid continues, that one headteacher can cover three sites to complete the complex task of being a headteacher for a split site school?
- Mount Street Infants is an excellent school with an excellent leadership team as evidenced by the Estyn report. Our children's experiences in Mount Street Infants does not tally with Powys County Council's views. In terms of the educational outcomes, to quote Geraint earlier 'there is so much more', I would ask the question how is there going to be more opportunity and how are we going to maintain the standard of teaching they get at this moment in time?

- I totally agree with your point of it being possible however, as there are no guarantees in life, we really want to maintain the current level that we have currently. While technology etc. is great, things like forest school for example are giving children actual benefits. My son came downstairs today to tell me that he had forest school today and he loved it. This is a provision that Shan and her team have worked on which is amazing, as simple as that. Obviously, there is no plan for that kind of facility in the new building and I know you have mentioned new technology but there are certain things that can't be replaced.
- Can I quickly say, it took 20 years for the forest school to be developed it was not something that happened quickly with one design.
- I feel that the great thing for MSI, it is not about the technology and things that you are promising with the proposal. I think that the nurturing and the teamwork and the spirit and ethos is what sets MSI apart and the solution that you are putting forward isn't, as far as I can see, going to benefit the infants.
- I work at Brecon High School, we do not have a forest school environment and as a teacher I have ordered my own trees from the national trust. This has not been factored into the design process at the new high school. From working on the old Brecon High School site, I do not see how you would create a forest school as the grounds are very steep.
- I think overall that it's indicating the site has some challenges in establishing that environment, sounds like some serious challenges.
- I wanted to pick up something on the transition between the infants and juniors. I found the proposal very negative about the transition between the infants and the juniors, you seem to be quite negative and you seem to be of the opinion that it is old fashioned or it's not 21st century. I find that quite frustrating because both my children went through that transition and they found it incredibly beneficial and I do think that it helped with the transition to High School. I found that the expectation for the year 2s, the responsibility they gained from being top of the school, was huge and I think it was a really positive thing. I found it quite frustrating that it was seen as a negative, this infant-junior separation because it was such a positive experience and they gained so much from it.
- Marianne mentioned that the site survey has not been done. I think a lot of discussion that comes from the parents at school is around the new site being out of town. It is a very difficult to give an opinion on when that is such a key part of the decision for parents.
- Is the plan to create a problem school on three sites so that it's easier to get the funding to build a new school?
- I think one of the major concerns if we move onto phase 2 is the risk and you have indicated in the proposal that there is a medium risk and high impact. We don't know and you don't know if you can get the funding. There is a real concern that you amalgamate these three schools and one of those school is quite geographically distant from the infant and junior schools. In terms of identity, I think that there are major issues there really. From our prospective if funding for phase 2 isn't secured there would be potential problems going forward.

- I have walked around the (proposed) site and there are multiple levels of very steep areas that are totally unusable. The edge of the school grounds is not where the fence is. The fence has to be within the grounds to allow for a safe route up to the swimming pool and so there is very little space and the complex proposal of the swimming pool and PRU, I just don't know how it will be feasible. I don't know how it is going to be a safe space. There are huge issues regarding traffic, the environmental impact. I don't know if National parks are involved as yet. Although you have done other school reorganisations further north in Powys, National Parks are very concerned and they may well have lots of restrictions that wouldn't happen elsewhere. Surely some planning regarding working with National Parks has already taken place.
- It (the proposed site) is in the same area where we have got a very well-developed site in Mount Street Infants, and a very strong feature of the provision is Forest Schools which strongly enhances the pupils' well-being. We need to be very confident as governors that our children don't get less than they have now. How are we able to be confident? What is the process in being involved, and what is the process for you? Have you visited the school even, have you seen the site?
- How is a 360-pupil new build school going to improve learner entitlement and experience for the pupils at mount street infants?
- I have just got a couple of concerns. One is that there is no guarantee with the money side of this, that you are going to get a new school. No disrespect to the school but looking at (*Mentioned a school but not clearly audible, believed to be Ysgol Calon Cymru*) in Llandrindod, and Builth have real concerns over how that goes forward. Also, as you say, the team are amazing but you are now trying to put 3 schools with 3 different ethos's, with three different teams. One is a rural school, two are town schools and you are putting a lot of pressure on a temporary Governor, temporary Governing unit and a new leadership team to try and move that forward and do better than currently, which is amazing with what they all doing. The last point I would say is that, given what the staff have gone through over the past year now with Covid, to put this on them as well is just asking too much. You know the staff wellbeing is really important and I think for them to go through this is just not fair. I just had to make that point.
- I keep hearing that the aging of the buildings and new technology and things. If that is the reason why we need this, to amalgamate the three schools in an out of town site.....the problem and the solution, to me, don't match. I heard from Marianne before that the new Governing Body will be able to contribute to the design but I didn't quite hear if whether there will be an opportunity for more consultation when we have more information about the site?
- I think the concern is that you haven't even spoken to, I think the point was raised about National Park, and you've not talked to planning, how do you know you can even go ahead with development on that site? There is the uncertainty of what happens next. We are in agreement that it seems such an

odd way to do it. We don't feel that the options will offer anything better for our children. How confident can you be without any feasibility without any exploration of possibility that it will go ahead. I don't see how you can be and it is a very high risk strategy.

- My understanding is, the idea of creating a school upon the Penlan site is that it will be a community school and there will be other resources up there. Otherwise, it will just be a building shoved up there, a leisure centre, potentially a PRU and a swimming pool. There are developments in the town that are being planned, for example an early years centre on Cradoc Road. I'm just wondering what your vision is on making that site if you were to get the funding and it was to go ahead, how will it become a community school and what other resources, specific resources, will be up there other than leisure facilities.

v) Consultation meeting with Governors of Mount Street Junior School

- More information is requested as to how the three schools would close in practice. It sounds simple, but it probably isn't. What are the plans regarding this?
- I understand the process in terms of systems etc, but my concern is the actual practical application of systems and staffing to achieve a move. I would like you to consider how we physically achieve the move and what support is there to physically achieve the move.
- I understand the phasing, but I want to know what happens when the school actually closes and the actual move to the new building, the actual process. How do you support the move and how is it done practically?
- I'm looking to understand what certainty we have in terms of retention of staff and also the long-term retention of their current salaries and salary bands. I imagine that there will be a reduction in the senior management team. Can you tell me what those guarantees are for our staff?
- I just wanted to ask about the funding for this proposal. Is the funding secured, is there money there to proceed, because the last thing we want to do is to have all this worry regarding the consultation, and find there is no money to do it?
- Will the funding that you apply for after the consultation apply to any of the options that were considered? Or is there something special about the current preferred option that would mean that it would be more likely to get funding?
- What would be the position if Cradoc school rejected the plan, but the Mount St schools wanted to go ahead?
- I'm assuming that in order to have a fair representation on the temporary governing body, there would be people from each school's governing body on the temporary governing body? Would the temporary governing body be structured in the conventional style of governing body, for example a local authority representative, staff members, parent governors? How are people elected into the temporary governing body, and would the temporary governing body run concurrently with the three existing governing bodies?

Would the existing governing bodies then disband in September 2022 when the three schools would merge?

- How feasible is it for one head to look after three different sites during such a turbulent time?
- If the plan goes ahead, and it is decided that you are going to build a new school, how much input would there be with the existing schools as to the design of the new school?
- I have two separate elements to discuss, one of which is on the basing of the numbers for 350. I'm not sure that you know, but within around about a kilometre and a half of the school site, there's a number of candidate sites in the Local Development Plan for the National Park. Under Welsh Government guidance that's up to 1700 homes within 1 1/2 kilometres. It's highly likely that most of those wouldn't be developed, but there's already another 150 homes that have been granted permission, so it could be that there's up to 1000 more homes within the direct catchment.
- I'm slightly unnerved by the fact that you've got a number of people traveling from Cradoc and literally passing a primary school to get to their primary school. I am interested in energy stuff and I have spoken with the designers and developers. of a lot of schools that you've delivered. With Brecon High School, it was all bells and whistles, but a lot of things were engineered out, because the budget gets constrained, and this has happened with a lot of other projects. And it's just one of those sort of things that I personally believe it's vital that we actually ensure that they are one of the key things that aren't cut from the budgets and there is in the potential for a new build, for a combined heat and power system, combining a number of buildings, potentially supplying the heat on a heat mains. This involves working beyond just a simple remake of the school.
- There is the potential there to collaborate with the broader community to do something quite transformational. I think we'll find that that sort of thing would be commonplace in 15 years time. So let's not miss an opportunity to potentially deliver that if it is there.
- I just wanted to think a little bit about my own experience in Ystradgynlais. I don't believe that this situation can't be as onerous as putting 11 schools into 4 schools as happened in Ystradgynlais, which had lot of impact on staff. Logically, these children can have world class facilities, but there may be some high tension around this in the months to come. And making logical decisions is going to be paramount.
- The other matter we need to consider is that of numbers, and the very transient nature of military children, and I just wonder if something like that has been taken into consideration.
- I am concerned for staff and whilst I can't see this process being as onerous as the Ystradgynlais experience, looking out at the individual colleagues and in terms of fixed term contracts etc which has been explained this afternoon, I just wanted to point out to governors as well as that there are serious considerations here for the well-being of our colleagues.
- Is there any research on the wellbeing and learning outcomes for pupils when moving into larger teaching environments? I am thinking particularly about the

effect on vulnerable or children with learning, learning difficulties and the impact on them because at Mount Street we have a very successful ALN programme.

- Can I just add a second question which is very different. I'm wondering if the proposal has taken into account or talked about the issues of transport infrastructure and road capacity? There is a housing development of significant size that is in the process of opening. We also have the hospital and all of those are within approximately quarter mile of each other on a single carriageway road running into the centre of Brecon, which comes to a set of traffic lights and in normal times and even before the new housing development opens, that would back up around school hours. I can only see this proposal exacerbating the problem quite considerably. Has the issue been considered at all?
- It's a follow up from early questions about the criteria for funding. It was mentioned that Welsh Government look at two main criteria which is looking at improving schools and the community focus. I am just wondering what the arguments are for saying that this proposal is community focused. The pupils in the new school are going to be further away from the populations and the communities they exist in.
- Thank you very much for giving us this opportunity to be involved in the consultation. It is very much appreciated. I'm sure that as the weeks go on there will be more and more questions. I do feel a bit happier tonight that the process does seem to be sort of open and transparent and we are having opportunities to put our points of view forward. Thank you very much for meeting this evening.

vi) Consultation meeting with Governors of Cradoc C.P. School

- I would like to ask about the lack of an individual impact assessment for Cradoc school. I think that Powys' response is that because the three schools are part of 1 project, we only must do one consultation for the project, but the three schools are entirely different. Cradoc is a rural school even have different things taken into consideration to adhere to the new code that was bought out in 2017, by the Welsh Government. I am not sure why we have to have a separate impact assessment where many of the things that impact Cradoc school are not on the radar because they are not considered as being having the same impact on the other two schools, so that is the first one. Would you like to come back on that one or for me to go through the questions?
- It is 7 cabinet members who will be deciding on this, but I just want to make sure that they are cited on the impact this is going to make to Cradoc separate to the other schools, and if they are just looking at one impact assessment for the whole cluster, it is just going to go over their heads and they won't even aware what some of the concerns are.
- If we were to build a new school separate to the way that any new school is built and what environmental targets must be set to that. I'm concerned about the message that we will be sending if a new school is built in Brecon and

we're forcing more people to travel further with their children to take them to school, which will effectively be the case for a rural ward like the Yscir ward. They haven't got far to travel because Cradoc is a lot closer to the community, whereas if they had to travel into Brecon, there will be more vehicle movement which is obviously going to have an adverse impact on the environment. So that needs to be taken into account in any Proposals going forward really, and I think when it comes to the time where people must make a decision on this on this, they need to be aware of that and that it could be contravening the objective that we are trying to get towards for 2030.

- I have no doubt that any new school is going to adhere to new environmental targets. It seems strange that we would be concentrating so much on doing that whilst counteracting the local people filling the air with exhaust fumes. On the same sort of subject really on school transport. I think this is something that has been raised before but there has been no response or justification. Free school transport must be put on for pupils to be taken to their nearest school. However, if a new school is built on the site of the old high school in Brecon it will not be the nearest school for the residents of Yscir. It is clear their nearest school will either be Priory school, by the cathedral, or Llanfaes school. So how are we going to be putting on free school transport to those pupils to get to this new school?
- From my point of view and probably from a legal point of view at the time when Cabinet must make the decision at that point in time, they will not be sure whether this will be in place or not, so they will be taking a bit of a punt really on the chances that it could be brought into place, whereas at the same time it might not. So that is something I think Cabinet members need to be aware of, really.
- I understand that phase 2 isn't a dead certainty and we hope to be able to get the right funding in place from the Welsh Government to proceed to build a new school, but if it doesn't, and this is voted to go ahead when it comes to Cabinet in a few months' time or a few weeks' time, then Cradoc school at the moment is in a pretty bad state. If they are going to be waiting indefinitely for a new school to be built for two, three or four years, and then a decision is made not to go ahead. For those few years, pupils in Cradoc will be having a substandard education because the school certainly does not meet the criteria set in the new Curriculum and it could last even longer as we could be back to square one. So again, I think it is a bit unfair for Cabinet members to be voting on something that isn't certain and might not happen. How certain are we that this is going to happen or not?
- On predicted pupil numbers, if you look at what the predicted pupil numbers are, they are not considering the number of new houses which will likely get built in Brecon and the surrounding areas. There is a bit of a question there over capacity and whether knocking down Cradoc School could put us in the position where we are not going to have enough school places.
- If the ambition is to try and sort of consolidate schools into one, then there are too many schools in Brecon town itself, and you should perhaps be concentrating on one of the other ones in Brecon rather than Cradoc because

we will still end up with too many schools in Brecon even with the new one being built.

- I was wondering about the impact assessment which would be made on the other communities which serve the school, areas such as Battle, Merthyr Cynog, Pontfaen, Llanfihangel Nant Bran, Upper Chapel, Lower Chapel and the Yscir ward and what assessments have been made on these.
- Looking at the consultation on page 6 the map is at best inadequate and at worst, and I hope not, but deliberately vague and possibly deceitful. It shows Cradoc school located in a small village just outside Brecon. Actually, it not only serves Cradoc village but a huge rural area that stretches up to 8 miles of the valleys up towards the Epynt Ranges. I feel that these areas should have been inputted into the map. I hope this map is not designed to give a false impression to councillors, the Cabinet members, and to the public who do not know the area and the background history of the school. As the school was originally an amalgamation of six small village schools and was sited in this current location as it was at the bottom of the three valleys, which now serves all that area. Why was the catchment area of the school not shown on the on the map? As some pupils are already travelling up to 8 miles to get to Cradoc school.
- One of the things that was mentioned in the staff discussion earlier is the acknowledgement of the very different impact that that will be had on Cradoc compared to the other Mount Street schools, and the fact that as far as the officers are aware, there is no legal reason why three separate impact assessments cannot be done. Marianne was going to go back and take a view from the legal team as to whether that should happen. We talked at some length really in our staff meeting about how the responses for the impact assessment would be different, with Mount Street being at one, perhaps Cradoc being at 10 and coming out as a 5 showing no impact. That is not the case, although there would probably be a positive impact for Mount Street, there may very well be a very negative one for Cradoc, and we need to make sure that that becomes very clear. I said it in the staff meeting and I think the governors would be with me on this. We really do want a separate impact assessment for Cradoc, and I think it is important that happens because we are in a very different situation than the Mount Street schools.
- Can I ask again, if it is legally possible to have them separated, I think certainly from our staff in point of view, we have made it clear we would like to see that, and I think the governors would agree with that.
- My concern during this Covid pandemic which is having a huge impact on our day-to-day life, particularly on our community, is for some of the generations within our community and extended community who are not in a position where they can access sufficient Internet or Wi-Fi and haven't got the opportunity to speak about the concerns of the consultation. I am concerned for the well-being of our children, our staff, teaching staff and non-teaching staff during this time. Speaking from a teaching background myself, just the day to day of ensuring that our children have had adequate education through Teams, to then put unnecessary stress on the well-being of children, whether they will all go to the same school as their friend, the teachers whether there

will be jobs available for them. Are we doing it at the right time during a worldwide pandemic?

- I do believe there is a generation out there who do not have Internet access or are not confident with it. They would want the opportunity to speak in a public meeting if we did have one. Seeing and answering people face to face is a lot different from a Zoom meeting or a Teams' meeting. And I just feel that we are not providing that opportunity for all. I appreciate you saying the responses are possibly higher in this manner, but it is not giving an opportunity for all, such as the generation before us. I am a past pupil of Cradoc who wanted to send their child there and are very much part of that community from years gone by.
- Looking at your first slide that you presented earlier regarding the vision. I think the second paragraph discusses the capital investment and the opportunities that a school can bring to a wider community in the activities that it can bring. If we are thinking about Cradoc, losing that in the village of Cradoc diminishes the opportunity for communities in the adjoining areas. So, I just wondered if you were able to answer if Cradoc was to close, where that fits within your vision?
- I think that again highlights the need that we do need that separate impact assessment and that is what we are definitively asking for, because that will collate all those views that can be presented to the Cabinet.
- All I wanted to state was when it was spoken about the global pandemic, I would have thought that as a minimum the consultation period should be extended so that everyone can put their views and opinions forward due to the difficulties we find ourselves in currently.
- Regarding the wellbeing of the pupils, where does that fit within your Powys wellbeing plan?
- I am hearing that you are providing the provision due to the pandemic, and obviously there is a significant amount of support that is being offered to both the pupils, the teachers, and parents of young people at this moment in time, so that demonstrates to me that there is a need for that. My question, really, was relating to the wellbeing of the pupils during this process. Have you considered the impact of the additional distress that is causing the pupils at Cradoc school at this moment in time?
- So, the Council's vision for 2025 states that it is your expectation that schools become a focal point within their communities. Many schools are already used extensively within their communities and have strong links with the communities in which they are located. So how can closing Cradoc, a community which has lost post offices, public transport links, shops and pubs over the years, how can closing Cradoc school fit with that vision? In addition to that, if you are going to do this while efforts, are you going to make to invest in that community to allow them to have some sort of Community Centre or hub?
- I do not think that you have considered there the fact of a child and their sense of belonging. You are going to make it a lot harder for children to attend after school clubs because they are much further from their home. I think all of that again signals that Cradoc needs its own impact assessment. I do not

- think that you have represented Cradoc fully or fairly, and those things that we are raising, do need to be considered. In addition to that, just whilst we are talking about the building of Cradoc School, if you are successful and you close the school, can I please ask what are your plans for that school area?
- Geraint mentioned that there will be minimal impact on the pupils in the short term. I disagree. As soon as the decision is made, parents will make their choices and friendships will start falling apart. Parents chose Cradoc for a reason; they wanted a rural school, and they will now choose an alternative such as Sennybridge.
 - Cradoc is unique. We have a choir, we have sports teams, we have clubs. What we do not have is new buildings.
 - It is possible that you would sell it for development, thereby increasing the number of children in the area, thereby increasing the number of children that would need to travel and the amount of traffic on the roads. So that is a possibility?
 - If we get through the first phase and we become one school with regards to headteacher, assuming none of our headteachers will be ring fenced, it will go out to a national advert. Then the new governing body would appoint a new headteacher. Am I right?
 - There is a lot of movement – because like you said or there will not be a short term there, be no worry for the children or anything, but I know it could be anytime when you have got a new head coming in, but with everything else going on in there and suddenly and maybe a different ethos been instilled suddenly into the school, things change in different ideas. I think it could really affect them, we have had children in tears now when Mrs. Morris had to deliver the news via Teams and I was still thinking it is detrimental to their wellbeing.
 - You say this will happen in 2024 at the earliest. Does there come a point where something must be done? Because if the money is not available, we are not going to sit like we are for indefinite number of years, that is my worry and having one head in three places if it goes that far.
 - Cradoc could still be in the school in 5-6 years with the school falling around its ears.
 - If Cabinet pass the consultation to go ahead, is it possible to delay the statutory notice to merge the three schools until funding is secured for phase 2. If funding is not forthcoming the notice need not be served? We could lose excellent staff during the uncertain time.
 - If the Headteacher is a teaching head, would we have to employ someone else or does the teacher move from one of the other schools or do we then get more money in our budget to replace that teacher?
 - We are already seeing children evaporate to other schools, due to the insecurity. However, we are oversubscribed in our 3+ setting and turning people away! There are enough children here, but we need to provide them with good facilities in a strong community.
 - It has been helpful listening tonight. Yes, it is emotive, and it is very hard to remove yourself from that being very emotive subject, but we are also, sensible people we do understand. You guys must do something, but it does

feel wrong in this point. Cradoc does offer something completely different to any of the other schools. You know, we are a community.

- We are talking about walking distance for pupils who live on the furthest point of Brecon will be expected to walk along a main road, cross 2 main roads, increased traffic load up the main Cerrigcochion hill, which now has several new housing estates a route to the public highway. You have a leisure centre, Brecon High School, the hospital, that trunk road where people are coming into Brecon from the Felinfach area to use the supermarket and you have a bus station. I am just questioning about the safety of our children. You know these are potentially 5-year-olds and lower, walking over 1.7 miles at the start and the end of the day. I am just concerned about the safety element this new build.
- We have children cycling to school now and arriving on horseback. They will not be able to do that if the school is Brecon.
- Can I thank the officers for confirming that there will also be a 3+ setting on the new site. However, this will also impact on the number of cars that will be visiting the site, particularly if a family have several children – they will not walk.
- There are going to be parents with pushchairs holding onto one child. We have lost the lollipop supervisors. I am concerned about children walking that distance and their safety.
- Do you believe (the likely route to the new site) is a safe route for them to travel? It is not a safe route.
- Why isn't rebuilding Cradoc School one of the options in the consultation? What enquiries have been made into the availability for funding of investment in Cradoc School?
- Going back to the Consultation Document it mentions Cradoc as a rural school on page 7 but then does not mention it until page 45 in the appendices. Is it the intention of Powys to close the school against its own rural school policy? I hope they are not merging the school with the Mount Street schools to close Cradoc School to get around the Rural Schools' policy to close Cradoc by the back door?
- First, on the point that Sarah raised over ring fencing and a position for permanent current headteachers. If this proposal gets the go ahead, will the three current headteachers roles not be deemed as temporary and therefore not permanent to be eligible to be classed as being ring fenced?
- If this does go ahead and for whatever reason phase two doesn't go ahead, for some reason, then revert back to the preferred option of having a new school building in Cradoc, but I'm just wondering if that can be considered whether there's perhaps there's a time frame or a time restraint which is put on this so that we don't go on in no man's land with a rotten school in Cradoc with pupils that are just waiting for a response for 12 months or 2 years. I think there needs to be something in place so that if a decision is made, we know how far we are going to go before we then revert to the first choice really. So, if you can take that on board and I think that was it would be a very fair way of doing it.

- On the impact assessment. I do not think I have really had a clear indication of whether we think we are going to get one. You said you are going to go back and get legal advice, but is that legal advice to find out if you can give us one or if you have to give us one?
- Do we know how long it will be until the decision is made? Roughly speaking how long are we talking before this goes to the next phase?
- How long would it be before it comes to Cabinet for a decision?
- As Sennybridge is also part of the transformation process, why was it not suggested that Cradoc and Sennybridge merged instead, as we are both rural schools?
- Can I refer the Council to the Rural Research report where rural schools achieved quite high scores in wellbeing, in wanting to learn, and the Council took part in it themselves because it was an ERW report July 21st, 2019. I am not asking for a comment, I am just asking for it to be noted.

DRAFT

5. ESTYN

Estyn's response to the consultation is provided below:

Estyn's response to the proposal by Powys County Council to close Mount Street Infants School, Mount Street Junior School and Cradoc C.P. School to establish a new primary school for pupils aged 4-11 in two phases. The first phase, on the three current sites with effect from 2 September 2022 and the second phase on one site in Brecon by September 2024 at the earliest.

This report has been prepared by Her Majesty's Inspectors of Education and Training in Wales.

Under the terms of the School Standards and Organisation (Wales) Act 2013 and its associated Code, proposers are required to send Consultation Documents to Estyn. However, Estyn is not a body which is required to act in accordance with the Code and the Act places no statutory requirements on Estyn in respect of school organisation matters. Therefore as a body being consulted, Estyn will provide their opinion only on the overall merits of school organisation Proposals.

Estyn has considered the educational aspects of the proposal and has produced the following response to the information provided by the proposer.

Summary/ Conclusion

The proposal by Powys County Council is to close Mount Street Infants School, Mount Street Junior School and Cradoc C.P. School to establish a new primary school for pupils aged 4-11 in two phases. The first phase, on the three current sites with effect from 2 September 2022 and the second phase on one site in Brecon by September 2024 at the earliest

The Council lays out a clear rationale for its proposal. It involves eradicating around £2.33m maintenance backlog between the three schools, which it considers to be in poor condition. The proposal also addresses the need to tackle decreasing pupil numbers and reduce the Council's surplus places in primary schools.

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.

Estyn is of the opinion that the current proposal is likely to at least maintain the education provision for pupils in the area.

Description and benefits

Powys County Council has laid out the benefits to this proposal clearly. The proposal will facilitate transition arrangements in the two schools based in Brecon along with perceived improved staff development opportunities. The proposal is a planned means to eradicate a large maintenance backlog, tackle decreasing pupil numbers and help reduce the Council's surplus places in primary schools. While the proposal identifies the cost of the maintenance backlog for Cradoc well it does not identify the difference in condition or cost of the remedial work between the two schools in Brecon.

The Council identifies many of the disadvantages associated with the proposal. The main disadvantages for pupils include additional travel for pupils at Cradoc CP and the difficulty of attending after school activities when the new school opens. The report identifies the loss of nursery education in the rural area of Cradoc, which is compounded by the lack of public transport to the village. However, the proposal does not detail clearly enough how it proposes to address the lack of nursery provision in Cradoc, as the alternative non-maintained settings listed all involve notable travel into Brecon or Sennybridge.

The Council has identified eight possible options for the three schools including maintaining the status quo, forming a federation or amalgamating the two Brecon schools only. They have analysed the different Proposals' strengths, weaknesses, opportunities, and threats along with assessing the options against a number of critical success factors. Based on this analysis they have identified the preferred option of merging Mount Street Infants School, Mount Street Junior School and Cradoc C.P. School to create a new primary school. The Council propose to implement this proposal on a phased basis with phase one establishing a new school operating from the current three sites and phase two involving moving to a new building located on the site of the former Brecon High School.

Since the proposal includes the closure of a rural school, the Council has clearly identified the reasons for formulating the proposal. These are mainly the school's falling role and concerns about the school building. Cradoc C.P. School has the capacity for a 175 pupils while the most recent data shows that the current number on roll is around 95 pupils. Concerns regarding the building include the problematic configuration of the school as it creates wellbeing concerns.

The reports correctly identify that should there be no school or nursery provision in Cradoc, it is likely that there would be an impact on families with

school-age children and that the new situation could encourage these families to leave the community. They also identify that the proposal could discourage young families from moving to the community. Importantly, the proposal does not detail clearly enough how it proposes to address these issues.

The school in Cradoc is also the only remaining public building in the community, however in this instance the Council has identified some alternative locations in the area where community events could take place. The proposal does not address how the wellbeing of the children in the village will be sustained when the only play area in the village is lost with the closure of the school.

The proposal identifies five possible risks to the project, including parents not wanting their children to attend a primary school as opposed to an infant/junior school or not wanting their children to attend the new school. These scenarios could result in parents moving their children to alternative local schools. Considering that the proposed location of the new school is on top of a hill on the outskirts of the town, the identification of this as a low risk by the proposal could be seen as too positive since parents could decide not to send their children there due to the inconvenience. The proposal has not looked in sufficient detail at the possible impact of the proposal on other schools should parents choose not to send their pupils to the new proposed school. It is unclear whether the Council have conducted a survey of parents' views on the location of the school and their possible choice of school should the new build go ahead. While the proposal identifies possible risks based on the uncertainties created by the proposal, it lacks detail regarding how the Council would respond should there be no capital funding available to fund the project.

The proposal acknowledges that the full implementation of the Proposals would result in additional travel to school for pupils for whom Cradoc 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 that is in operation at that time, it is acknowledged that there could be an impact on some pupils' ability to access after school activities. Travel could also impact on the ability of parents to take part in school events and meetings since there is no public transport to the village. The proposal does not detail how it proposes to address travel issues related to after school activities

The Council have considered the extent to which this proposal supports the target of the WESP. As the proposal is to amalgamate three English-medium schools in order to establish one new English-medium primary school it is not linked to the targets in the Council's Welsh in Education Strategic Plan. The Proposals would therefore not expand or reduce the availability of Welsh language provision.

Educational aspects of the proposal

Overall, the section in the proposal on its impact on standards, wellbeing, provision and leadership in all three schools is too general as it lacks detail. The proposal states that standards, wellbeing, provision and leadership in all three primary schools are currently good and that the Council would expect amalgamating to further strengthen the current situation. However, it is not clear on what this judgement is based as the proposal does not contain sufficient information on the current performance of the schools. The proposal generally has an over reliance on stating that the Council anticipates that amalgamating the three schools would have a positive impact or would strengthen standards, provision and leadership.

The proposer notes the enhanced opportunities for pupils and staff and the wider range of facilities that will be available in the new school. It also refers to the benefits to staff and pupils that would arise as a result of sharing staff expertise and good practice. It is fair to assume that it is likely that experiences for learners would improve with a modern, purpose-built school as proposed in phase two of the development.

The proposer has carried out an equality impact assessment of the proposal and claims reasonably that the proposal would provide enhanced opportunities to support pupils belonging to vulnerable groups, including those with special educational needs. It is clear from the proposal how the phased development will work and that the proposal is likely to cause very little disruption to learners.

6. ISSUES RAISED DURING THE CONSULTATION PERIOD

The following tables list the issues raised during the consultation period and provide the local authority's response to these issues.

1. COMMENTS ABOUT THE CURRENT SCHOOLS

1.1 MOUNT STREET SCHOOLS

1.1.1 General comments about both Mount Street Schools

1.1.1.1	Both schools have an enthusiastic, professional and committed team of inspiring staff who are focused on continuing to provide high quality, child oriented teaching and learning.	The Council notes these comments about Mount Street Schools.
1.1.1.2	We have also specifically chosen an Infants / Juniors system, because of the way we feel each school can better cater for the ages of the children.	As above.
1.1.1.3	Having had 2 children go through both MSJS and MSIS and having served as a governor at both (Chair at the former) I feel it is wholly unnecessary to merge the 2 schools in any way. They both provide excellent learning environments for their own cohorts and have been recognised by a number of independent organisations as such.	As above.
1.1.1.4	My son attended both Mount Street schools, they were great schools with strong individual identities, catering for 2 very different periods of childhood.	As above.
1.1.1.5	In both the Mount Street schools these head teachers are excellent, they know all the pupils in their schools. They save The Council money by stepping in to cover illness on numerous occasions, they run activities and work tirelessly to secure funding to improve the provision for the pupils in their schools.	As above.
1.1.1.6	MSI/MSJ are not small schools/ they are not in deficit/ they do not have significant surplus places/Numbers set to increase according to the horizon scanning.	As above.

1.1.1.7	Both schools have an enthusiastic, professional and committed team of inspiring staff who are focused on continuing to provide high quality, child oriented teaching and learning.	As above.
1.1.1.8	The grass field is a fabulous resource, again used by both schools and allows for outdoor playing, sport activities and exploring nature in a safe, easily observed, manageable way, which is ideal for learners with special, educational needs.	As above.
1.1.1.9	I understand that the two Mount Street schools have very good inspection reports. These are not easily earned and shows that each school is working very well as it is.	As above.
1.1.1.10	That Mount Street Infant and Juniors are the last remaining separate schools of that age school in Powys is something to be proud of. We have survived for a reason, it works. It worked 30 years ago when I was there, it worked 30 years before that and it is still successfully working now. Each school can individually be totally focussed on the needs of KS1 or KS2. Because they don't have to cover the whole primary age range they can have age-appropriate facilities, tables and chairs, toilets and wash basins, outdoor play equipment. The needs of a 4-year-old are very different to an 11-year-old. I love that the Infants school has such a welcoming, small, family feel and that they can concentrate on the early years and KS1. And in the playground, no scary 11-year-olds to intimidate the little 4-year-olds.	As above.
1.1.1.11	Mount Street Infants and Juniors are both wonderful schools, with wonderful head teachers and teaching staff. It saddens me that something that works so well should be destroyed just to save money.	As above.
1.1.1.12	As a former pupil I really benefitted from having the Junior and Infants school separate, as it provided a sense of progression between stages of life. The transition means that even at ages 6-7, year 2 pupils are able to be role models for younger pupils; something which would rarely happen in a normal primary school. Personally, it provided a sense of accomplishment, making my school years feel less monotonous. It also helped to make the transition to secondary school less daunting.	As above.

1.1.1.13	Both Junior and Infant schools are large enough to sustain themselves as independent schools. There has been much research into the benefits of children benefit from being taught in smaller schools.	As above.
1.1.1.14	Both are excellent schools and both have benefited from their town centre location.	As above.
1.1.1.15	Both schools have had a positive impact on my children, both pastorally and academically. They have and will come out as well rounded, caring, enthusiastic, empathic, and engaged learners, all due to the school's team, location, resources, and building, all of which you want to destroy. The pupils are nurtured and thrive in the school system that currently exists.	As above.
1.1.1.16	My children received a fantastic education in the Infant school lead by a highly skilled Foundation Phased cohort of staff and are now receiving a great Junior education in the Junior School.	As above.
1.1.1.17	My children attended both Mount Street Infants and Juniors and benefited immensely from the attention the teachers were able to afford to them - I will be forever grateful to all the teachers at both schools. I never failed to be touched by the teachers' attentiveness, attention, care and gentle communication with my children and during their time there witnessed this level of care meted out to all the children in the school at all times.	As above.
1.1.1.18	I strongly feel that attending separate Infants and Junior schools benefitted me and my siblings.	As above.
1.1.1.19	Pupils at the Infants School look up to pupils in the Junior school, they aren't scared of them, they envy them and can't wait to move up, to where you're expected to be just that little bit more grown up, a bit more independent.	As above.
1.1.1.20	The transition from Infants to Juniors prepares pupils for the step up to High School 4 years later, having already experienced a similar move.	As above.
1.1.1.21	I remember the year 3 teachers and the Junior School head teacher Mr Wormleighton coming over to the Infants school to talk to us and prepare us for the move, and all my year 2 class going over to the Junior school for visits to help us with the transition. I	As above.

	don't remember feeling worried at all, I think it was really well managed. And from what I hear from other parents now, it still is.	
1.1.1.22	Children can be better cared for in smaller settings where they are not lost among the crowd. All my children went to the Mount Street Schools and benefitted from the warm, family atmosphere of both schools. One of my children has Asperger's and he - now a young adult - commented that he would not have been able to attend a larger school as it would have been too overwhelming.	As above.
1.1.1.23	We have such fond memories of the two great schools, it would be wrong to destroy the intimacy and character of a crucial part of the community of Brecon.	As above.
1.1.1.24	Currently parents using Mount Street Schools have the option of parking at the Coop and walking up to the school. This is a positive for children as they can walk and observe day to day activity in the community. This is an aspect which is important in terms of reducing carbon, improving health, and promoting interest and knowledge in local surroundings.	As above.
1.1.1.25	Both MSI and MSJS work with local communities. Including Morrison's who provided free fruit for key worker children during the lockdown, the Co-op who provide free parking and additional funds as part of their charity work. A number of local care homes for the elderly work with the school and dementia friends, and the pupils (prior to Covid) visited the care homes to work alongside the elderly people on activities. The PTA have close links with various business owners in town who provide support for events and fund raisers.	As above.
1.1.1.26	My children currently attend MS Juniors and Infants. The schools provide a friendly nurturing learning environment at the heart of the community, they are community spaces.	As above.

1.1.2 Comments about Mount Street Infant School

1.1.2.1 General positive comments about the school

1.1.2.1.1	Mount St is a very caring happy school that provides a stimulating environment for children to feel safe, children are at the heart of everything and thrive well in this school	The Council notes these comments about Mount Street Infant School.
1.1.2.1.2	Mount street Infants is a highly respected and valued school in the local community; it has provided my children with a first-rate education and an overall positive experience that their caring and innovative education have further enhanced.	As above.
1.1.2.1.3	Mount Street Infants particularly gives a fantastic start to any child's education; it should be celebrated and used as an example for others to follow, not destroyed.	As above.
1.1.2.1.4	I chose to send my child to Mount Street Infants school due to it being an excellent school under an excellent head.	As above.
1.1.2.1.5	Mount Street Infants is an excellent school. The feel good factor in the school is amazing.	As above.
1.1.2.1.6	Mount Street Infants is an excellent school. Why change something that is working so well? We chose Mount Street Infants as a school for our children due to its excellent Estyn report, its strong reputation for child-led care, it's ability to focus entirely on foundation level learning, and its ability to offer forest school in its own dedicated woodland space	As above.
1.1.2.1.7	Mount Street Infants is an amazing organisation that delivers excellent education in a very special setting.	As above.
1.1.2.1.8	The school is currently excellent, with an excellent Estyn report, with a very strong team of staff and an outstanding head teacher.	As above.
1.1.2.1.9	Powys should be celebrating and promoting the provision at Mount Street Infants and sharing the good practice that exists throughout Wales.	As above.
1.1.2.1.10	Estyn, Healthy Schools have praised the school, and many others recognise its excellence as a school. The excellent quality of the school's care, support and guidance for pupils results in outstanding levels of wellbeing. The school has an exceptionally happy family atmosphere where nearly all pupils thrive. It provides an extensive range of imaginative learning experiences, both in class and in the stimulating outdoor environment, which	As above.

	results in nearly all pupils having very positive attitudes to learning and achieving well.	
1.1.2.1.11	There doesn't seem to be anything wrong with the Infant school. It is a happy environment, always welcoming. They seem to understand what is best for the children and are very approachable.	As above.
1.1.2.1.12	Mount Street has an excellent rating and I would like (as well as lots of others) my child to remain in the school that has proven time and time again they have the best interests of our children at heart and they have the award to prove it.	As above.
1.1.2.1.13	The setting at Mount Street Infants is lovely peaceful and calm.	As above.
1.1.2.1.14	I choose Mount Street Infants knowing how nurturing the environment is, the high levels of trained staff in each class, allowing children to get the support needed.	As above.

1.1.2.2 Comments about the quality of provision at the school

1.1.2.2.1	MS Infant School is a well-respected school with an excellent reputation, as borne out by the last school inspection.	The Council agrees that the standard of education at Mount Street Infant School is good.
1.1.2.2.2	Mount Street Infants has recently had their ESTYN report. As I hope you are aware Mount Street Infants had the best standards and the best school categorisation. This is not true of the other schools. The wonderful staff with their Head leadership has made this possible.	As above.
1.1.2.2.3	MS Infants had an Excellent Estyn inspection in 2020, and was graded Good or Excellent in all 5 areas. With only 2 recommendations it's hard to see why it was not Excellent in all areas. Two of the key areas which they were deemed 'Excellent' were Wellbeing and attitude to learning and Care, support and guidance.	As above.
1.1.2.2.4	As stated in the Estyn Report (January 2021) Mount Street Infant School is an excellent school with children who are taught and cared for by an amazing staff team and Headteacher. The skills within the New Curriculum for Wales and the Foundation Phase	As above.

	are learnt and consolidated, by all the children, in an excellent learning environment that has been developed over many years.	
1.1.2.2.5	Estyn (2020) found standards to be excellent or good. The National School Categorisation System for 2019 determined the school to have an A for Improvement Capacity and Green for Support Capacity. This is better than the other two schools.	As above.
1.1.2.2.6	MSI is currently excellent, with an excellent Estyn report, with a very strong team of staff and an outstanding head teacher. All of this would be sacrificed if this proposal is taken forward.	As above.
1.1.2.2.7	The results of the Estyn inspections have been extremely good for Mount St. one interferes with this winning formula at one's peril it seems to me.	As above.
1.1.2.2.8	The school's Estyn report documents that all children at Mount Street Infants School experience a high-quality, inspiring education. Given the above comments from Estyn does Powys County Council agree that Mount Street Infants School already achieves The Council's Vision Statement?	As above.
1.1.2.2.9	The staff at Mount Street Infant School have worked tirelessly to achieve a n excellent Estyn Report and to cope with the demands of the COVID19 pandemic. This transformation plan will undermine all their hard work and commitment.	As above.
1.1.2.2.10	The school received an ESTYN inspection in January 2020 where all areas were judged to be GOOD or EXCELLENT.	As above.
1.1.2.2.11	The infant school currently has Healthy School status, the have introduced Thrive and hold Platinum Eco School Status these will be lost if the school's merge.	As above.
1.1.2.2.12	I am deeply aware of the quality of education and pastoral care that has been built up over years at Mount Street.	As above.
1.1.2.2.13	Mount Street Infants delivers such high-quality foundation phase education, with a strong community ethos.	As above.
1.1.2.2.14	Whilst Powys Education Services had a poor Estyn report in the summer of 2019 Mount Street Infant School had an excellent Estyn report in January 2020.	As above.

1.1.2.2.15	Comment from the school's Estyn inspection: 'The excellent quality of the school's care, support and guidance for pupils results in outstanding levels of well-being.'	As above.
1.1.2.2.16	Comment from the school's Estyn inspection: 'The school has an exceptionally happy family atmosphere where nearly all pupils thrive.'	As above.
1.1.2.2.17	Comment from the school's Estyn inspection: 'Estyn will invite the school to prepare a case study on its excellent practice in key aspects of its provision that results in outstanding levels of well-being and very positive attitudes to learning for dissemination on Estyn's website.'	As above.
1.1.2.2.18	The Mount Street Infant School Estyn Report (2020) states: 'Many pupils' use of Welsh is above expectations for their age. Nearly all pupils develop confident conversational skills, have a good range of vocabulary in formal and informal activities. Many pupils in the Specialist Centre respond appropriately to basic Welsh phrases when greeting others.' And 'The provision for Welsh language development is very strong. The environment is rich in Welsh vocabulary and pupils often conduct activities in Welsh.'	As above.

1.1.2.3 Comments about the school being an infants school

1.1.2.3.1	I feel that our pupils benefit greatly from being in an Infant school and they have the experience of leadership of being the elders of the school before the transition to the Junior school. They gain a lot from that experience as the pupils themselves tell us as well as their parents who see it as an empowering experience for their children. It seems that Powys would rather see all age through schools than separate infant and junior schools and the Consultation Document shows it to be a detrimental experience, when, in fact, the opposite is true.	<p>As stated in the Consultation Document , School reorganisation in Powys has gradually moved to a model of 'all-through' provision in primary schools across the county. Mount Street Infant and Junior Schools represent the last remaining separate infant and junior schools within the County.</p> <p>The advantages offered by single school provision for primary age pupils are well known and evidence based. Due in part to an increased critical mass of learners, 'all-through' primary schools are usually able to offer both enhanced continuity of provision and a curriculum which is more broad</p>
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		and balanced in content delivered in a continuous and coherent way from the Foundation Phase through to the end of Key Stage 2.
1.1.2.3.2	Starting in a smaller school with expertise in early years nursery and infant provision is I believe a very beneficial experience. This along with ample access to outside space and the forest school environment provides an excellent introduction to school.	As above. The Council recognises that Mount Street Infants School benefits from a large outside space and forest school environment.
1.1.2.3.3	It pains me the opposing viewpoint from the County about the transition between Infants and Juniors. My children have found it a positive experience. Year 2 in the Infants was amazing; they were Head of the school. They had responsibility, had the opportunity to be on committees, lead the school by example, and be ahead of their peers in combined primary schools. The transition was a positive experience and helped enormously with the transition to High school. I can only see positives with the two separate sites.	Comment noted.
1.1.2.3.4	If I wanted a primary school, we would send our child to one of the other schools but we want Mount Street Infants because it is an Early Years Facility. The staff are all experts and understand the importance of good quality provision.	All schools, regardless of whether they are infant, junior, primary or secondary, have staff with expertise in various areas of learning and are committed to delivering the highest quality provision.
1.1.2.3.5	It has taken many years of evolution of the school's ethos, the outdoor setting, staff development and training to create the excellent nurturing environment that Mount Street Infants now has to meet the needs of foundation phase and the new Curriculum.	Comment noted.
1.1.2.3.6	Many parents continue to select Mount Street Infants as their preferred school in Brecon. They value the fact that by Year 2 the pupils are capable of participating fully in meetings linked to the acquisition of the Eco School Platinum Award and the Healthy Schools National Award. They value that the Year 2 children take a lead in representing the school and are able to explain why Mount Street Infants is such an important school.	Comment noted.

1.1.2.3.7	Early Years education is paramount to developing lifelong learners who will go on to become the citizens of a future Wales.	All schools, regardless of whether they are infant, junior or primary, are required to develop the citizens of the future, and the new Curriculum for Wales will be instrumental to this.
1.1.2.3.8	Pupils experience a varied and rich curriculum delivered by teachers who are experts in Foundation Phase education.	Comment noted.
1.1.2.3.9	Pupils in the pre-school setting are fully included within the school, this wouldn't be possible in a primary with children up to 11 years old.	Comment noted.
1.1.2.3.10	The friendly, intimate, nurturing environment it provides, is in part down to it being an infant school rather than a primary.	The Council disagrees with this – whilst recognising that Mount Street Infants School has a positive and nurturing environment, all other schools in Powys also support their Foundation Phase pupils in the same way.
1.1.2.3.11	I remember that feeling of being one of the big kids in year 2, Queen of the castle at age 6! It helped me to grow up a bit, giving me opportunities to take part in whole school performances and take on responsibilities as a playtime monitor that I wouldn't have had in year 2 in a large primary school.	Comment noted.
1.1.2.3.12	Parents choose Mount Street School because children can transition from Infants' school to Junior school - this leads to resilient learners.	There is no evidence that pupils in infant schools are more resilient than pupils in junior or primary schools.

1.1.2.4 Comments about the size of the school

1.1.2.4.1	The small size of Mount St Infants is one of the factors that drew me to it.	Comment noted.
1.1.2.4.2	Concern that it would be more likely for pupils to be lost in the crowd in a larger school, whereas in an intimate, nurturing school like Mount Street Infants, the teachers will get to know pupils individually, allow them to grow and develop based on their individual strengths.	All schools, regardless of their size, are able to provide for the needs of their pupils, and teachers are able to get to know pupils individually allowing them to grow and develop based on their individual strengths.

1.1.2.5 Comments about the school buildings / grounds

1.1.2.5.1 Comments about the building

1.1.2.5.1.1	Mt. Street infants is over 50 years old and a new building is required.	The Council recognises that Mount Streets Infant School needs a new building and that is what is being proposed.
1.1.2.5.1.2	In the recent Estyn report for Mount Street Infants there was no comment of the poor state of the building, only praise of the wonderful provision the school provided.	Comment noted.
1.1.2.5.1.3	In a response to a question asked by County Councillor Rijnenberg regarding a breakdown of the backlog work required to repair Mount Street Infants School, the Head of Service stated: "The backlog maintenance figure is based on a calculation – square meterage of a school multiplied by ESTIMATED cost based on the condition of the building – this is not based on an itemised list of works." The figure of circa £712,314 in outstanding maintenance was therefore a guess and not evidence based.	This is correct – as indicated, the estimated backlog maintenance figure is based on a calculation.
1.1.2.5.1.4	The Mount Street Infants Building Condition Survey undertaken in October 2020 estimates the cost of maintenance required to actually be £208,935.95. The report recommends that the heating system is replaced at a cost of £93,849.00. This work has already been undertaken so the revised cost of works required is £115,086.95.	Comment noted.
1.1.2.5.1.5	Powys County Council has recently been given £2.2m to undertake large scale maintenance projects. This money could be used to carry out large scale maintenance on Mount Street Infants School. How much of the £2.2m has been allocated to Mount Street Infants School?	The Welsh Government allocated £2.2m in 2020/21 from its Capital Maintenance Grant to support repairs and maintenance in schools. This was added to the Council's contribution to the Schools Major Improvements Programme. Projects are prioritised according to the scoring methodology outlined in the Council's Asset Management Plan. £15,000 has been allocated to improve the entrance at Mount Street Infants School this year.

1.1.2.5.2 Comments about the grounds

1.1.2.5.2.1	They have a lovely outdoor area.	The Council acknowledges that Mount Streets Infant School has extensive outdoor space, and that the school uses this
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		space extremely well to enhance teaching and learning opportunities, and to support the wellbeing of pupils.
1.1.2.5.2.2	The school's grounds include a coppiced wood, forest school, community gardens, trim trail and a large field which pupils use every break time, whatever the weather. Regular time spent in this high-quality natural environment strongly enhances pupils' wellbeing and attitudes to learning.	As above.
1.1.2.5.2.3	The facilities the school offers is incredible - forest school, playing field, climbing frame	As above.
1.1.2.5.2.4	Our well-developed school site encompasses mature woodland, large playing field, community garden, pond, outdoor classroom, climbing apparatus, pirate ship, wooden stage, storytelling circle, hard service area, all specifically designed for early years children and their physical needs. All of this of course supports the holistic nature of early year's education and will be fundamental in the delivery of the new Curriculum. Never has this outdoor environment be more needed than in this time of COVID and will be paramount to wellbeing as we move forward. An environment that allows our pupils to learn in a well-established nurturing and stimulating outdoor environment is, we feel their right.	As above.
1.1.2.5.2.5	The Ofsted Report commented on the commendable provision of opportunities for children to learn through interaction with their local environment. On my visit to the school last month I was shown their woodland garden and heard evidence from the children themselves of their understanding of the importance of local wildlife.	As above.
1.1.2.5.2.6	The Infant School is set within wonderful grounds which enhance pupils experiences and learning, a feature that is much praised in the Infants recent Estyn report. These grounds and Forest School facilities have taken many years to develop and will all be lost when moved to a new site.	As above.
1.1.2.5.2.7	Comment from the school's Estyn inspection: 'The use of the extensive grounds to enrich pupils learning and well-being is a very strong and sustained feature of the school's provision.'	As above.

1.1.2.5.2.8	Comment from the school's Estyn inspection: 'An excellent feature of the school's provision over many years is its expert use of the outdoor environment to inspire and motivate pupils, including those with special educational needs.'	As above.
1.1.2.5.2.9	Comment from the school's Estyn inspection: 'Pupils work in the outdoor areas, in the extensive grounds and forest school has a powerful impact on their well-being and attitudes to learning.'	As above.
1.1.2.5.2.10	Comment from the school's Estyn inspection: 'Pupils regular work in the outdoors promotes very effectively their exceptional appreciation of the environment and the importance of safeguarding.'	As above.
1.1.2.5.2.11	We are aware that the Infant's School field was gifted to Mount Street children by either Penybryn House, Penlan or the Estate owning the area in and around the school. The 'Forest School' area was gifted to the School by Mr Cliff Jenkins for use by children of the school. Therefore, can Powys County Council use the site for anything other than an educational facility?	The Council is not aware of any restrictions relating to the ownership of the land on which the school is located.

1.1.2.5.3 Comments about the Forest School area

1.1.2.5.3.1	I personally love the forest school and the quirky outdoor spaces the school has. It provides a rich and diverse array of environments which is so essential for the stimulation of children's creative and cognitive development. These are all things which the new Welsh curriculum is aspiring all schools to be. We know the great benefits of having this forest school which has been proven time and time again to improve wellbeing, encourage experiential learning and independence and a give child a bigger understanding of our responsibilities to the earth. It is highly successful and inclusive. I see children who barely speak come out if their shells at forest school, and this will all be taken away and I believe Cradoc also has one. By destroying the schools and moving them to a location where there is no provision for this is appalling.	<p>The Council recognises the importance of forest schools provision to the development and wellbeing of children. It is also recognised that the forest school at Mount Streets Infants School is located in an area of mature trees. Should Mount Street Infant School close, the Council would ensure that there would be a forest school area at the new school. It is recognised however that this wouldn't be the same as the current forest school area at Mount Street Infant School for a number of years.</p> <p>However, the Council believes that forest school provision can be delivered in a variety of ways and does not solely rely on the availability of an area of mature trees.</p>
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1.1.2.5.3.2	What forest school provision will be put in place for students if the site moves.	As above.
1.1.2.5.3.3	The infant school has a brilliant forest classroom which is unique and has been around for many years. This cannot be moved to the new school!	As above.
1.1.2.5.3.4	My two children went to Mount Street Infants (and then Mount Street Juniors) and the forest school was such an important part of their school life and enhanced their view on the world around them. Learning outdoors is proven to have a huge positive impact on children's learning	Comment noted.
1.1.2.5.3.5	There is also an incredible outdoor element using the woodland for forest school and so many different areas of the playground.	Comment noted.
1.1.2.5.3.6	The forest school and outdoor classroom is extremely important, and it is these activities which are recounted by the kids, and which are remembered by them.	Comment noted
1.1.2.5.3.7	The focus on Outdoor Learning using Forest School is a major asset of Mount Street Infants which has taken decades to establish and hone. The Mount Street Infants School Estyn report January 2020 states: The use of the extensive grounds to enrich pupils' learning & well-being is a very strong & sustained feature of the school 's provision. They include a coppiced wood, forest school, community gardens, trim trail & a large field which pupils use every break time whatever the weather. Regular time spent in this high-quality natural environment strongly enhances pupil's well-being & attitudes to learning.	Comment noted.
1.1.2.5.3.8	The Estyn report praises the school's outdoor learning environment. The school is nestled in the community being protected by the harshest of weathers allowing our pupils to have year-round access to the matured outdoor areas in all weathers. The forest school is now reaching maturity after being planted for the millennium, 21 years ago and every child uses it at least once a week come rain or shine. They really look forward to the trip to learn outdoors in the forest and what a time right now is during a global pandemic that high quality outdoor environments have on children`s wellbeing.	Comment noted.

1.1.2.5.3.9	The pupil's access to Forest School and outdoor education is second to none. The Forest School site and the expertise of the staff have been developed over a long time and cannot be recreated overnight in a new school.	Comment noted.
1.1.2.5.3.10	The Infants school's ethos and focus is on outdoor learning which can be facilitated within the perimeters of the school site by means of the 'forest school' area, which has taken decades to develop. In fact, as part of an active PTA, our children were members of a group who were responsible for planting a number of the mature trees that are now growing on the site.	Comment noted.
1.1.2.5.3.11	The forest school at the Infants, which has developed over a long period and is such a positive vital resource for pupils and the school community, is even more vital post-COVID. It is all about well-being, creative learning, being outside, connecting with nature, and developing a love of the great outdoors.	Comment noted.
1.1.2.5.3.12	Mount street infants school has a very established Forest school which is very highly regarded and respected by the school.	Comment noted.
1.1.2.5.3.13	The forest school is very much loved by the pupils of the school and Mount Street Infants and Nurseries have worked very hard to develop this provision which benefits the children's ability to be able to access outdoor learning.	Comment noted.
1.1.2.5.3.14	In recent times of the pandemic, outdoor learning was very much needed, and it was a way for the school to be open as the children were spending so much time outdoors and learning from the outdoor classroom and accessing the forest school sessions.	Comment noted.
1.1.2.5.3.15	The benefits of outdoor learning and forest school education should be encouraged and actively engaged with by the Council as it promotes healthy lifestyles for pupils and staff.	Comment noted.
1.1.2.5.3.16	Mount street infants should be supported to keep the forest school provision as it makes the school unique to Brecon and it is definitively a selling point for parents sending their children to Mount Street Infants school.	Comment noted.

1.1.2.5.3.17	The forest school was planted by students over 20 years ago, it takes a very long time to establish a wood which has been created for the students at the school.	Comment noted.
1.1.2.5.3.18	The Forest school is a huge asset to the Powys community as they are a growing community which has proven benefits for children and staff working in the outdoors.	Comment noted.
1.1.2.5.3.19	Here are some examples of the positive benefits of providing a forest school education for children and young people in Brecon which are: Social skills such as developing confidence and having an increased awareness of the consequences of their actions towards their peers by working in teams and participating in sharing activities such as tools and equipment. Furthermore, children developed confidence and time and space to gain experience in developing their independence.	Comment noted.
1.1.2.5.3.20	It has been recommended that accessing forest school education has an impact on children's motivation to learn as children are drawn to the woodland and are more likely to actively participate and concentrate for longer periods. Also, children's physical skills develop especially throughout the early years of education in the nursery and Infants school as it develops physical stamina and fine and gross motor skills.	Comment noted.
1.1.2.5.3.21	It would be a HUGE loss to the school and the unique character of Mount Street Nursery and Infants school to lose the ability to be able to access the Forest school and outdoor classroom.	Comment noted.
1.1.2.5.3.22	There are significant amounts of academic research that supports the facilitation of Forest school as a fantastic learning opportunity for young people It is very important to me and my children that Powys County Council answers the question of what will happen to the forest school land and what will this be used for when the site of mount street infants and nursery school potential moves.	Comment noted.
1.1.2.5.3.23	The weekly forest school sessions currently taking place at the MSIS are vital to pupils' well-being. Additionally, in the current climate it is more important than ever to build environmental awareness among children.	Comment noted.

1.1.2.6 Comments about school staff

1.1.2.6.1	All MSIS staff are qualified to do Forest School and Incredible Years.	Comment noted.
1.1.2.6.2	The staff are very supportive.	Comment noted.
1.1.2.6.3	The staff at Mount Street Infant School have worked tirelessly to achieve an excellent Estyn Report and to cope with the demands of the COVID19 pandemic. This transformation plan will undermine all their hard work and commitment. Staff should be focussed on supporting children's learning through the ongoing disruption caused by COVID.	<p>The Council acknowledges that any school reorganisation proposal leads to a period of uncertainty for the staff involved. The Council's HR officer offered support to the three schools to provide an opportunity for them to ask informal questions / raise concerns, however this offer was not taken up.</p> <p>The Council is committed to supporting schools and learners, including through periods of change. An experienced headteacher is working for the Council to support school leaders to help them manage possible changes for their staff and learners.</p>
1.1.2.6.4	Staff Development Opportunities – the Mount Street Infants Estyn Report in January 2020 stated, “Professional learning opportunities for staff are excellent - “the school has best foundation phase practice at its heart”. Amalgamating three schools will not improve the already excellent learning opportunities for staff at Mount Street Infants School.	Comment noted. However, being part of a larger all-through primary school would provide staff with more opportunities outside of the Foundation Phase. There would be an opportunity in the new school for Mount Street Infants School's excellent practice in delivering Foundation Phase education to be shared more widely.
1.1.2.6.5	Many of our staff, teachers and teaching assistants have been to schools abroad in order to develop our understanding of exceptional early years provision. We have been able to bring this information back to our setting enhancing our provision still further and have shared our best practice ' with other schools. This was encouraged and made possible by our Headteacher who not only took the time to contact the relevant agencies and organise meetings for us but also took our classes whilst we were away so that the financial impact was minimal. This degree of professional development is beyond expectations with no	As above.

	other school in Powys, that we know of, accessing the scheme. ESTYN reported that Professional learning opportunities for staff are excellent. This opportunity would not be possible under the proposed merger.	
1.1.2.6.6	The staff in Mount Street Infants are incredible	Comment noted.
1.1.2.6.7	The staff are second to none.	Comment noted.
1.1.2.6.8	The teachers at Mount Street are second to none and are loved by all the children. That environment helps children to thrive, hence all the awards they have received.	Comment noted.
1.1.2.6.9	It has a personal approach and I feel my daughter is given one on one attention by staff who know her.	Comment noted. However, all schools, regardless of their size or category, are required to support, challenge and nurture all children to achieve their full potential.
1.1.2.6.10	Comment from the school's Estyn inspection: 'A united team of committed teachers and support staff share the Headteacher's enthusiastic and inspiring vision for the school, which has best foundation phase practice at its heart.'	Comment noted.
1.1.2.6.11	At the moment Mount Street Infant School has outstanding leadership, care and support, as highlighted in their 'green' school categorisation and 'excellent' standards	Comment noted.
1.1.2.6.12	The school's Estyn report states: 'The headteacher leads the school with a passion for the learning and wellbeing of all pupils. Parents, governors and staff share her inspiring vision, which has effective foundation phase practice at its heart, and anticipate s the core purposes of the future new Curriculum for Wales very well. Staff morale is high and they work very effectively together as a united team to do the best they can for the pupils.'	Comment noted.
1.1.2.6.13	Currently the Staff at Mount Street Infants provide a learning environment that is rich in Welsh language, culture and heritage and they will continue to develop provision in this area, beyond the requirements of the Curriculum for Wales.	Comment noted.
1.1.2.6.14	Over the past 2 years our feelings about the school have been confirmed as we have seen how the staff at Mount Street Infants teach, support and care for our children with love and	Comment noted.

	compassion, under the leadership of a wonderful infant head teacher.	
1.1.2.6.15	Mount Street Infants is so special because of the close community and sense of belonging that had been fostered by the head and the staff at the school.	Comment noted.
1.1.2.6.16	The Infants school is fiercely protective of their head teacher and rightly so. She does so much for the staff, pupils and school. I only began working there last year but have been a student on placement there for a few years before and have seen how fantastic she is at keeping it all together.	Comment noted.
1.1.2.6.17	The Head is incredible, highly respected, and valued, and I would say the best Head that I have come across.	Comment noted.
1.1.2.6.18	We are led by an outstanding Headteacher who has the pupils' well-being and learning at heart.	Comment noted.
1.1.2.6.19	The Head knows the names of all the children and is very approachable as are all the teachers.	Comment noted.
1.1.2.6.20	There is a real family feel to the school. This is achieved by the staff being so together and held in this way by the Headteacher who is full time in the school.	Comment noted.
1.1.2.6.21	If at any time there is any concern, I am able to speak to the Head on dropping off in the morning or collecting in the evening.	Comment noted.
1.1.2.6.22	Many of the staff at the school are only there due to the headteacher's hard work at securing funding for the school, of which I am one. I would not have my job and the opportunity to earn while I complete my studies if it were not for her, and this can be said for many other staff members in the past too.	Comment noted.
1.1.2.6.23	There is a strong, close-knit team that again, have developed over time and work incredibly well together to provide pupils with a first-rate education, as well as a caring, positive environment. This cannot be recreated overnight.	Comment noted.

1.1.2.7 Comments about current pupils

1.1.2.7.1	Comment from the school's Estyn inspection: 'The school provides an exceptionally calm, nurturing family atmosphere so that nearly all pupils want to come to school and feel happy and safe there.'	The Council is pleased to note these comments about pupils.
1.1.2.7.2	Comment from the school's Estyn inspection: 'The emotional and behavioural support provided for pupils is outstanding and reflects staff knowledge of the needs of individual learners.'	Comment noted.
1.1.2.7.3	All the children are treated as individuals and nurtured and encouraged to be the best that they can be.	Comment noted.
1.1.2.7.4	Children were delighted to return to school. They were devastated in January when schools closed for the majority of learners. I am aware that this is not the case in all schools but both Mount Street Infants and Juniors are happy schools where children thrive.	Comment noted.
1.1.2.7.5	Pupils feel safe and valued in the school. New pupils are given the care and guidance needed to engage in school so that they thrive and enjoy learning	Comment noted.
1.1.2.7.6	Pupils with additional learning needs are supported, with suitable provision provided for them.	Comment noted.
1.1.2.7.7	MAT pupils are regularly challenged, placed in mixed classes with the year above in order to stretch them, and have the opportunity to complete work above their age level.	Comment noted.

1.1.2.8 Links between the school and the community

1.1.2.8.1	Mount Street Infants school is a community school that is thriving in the local community.	Comment noted.
1.1.2.8.2	It is very much a Community School and in my view it should remain so.	Comment noted.
1.1.2.8.3	Comment from the school's Estyn inspection: 'The school's links with the community are exemplary and ensure that all pupils have the opportunity to engage with the wider world.'	Comment noted.
1.1.2.8.4	Mount Street Infants is a community school best placed to serve the community in its current location in Brecon Town.	Comment noted.

1.1.2.9 Reference to the military

1.1.2.9.1	As around 20% of the pupils at the infant school are from military families the school has close links to the military which includes financial support of new initiatives such as the outdoor classroom. The school has a real talent for inclusivity. It's truly amazing how quickly children settle in and are accepted for who they are whenever they start in the school year, and this is due to the ethos of the school.	The Council recognises that Mount Street Infants School has close links with the military and has several pupils from military families and is pleased to note how well the school supports these children.
1.1.2.9.2	Mount Street is a fantastic school which provides additional support to military families.	As above.
1.1.2.9.3	The school has an exceptionally happy family atmosphere where pupils thrive. This is the reason that so many military families choose Mount Street Infants to send their children when they arrive in Brecon. It is here that they are welcomed and supported through their learning when they may have a parent who has been deployed around the world. The military children will have moved schools more than most and they are supported and cared for in a close family feel environment. It provides an extensive range of imaginative learning experiences, both in class and in the stimulating outdoor environment, which results in nearly all pupils having very positive attitudes to learning and achieving well.	As above.
1.1.2.9.4	Military are very much involved with Mount Street who care and nurture all the children and have a T.A. who is employed by the military to help with different cultures and languages and make them feel safe and cared for, all children's welfare is paramount because the staff know all the children and what their needs are	As above.
1.1.2.9.5	Mount Street Nursery and Infants school have provided significant amounts of pastoral care and support to military families and service personnel. There are additional challenges which children of military service face and the school have developed and fostered relationships and long term partnerships with the families of military families to have highly respected interactions and have provided support to the families during times which may be	As above.

	difficult and have cultivated Mount street infants school has incredibly strong links with the armed forces such as links to the feeder school and hold joint events, a teacher supports the toddler group that meets at our school and leads an outdoor learning session, this enables parents to gain a feel for the school and see the caring and nurturing ethos in practice before their child starts attending nursery. The school has very close links to the pre-school provision and is very aware of the needs of the Service families, supporting specific and individual needs for the pupils. The school is invited to service events and celebrations at the Army Barracks, including Dashain and Christmas, etc.	
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1.1.2.10 Comments about specialist provision at the school

1.1.2.10.1	Staff and pupils at the Specialist Centre were highly praised in the latest Estyn report. The report states "The specialist centre provides a calm learning environment where the relationship between staff and pupils supports learning very well".	The Council is very pleased to note these comments about specialist provision at the school.
1.1.2.10.2	There is SEN specialist provision at Mount Street Infants	As above.
1.1.2.10.3	The support of EAL pupils is evident throughout by all the school community	As above.
1.1.2.10.4	My daughter has additional needs as well as developmental trauma secondary to being adopted. Mount street is not our closest school. We have specifically chosen Mount Street for what it can offer to our daughter.	As above.
1.1.2.10.5	Mount street infants is a dynamic diverse community with excellent practice in attachment which they have received a certification, support of emotional mental health and additional needs.	As above.

1.1.2.11 Comments about early years provision at the school

1.1.2.11.1	Smarties are a fantastic asset to Mount Street Infants and they are a part of the community of the school. It would be such a	Should the school close, the early years provision at the school would remain during the Phase 1 of the proposal.
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	shame and devastating to lose a vital part of the early year's foundation education which is so important for our young people.	Phase 2 of the Proposals – to build a new primary school – would also include purpose-built facilities for early years provision.
1.1.2.11.2	With uncertainty surrounding provision at Mount Street infants, it is a risk that this will impact on the security of the provision at Smarties 3+setting. Early Years provision is the keystone of an infant or primary school and good links between Mount Street Infants and Smarties is essential for the children.	As above.
1.1.2.11.3	Many parents select the Smarties 3+ setting to begin their children's education. They grasp the amazing opportunity to start their children's education in a setting that provides sector leading outdoor provision that has taken over 20 years to establish.	As above.
1.1.2.11.4	Starting school in reception was completely stress-free as pupils have already attended Smarties at the school for a year and so felt a part of it.	As above.

1.1.2.12 Comments about wraparound provision at the school

1.1.2.12.1	I work 3 days a week, on which all three of our children attend breakfast and after school club at the school for full wraparound care.	Comment noted.
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1.1.2.13 Other comments

1.1.2.13.1	Mount Street Infants has one of the largest admission numbers in Powys.	The admission number for Mount Street Infants School is 43, which is amongst the highest admission numbers in the county.
1.1.2.13.2	MSIS use a different Phonics programme to the other schools.	Comment noted.
1.1.2.13.3	There doesn't seem to have been any effort to understanding the nature of MSIS and all that it represents.	The Council's Schools Service staff have been closely involved with developing the current proposal for the three schools. These include the School Improvement Team, ALN officers, early years officers, finance, and HR officers. These officers have in-depth knowledge of the various aspects of the school. Alongside this, the consultation exercise allows

		stakeholders to provide further information to enhance the Council's understanding of all three school communities.
1.1.2.13.4	I think that the proposal fails to acknowledge that it is the culture, the nurturing environment and the strength of the team which makes the school. Hard work has gone into this, and it is far more important than shiny facilities.	Comment noted.
1.1.2.13.5	When will Powys CC commit to developing Mount Street Infant School as a centre of excellence for outdoor learning?	The Council's current proposal is to merge Mount Street Infants School, Mount Street Junior School and Cradoc C.P. School, initially on their current sites before a move to a new building in the future. There would be an opportunity for the staff of all three schools to share their expertise amongst a wider group of staff so that more pupils would be able to benefit from this. In the case of Mount Street Infants School, expertise in outdoor learning would be an excellent addition that could be shared.
1.1.2.13.6	When will Powys CC commit to developing Mount Street Infant school as a centre of excellence for Foundation Phase good practice?	As above.
1.1.2.13.7	When will Powys CC commit to developing Mount Street Infant School as a centre of excellence for the new Curriculum for Wales?	As above.

1.1.3 Comments about Mount Street Junior School

1.1.3.1 General positive comments about the school

1.1.3.1.1	I am a teacher and previously taught at Brecon High School. Many of the pupils I taught came from Mount Street School. These pupils were well-rounded, confident individuals who were clearly well-taught and were full of enthusiasm to learn. This attitude had obviously been nurtured at Mount Street School and, therefore, I feel that this school is a hugely valuable asset to the children of Brecon and should be allowed to remain for future generations.	The Council is pleased to note this comment about the pupils of Mount Street Junior School.
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1.1.3.2 Comments about the quality of provision at the school

1.1.3.2.1	Their inspection report graded it Good in all three areas in 2016. Since then, the new Head took over he has built on these areas and added a significant number of initiatives. Including Nurture for pupils with low self-esteem or ALN provision. Regular mindfulness sessions for all, funding for more outdoor initiatives a partnership with the Brecon Museum, charity groups, businesses and library and much more.	The Council is pleased to note these comments about the quality of provision at Mount Street Juniors School.
1.1.3.2.2	A quote from 2016 states – Standards of pupils' wellbeing and inclusion are high throughout the school. Behaviour is consistently good and nearly all pupils show respect, care and concern for one another. They feel safe in school and know whom to turn to if they have a problem. Nearly all pupils have positive attitudes to their learning and participate enthusiastically in lessons, such as when they work together in groups to prioritise arguments ready for a debate about who was to blame in activating a missile. Most pupils know what they need to do next to make good progress in their learning.	As above.

1.1.3.3 Comments about the school buildings / grounds

1.1.3.3.1	The layout of Mount Street Juniors is great.	Comment noted.
1.1.3.3.2	Mount Street Junior School is an excellent fairly new building, The playing field shared by the schools is wonderful.	Comment noted.
1.1.3.3.3	Mount Street Junior school was only built in 1987 and is a warm, friendly environment with beautiful trees. It's upkeep and repairs have been rather neglected but it is a sound building. To cease use of it and spend a huge amount of public money seems scandalous.	Comment noted.
1.1.3.3.4	You state in the proposal that the buildings are in bad state of repair when the Junior school is a relatively new, well-built building, and I do not feel a new build will offer any more than what they already have.	Comment noted.

1.1.3.3.5	<p>Can I clarify what budget if any is set aside for routine maintenance of schools? As a previous pupil at Mount Street Junior School I attended a state of the art facility 30 years ago. It beggars belief how a building has been wilfully neglected by the local authority to such an extent that it needs replacing within this time period. Moving on, does this mean that in another 30 years time the current new builds will be in disrepair and not fit for purpose?</p>	<p>The Council's schools maintenance funding has steadily reduced over the last few years, and the Council has to prioritise its funding accordingly. Schools are prioritised using a scoring criteria which can be found in the Council's Schools Asset Management Plan. The Council's school maintenance budget for 2021/22 is approximately £5 million.</p> <p>£150,500 has been spent on Mount Street Junior School as part of the major improvement programme between 2012 and 2019, on safeguarding fences, a new boiler, roofing works and external fire doors.</p> <p>With appropriate maintenance, the expected lifespan of a new school building is 65 years.</p>
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1.1.3.4 Comments about school staff

1.1.3.4.1	<p>I have met the Headmaster at Mount Street Juniors, and I am amazed that he seems to know the name of each student. The warmth I feel from him towards the students, how their eyes light up when he calls them by their name is truly heart-warming, and a tonic to how impersonal education so often is.</p>	<p>The Council is pleased to note these comments about the Headteacher of Mount Street Juniors School.</p>
1.1.3.4.2	<p>I value the fact that Mr Hopkins, the current Headteacher is there to run the school on a daily basis thus allowing the SLT and other teaching staff to focus on teaching their classes. He knows mine, and indeed all the children at the school personally and is always available to engage and talk to parents.</p>	<p>As above.</p>

1.1.3.5 Comments about the school being a Junior school

1.1.3.5.1	<p>I love and admire how the Junior school can be a little bit more grown up, facilities and resources appropriate for 7- to 11-year-olds, slightly more rigid 'rules' to follow for the needs of 7- to 11-year-olds, a few more lessons spent sitting still in rows, a playground set up for 7 to 11 year olds, just that little bit different</p>	<p>Comment noted.</p>
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	to create an appropriately less infantile environment for them to grow and flourish in.	
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1.1.3.6 Links between the school and the community

1.1.3.6.1	I am aware that at Mount Street, strong links with the community have been created by pupils being within walking distance of local places. Pupils from 4 years old onwards can walk to host services in The Plough Chapel whilst the Infant School have developed similar close links with the Dementia Centre, again a matter of minutes away on foot. Pupils walk to the nursing homes to sing, they walk to local sites of interest, the castle, the museum and the library.	Comment noted.
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1.2 CRADOC C.P. SCHOOL

1.2.1 General positive comments about the school

1.2.1.1	Cradoc school is well loved, successful and not even half empty!	The Council notes these positive comments about Cradoc C.P. School.
1.2.1.2	Cradoc is a village school offering unique education to village children. Why change when they have excellent facilities, excellent results and excellent teachers.	As above.
1.2.1.3	The schools is successful and has a proud history – something which was recently demonstrated by the 50 year celebrations.	As above.
1.2.1.4	It is a popular school serving my local community and local people are happy with it.	As above.
1.2.1.5	Cradoc school is a successful school with beautiful grounds and happy children and parents.	As above.
1.2.1.6	Cradoc is a good school, deep rooted in the community, it is a working success- why change it.	As above.
1.2.1.7	Cradoc is a highly regarded and successful rural school, serving the immediate community and beyond.	As above.

1.2.1.8	With 95 pupils, and very good teaching and pupil experiences, this rural school is thriving and the heartbeat of our large community.	As above.
1.2.1.9	With pupil numbers set to increase, and an improved Estyn report, Cradoc is an excellent school and provides so much more than just education.	As above.
1.2.1.10	Cradoc school offers a sense of 'family' belonging. All the children, parents and wider families know and support each other.	As above.
1.2.1.11	I wanted my children to attend Cradoc School due to the rural nature of its location and the fact that it is set in a wonderful community where the older children are brought up with values to support and look after each other and more importantly the younger children. All the children know each other and the teachers know them all. This gives an incredible feeling of safety not only for parents but also for the children and this is particularly important during these troubling times.	As above.

1.2.2 Comments about the quality of provision at the school

1.2.2.1	Cradoc school provides a good education with pupils achieving expected outcomes.	Comment noted. Powys County Council would agree that all schools in the consultation provide a good standard of education for their pupils.
1.2.2.2	Pupils and staff have worked hard to earn many awards and status' (including Healthy School, Eco School, School of Sanctuary, Lead Creative School and ERW Cymraeg Campus) which will be lost if the school were to be closed.	Comment noted. There would be opportunity as part of a new school to work towards new awards using the evidence that they have from the three schools.
1.2.2.3	Cradoc School currently holds a Platinum Eco Schools Award, what will happen to such awards if the school is merged with others on one site?	Although the school may lose its Eco Schools award, the high-quality provision which the school has developed to achieve this status would be maintained. The new school could reapply using the evidence that they have from the three schools.
1.2.2.4	I am very impressed with the education pupils receive at Cradoc and feel it doesn't need improving.	Comment noted.

1.2.3 Comments about pupil numbers / the size of the school

1.2.3.1	Cradoc school is a rural school and projections with regards to future pupil numbers would suggest that it is not a small school and is a viable in its own right.	<p>The Council recognises that Cradoc C.P. School is classed as a 'rural school' by the Welsh Government.</p> <p>The Welsh Government also defines small schools as schools below 91. Cradoc C.P. School pupil projections do not indicate a significant increase in numbers, with numbers projected to remain in the 90s.</p> <p>The school's size isn't one of the reasons for the current Proposals.</p>
1.2.3.2	Based on pupil numbers and projections Cradoc is not a small or unviable school	As above.
1.2.3.3	The school originally had 3 classrooms with a PAN of 15 per year group. Is there any reason why the school could not reduce its PAN. The PAN was increased at a time when the school was more popular to accommodate parents from Brecon wanting their children to be educated in a rural school.	<p>The capacity of Cradoc C.P. School is 175. The capacity of a school is calculated using the WG Guidance – Measuring Capacity of Schools in Wales'. For primary schools, the capacity is calculated on the size of rooms designated as 'classbases'. Specialist and support rooms such as libraries, IT rooms and staff rooms are not included in the calculation but must all be measured. The spaces in classrooms are then checked against the total usable space available to see if there is too much or too little space available to support the core teaching activities.</p> <p>The capacity measurement is used to provide the indicated admission number when divided by the relevant number of year groups. This admission number, when incorporated into the published admission arrangements, sets the number of pupils to be admitted to the school.</p>
1.2.3.4	The school's admission number is unnecessarily high as a result of historically high numbers in the school. However, the pupil admission number could be reduced from 25 to, say 18. This would mean that we still have a proportion of vacant spaces, to be able to provide education for the influx of military families,	As above.

	Children Looked After and other families who wish to choose a rural school.	
1.2.3.5	Cradoc C.P. School is not a small primary school. Currently, there are 96 pupils in attendance. The education department's position is that the school has low pupil numbers, but their higher figure of around 150 pupils needs reevaluating, taking into account the site requirements of the new Curriculum.	<p>The Council recognises that Cradoc C.P. School is classed as a 'rural school' by the Welsh Government .</p> <p>The Welsh Government also defines small schools as schools below 91. Cradoc C.P. School pupil projections do not indicate a significant increase in numbers, with numbers projected to remain in the 90s.</p> <p>The school's size isn't one of the reasons for the current Proposals.</p>
1.2.3.6	Pupil numbers are increasing and many children already travel quite a distance to their nearest school in Cradoc.	<p>Historical pupil numbers show that pupil numbers have, in the main, been falling year on year at Cradoc since 2014.</p> <p>As Cradoc C.P. School is located in a rural area, it is fully acknowledged that some pupils already travel quite a distance to attend the school, and that travelling to alternative provision in Brecon would lead to an increase in travel time / distance for these pupils. The furthest travel distance for pupils to attend the new school on the Penlan site would be 9.6 miles, compared with a current maximum travel distance of 6.7 miles to Cradoc C.P. School, based on PLASC 2021 data.</p>
1.2.3.7	Cradoc is not a rural school with less than 50 children in Powys, surely these schools warrant action before ourselves if cost is an issue along with educational opportunity.	<p>The Council recognises that Cradoc C.P. School is classed as a 'rural school' by the Welsh Government .</p> <p>The Welsh Government also defines small schools as schools below 91.</p> <p>Cradoc C.P. School pupil projections do not indicate a significant increase in numbers, with numbers remaining in the 90s.</p>
1.2.3.8	Numbers at the school have ebbed and flowed as families grow up but then return with their own children.	Historical pupil numbers show that pupil numbers have, in the main, been falling year on year at Cradoc since 2014.

1.2.3.9	Cradoc cannot be deemed as a small rural school with dwindling numbers. Fluctuation has been seen as the reduction of family size has been witnessed across the nation. Class sizes remain with no more than two year groups per class and the School cannot be seen to have excess surplus pupil spaces unfulfilled. In the coming months alone we have nine new children due to enrol in addition to numbers predicted, where Cradoc has been chosen by parents as their first choice of educational provision for their children despite the threat of its closure. The standard of education remains good and these additional numbers illustrates it.	<p>The Council recognises that Cradoc C.P. School is classed as a 'rural school' by the Welsh Government .</p> <p>The Welsh Government also defines small schools as schools below 91. Cradoc C.P. School pupil projections do not indicate a significant increase in numbers, with numbers projected to remain in the 90s.</p> <p>The school's size isn't one of the reasons for the current Proposals.</p>
1.2.3.10	[The school] has a good sustained number of pupils in accommodation that isn't fit for purpose (porta cabin on top of porta cabin). As a rural school the number of pupils does fluctuate depending on people moving into the area. The Yscir ward has very little new housing and so people moving in can only do so when some of the older generations move out – out community once moves in stay in and we want our school to remain part of it.	Historical pupil numbers show that pupil numbers have, in the main, been falling year on year at Cradoc since 2014.
1.2.3.11	Unlike the village schools involved in other local school closure consultations who have under 40 pupils, we are not a small village school struggling for numbers we have 96 pupils. Yes, our numbers have fallen over the last few years but as the Organisation for Economic Co-operation and Development (OECD) has said recently: "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."	Comment noted.
1.2.3.12	If the merger does go ahead, it will essentially mean Cradoc school ceases to exist and instead becomes absorbed in Mount Street school. Are pupil numbers now in Cradoc so low that the school is being faced with closure?	<p>The Proposals do not mean that Cradoc C.P. School becomes absorbed in the Mount Street Schools. Phase 1 of the Proposals would mean all three schools close and reopen as a new multi-sited school initially, until Phase 2 when the school would move to a new building.</p> <p>The reasons why change is required at Cradoc C.P. School are outlined in the Consultation Document :</p> <ul style="list-style-type: none"> - Decreasing pupil numbers

		<ul style="list-style-type: none"> - Building condition - Building Configuration.
1.2.3.13	Cradoc school is a completely different case and it's certainly not a failing or 'small' school by any standards.	Comment noted.
1.2.3.14	It is so welcoming, arriving at school and knowing the large majority of parents and children, and the staff knowing parents by name too – something you don't get in bigger town schools.	Comment noted.
1.2.3.15	There is a huge sense of family community, every child knows everyone else and the pupils support each other in a way that doesn't happen so frequently in a larger school. Smaller but efficient classes mean greater cohesion and sense of belonging; also, research has shown that bullying is far less likely to occur. In these days where there are a greater number of parents who are separated there are important values that can be learnt.	<p>Comment noted.</p> <p>There is no evidence of more bullying taking place in larger schools compared to smaller schools. All schools have anti-bullying policies.</p>
1.2.3.16	Pupil numbers are unpredictable at the best of times and there are several applications to join Cradoc School already being processed across various year groups. In addition, application for places mean that we anticipate the largest Reception intake for many years. The numbers are rising and not falling as suggested in the documentation, despite some parents choosing an alternative school due to the consultation and potential closure. The portacabins had to be added on due to the fact that numbers were increasing in the original school so pupils now have to brave the weather to reach their classrooms.	<p>Pupil numbers at Cradoc C.P. School were 94 on the Finance November count date (5th November 2021).</p> <p>The condition and configuration of the building has been recognised as a reason why change is needed at Cradoc C.P. School.</p>
1.2.3.17	In the future, demand for spaces at Cradoc School is likely to increase further. It is thought that in the next 3 to 4 years pupil numbers in Cradoc will increase by around 25%.	Pupil numbers aren't expected to increase significantly at Cradoc C.P. School.

1.2.4 Comments about the school buildings / grounds

1.2.4.1	But its buildings are well past their lifespan.	The condition and configuration of the building has been recognised as a reason why change is needed at Cradoc C.P. School.
1.2.4.2	Cradoc School is in desperate need of a rebuild. Nobody I know denies this.	As above, Phase 2 of the Proposals provides for a new build school.

1.2.4.3	In terms of Cradoc, there is need for a new building of quality.	As above.
1.2.4.4	Cradoc is long overdue a new school building. The staff work hard to give the very best educational environment. However, the physical condition of the building leaves much to be desired in this day and age. Having THREE demountable classrooms in use is frankly a sad reflection of poor provision by the Council.	The condition and configuration of the building has been recognised as a reason why change is needed at Cradoc C.P. School.
1.2.4.5	There has been no investment in the infrastructure at Cradoc School other than the car parking area. The buildings themselves have deliberately been allowed to disintegrate, and this is then being used as a reason to close the school.	The Cradoc building has not deliberately been allowed to disintegrate. £375,000 has been spent on works to Cradoc, including the car park which cost £180,000. This included refurbishing mobile classroom, new boilers and controls, environmental health works to the kitchen and rewiring works.
1.2.4.6	A wonderful car park was built about 4 years ago and is a real asset to the school. All is needed now is a new building where the existing school is and it will always be the heart of the community. I think this proposal is disgraceful after all Cradoc school have been waiting for a new school for years!	The Council invested £180,000 to provide a new car park for Cradoc C.P. School and Phase 2 of the Proposals will provide for a new school building.
1.2.4.7	The Council has spent thousands on getting the car parking sorted and it is great but now they plan to rip the school out from under it – it doesn't make sense!!	The Council has a duty to maintain its schools estate to ensure schools can operate safely and provide good learning environments for children and staff. The Council does not stop investing in its schools estate even if they are subject to Proposals for reorganisation.
1.2.4.8	Why has there been no significant maintenance carried out recently at Cradoc, causing a backlog of £628K at the school?	The Cradoc building has not deliberately been allowed to disintegrate. £375,000 has been spent on works to Cradoc, including the car park which cost £180,000. This included refurbishing mobile classroom, new boilers and controls, environmental health works to the kitchen and rewiring works. Whilst there has been investment, the backlog maintenance figure outlines the poor condition of the building.
1.2.4.9	The [Cradoc] building is not sustainable in its current state for the long term and needs investment NOW. Funding for this new proposal will be a long-drawn-out battle and in the meantime the children of Cradoc will again be left in limbo.	The Council agrees that the Cradoc building is not suitable and is committed to providing the children of the three schools with the highest quality learning environment that would provide them with facilities, technology, and outdoor learning spaces to support their learning.

1.2.4.10	<p>Our buildings are in a poor state of repair solely due to mismanagement of them by Powys County Council, you are the ones who have allowed a £628k backlog of maintenance build up by not investing in the school and we have been patiently waiting for our turn, watching Llangorse, Llyswen, Talgarth, Hay and Clyro get their new school buildings in 2018/19.</p>	<p>The Cradoc building has not deliberately been allowed to disintegrate. £375,000 has been spent on works to Cradoc, including the car park which cost £180,000. This included refurbishing mobile classroom, new boilers and controls, environmental health works to the kitchen and rewiring works.</p> <p>The capital investment in schools in the Gwernyfed area was a result of an area school reorganisation which saw the number of schools reduce from 10 to 5.</p>
1.2.4.11	<p>Yes, Cradoc's building is in poor condition but we have been asking Powys for over 12 to 18 months to help us to rebuild the school and this also involved Portfolio Holders attending the school agreeing that there was no point in trying to fix the issues because they are past this and the school needs a new building. This is so disappointing that this was being promised on one hand and in the background there were always plans to close the school.</p>	<p>The Council agrees that the Cradoc building is not suitable and is committed to providing the children of the three schools with the highest quality learning environment that would provide them with facilities, technology, and outdoor learning spaces to support their learning.</p> <p>It is not the case that 'in the background there were always plans to close the school' – strategic review of schools in the Brecon catchment was carried out and a Programme Business Case was approved by Cabinet in September 2020.</p>
1.2.4.12	<p>Please can you tell me how many pupils Cradoc was originally built for in 1969?</p>	<p>The Council does not have this information.</p>
1.2.4.13	<p>Has The Council considered the land on which the school is build and the playing fields? I think you may find that it is was gifted by a land owner and so this will be taken back if there is no school in Cradoc and therefore if we were thinking of building houses on the land then I think you may have to think again.</p>	<p>There are no restrictions relating to the disposal of the land on which Cradoc C.P. School is located.</p>
1.2.4.14	<p>The grounds are a superb arena for Forest Schools and could not be replicated in the short term, if at all, at a new build, so depriving children of a safe place to learn new skills and the opportunities to learn outside in all weathers, how to develop team working skills, independence, resilience, care for the environment and for each other.</p>	<p>The Council notes these comments about the grounds at Cradoc C.P. School and recognises the importance of forest schools provision to the development and wellbeing of children. Should Cradoc C.P. School close, the Council would ensure that there would be a forest school area at the new school. It is recognised however that this wouldn't be the same as the current forest school area at Cradoc C.P. School for several years.</p>

		However, the Council believes that forest school provision can be delivered in a variety of ways and does not rely on the availability of an area of mature trees.
1.2.4.15	The children thoroughly enjoy Forest School in the woodland area	Comment noted.
1.2.4.16	Cradoc primary is a wonderful site for education with amazing views of the Beacons.	Comment noted.
1.2.4.17	Cradoc is a beautiful setting,	Comment noted.
1.2.4.18	The grounds have more grass than lots of other schools	Comment noted.
1.2.4.19	Lastly it is very nice that in class we can open our windows and not have the noise of cars in our ears instead we have the sound of lambs and birds and even children playing sometimes.	Comment noted.
1.2.4.20	The landscape around us is amazing. As we have football pitches, ponds with an endangered species of great crested newt. Our school grounds are muddy but it is a unique thing because no local school have that they have a pitch and a yard. We have a lot more things.	Comment noted.
1.2.4.21	One of the things I think makes the school unique and worth saving is the grounds Cradoc school has the best grounds, it has a small forest, a pitch, nature area, pond, yard, ford and the beautiful fields surrounding it.	Comment noted.
1.2.4.22	The school grounds are wide and have a lot of luscious fauna and flora. Everything that makes our school grounds unique is the glorious hillsides, the countryside, the little town just outside of the school, and we have a hill on our playground, unlike other schools. We also have a pine forest, birch trees, silver birch trees and giant oak trees.	Comment noted.
1.2.4.23	Its grounds offer an established Forest Schools area and recently erected play facilities.	Comment noted.
1.2.4.24	I would like to talk about our school grounds, we have hills and a pitch and fields, I know most schools have that but we have a forest and a pond filled with fish and frogs but we also have endangered species like the Great Crested Newt.	Comment noted.
1.2.4.25	In our school grounds we have lots of grass, a bit of tarmac to play on when it's too wet to go on the grass, lots of play	Comment noted.

	equipment and we also are in a very quiet place with no loud noises and traffic.	
1.2.4.26	We have lots of space to play and explore in the trees and loads of space to run around in the open grass and do sports day on the big pitch and play on the playground and play games like rugby, football, netball and loads others as well. Our pond is very cool and has a lot of space for looking at the things in the pond and those things are what makes our school unique.	Comment noted.
1.2.4.27	Next I would like to talk about the playground. We have a climbing frame which has been here for years and so many people have and do go on it that the grass has gone into dirt and the grass won't grow back. We also have so many memories in the fort it's like a home away from home it's full of heartfelt and fun memories. Our school is super nature friendly the butterfly garden is just one of many things like the big playing field, our little playground for the younger children. All of these examples are just proof that our school is eco friendly.	Comment noted.
1.2.4.28	We have lots of history with the Celtic forts and the standing ancient stones around Cradoc and that's another thing that makes it special.	Comment noted.
1.2.4.29	We have the Crug/Celtic Hillfort, Y Gaer/Roman Fort and Penoyre/Victorian Country House. Our school is surrounded by history and is a piece of history itself.	Comment noted.
1.2.4.30	In walking distance there is a Celtic hill Fort which is called the crug which is about 3,000 years old. Over the road is a rones Roman Fort which is 2000 years old. There is also an old country house called penogue.	Comment noted.
1.2.4.31	We have lots of outdoor space and it is good for our health and well being. In other schools they will learn about the Romans but we follow the Romans shadow. In Cradoc we have lots of nature around us but if it gets knocked down we will lose it.	Comment noted.
1.2.4.32	They have an opportunity on a weekly basis to participate in 'Forrest Schools' the out-door experience which supports the nurturing of independent learners and gives learners an opportunity to embrace learning in a different environment.	Comment noted.

1.2.4.33	We have lots of things most schools don't have including all the fields and forests and even tree houses.	Comment noted.
1.2.4.34	Cradoc school ground is always open and it provides a safe place for local children to exercise and play within their rural community.	Comment noted.
1.2.4.35	Cradoc school gates remain open in the holidays, acting as a safe play area for local children, away from busy roads. For us, it has provided an ideal venue for my grandchildren to learn to ride their bikes, scooters and trial out new modes of transport after Father Christmas has visited.	Comment noted.

1.2.5 Comments about extra-curricular provision at the school

1.2.5.1	Cradoc School is at the heart of so many groups and clubs: playgroup, Shake Rattle & Roll music group for Pre-schoolers, gardening club, sports clubs, choir, music lessons to name just a few.	The Council has recognised, in the Consultation Document and the draft Community Impact Assessment, the central role that Cradoc C.P. School has within the community. The Impact Assessment will be updated to include information gathered during consultation.
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1.2.6 Comments about school staff

1.2.6.1	Cradoc School is a very special place and it's staff are outstanding.	Comment noted.
1.2.6.2	Cradoc teachers have always been by the pupils' side.	Comment noted.
1.2.6.3	The teachers have been mentors and have helped us overcome the anxiety to return to school.	Comment noted.
1.2.6.4	The teachers are so kind.	Comment noted.

1.2.7 Comments about current / former pupils

1.2.7.1	Many successful students have come from Cradoc school to lead many good, varied careers.	Comment noted.
1.2.7.2	In addition, Cradoc is a very successful school and helped me get into private school together with my siblings. We only attended for	Comment noted.

	a couple of years, but it was life changing for us both. As a result, a third sibling attended the school all the way up.	
1.2.7.3	One of our granddaughters is now a Primary School Teacher, shown on the video and another granddaughter is presently in University in Swansea studying Business. My grandson has taken on a career in Agriculture and another granddaughter is in the High School in Brecon and will be taking her GSCEs next year, so very proud of all they have achieved from their education in Cradoc School.	Comment noted.
1.2.7.4	My two children were educated there receiving the best quality of learning and life experience that a primary school can offer. This is so often diluted or lost in larger schools.	Comment noted.
1.2.7.5	Generations of families have chosen Cradoc School to offer a unique experience set in a prime location.	Comment noted.
1.2.7.6	Cradoc School with its protective, family and inclusive atmosphere and agenda has been chosen by generations of parents to be the best experience and opportunity regarding all issues.	Comment noted.
1.2.7.7	I attended Cradoc School as part of its first intake of pupils when the school opened 1969, our 3 children have all received their primary education there and we now have the third generation of our family attending with our granddaughter due to start next year.	Comment noted.
1.2.7.8	The school has served our family and the pupils of this area extremely well in the past, and continues to do so, and given the opportunity and the appropriate support is more than capable of doing so in the future. Many families have moved to this area, specifically to send their children to Cradoc School, many of whom attended the school themselves, so I feel it just goes to show how much high regard the school has in this locality.	Comment noted.
1.2.7.9	We are seeing many pupils that attended this school many years ago, come back and support the area with their own children attending this school.	Comment noted.
1.2.7.10	Once going on to High School, I have been told from staff that you can always tell what children have attended Cradoc School. They seem to be more respectful, well-mannered and keen to do well.	Comment noted.

1.2.7.11	We have a responsibility to provide our children with the best education we can within our means. Cradoc School provided that for our 2 children- whom are now both older teenagers. It provided them with a community spirit and a belonging that will stay with them forever.	Comment noted.
1.2.7.12	Success is being proud of who you are and reaching your potential and Cradoc school has definitively given our children "roots to grow and wings to fly".	Comment noted.
1.2.7.13	Our children are flourishing within this setting, the schools offers so many opportunities and the teaching and learning is of an excellent standard.	Comment noted.
1.2.7.14	I currently have three children attending Cradoc school, they are always excited to go and are all working ahead of their age, and that is all thanks to the wonderful teachers recognising their abilities and challenging them further.	Comment noted.
1.2.7.15	Past pupils from Cradoc have gone on to such a vast, impressive variety of careers across the globe.	Comment noted.
1.2.7.16	Cradoc C. P. School provided our children with a fabulous and happy grounding for their further education. They often reflect on the superior Welsh language skills and knowledge they had on entering Brecon High School, compared to the other feeder primary schools. This allowed them to enter secondary school with great confidence and ease, with them all going on to achieve degrees in their chosen subjects and pursuing careers away from the area.	Comment noted.
1.2.7.17	The school has served our family and the pupils of this area extremely well in the past, and continues to do so, and given the opportunity and the appropriate support is more than capable of doing so in the future.	Comment noted.
1.2.7.18	Cradoc children also share friendships underpinned by farming and rural activities. Many go on to join the local Young Farmers Organisation or study agriculture at college or university.	Comment noted.
1.2.7.19	The children in this smaller school have an identity closely connected with the rural area that it serves and there are many	Comment noted.

	advantages that may not be 'measurable' but are nonetheless to be considered.	
1.2.7.20	My four children had a good start at Cradoc school which has helped them to develop further over the years.	Comment noted.
1.2.7.21	Cradoc Primary School has been there on the same site for 51 years and three generations of my family have been educated there.	Comment noted.

1.2.8 Parents bring their children to the school although it isn't their closest school

1.2.8.1	<p>I've nothing against townfolk but they are different, having different priorities and agendas. The children are different too! This is why a significant number of children are brought out of Brecon each day to school at Cradoc, often by parents who went to Cradoc school but now find themselves living in Brecon, wanting the very best rural education for their children.</p>	<p>The Council acknowledges that a significant proportion of children attending Cradoc C.P. School live closer to other schools.</p> <p>The closest school for the 91 pupils attending Cradoc C.P. School, based on PLASC 2021 data is as follows:</p> <table border="1" data-bbox="1223 783 2020 1098"> <thead> <tr> <th>Closest school</th> <th>% of pupils</th> </tr> </thead> <tbody> <tr> <td>Cradoc C.P. School</td> <td>50.5%</td> </tr> <tr> <td>Priory C.i.W School</td> <td>24.2%</td> </tr> <tr> <td>Llanfaes C.P. School</td> <td>8.8%</td> </tr> <tr> <td>Sennybridge C.P. School</td> <td>5.5%</td> </tr> <tr> <td>Mount Street Infants School</td> <td>4.4%</td> </tr> <tr> <td>Archdeacon Griffiths C.i.W School</td> <td>3.3%</td> </tr> <tr> <td>Builth Wells C.P. School</td> <td>3.3%</td> </tr> </tbody> </table> <p>This suggests that 50% of pupils attending Cradoc C.P. School are attending their closest school, with the remaining 50% living closer to other schools. 37% of pupils choose to travel to Cradoc C.P. School from Brecon town itself. The Council disagrees that there are differences between children attending schools in Brecon and those attending schools outside Brecon. Pupils across the whole catchment</p>	Closest school	% of pupils	Cradoc C.P. School	50.5%	Priory C.i.W School	24.2%	Llanfaes C.P. School	8.8%	Sennybridge C.P. School	5.5%	Mount Street Infants School	4.4%	Archdeacon Griffiths C.i.W School	3.3%	Builth Wells C.P. School	3.3%
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Builth Wells C.P. School	3.3%																	

		take part in a number of extra-curricular activities such as sports clubs, Scouts, Cubs, Brownies etc, and all these pupils transfer to the same secondary school. The Council also believe that children benefit from being in learning environments where diversity is welcomed and celebrated.
1.2.8.2	Many parents, including myself, elect to send our children to Cradoc over other schools that are geographically closer because of the idyllic village location and unique learning environment that it offers .	Comment noted.
1.2.8.3	The school has over 90 children attending, many of these families choosing to travel from other areas to attend this community based rural school, which has excellent teaching and other non- curriculum activities.	Comment noted.
1.2.8.4	Parents from within Brecon, where there are schools with better facilities far closer to their homes, prefer to send their children to Cradoc C.P. School, despite its poor building standard. This is due to the excellent staff, high pupil attainment, good governance, management and, the fantastic rural setting.	Comment noted.
1.2.8.5	Many parents drive past their nearest schools located in Brecon town to attend rural schools instead, this must speak volumes about the standard of education and setting provided.	Comment noted.
1.2.8.6	We live in Brecon but choose to send our children to this school due to the reputation and the rural setting in which it lies.	Comment noted.
1.2.8.7	Many parents bring their children out of town to Cradoc purely because they want their child educated in that setting. The smaller class sizes, many lessons delivered outside (particularly in these times), surrounded by fields, livestock and woodland, and having the opportunity for Forest Schools, gardening club and such. It is so much more beneficial to the children to continue with smaller class sizes in a smaller - yet financially stable and well run - school, albeit a newer building which is a safer environment for them.	Comment noted.

1.2.8.8	Many from outside the school's catchment choose Cradoc for its many qualities, primarily for the strong community ethos and being rural, neighbouring fields and woodland in a lovely village.	Comment noted.
1.2.8.9	Pupils have moved from Mount Street school to Cradoc. The schools have different workings and methods which don't suit every child. Pupils that failed to make friends in Mount Street have flourished at Cradoc.	Comment noted.
1.2.8.10	It has often attracted children from Brecon itself as some parents have preferred the rural location and demographic.	Comment noted.
1.2.8.11	We are even seeing families living in Brecon who choose to send their children to this rural school and prepared to travel the extra distance for them to do so.	Comment noted.
1.2.8.12	We live in Brecon, but have deliberately chosen a small rural school to meet his needs. My son has a specific learning requirement where he is far more nervous and withdrawn in larger groups. In larger crowds, he becomes more withdrawn, and less confident. He is incredibly happy and comfortable at school in Cradoc. Here, he thrives. Why would Powys consider taking away this option for not only my son, but every child who attends Cradoc. This is true for current pupils, and also for pupils for generations to come.	Comment noted.

1.2.9 Comments about the school's rural nature

1.2.9.1	Cradoc is a standalone rural community school which should not be amalgamated with other primary schools. Its rural nature should remain so that the rural community can access a school which respects its surroundings and immediate community.	The Council recognises that Cradoc C.P. School is a rural school serving a large rural area.
1.2.9.2	With the school on our doorstep and being full of rural families committed to around the clock occupations such as ours, Cradoc school provided a rare (and most importantly a convenient) opportunity to take time away from the farm to participate in sports day parent's races, attend concerts and fund raising events for local community. This is something that just would not be	The Council recognises that Cradoc C.P. School has a large proportion of farming families and acknowledges that this school may be more convenient to these families, if it is their closest school. The Council would expect the new school to ensure the same level of parental/community participation as currently happens at all three schools once the new school is established.

	possible if the school was situated further away from the farm, in Brecon town.	
1.2.9.3	Cradoc school serves a large rural community. It has a huge community ethos and a rural grounding which is unique. A town-based school would not be able to uphold the individual nature of this wonderful school - where the children's learning and development is centred around their local environment and its principles.	Should the Council proceed with the Proposals, the new school would be required to deliver the new Curriculum for Wales. Local context would be a factor in the delivery of the new Curriculum. The new school would be able to develop the curriculum around both urban and rural communities that it serves.
1.2.9.4	I like the fact it's a small country orientated school.	Comment noted.
1.2.9.5	As a rural school teachers can focus more so on the interests of the children with agricultural backgrounds.	Comment noted.
1.2.9.6	Some children are much more suited to a rural school for their education. My eldest was a pupil in Mount Street 4 years ago and it wasn't until we moved him to Cradoc that he really started to flourish in his learning and his confidence.	Comment noted.
1.2.9.7	Our School is a rural school covering over 90 square miles of catchment area.	Comment noted.
1.2.9.8	Cradoc is a jewel in the crown of Welsh education because the children's home life is reflected by the very ethos of the values taught at the community school. Children from rural families are surrounded by children who have similar backgrounds and values.	Comment noted.
1.2.9.9	This is one of the last rural schools in the area	Comment noted.
1.2.9.10	Cradoc is the last remaining school in a more rural area and serves this community in a very particular way.	Comment noted.
1.2.9.11	The school understands and meets the needs of children from rural backgrounds.	Comment noted.
1.2.9.12	Events at the school are often themed around the farming calendar and rural way of life we lead and many aspire to be a part of.	Comment noted.
1.2.9.13	Cradoc school would be a huge loss to the community. Its a wonderful school which has always accommodated the rural children.	Comment noted.
1.2.9.14	It's a fully rural school with great location that people chose to send their kids to.	Comment noted.

1.2.9.15	Cradoc School is a remaining gem in Powys' rural crown. As numerous areas lose their identity and are swallowed up by supposedly money-saving giant enterprises, Powys is so fortunate to be the envy of so many urban inhabitants to be able to offer educational opportunities and community resilience actually in the rural setting.	Comment noted.
1.2.9.16	This rural school attracts many new families to the wide rural area as well as supporting the existing families over many years.	Comment noted.
1.2.9.17	Cradoc primary school is a rural school and has beautiful surroundings for miles all around, where there is: no busy roads, barely any pollution and has amazing wildlife	Comment noted.
1.2.9.18	many parents chose the school for its rural community values and setting.	Comment noted.
1.2.9.19	We are seeing new families attracted and moving into the rural countryside for an improved way of bringing up their children and attending these rural settings. School is always a priority with families in this decision making.	Comment noted.
1.2.9.20	inside it's a community school where by all the children know each other no matter age they all look out for each other and that is something unique to a rural school that you are trying to destroy!	Comment noted.
1.2.9.21	Cradoc is a rural school serving its wide rural community – it was built as close as possible to the base of the three valleys when smaller distant schools were amalgamated back in the 1960's. It has retained its rural roots. As you can see the school motto is "Providing roots to grow and wings to fly".	Comment noted.

1.2.10 Comments about the school's catchment area

1.2.10.1	Catchment area; Throughout the consultation process, governors, parents and I were informed that Powys County Council had concerns about the number of pupils attending Cradoc C.P. School from outside its catchment area. On querying this, I was informed that the Council do not have catchment maps, but when checking The Council's Geodiscoverer website I discovered that	<p>The Council acknowledges that a significant proportion of children attending Cradoc C.P. School live closer to other schools.</p> <p>The closest school for the 91 pupils attending Cradoc C.P. School, based on PLASC 2021 data is as follows:</p>
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	<p>there are indeed catchment maps available. The one that is available for Cradoc is inaccurate as it represents a far smaller area than where pupils currently travel from. I therefore question The Council's claim that too many pupils come from outside a catchment area they claim does not exist? I have also attached a copy of the current Cradoc C.P. School catchment area held by Powys County Council and draw your attention to the one prepared by the Save & Rebuild Cradoc School group in the attached impact assessment at page 10.</p>	<table border="1" data-bbox="1227 261 2029 579"> <thead> <tr> <th>Closest school</th> <th>% of pupils</th> </tr> </thead> <tbody> <tr> <td>Cradoc C.P. School</td> <td>50.5%</td> </tr> <tr> <td>Priory C.i.W School</td> <td>24.2%</td> </tr> <tr> <td>Llanfaes C.P. School</td> <td>8.8%</td> </tr> <tr> <td>Sennybridge C.P. School</td> <td>5.5%</td> </tr> <tr> <td>Mount Street Infants School</td> <td>4.4%</td> </tr> <tr> <td>Archdeacon Griffiths C.i.W School</td> <td>3.3%</td> </tr> <tr> <td>Builth Wells C.P. School</td> <td>3.3%</td> </tr> </tbody> </table> <p>This suggests that 50% of pupils attending Cradoc C.P. School are attending their closest school, with the remaining 50% living closer to other schools. 37% of pupils choose to travel to Cradoc C.P. School from Brecon town itself.</p> <p>The Council is currently in the process of drafting catchment maps and will be consulting with school communities to verify these, before publishing these along with school admissions information.</p>	Closest school	% of pupils	Cradoc C.P. School	50.5%	Priory C.i.W School	24.2%	Llanfaes C.P. School	8.8%	Sennybridge C.P. School	5.5%	Mount Street Infants School	4.4%	Archdeacon Griffiths C.i.W School	3.3%	Builth Wells C.P. School	3.3%
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1.2.10.2	Cradoc is accessed by surrounding villages – from far afield, I access it as it's got such a good reputation	Comment noted.																
1.2.10.3	Cradoc C.P. School is a thriving, well run community school which serves a vast rural area, from Trallong to Garthbreny, and the Eppynt down to Brecon.	Comment noted.																
1.2.10.4	Cradoc is and has been a very successful rural school supporting a wide community from Upper Chapel, Merthyr Cynog, Pontfaen, Aberbran and Llanfihangel Nant Bran.	Comment noted.																
1.2.10.5	Cradoc serves a very large rural community south of the Epynt and north of Brecon, as far west as Sennybridge and to Llanddew in the east.	Comment noted.																
1.2.10.6	The school covers a very large area to the North/North-West of Brecon, including quite a few pupils from town itself.	Comment noted																

1.2.10.7	Cradoc is successful and probably has the largest catchment area of the schools around Brecon.	Comment noted.
1.2.10.8	Cradoc is a rural school that serves a wide rural community.	Comment noted

1.2.11 Links between the school and the community

1.2.11.1	It is the heart of our rural community and a place where many community events take place. For example in 2019 we celebrated 50 year of Cradoc School on the grounds of Cradoc School - what a great community event that was, also school fetes on Saturdays in the summer, fundraising events for the School, family barbecues on the school yard, bingos, young farmers events ... just to name a few of many events that has taken place there so far.	The Council acknowledges the central role of Cradoc C.P. School within the local community. The draft Community Impact Assessment will be updated to take account of information gathered during the consultation.
1.2.11.2	Cradoc is not a tiny rural school, it is the heart of the community for a rural area that has very few other facilities and services.	As above.
1.2.11.3	When collecting our children from Cradoc School we have an opportunity to talk to neighbours and people in our community and have formed new friendships. This social experience is crucial as rural life can be lonely.	As above.
1.2.11.4	The school had (and still has) a thriving social calendar which in turn continues to supply a support network for mums and dads alike. Celebrations at Christmas, Easter, St David's Day, Sports Day gatherings and glorious summer fetes, not to mention the many children's birthday parties held at Cradoc school.	As above.
1.2.11.5	For decades, Cradoc school has been the guts right at the centre of our rural community. It has brought us together and I promise you people need that bond more than ever. We have had Easter Bingo, Pilates, meetings, Community First Aid Courses, Wine Tasting and hundreds of events integrating families when we have watched our children perform in various events throughout the year. Cradoc School has always been very welcoming to the community.	As above.
1.2.11.6	The site provides a great opportunity as a community hub which includes the school	As above.

1.2.11.7	Cradoc has a great community that go above and beyond for the children.	As above.
1.2.11.8	Cradoc school is vital for securing the future of the local community	As above.
1.2.11.9	The school has been a strong presence in the community for many years and should continue on.	As above.
1.2.11.10	Cradoc school provides a hub for the community which has lost so many of its other centres (churches village halls etc)	As above.
1.2.11.11	Cradoc school is highly respected in the community- not only for the Educational Authority's markers but for the even more important and immeasurable fact that for decades it has nurtured, instilled kindness and belonging at the core of its families and provided us with a location that we can all come together to celebrate the important events of the year. With the Covid pandemic it has highlighted more than ever the importance of belonging in the community to maintain good mental health.	As above.
1.2.11.12	I feel so strongly that, without the school, the sense of 'coming together' in this rural community will be lost; town schools just don't have the same atmosphere. Cradoc has already lost its post office, shop and other services and the school/hall/playground is the main place in the community for parents, grandparents and children to meet.	As above.
1.2.11.13	Not only is Cradoc School a place of education, it is a place where events and social gatherings take place (for example YFC events), we get to know and talk to local people in our community and our neighbours. For me, life in this part of the world as a sheep farmer can be very quiet and lonely. Taking the children to School is a nice experience and brings the chance to talk to friends and neighbours outside of my family. Cradoc School is the heart of our local community.	As above.
1.2.11.14	Cradoc school building is used for a wide range of events effectively drama, bingo, YFC, community meetings. It is not just a place of education. It gives local people like myself a sense of community.	As above.

1.2.11.15	In the past the school has held many functions in the community i.e. the sports community have held funding raising and social events, the W.I. have held their meetings there, the YFC have also used it in the past.	As above.
1.2.11.16	Cradoc school is part of a great community with lots of great neighbours who will help build Cradoc up.	As above.
1.2.11.17	Whenever the school needs a new climbing frame or any equipment there will always be neighbours and people queuing outside the gates to help us build those things just for us to have fun in our school.	As above.
1.2.11.18	Families rely on the school for their social interaction – a meeting place, of like minded people, especially at the drop-off and pick-up times for their children.	As above.
1.2.11.19	The mental health and wellbeing of all age groups in school and in the wider community benefit from the interaction between young and old, as well as peer to peer. Dividing a community and sending the youngsters to the other side of the town would be detrimental to all generations.	As above.
1.2.11.20	Cradoc has hosted Refugee away days... open days for the community.... a hub for the surrounding areas.	As above.
1.2.11.21	Little did we know that the school would become a lifeline and provide opportunities to become part of a thriving local rural community, integrating into friendship groups (?and farming/business contacts – agri suppliers, renting ground etc etc) that provided a support network for the whole family.	As above.

1.2.12 Comments about early years provision at the school

1.2.12.0	<p>Response from Estyn:</p> <p>The proposal does not detail clearly enough how it proposes to address the lack of nursery provision in Cradoc, as the alternative non-maintained settings listed all involve notable travel into Brecon or Sennybridge</p>	<p>Should Cradoc C.P. School close, early years provision would continue to be available in Cradoc during Phase 1 of the Proposals. Phase 2 of the Proposals includes building a new school which would have integrated early years facilities, and the intention is that this would provide early years education and wraparound provision. Any parent would be able to apply for a place at this setting.</p>
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		It is recognised that should there be no school in Cradoc then there would be a risk to the early years setting - 3@Cradoc and this may have an impact on families if they are required to travel further to access early years provision.
1.2.12.1	Cradoc is only one of two schools in this area who welcomes all children (not limited to Cradoc children) from babies up to school age to participate in a music and dance group - Shake Rattle and Roll. Ideal for children and parents to have an early insight into the surroundings and running of the school. Also giving potential Cradoc children a head start and confidence for when they start school. Will this be available in the new location and to any baby or child from any area to attend?	
1.2.12.2	My son attends the @3 setting, they have been so accommodating with him. We think he has autism and the staff at Cradoc have dealt with him so well and really understand him.	Comment noted.
1.2.12.3	Cradoc school is also very popular due to the excellent start they get in 3@Cradoc. My children have all thoroughly enjoyed their time there and my youngest is very excited to be starting after the summer. I cannot praise the setting enough: the children learn so much and the staff are so nurturing.	Comment noted.
1.2.12.4	3@Cradoc is adjoining the first classroom so the children have time to get to know their future teachers and environment, making the transition very smooth.	Comment noted.
1.2.12.5	They have made use of the unique 3@Cradoc childcare provision	Comment noted.
1.2.12.6	The Mother and Toddler sessions and additional activities such as the Shake Rattle and Roll music sessions have been vital in integrating back into the community to form new and re-form existing friendships in the close rural community.	Comment noted.

1.2.13 Comments about wraparound provision at the school

1.2.13.1	Cool Kids @ Cradoc (CKC) is a breakfast, after school and holiday childcare setting that operates at Cradoc School. CKC has a reputation for being one of the best childcare facilities in Powys –	The Council recognises that the Cool Kids @ Cradoc provides excellent wraparound provision.
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	gaining 'Excellent' in all categories by the Care Inspectorate of Wales. Our latest inspection report can be found at https://careinspectorate.wales/service-directory?search_api_fulltext=Cool+Kids+%40+Cradoc	
1.2.13.2	Wrap around care is a strong feature of the school's provision for the community and has been rated as "Excellent" by inspectors.	As above.
1.2.13.3	I rely on the CoolKids@Cradoc wraparound care as it enables me to have sensible work pattern and I have read they will not be able to continue - Janet, Laurie and the team are like family and the thought of losing them and their support is unbearable. You have given no guarantee of any wraparound childcare provision within this proposal.	Should Cradoc C.P. School close, early years provision would continue to be available in Cradoc during Phase 1 of the Proposals. Phase 2 of the Proposals includes building a new school which would have integrated early years facilities, and the intention is that this would provide early years education and wraparound provision. Any parent would be able to apply for a place at this setting.
1.2.13.4	It has excellent wrap around care, holiday clubs, pre - school provision. All of which are essential to working parents.	Comment noted.
1.2.13.5	The school offers breakfasts club, after school club and holiday club.	Comment noted.
1.2.13.6	Cradoc school already has a very successful well-established breakfast and after school club for the ever increasing working families in the area.	Comment noted.
1.2.13.7	The school provides amazing, activity packed holiday provision and wraparound care.	Comment noted.
1.2.13.8	Cradoc is the only place near me which has childcare during holidays – my nearest primary doesn't offer this consistently...My child loves going to Cradoc to access Cool Kids.	Comment noted.
1.2.13.9	Cool Kids @ Cradoc is one of a few Out-of-School childcare services that has remained open during the Covid 19 Pandemic, helping parents to continue to attend work in these uncertain times. Our service has also been invaluable to the well-being of the children attending. Allowing them to attend a safe play setting which closely follows the Welsh Government 's guidelines on keeping children safe during the Covid 19 Pandemic.	Comment noted.
1.2.13.10	Cool Kids @ Cradoc work closely with 3 @ Cradoc to provide wrap-around care for 48 weeks of the year.	Comment noted.

1.2.14 Other comments

1.2.14.1	Cradoc School has been an integral part of The Councils COVID-19 strategy, using the school as part of their HUB.	The Council is pleased that Cradoc C.P. School has been able to play an integral part during the pandemic.
1.2.14.2	The school is managed and run tightly and is not and hasn't been in debt like some other school	It is true that the school has been in a surplus budget position for the last 3 years.
1.2.14.3	Cradoc PTA are every well supported by the parents and the wider community, coming together for many fundraising and social events. e.g. we have recently provided over £6,000 for computers.	Comment noted.
1.2.14.4	The PTA at Cradoc has done an excellent job raising funds for the school and is so well supported. They have funded a large order of technology devices (tablets, laptops and such), though it is a shame The Council are slow at getting these devices networked and even slower at improving the internet at the school.	Comment noted.
1.2.14.5	The kind PTA of Cradoc school asked the community if they wanted to help tidy up the school grounds and there were people queuing by the gate I remember that day I tripped over a brush and hurt my knee and the community was so kind they helped me clean myself up.	Comment noted.
1.2.14.6	This school might not have the best building and technology but we have a heart and that is special, and should be treasured and not trashed.	Comment noted.
1.2.14.7	How can PCC justify closing a school such as Cradoc which currently has close to 100 pupils?	The reasons why change is required at Cradoc C.P. School are outlined in the Consultation Document: <ul style="list-style-type: none"> - Decreasing pupil numbers - Building condition - Building Configuration.
1.2.14.8	How can PCC justify closing a school such as Cradoc which is well-run and financially viable?	As above.
1.2.14.9	How can PCC justify closing a popular school such as Cradoc which is situated in such perfect surroundings ideally positioned for helping to deliver the aims of the New Curriculum for Wales?	As above.

1.3 OTHER GENERAL COMMENTS ABOUT THE CURRENT SCHOOLS

1.3.1	These appropriately sized (not small!) community schools serve the local children and community admirably and I strongly object to their merging.	Comment noted.
1.3.2	Each school has its own individual identity, provision of teaching excellence and an outstanding ability to establish close links with the immediate communities and close relationships with parents and carers.	Comment noted.
1.3.3	The major selling point for all three schools are the outdoor areas, forest schools and wildlife havens to enable children, families and staff to learn in the outdoors which is essential during the pandemic	Comment noted.
1.3.4	All three schools in their current locations provide excellent education. The size of each is appropriate for the age of the children and they are well-sited for easy access. They are child friendly; large schools are not – they suit administrators not children, and the children are what education is about.	Comment noted.
1.3.5	Staff expertise and good practice is already shared between schools through cluster collaboration.	Comment noted.

2. COMMENTS ABOUT PHASE 1 OF THE PROPOSALS

2.1 Concern about the impact on quality of provision

<p>2.1.0</p>	<p>Response from Estyn:</p> <p>Overall, the section in the proposal on its impact on standards, wellbeing, provision and leadership in all three schools is too general as it lacks detail. The proposal states that standards, wellbeing, provision and leadership in all three primary schools are currently good and that the Council would expect amalgamating to further strengthen the current situation. However, it is not clear on what this judgement is based as the proposal does not contain sufficient information on the current performance of the schools. The proposal generally has an over reliance on stating that the Council anticipates that amalgamating the three schools would have a positive impact or would strengthen standards, provision and leadership.</p>	<p>The Council is committed to providing the children and staff of the three schools with a high-quality learning environment, which will include modern, purpose-built facilities and technology fit for the 21st Century, further enhancing the school's ability to implement the new Curriculum for Wales, for the benefit of all pupils. Phase 1 of the Proposals, establishing a new school initially on the current three sites, is a fundamental step in realising the outcome of Phase 2, which is the construction of a new school building.</p> <p>The intention of these Proposals is to merge the three schools to become one school, with the schools staying on their current sites temporarily until they transfer to the new building.</p> <p>When merging schools into a new building, the Council's approach has been to merge the schools before the new building is ready. This enables the establishment of a new governing body, the appointment of a headteacher and the development of a vision for the new school. It also allows the governors and headteacher of the new school to have direct input into the design of the new building and to ensure that the staffing of the new school is appropriate.</p> <p>However, there would also be benefits to Phase 1 in terms of supporting teaching, learning and leadership across the three sites. There would be the opportunity to share good practice across all sites, meaning that provision would benefit from shared expertise from all teachers. With the introduction of the new Curriculum, this approach will have a positive impact on improving outcomes for pupils.</p>
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		<p>It is anticipated there would be a positive impact on quality and standards through the establishment of one new larger primary school. In respect of pupils currently attending the Mount Street Schools, this would mean that pupil progression would be monitored throughout pupils' time in primary school, from age 4 to 11, ensuring continuity in delivery and approach. As a larger school, the headteacher would be able to spend more time on leadership, enabling a greater focus on improving the quality of provision. In addition, there would be a larger team of staff, enabling expertise to be shared across the school and enabling more distributed leadership and professional development opportunities.</p> <p>Each school brings its own individuality, however, there are also many areas where, by amalgamating, staff would benefit from working together, sharing good practice, sharing knowledge and experiences in preparation for the implementation of the new Curriculum, ensuring consistency in approaches to literacy and numeracy, for example.</p> <p>All three schools currently provide good quality education and are self-improving schools – this is the view of the Council's School Improvement Team. It is recognised that they have different strengths, however, this will be a benefit to a new school as the school will be able to meet the needs of all pupils.</p> <p>With an amalgamation of the three schools, the strength in leadership and excellence identified by Estyn and the Council would be shared within the new school, impacting positively on standards and leadership.</p> <p>Should the Proposals be implemented, then a temporary governing body would be established. The first task would be to recruit a headteacher for the new school and to establish a</p>
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		strong senior leadership team. The headteacher would be able to oversee the strategic development of the school as whole, supported by the senior leadership team.
2.1.1	3 schools all with very different strengths being merged and run on 3 sites is going to be a logistical nightmare and will not improve educational outcomes for the children.	As above.
2.1.2	Lowering of standards educationally and imaginatively for pupils with an academy style blend.	As above.
2.1.3	Merging the three schools will result in less focus on each school site which is likely to result in slipping standards. It is bizarre to me that Powys County Council would be willing to risk the standards of three schools with positive Estyn reports.	As above.
2.1.4	With no funding secured for phase 2, all that is being done here is a paper-pushing exercise to reduce the number of head teachers and inevitably have a negative impact on education.	As above.
2.1.5	Phase one could impact on the standards at Mount Street School as the new Headteacher will be concentrating on raising standards at the other 2 schools.	As above.
2.1.6	MSIS is currently excellent, with an excellent Estyn report, with a very strong team of staff and an outstanding headteacher. This in our view would be sacrificed if this proposal is taken forward.	As above.
2.1.7	Mount Street Infants School has an Improvement Capacity of A and a Support Capacity of Green. Will Powys County Council agree that amalgamation of the schools will result in Mount Street Infants School losing these categorisations that they have worked so hard to achieve.	As above. There have been no national categorisation data published for schools since the autumn term in 2019. Welsh Government has announced that there will be no categorisation during the academic year 2021-22 and are also exploring alternative systems for school improvement to replace the current categorisation system.
2.1.8	There is a serious RISK to standards at Mount Street Infants in the transition period with one management structure over 3 schools for an unspecified amount of time.	See 2.1.1
2.1.9	This merger would not enhance, nor even sustain present provision at MSIS and Powys would lose the existence of an exceptional school in their portfolio.	See 2.1.1

2.1.10	I am saddened that you want to water down the excellent provision at MSIS by amalgamating with two other schools of poorer standards.	See 2.1.1
2.1.11	In relation to Mount St Infants, I note the “excellent” Jan 2020 Ofsted report which clearly rates the school highly. The onus is on PCC to justify disrupting such a school by amalgamating it with 2 others.	See 2.1.1
2.1.12	How is this proposal going to improve on the current ‘excellent’ and ‘exceptional’ provision at MSIS?	The Proposals would maintain the excellence in Wellbeing and Care, support and guidance identified by Estyn in Mount Street Infants inspection report in January 2020. The strengths across all three schools can help to improve the areas identified as recommendations by Estyn, i.e., developing pupils’ independent presentation skills and increasing the range of approaches teachers use to ensure all pupils are engaged.
2.1.13	Even if sharing Staff skills and training programs becomes a priority for the new school. It will mean a high risk of lowering standards for the pupils at MSIS whilst this process is being facilitated.	See 2.1.1
2.1.14	The united team' and exceptionally happy family atmosphere' at MSIS noted by our ESTYN report where all pupils thrive, would no longer exist; The enthusiastic and inspiring vision' that ESTYN noted as having best foundation phase practice at heart ' would be lost; the team of staff who work effectively together for the good of their pupils' would be demoralised.	See 2.1.1
2.1.15	Phase 1 and the merger of three schools places the MSIS school community at risk and threatens the following - Excellent Estyn Report 2020, high standards, categorisation, school grounds, school woodland, planted over 20 years ago and named the Millennium Wood, Platinum Eco school, Healthy School National Award, ICT infra structure, links with town including Dementia Matters, The Hours art exhibition, visits to bakery, fire station. Parents of children at the school and within the 3+setting, services families, Nepalese families. PTA Smarties Little Gems	See 2.1.1. All three schools have strengths and the amalgamation of the schools should bring these strengths together rather than be detrimental to any of the schools.

2.1.16	The 'united team' and 'exceptionally happy family atmosphere' noted by MSIS's ESTYN report where all pupils thrive, would no longer exist; The 'enthusiastic and inspiring vision' that ESTYN noted as having 'best foundation phase practice at heart' would be lost; the team of staff who 'work effectively together for the good of their pupils' would be demoralised. Our school identity would be lost.	See 2.1.1
2.1.17	How will merging these schools "improve learner entitlement and experience" for the children of Mount Street Infants School?	See 2.1.1. The Proposals would maintain the excellence in Wellbeing and Care, support and guidance identified by Estyn in Mount Street Infants report in January 2020. The strengths across all three schools can help to improve the areas identified as recommendations by Estyn, i.e., developing pupils' independent presentation skills and increasing the range of approaches teachers use to ensure all pupils are engaged.
2.1.18	In respect of Cradoc pupils, how will this proposal "significantly improve outcomes for children", as stated?	See 2.1.1

2.2 Concern about the impact on pupils

2.2.1	There are 400 reasons not to merge Cradoc and Mount Street's infant and junior schools. That is the number of children whose education would be disrupted by the Council's proposed merger. At a minimum pupils will be disrupted by a school name-change, uniform change, a change of staff and loss of community, but it is likely to be much more than that.	<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 to help them manage possible changes for their learners. It is also expected that school governors, staff and parents support the children to ensure that there isn't a detrimental impact on their wellbeing.</p> <p>The Council is committed to providing the children and staff of the three schools with a high-quality learning environment, which will include modern, purpose-built facilities and technology fit for the 21st Century, further enhancing the</p>
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		<p>school's ability to implement the new Curriculum for Wales, for the benefit of all pupils. Phase 1 of the Proposals, establishing a new school initially on the current three sites, is a fundamental step in realising the outcome of Phase 2, which is the construction of a new school building as this will enable the school's governors, staff, pupils and parents to have an input into the design of their new school.</p> <p>The intention of these Proposals is to merge three schools to become one school, with the schools staying on their current sites temporarily until they transfer to the new building.</p> <p>Disruption for pupils would be minimal during the first phase of the Proposals, as it is expected that most staff would remain on their current sites, although it is recognised that senior leadership may change. Pupils would be able to participate in discussions such as the name and logo of the new school. It would be a decision for the temporary governing body whether a new uniform would be needed, but pupils usually are able to participate in this discussion as well.</p> <p>It is recognised that there would be more disruption for pupils when they move into the new school building, but they would also have the opportunity to be part of the development of the school. The Council usually organise sessions with pupils (and governors, staff and parents) during the development of new school designs, and site visits would be arranged as the construction unfolds.</p>
2.2.2	Concern about potential loss of learning opportunities for the children and their education suffering.	<p>The Council is committed to providing the children and staff of the three schools with a high-quality learning environment, which will include modern, purpose-built facilities and technology fit for the 21st Century, further enhancing the school's ability to implement the new Curriculum for Wales, for the benefit of all pupils. Phase 1 of the Proposals, establishing</p>

		<p>a new school initially on the current three sites, is a fundamental step in realising the outcome of Phase 2, which is the construction of a new school building.</p> <p>The intention of these Proposals is to merge the three schools to become one school, with the schools staying on their current sites temporarily until they transfer to the new building.</p> <p>When merging schools into a new building, the Council's approach has been to merge the schools before the new building is ready. This enables the establishment of a new governing body, the appointment of a headteacher and the development of a vision for the new school. It also allows the governors and headteacher of the new school to have direct input into the design of the new building and to ensure that the staffing of the new school is appropriate.</p> <p>However, there would also be benefits to Phase 1 in terms of supporting teaching, learning and leadership across the three sites. There would be the opportunity to share good practice across all sites, meaning that provision would benefit from shared expertise from all teachers. With the introduction of the new Curriculum, this approach will have a positive impact on improving outcomes for pupils.</p> <p>Each school brings its own individuality, however, there are also many areas where, by amalgamating, staff would benefit from working together, sharing good practice, sharing knowledge and experiences in preparation for the implementation of the new Curriculum, ensuring consistency in approaches to literacy and numeracy, for example.</p> <p>All three schools currently provide good quality education and are self-improving schools. It is recognised that they have</p>
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		<p>different strengths, however, this will be a benefit to a new school as the school will be able to meet the needs of all pupils.</p> <p>With an amalgamation of the three schools, the strength in leadership and excellence identified by Estyn and The Council would be shared within the new school, impacting positively on standards and leadership.</p> <p>Should the Proposals be implemented, then a temporary governing body would be established. The first task would be to recruit a headteacher for the new school and to establish a strong senior leadership team. The headteacher would be able to oversee the strategic development of the school as whole, supported by the senior leadership team.</p>
2.2.3	Phase 1 makes no sense as there is no real benefit for the community, the school staff and, most notably, the pupils. Any proposal should at the very least improve children's education, attainment, and wellbeing, especially when compared with what they currently have; our children and school community would be worst off with this proposal.	As above.
2.2.4	One new, larger school would not provide enhanced opportunities for ALL pupils.	As above.
2.2.5	I don't think that having a joined up school on a new site will have a major benefit to learners or their experiences. Why would this alter their opportunities?	As above.
2.2.6	Children would not benefit from a larger school which could potentially increase the size of contact groups.	As above.
2.2.7	How will Powys CC protect well-being and education of the children during Phase 1?	As above.
2.2.8	How will Powys County Council provide better than our children have now at MSIS?	As above.
2.2.9	How will Powys County Council improve on the outstanding emotional and behavioural support that the pupils of Mount Street Infants School currently have?	As above.

2.2.10	I have a very strong view that this is not in the interest of any of the children in any of the schools affected.	As above.
2.2.11	There is a danger that the ethos of MSIS can be lost and children can become anonymous in a bigger school.	As above.
2.2.12	The impact on children would be detrimental for a number of reasons including reduced relationship building, uncertainty, impact on mental health, reduced opportunities for learning due to lack of planning and leadership.	As above.
2.2.13	Restructuring within their current settings won't work and vulnerable' impressionable children will be disadvantaged.	As above.
2.2.14	The impact of Covid-19, the uncertainty of the consultation process and potentially more disruption during Phase 1 will bring a time of insecurity to the children when they actually need the school to be a constant and calm sanctuary during these turbulent times.	As above.
2.2.15	The children have missed so much face-to-face school time during the past year, they need less disruption going forward, however I am concerned that the merger as proposed in Phase 1 would cause more disruption.	As above.
2.2.16	Amalgamating such different schools will cause such a change to the children who have all had an incredibly turbulent 12 months, with so many changes. Now The Council threatens to close their school and merge them so they face even more changes, so The Council can save money. I am strongly against the amalgamation and it will be detrimental to the children. They definitively do not want the change, their voices are the most important!	As above.
2.2.17	The uncertainty and disruption will significantly and negatively impact the most vulnerable pupils, especially after what they have experienced in the pandemic this year. The last thing that they need having just got back into school.	As above.
2.2.18	Child centred learning is a key feature of MSIS but how would the pupils share ideas across the sites when the resources, facilities and staff qualifications are so different?	Child centred learning is about individual learning experiences. The staff would be sharing the experiences and good practice between each other over the three sites to ensure the pupils benefitted from these experiences.

2.2.19	My partner and I do not think this will help the children have a better education than if Mount Street Infants is left as it is.	Comment noted.
2.2.20	By the time the children actually move school many children would have moved anyway with the potential damage already done!!	Comment noted.
2.2.21	During Phase 1 how will Powys CC protect the children from the services community?	Should the Council proceed with the Proposals, the new school would be responsible for ensuring that the needs of all pupils are met, including children from the services community.
2.2.22	MSIS pupils go swimming every week. If the Foundation Phase pupils on another site are unable to go swimming because of access or transport costs, this will mean the MSIS pupils will no longer have swimming lessons, which we feel (and there is evidence to prove) is a lifesaving skill easier learnt at a younger age?	Most schools have swimming as part of their curriculum, including for Foundation Phase pupils. Whilst this would be a decision for the new school, there is no reason why Foundation Phase pupils would not be able to continue to have weekly swimming lessons.
2.2.23	The latest Estyn report states that pupils at Mount Street Infants School have “ <i>outstanding levels of well-being and very positive attitudes to learning</i> ”. How will the outstanding levels of well-being and very positive attitudes to learning be enhanced by our pupils attending a new larger school?	Powys County Council recognise the outstanding practice at Mount Street Infants School. The practices and strategies employed by all staff at the school would be retained within the new school. In a new, purpose-built school learning experiences would be enhanced.
2.2.24	By merging schools are staff going to be moved? This would be very unsettling for the children as they build very close bonds with staff.	Disruption for pupils would be minimal during the first phase of the Proposals, as it is expected that most staff would remain on their current sites, although it is recognised that senior leadership may change

2.3 Concern about loss of each school’s individual identity / awards

2.3.1 Concern about loss of school identity

2.3.1.1	Closing the current schools and reopening one combined school will serve only to create a sense of lost identity, I cannot see how it will benefit either staff or pupils.	Should the schools close, then there would be an opportunity to develop a new sense of identity and ethos within the new school, building on the strengths of the current schools. All schools operate within their own school communities, and there would be an opportunity to develop a new school community.
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2.3.1.2	Having only one head for the three schools will mean a loss of individual school identity and as a consequence, a breakdown of the sense of community within and surrounding the school.	As above.
2.3.1.3	Individual schools know their particular community, have specific projects and goals. They know the context of their school population. Amalgamation loses diversity – disengaged rapid+specific responses and numbness the richness of diversity.	As above.
2.3.1.4	Combining three schools will save money, but at what cost, as each school has strived to be the best of its abilities and have been awarded their own merits. Therefore each school has its own identity.	As above.
2.3.1.5	I feel very strongly that if the merger is set that schools will lose their identity and their unique way of teaching.	As above.
2.3.1.6	The 3 schools have an individual ethos, and community links, which is strongly supported by the new Curriculum for Wales where it states 'A school's curriculum is everything a learner experiences in pursuit of the four purposes. It is not simply what we teach, but how we teach and crucially, why we teach it.	As above.
2.3.1.7	Each school currently has its own identity, and we have specifically chosen Mount Street Infants over other schools in the area because of how well we feel it is run.	As above. All three schools provide a good quality education. The Proposals to amalgamate the schools would support teaching, learning and leadership. There would be sharing of good practice across all sites, meaning that provision would benefit from shared expertise from all teachers. With the introduction of the new Curriculum, this approach will have a positive impact on improving outcomes for pupils.
2.3.1.8	How will Powys CC protect the uniqueness of Mount Street Infant School during Phase 1?	Should the Council proceed with implementation of the Proposals, Mount Street Infant School would no longer exist – a new school would be established which would initially operate across the three existing sites. This would enable good practice and the expertise of teachers across all three existing schools to be shared across all three sites. Should the schools close, then there would be an opportunity to develop a new sense of identity and ethos within the new

		school, building on the strengths of the current schools. All schools operate within their own school communities, and there would be an opportunity to develop a new school community.
2.3.1.9	The proposal for phase one will impact hugely on pupils as they will no longer go to MSIS but to a currently unnamed school. Does PCC agree that the school's identity will be lost?	As above.
2.3.1.10	Cradoc school children have such a strong identity with their current school name, uniform and community and merging the 3 schools will completely lose that identity, along with the school mantra.	The Council notes these comments about the current identity of Cradoc C.P. School. Should the Council proceed with implementation of the Proposals, Cradoc C.P. School would no longer exist – a new school would be established which would initially operate across the three existing sites. There would be an opportunity to develop a new sense of identity and ethos within the new school, building on the strengths of the current schools, and there would be an opportunity for pupils and the wider school communities to contribute to developing the identity of the new school. All schools operate within their own school communities, and there would be an opportunity to develop a new school community.
2.3.1.11	I fear that the independence of Cradoc C.P. School, which is a factor which makes the school so great, would be lost in the amalgamation of the schools. Cradoc C.P. School has strong links to farming/rural communities and is a great asset to the local community as an independent organisation.	As above.
2.3.1.12	Concern about the loss of community identity provided by the school with Cradoc becoming just a dormitory hamlet and the concern of yet another rural school being closed.	As above. The Council notes the concerns about the potential impact of the Proposals on the Cradoc community.

2.3.2 Concern about loss of school awards

2.3.2.1	MSI will lose all their ECO flag status and healthy schools status that they and pupils have worked so hard to achieve over the last 15 years.	Although the school may lose its ECO Flag status, the high quality provision which the school has developed to achieve this status, would be maintained. The new school could
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		reapply using the evidence that they have from the three schools.
2.3.2.2	Mount Street Infants will lose all its previously hard earned awards and accolades Eco-School, Healthy School, investment in infrastructure equipment and resource from the PTA and MOD	As above.
2.3.2.3	How will enthusiasm and commitment to on-going projects be maintained when just overnight on September 1st 2022, we lose our Eco Flag and Healthy Schools status? The Staff and pupils at MSIS have worked tirelessly over the last 20yrs alongside parents, the M.O.D, the local community, the Ghurkha regiment, the high school, the national parks and others to initially achieve, embed and then maintain our pinnacle status in these key awards. To have to start from the beginning would be demoralising and cruel, especially given the situation that we will still be in the same building, with the same staff (less our Headteacher) with the same families for years to come but without any of our achievements being recognised. It is not a case of just re submitting what we already do as each stage has to be achieved and maintained one section at a time.	The school has a very strong evidence base to support their work on promoting healthy schools and eco-schools. The work the schools do in these areas is for the benefit of the pupils. This will be maintained as strong processes are in place within the school and these would not be lost if the Proposals were to be accepted. Schools do not carry out these projects solely to get the recognition of the badges or flags but for the impact these have on the pupils.
2.3.2.4	Potential loss of the eco-status by the MSIS under a new headteacher.	As above.
2.3.2.5	I do not want the children sacrificing their headteacher, their Eco School Flag status, their Healthy Schools status, their Excellent Estyn rating, and their Mount Street Infant School Identity for the future possibility of a new building.	Comment noted.
2.3.2.6	Cradoc is a rural school and the pupils and staff have strived so hard to build up its ethos and status, with many accolades and awards to the school's name. These will all be lost if the school no longer exists as Cradoc School, with all the hard work going to waste.	See 2.1.1

2.4 Concern about mixing rural and town schools

2.4.1	It does NOT make sense to amalgamate a rural school (Cradoc) with two town schools (Mount Street Infants and Mount Street	All schools in the Brecon catchment have a strong collaborative ethos and work very well together as a cluster of
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	<p>Juniors) where there have been no previous links and jeopardising the excellent performance of MSI and good performance of MSJ (as assessed by Estyn).</p>	<p>schools – these include schools that are located in the town of Brecon and in rural settings, plus a mixture of English-medium, Welsh-medium and dual stream schools, some with a Church in Wales ethos. The schools already have strong links, whatever their status.</p> <p>Analysis of the pupils attending Cradoc C.P. School suggests that a significant proportion come from the town of Brecon itself. All schools deliver education based on the same curriculum and are planning to introduce the new Curriculum, whether they are located in a rural or a town environment.</p>
2.4.2	<p>Cradoc School is a rural school and wishes to remain in its entirety - it does not and should not be forced into Brecon. This speaks for itself when so many parents from Brecon have chosen to send their children to a rural school.</p>	<p>As above.</p>
2.4.3	<p>Cradoc and Mount Street very different schools with a different demographic. Cradoc deserves to remain as a local school serving local children.</p>	<p>As above.</p>
2.4.4	<p>Amalgamating the two Mount Street schools makes perfect sense. But, to add Cradoc to such an amalgamation makes no logic. Cradoc is very "rural", whilst the Mount Street schools are totally town / city orientated.</p>	<p>As above.</p>
2.4.5	<p>Mount street juniors and infants already work alongside each other but Cradoc is of no relation. Also, you are talking about 2 town schools vs a country village school.</p>	<p>As above.</p>
2.4.6	<p>I feel that the schools should be left separate. They both provide education to children from different demographics and amalgamating them is not a fair option for any of the children.</p>	<p>As above.</p>
2.4.7	<p>I agree with merging Mount St infants and Mount St Junior school but strongly disagree with Cradoc being merged. Cradoc is a wonderful rural school and shouldn't be merged with Mount St.</p>	<p>As above.</p>
2.4.8	<p>I feel that this is a good fit for Mount St Infant School and Junior School but not so for Cradoc which serves a rural area and is a community hub.</p>	<p>As above.</p>

2.4.9	Cradoc is a rural school and as such should be viewed differently and separately from the Mount Street Schools. A whole other proposal is needed for Cradoc.	As above.
2.4.10	It makes no sense to amalgamate a strong independent rural school with two town schools some miles away. Unless it is a deliberate ploy to try and weaken Cradoc in order to justify closing it.	As above.
2.4.11	It feels as though Cradoc C.P School has been “lumped” together with Mount Street Juniors and Infants out of ease by Powys County Council in a bid to resolve the fact that Cradoc is in need of a new school building.	As above.
2.4.12	There seems no sense to add Cradoc into the mix; there is no history of links between Mount Street and Cradoc, the former are in Brecon, and Cradoc is a rural school with very different communities. It seems that it has all just been lumped together with no thought on the outcome and impact.	As above.
2.4.13	I understand that some of the current schools' buildings are not fit for purpose but not the proposal to deal with this by amalgamating the rural Cradoc School with 2 Brecon town-based schools.	As above.
2.4.14	What is your reasoning behind amalgamating a rural school with an urban school? You have to be seen to do everything possible before even considering closing a rural school! What are your reasons for merging? Do you think a merge won't mean closing to the Welsh Government !!! Mount street is already a very large school and Cradoc isn't the smallest.	As above.
2.4.15	Mount Street provide a globalised education's Cradoc develops a rural ethos. They aren't matched at all.	As above.
2.4.16	It is difficult to see the logic in merging 2 town schools with a rural school when they have no previous connections. The needs of Cradoc School and their community cannot be met by joining with Mount Street schools and PCC should consider addressing the issues raised in the 'case for change' for Cradoc school separately.	As above.
2.4.17	The proposal to merge two urban schools with a rural school is ludicrous. Powys County Council do not appear to have given any	As above.

	consideration to the fact that these types of school are very different. They are unique in nature and by merging them fails to recognise their roles in their respective communities. If the parents wanted the children to be attending an urban school why have they chosen to send them to Cradoc C.P School when there are four other primary school choices in Brecon?	
2.4.18	What benefits are there for the children of Mount Street Infants School of a merger with Cradoc C.P. School? Mount Street Infants School has no history with this rural school.	As above.
2.4.19	All 3 schools currently work very differently. Cradoc school encourages their rural children from various farming communities to learn and develop through outdoor, muddy play and it works extremely well, it's what the children are used and forms happy and healthy relationships between children and teachers. Mount street school couldn't be more different. It would be impossible to merge these very different schools so that all pupils are as happy and motivated as they are now.	As above.
2.4.20	Bringing schools of different styles together rarely supports improving the learning environment but waters down the best practice and negatively impacts outcomes for children and families.	As above.
2.4.21	The lifestyles that children have from a rural community are very different to those of children who reside in a town. If the schools were to merge I would be extremely concerned as to how empathetic children from the town would be to the challenges that children from a rural life face. If the proposal goes ahead, how does Powys County Council plan to integrate the children from the two urban schools with Cradoc C.P School?	As above.
2.4.22	How will Powys CC protect the MSIS school community from an unnatural merger during Phase 1?	As above.
2.4.23	The benefits of a rural school are highlighted in the School Organisation Code 2nd Edition. By merging the three schools, Powys County Council are removing the "choice" for parents as to whether their child(ren) are sent to a rural or urban school.	As above. The Council recognises that parents can choose to apply for a place for their child(ren) in any school they wish, however there is no requirement for The Council to provide a choice of

		schools of certain types. There are currently 7 schools which provide primary education in the Brecon catchment. The current proposal is proposing to merge 3 of these schools, however there would still be 5 schools in the catchment which would continue to provide choice. This includes community primary schools, Church in Wales provision, a Welsh-medium primary school and a school located in a rural area.
2.4.24	It is not clear why Cradoc School is being considered with Mount Street Infants and Junior School – except as a means to reduce building and running costs. Have the social/community effects of this been factored into the assessments carried out?	<p>The reasons for the Proposals are outlined in the Consultation Document published in respect of these Proposals.</p> <p>A range of impact assessments have been carried out. These will be updated to reflect the feedback received during the consultation period, and updated versions will be considered by the Council's Cabinet when determining whether or not to proceed with the Proposals.</p>

2.5 Concern about changes to leadership arrangements

2.5.1	Concern about disruption cause by loss of the current headteacher of MSIS, who has been working towards a safe school-community nurturing pupils' well-being and development.	<p>Ensuring that staff are treated fairly throughout any process is a fundamental and important principle. Should the decision be to go ahead with the Proposals, then the Council would work with the temporary governing body, which would be responsible for agreeing the staffing structure. Its first task would be to appoint a headteacher to the new school, and followed by the senior leadership team and then the whole school staffing structure.</p> <p>There would be opportunity for the current headteachers to be considered for any posts within the new school. A temporary governing body can, under certain circumstances, ringfence the positions of headteacher and deputy headteacher to those currently in these positions, rather than go to a national advert (as would normally be the case for a headteacher position).</p>
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		<p>This would therefore be a decision for any temporary governing body.</p> <p>However, there would need to be a formal consultation process to ensure that the process was carried out fairly and legally and to try and avoid any compulsory redundancies.</p> <p>The headteacher of the new school would be expected to continue to promote nurture and wellbeing in the new school.</p>
2.5.2	The disruption caused by the loss of the Headteacher seems insurmountable and completely unnecessary considering MSIS has little, if anything at all to gain from this Phase One merger with MSJS and Cradoc.	As above and 2.1.1
2.5.3	The loss of a known and much respected head teacher at Mount Street Infants, the process of appointing a new head teacher, job insecurity for all staff, changes to the governing body will be difficult for the children and families.	As above.
2.5.4	It is an impossible task for one headteacher to look after all three sites.	In Powys there are examples of headteachers successfully managing schools across more than one site, including a three-school federation across three school sites. This has been successfully implemented with standards being maintained across each of the schools.
2.5.5	I can't see the sense in the schools being joined under one head while they exist in separate sites.	See 2.1.1
2.5.6	I am concerned about this amalgamation in terms of leadership. For three schools all on separate sites to be run by one headteacher! I view this as a very difficult job.	In Powys there are examples of headteachers successfully managing schools across more than one site, including a three-school federation across three school sites. This has been successfully implemented with standards being maintained across each of the schools.
2.5.7	I worry that the third school is too far away to be covered by one Headteacher.	Cradoc C.P. School is located within approximately 4 miles of Mount Street Infants and Mount Street Juniors. The Council does not think that this distance is excessive in terms of leadership and management.
2.5.8	A head teacher covering three sites would be severely challenged to visit all three sites safely.	As above.

2.5.9	The new headteacher will struggle to keep the current community spirit and academic performance at each of three schools if s/he is to be present at each site only twice a week.	From the experiences of three school federation in Powys, it would be possible to continue the academic progress and community spirit with one headteacher.
2.5.10	I would worry that the head won't know the individual children in each school so won't be as able to pick up on problems as they arise and that they won't have the same level of contact with the onsite staff to be actively managing the school.	See comment 2.5.4
2.5.11	I am concerned that the headteacher would not have time to know the children or the families, they cannot have a relationship with all pupils over three sites and it would worry me if a parent ever had any concerns that it would not be a very personal meeting. Schools are all about relationships, strong, trusting relationships...this will no longer exist with one headteacher overseeing three schools on three sites.	It would be possible for the headteacher to have a personal relationship with the pupils as has been witnessed in The Council's other three-school federation in Powys.
2.5.12	A one head three campus approach will immediately lose the level of personal attention that currently exists.	As above.
2.5.13	Concern that the headteacher would not be accessible to parents/carers and pupils	The headteacher would manage their time between the sites and be able to organise meetings with parents around this.
2.5.14	One head teacher and one Governing Body cannot have the same close relationship with each individual school site and community of parents and carers.	It is possible that having one governing body can bring the three current school communities together to create a new school community, as it would be possible to combine the thoughts and views of the three into a more cohesive governing body.
2.5.15	Each school needs its own head, with a more intimate understanding of the school and its pupils – I do not believe that one headteacher for three very different schools would have the level of engagement the current headteachers have. The evidence should be clear from so many realms that more centralised systems are weaker and less personal.	The three-school federation in Powys provides evidence that the centralised system has strengthened the relationship between the school and their families across three sites.
2.5.16	I fear a change/loss in leadership (only part-time on each site), will have a great impact on guidance, care and support to staff meaning the amalgamation in ' Phase 1' would be detrimental to pupils and the school community as a whole.	With one headteacher it would bring three leadership teams together and ensure continuity in the processes and strategies employed across the three sites. This would also benefit pupils as they move on to secondary education as they would have experienced similar systems through their primary education.

2.5.17	You are proposing merging three schools, headteachers, governing bodies, school councils into one, how will this increase leadership capacity? This will remove leadership capacity from pupils, staff, and the wider stakeholders.	As above.
2.5.18	I am concerned about staff having a trusting working relationship with a headteacher who they may not see from one week to another, considering how much they converse and look to their current head for advice and ideas they would no longer be receiving this level of support.	The headteacher would be a presence in the school throughout the week. Therefore, it should not be a concern that you would not see the headteacher from week to week.
2.5.19	Concern that staff would have less support compared with having a headteacher on-site always.	The headteacher would be present at school sites throughout the week and be able to have a strong relationship with their staff.
2.5.20	For pupils (and parents) it is so important to know the headteacher, for them to be approachable, and for them to be present on site - as it is currently. This would be lost through an amalgamation.	The headteacher would be present at each school site throughout the week and should build strong relationships with pupils and know them as individuals.
2.5.21	Concern that pupils would lose their Headteacher, who currently knows every child and parent and spends time sitting reading with the children, caring for them and their families – would a Headteacher over two sites be able to do this?	As above comment.
2.5.22	The parents and pupils would treat the Headteacher as a visitor 'someone to respect from a distance but with no true relationship or understanding of our exceptionally happy' school (ESTYN 2020).	See comment 2.5.4
2.5.23	I believe that the three sites should retain their headteachers to enable them to guide us safely out of a pandemic, and who knows how long this will go on, and to effectively carry out the day to day running of the school.	Comment noted.
2.5.24	The impact on the new Headteacher will be enormous. It is acknowledged on page 31 that operating across three sites could cause challenges for the school's leaders. Is it necessary to put all this upheaval onto one Headteacher when there is no guarantee that funding will be available to build a new school? Leading 3 schools for an undetermined period of time is just impossible and will lead to increased stress levels. Will Powys	From experience within Powys, the headteacher of a three-school federation has been successful in improving standards across the whole federation and these being maintained across each of the schools.

	County Council admit that leading 3 schools for years will be a very onerous and very stressful task? If the schools are amalgamated and funding is not made available will the schools revert to 3 separate schools with 3 headteachers?	
2.5.25	The process does not truly value the head's role, the vision, the input of leadership of an excellent school, and the impact of this being spread across three sites for what is apparently an unprescribed period of time.	The Council does not agree with this statement. The Council fully values the role of the headteacher. From experience within Powys, the headteacher of a three-school federation has been successful in improving standards across the whole federation and this is being maintained across each of the schools.
2.5.26	How does PCC envisage one head teacher effectively covering three school sites to complete the responsibilities listed below? Manage the changes due to the amalgamation of three schools, including changes to staffing structures and Governing Bodies; Respond to the continued demand of COVID; Ensure that three School Development Plans are developed; Maintain ALN provision and the SSC class at Mount Street Infants and Junior Schools; Embed the New Curriculum for Wales; Ensure the 3+ setting at the infants thrives and numbers attending are stable or increasing; Support the children and families from the military services; Ensure that grants from the MoD that have been awarded to individual schools are spent as stated in the grant applications made by individual schools.	The pandemic has been a challenging period for all schools. The headteacher of The Council's three-school federation has successfully led these schools through the pandemic period, ensuring that remote learning has been provided to all pupils and maintaining the wellbeing of pupils and staff.
2.5.27	Members are concerned that many of the tasks currently performed by the Headteacher cannot be delegated to other staff members including responding immediately to Safeguarding issues, phone calls and emails, being a visual presence to provide a welcoming atmosphere for every single parent and all pupils by understanding their individual needs and circumstances, organising prompt solutions to issues with building maintenance, scrutinising the budget, supporting staff, supporting pupils, supporting parents, supporting the 3+ setting and the complex needs of the CIW regulations, contact with Governors, on rare occasions the ultimate authority in behaviour management but on more regular occasions the ultimate recognition of achievement.	When a new leadership team is established, the roles and responsibilities of each member will be clear. There are statutory roles that only headteachers can undertake, such as exclusions. In terms of safeguarding, each site would have a safeguarding lead. This does not have to be the headteacher. In other multi-sited schools, each site has a deputy headteacher or teacher in charge that supports the headteacher when they are not on site.

2.5.28	I do not believe that one head teacher covering three school sites will have adequate time to support staff. The deputies at each school will become the leader of each separate school site and will have to pick up the day to day running of the schools with an overall loss in teaching resource.	The roles and responsibilities of all members of the leadership team will be clearly defined. This will be a governing body and headteacher decision across the sites. There would be dedicated leadership time for all deputies within each school to carry out their roles.
2.5.29	Concern that deputies would have to step up and run the school while the Headteacher is at one of the other sites, which would lead to a loss of teaching time.	See comment above.
2.5.30	If all three schools are amalgamated does this mean that the one Head will therefore prioritise the other schools and in turn not be available in this school (MSI) for the majority of the week? This could have a negative impact on the remaining staff and the running of the school.	The headteacher would divide their time between the three sites supported by a strong senior leadership team.
2.5.31	Standards are variable across the three schools, with MSIS having the best standards and the best school categorisation. We feel that this would mean that a new Headteacher overseeing the three sites would be moved away from MSIS with its GREEN categorisation and good to excellent ESTYN judgements but would in fact be expected to prioritise in making improvements on the other sites.	National Categorisation has not been carried out since 2019. Categorisation highlighted the amount of support a school needed to improve. Green and Yellow schools were seen as self-improving schools. Over the pandemic period, Powys' school improvement team have worked with all three schools and are content that each school provides a quality education to their pupils.
2.5.32	What if there were a safeguarding issue and the Head was at another school and the deputy was teaching, what would happen?	Each school will have a designated safeguarding lead and a deputy safeguarding lead. This is the same as currently happens in the schools. If the safeguarding lead was unavailable, it would be possible to contact the headteacher who could return to the school.
2.5.33	How will one Headteacher be on-site to open up the school for Breakfast Club on all three sites and be in school until 5:30pm with After-school Club across all three sites?	The breakfast club and after school club should be staffed appropriately with leaders and support staff. It should not be the headteachers role to oversee the breakfast and after school clubs.
2.5.34	Due to Staff reorganisation in 2019, MSIS does not have a deputy head teacher. Who will be in charge on the days that the new Headteacher is off-site? Who will take that teacher's class when that person has to leave the classroom to sort out any one of the	Each site would have a deputy headteacher or teacher in charge to oversee the school while the headteacher was not on site. They will have designated roles and responsibilities which would include what to do when the headteacher was not on site.

	many daily issues that our Headteacher would normally deal with on our behalf, as mentioned above?	
2.5.35	Smarties, the 3+ setting at Mount Street Infants is an important part of the school and comes under the management of the Headteacher. The setting is thriving & numbers are increasing. Phase one of the Proposals will impact on Smarties as the Headteacher will be covering 3 sites and will not be available at Mount Street Infants School every day.	The role of the RI of an early Years setting could be taken on by any member of staff within the school.
2.5.36	In Phase 1 there will be even more responsibility placed on leadership teams in each school with a headteacher stretched over three sites	See comment 2.5.33
2.5.37	One headteacher covering three school sites will NOT have adequate time to support staff. The deputies at each school will become the leader of each separate school site and will have to pick up the day to day running of the schools with an overall loss in teaching resource.	See comment 2.5.33
2.5.38	As we as a society recover from a pandemic and racial tension, a school which focuses on well-being and is inclusive is highly valued, we fear this would be lost with leadership spread so thinly across three sites.	The headteacher and senior leadership team of the new school would have the opportunity to focus on well-being of pupils and staff and inclusivity in the same way as the current headteachers, and expertise from amongst the three current schools would only benefit this further.
2.5.39	Merging and managing a larger school over several sites is more challenging for the Headteacher and leadership team as there will be a constant need to travel between sites, often several times a day as "situations" dictate	See comment 2.5.4
2.5.40	Cradoc, in recent years had a shared head teacher with another school and it failed to work on all levels.	Cradoc had a shared headship arrangement with another school for one year. This situation ceased as the headteacher wished to return to Cradoc School.
2.5.41	Each school operates differently and has a different teaching style (which is what makes each great) I worry one person would not be able to manage this and support the staff and children. My other concern not only would they be managing three schools but also putting together a funding bid/ plans/ consultation for a new school building. Again, someone cynical would suggest The Council are looking for a 'yes person' with more of a business head than an	Each school brings its own individuality, however, there are also many areas where, by amalgamating, staff would benefit from working together, sharing good practice, sharing knowledge and experiences in preparation for the implementation of the new Curriculum, ensuring consistency in approaches to literacy and numeracy, for example.

	education background. How would this person have all the children's interests at the centre of the decisions they make when each school is so different.	
2.5.42	There would be additional pressure on the headteacher, as supported by feedback received from the headteacher at Welshpool.	Comment noted. The situation in Welshpool was unique to Welshpool. Due to the contractor becoming insolvent, the new building took significantly longer than expected and the school remained on multi-sites for longer than expected.
2.5.43	At Cradoc the headteacher also teaches part time. If the headteacher was to lose their job, who would be teaching their class? This would mean bringing in cover at a cost.	All staffing would be reviewed and this would ensure that there are appropriate numbers of teaching staff across each of the schools to deliver education to the pupils.

2.6 Other comments about changes to staffing arrangements

2.6.1	Staff would not be able to liaise with other teachers to further develop transition plans from Foundation phase to KS2 within a larger school on three sites	There would be opportunities for all staff to liaise with other staff. In the first phase, it is expected that staff remain on their current sites, but there would be enhanced opportunities to share expertise and knowledge within a wider group of staff. Over the pandemic period, staff have become used to using technology and applications to work virtually with other schools and to take part in training opportunities.
2.6.2	How will planning across the three sites take place so that there is equality in the provision? E.g., how will the Year One teachers at MSIS do their planning with the Year One teachers at another site?	There can be shared networks for staff to share planning and ideas. Staff could be released for PPA at the same time to work virtually to share ideas and planning.
2.6.3	Concern that the SLT team would be fragmented which would negatively impact pupils	The headteacher would be the lead in bringing together the senior leadership team to ensure they are a consistent and coherent team. There are other schools in Powys that are multi-sited and Powys would be happy to link these to the new headteacher to share their experiences in establishing and maintaining consistency across their schools.
2.6.4	Loss of close teamwork – especially in Mount Street, where there is a very close, effective, and supportive team.	There is no reason why the close teamwork of current staff at the three schools would be lost. During the first phase of the Proposals, staff would remain on their current sites, and there would be an opportunity to develop enhanced team working across a wider group of staff.

2.6.5	Staff morale would be severely hit with all the uncertainty and loss of support, identity, and job security, impacting pupils.	<p>The Council also acknowledges that any school reorganisation period causes a period of uncertainty for those affected by the Proposals.</p> <p>An experienced headteacher is working for The Council to support school leaders to help them manage possible changes for their staff and learners. In addition, staff wellbeing will be supported through the process by the HR team, their unions and they will have access to the Employee Assistance Programme for Powys currently delivered through Carefirst.</p>
2.6.6	The amalgamation would mean all staff would be uncertain of future employment when the 'new school' may or may not be built.	Once any staff structure is created by the temporary governing body, staff are fully consulted with at every stage so have involvement throughout the process.
2.6.7	Concern about the negative impact on staff including stress.	<p>The Council also acknowledges that any school reorganisation period causes a period of uncertainty for those affected by the Proposals.</p> <p>An experienced headteacher is working for The Council to support school leaders to help them manage possible changes for their staff and learners. In addition, staff wellbeing will be supported through the process by the HR team, their unions and they will have access to the Employee Assistance Programme for Powys currently delivered through Carefirst.</p>
2.6.8	Does PCC have the resources to provide adequate support for staff and the schools for a transition of 4-5 years or longer?	Support is ongoing for the duration of the process and across all stages.
2.6.9	How is best foundation phase practice going to be provided when teachers will no longer be specialists?	There will need to be foundation phase teachers in the schools, therefore, the specialism will be maintained in these schools. The sharing of good practice between foundation phase staff will enhance teaching in the foundation phase.
2.6.10	How will PCC ensure that staff's deep understanding of the foundation phases would not be weakened under this proposal?	As above.
2.6.11	Where is the assessment of impact on staff and pupil health and wellbeing?	The Proposals' impact on staff is considered on page 23 of the Consultation Document , and is also considered in the

		draft impact assessment document. The draft impact assessment document will be updated to reflect comments received during the consultation period, and an updated version will be considered by the Council's Cabinet when determining whether or not to proceed with the Proposals.
2.6.12	How will Powys CC protect staff during Phase 1?	Any staffing changes required through Phase 1 and beyond would need to be duly consulted on and support will be given to staff throughout this process by HR and the relevant trade unions.
2.6.13	I can only imagine the negative impact these Proposals will have on the morale of both staff and pupils during Phase 1 of the Proposals. The axe will be hovering so to speak on all members of staff who will have only the 'opportunity', not a guarantee to gain a job in the new school. Will the staff be put out of their misery and know their fate during Phase 1 or will they have to wait until Phase 2 to find out whether they will still have a job?	During consultation on any proposed staffing structure, there would be an opportunity for the temporary governing body to consider the staffing requirements for both phases of the Proposals, to ensure that as much as possible is resolved in one management of change process. This would be possible for a number of posts but staffing structures do need reviewing regularly by Governing Bodies due to pupil numbers etc.
2.6.14	What will happen to the other two Heads? Provided of course that one of the current three gets the job in the first place!	All affected staff would need to be consulted with and through the relevant policies and discussion with those staff a number of options may be available such as redeployment
2.6.15	The current pandemic and the world view that this is likely to happen again means that we must do better in protecting our communities, especially schools. This proposal means staff will be moving between sites, and if schools go back into lockdown or outside visitors must be restricted, how does this work with one Headteacher? Indeed, we should be discouraging people from moving between schools in the current circumstances.	It is not expected that staff move between sites, although there would be occasions when the whole group of staff would need to come together for professional learning, team building etc.
2.6.16	The Consultation Document states that pupils could benefit from staff specialisms. During phase one of the proposal this would only happen if staff were to move between the three sites. Does Powys County Council agree that this would increase travel costs, staff would need business insurance for their vehicles, it would discriminate against members of staff who do not drive (there is no bus service between Brecon and Cradoc), it would increase carbon emissions, would logistically be a nightmare to co-ordinate	Specialisms do not have to be delivered by the same teacher. As a specialist, the teachers can share their practice with others, conduct training and assessments to support other teachers. As the pandemic period has shown us, many of these things can be done virtually and would not add to additional travel for staff.

	and, with COVID set to be with us for some time yet, be very dangerous for the children to have staff moving around from one site to another? How would this work in practice? If one teacher went from Mount Street Infants School to Cradoc School who would teach the class in Mount Street Infants School?	
2.6.17	Would staff have to work across the three sites or have to move at different sites during Phase 1?	In the first phase, it is expected that staff remain on their current sites, however this would be a decision for the temporary governing body.
2.6.18	Will there be one setting leader for each three-year-old setting or will there be a team leader in each setting? Governing bodies do not have control of three plus settings.	Further discussions would be required with the early years providers as the design of the new school progresses to understand staffing requirements.

2.7 Concern that Phase 1 would continue for longer than intended

2.7.1	I do not feel that merging three schools on three separate sites provides any benefits, especially as funding for a future school on a single site has not been guaranteed, and is highlighted as the most risky element of the phase 2 proposal.	<p>The Council is committed to providing the children and staff of the three schools with a high-quality learning environment, which will include modern, purpose-built facilities and technology fit for the 21st Century, further enhancing the school's ability to implement the new Curriculum for Wales, for the benefit of all pupils. Phase 1 of the Proposals, establishing a new school initially on the current three sites, is a fundamental step in realising the outcome of Phase 2, which is the construction of a new school building as this will enable the school's governors, staff, pupils and parents to have an input into the design of their new school.</p> <p>The intention of these Proposals is to merge the three schools to become one school, with the schools staying on their current sites temporarily until they transfer to the new building.</p> <p>When merging schools into a new building, the Council's approach has been to merge the schools before the new building is ready. This enables the establishment of a new governing body, the appointment of a headteacher and the</p>
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		<p>development of a vision for the new school. It also allows the governors and headteacher of the new school to have direct input into the design of the new building and to ensure that the staffing of the new school is appropriate.</p> <p>See 2.1.1</p>
2.7.2	The plans for Phase 1 should be scrapped until there is more information and a guarantee that Phase 2 will take place. It is very unfair to put the children, parents, staff and community through such a nightmare process when Phase 2 currently seems to be a pipe dream, with no planning or actual plans in place.	As above.
2.7.3	Pupils would have years of uncertainty with a fragmented school over three sites and little chance of an amalgamation on-site in a new school.	As above.
2.7.4	Phase 1 could commence without the security of funding for Phase 2. If the plans go ahead there is no time limitation set out for the one head, one Governing Body for the three schools. This would have a detrimental impact on the children and staff of all three schools.	As above.
2.7.5	PCC have planned for two years (minimum) between phases 1 and 2, why? Should 21st Century Schools funding not be available, The Council could consider utilising alternative funding sources.' such as what? Is it possible that Phase 1 could begin before the funding for phase 2 has been secured? That could be disastrous.	As above.
2.7.6	You suggest this merge would take place and then a move to one new building in the future would take place. How can you expect the children to withstand these interruptions for an indefinite length of time, as sometime in the future suggests? Particularly when you cannot guarantee this project will even receive the required capital funding.	As above.
2.7.7	A new school operating on 3 sites indefinitely with no secure funding for Phase 2 with the extra challenges that brings cannot easily ensure well-being of children and staff, also families who	As above.

	may end up with siblings attending different sites according to space available or reorganisation by a new Governing Body and Head.	
2.7.8	The recent Welshpool amalgamation took 5-6 years, which had a negative on staff and placed excessive pressures on one head teacher covering three schools over separate sites for an extended period of time.	As above.
2.7.9	Realistically the Option 4 proposal in this consultation is likely to mean an amalgamated school (Cradoc, Mount Street Juniors, Mount Street Infants) operating across three sites for at least 4-5 years. If no funding is secured for a new school this position would be permanent and would be an awful outcome for all three schools. An amalgamated school across three sites for a period of 4-5 years or longer in my view is unacceptable	As above.
2.7.10	The proposed time frames are unrealistic. The consultation gives no certain future end date for a new school other than at the earliest 2024. The experience from the recent Welshpool amalgamation took 5-6 years which was disruptive to students and staff. This is particularly important at the moment, when the students and staff have had such a tough year.	As above.
2.7.11	The experience from the recent Welshpool amalgamation took 5-6 years – leading to negative impacts on staff including stress and in the case of the Welshpool amalgamation placed excessive pressures on a head teacher covering three schools over separate sites for an extended period of time.	As above.
2.7.12	The consultation gives no certain future end date for a new school other than at the earliest 2024. We understand from talking to staff involved with the recent Welshpool amalgamation that the process took 5-6 years. Communication with the head teacher at Welshpool confirmed that “Timescales were absolutely NOT adhered to” and that the “The impact of this was huge....We all despaired of it ever happening at many points in the journey”	As above
2.7.13	Can PCC state realistically how long Phase 1 under Option 4 is likely to exist?	As above.

2.8 Financial impact of Phase 1

2.8.1	<p>The very little savings The Council will have made by taking away two experienced Headteachers will have been spent on rebranding a poorly thought out three site school.</p>	<p>The Council is committed to providing the children and staff of the three schools with a high-quality learning environment, which will include modern, purpose-built facilities and technology fit for the 21st Century, further enhancing the school's ability to implement the new Curriculum for Wales, for the benefit of all pupils. Phase 1 of the Proposals, establishing a new school initially on the current three sites, is a fundamental step in realising the outcome of Phase 2, which is the construction of a new school building as this will enable the school's governors, staff, pupils and parents to have an input into the design of their new school.</p> <p>The intention of these Proposals is to merge the three schools to become one school, with the schools staying on their current sites temporarily until they transfer to the new building.</p> <p>When merging schools into a new building, the Council's approach has been to merge the schools before the new building is ready. This enables the establishment of a new governing body, the appointment of a headteacher and the development of a vision for the new school. It also allows the governors and headteacher of the new school to have direct input into the design of the new building and to ensure that the staffing of the new school is appropriate.</p> <p>It is estimated that annual revenue savings would equate to £16,181 as part of Phase 1, and £220,066 for Phase 2.</p> <p>The Council is currently revising its funding formula for schools. Should Cabinet approve the new formula, the savings would need to be recalculated.</p>
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		It is acknowledged that there would be some additional set up costs associated with establishing the new school – as indicated in the Consultation Document published in respect of this proposal, 'there would be some additional set-up costs. Based on previous primary school mergers, this is estimated to be in the region of £50k.'
2.8.2	The proposal offers no real finance gains in the short term – as indicated in the consultation report. In the long-term there are likely to be increased budget and staff pressures if pupils disperse from Cradoc to other rural schools in the transition period or transition sees loss of children from MSI and MSJ. This will place pressure on the Governing Body to make staff redundant in the future.	As above. It is not expected that any pupils would transfer to other schools during Phase 1 of the Proposals, and it is expected that all pupils attending the new school would then transfer together to the new school building when it opened.
2.8.3	Phase 1, on the outset, seems to be purely to save money having one headteacher instead of three, however I don't believe this will be saving any money in the long run. Instead, it is adding extra stress on our children and the poor staff who have already had 12 months of worry, uncertainty and upheaval - their mental wellbeing obviously isn't taken into account with this 'transformation'.	See 2.8.1
2.8.4	I don't see any positives for the children and teachers in Phase 1 and only a marginal benefit for the taxpayer, which is then drowned by the cost of Phase 2.	Phase 1 is an inherent part of the Proposals and is crucial to achieving the outcome, which is a brand new modern school building for the children of the three schools. See 3.1.1. As above - It is estimated that annual revenue savings would equate to £16,181 as part of Phase 1, and £220,066 for Phase 2. The Council is currently revising it's funding formula for schools. Should Cabinet approve the new formula, the savings would need to be recalculated. See 3.1.1

		<p>This does not include the cost of the capital investment which is 65% funded by grant from Welsh Government. In order to be awarded this grant funding the Council needs to prepare a series of business cases which must demonstrate value for money to the public purse as a whole, including the costs of capital investment over the life of the asset.</p> <p>All three schools provide good quality education. Whilst they all have different strengths, this would be a benefit to the new school as the school will be able to meet the needs of all pupils. The impact on pupils and staff is considered in the Consultation Document published in respect of this proposal.</p>
2.8.5	Concern about the outgoing costs of running three sites. How much will this take away from the funds for teaching provision in the future?	The costs of running 3 sites will be the similar to current costs. Only once Phase 2 is agreed and implemented will there be the savings associated with a single site which would allow for reinvestment across the authority.
2.8.6	Concern about the budget and how this will be fairly shared amongst the three school sites, especially taking into consideration the exceptionally poor condition of the school building at Cradoc.	Funding would be allocated to the new school via the Council's funding formula and all costs would then come from this budget. The new school's temporary and then permanent governing body would then be responsible for deciding how this is spent.
2.8.7	School budgets are stretched, how this is going to work over three sites (potentially for at least six years).	See 2.8.6
2.8.8	How will resources be fairly managed so that all children, whichever site they are on, have access to the same resources?	See 2.8.6
2.8.9	During Phase 1 how will Powys CC protect the MOD Grant funding that provides supports the UK and Nepalese children? The MoD Education Support Fund, a UK wide grant, has been applied for successfully for many years. This funding has enabled Mount Street infants to employ teaching assistants to support very young services children who are having to cope with multiple changes of school. By Year 2 some services children are starting their third or fourth school. The school has been able to ensure that one of the teaching assistants is first language Nepali, to allow verbal translation for children and parents when needed. In	As part of Phase 1, the pupils would remain on the current sites but as part of the new school. Should the grant continue to be available from the MoD, the new school would be able to apply for it. The application process would require the school to set out how the grant will support military children and the school would need to apply the grant in line with the grant's criteria. Given the success of the existing schools in accessing this funding, the Council does not foresee difficulties in future applications.

	Wales, the Supporting Services Children in Education, is able to pass on funding to Mount Street Infants. Over the past ten years £150,000 has been applied for, granted and audited successfully. The impact of this funding is threatened if Phase 1 becomes a reality. Currently 3 schools can apply but it is unlikely that the level of support would be maintained. Phase 1 will have a very negative impact on the provision for the military children.	
2.8.10	Realistically it is likely to take 4-5 years to realise and implement Phase 2. In the interim the existing schools will still need to be adequately maintained. Why has PCC not factored school maintenance costs over the transition period into the consultation proposal?	The maintenance costs are likely to remain the same as they are currently and are already factored in to the costs through the funding formula, which allocates funding based on a property condition survey.
2.8.11	Amalgamation of the 3 schools would lead to additional travel costs for the Headteacher, for staff and for governors.	It is not expected that staff move between sites, although there would be occasions when the whole group of staff would need to come together for professional learning, team building etc. Any staff affected by this may be eligible for payments under the disturbance policy and/or claim mileage for travel between sites.
2.8.12	Amalgamation could lead to taxis having to be provided to transport staff between schools, again an additional cost as happened when contact centre staff travelled between new County Hall and Neuadd Brycheiniog.	As above.
2.8.13	The three sites all have different needs, pupils, families and buildings. They will be impacted negatively by trying to stretch the budget over the three sites/buildings. Tough decisions will have to be made, which could significantly impact the other sites, pupils, and staffing. Given the history, e.g. Ysgol Calon Cymru, the new school is likely to go into debt, something that Mount Street Infants is currently not.	See 2.8.6
2.8.14	There are no financial benefits. The proposal offers no real financial gains in the short term– as indicated in the consultation report. In the long-term, there are likely to be increased budget and staff pressures if pupils disperse from Cradoc to other rural	This is incorrect - It is estimated that revenue savings would equate to £16,181 as part of Phase 1, and £220,066 for Phase 2.

	schools in the transition period – placing pressure on the Governing Body in the future to make staff redundant.	The Council is currently revising it's funding formula for schools. Should Cabinet approve the new formula, the savings would need to be recalculated.
2.8.15	Why merge the schools at all when there is no guaranteed plan for a new school to be built as from the figures presented this would not even save any money.	<p>As part of the transformation programme, it is planned that a new school on a new site in Brecon is created. It is estimated that revenue savings would equate to £16,181 as part of Phase 1, and £220,066 for Phase 2.</p> <p>The Council is currently revising it's funding formula for schools. Should Cabinet approve the new formula, the savings would need to be recalculated.</p>

2.9 Comments about buildings

2.9.1	I'm assuming the Phase 1 plan has been developed as a way of making it possible to access capital funding for a new school from the 21st Century Schools Fund (for phase 2). This is a way of avoiding the need for The Council to meet its obligations to maintain its schools out of its own budgets (which it has neglected to do in recent years).	<p>The Council is committed to providing the children and staff of the three schools with a high-quality learning environment, which will include modern, purpose-built facilities and technology fit for the 21st Century, further enhancing the school's ability to implement the new Curriculum for Wales, for the benefit of all pupils. Phase 1 of the Proposals, establishing a new school initially on the current three sites, is a fundamental step in realising the outcome of Phase 2, which is the construction of a new school building as this will enable the school's governors, staff, pupils and parents to have an input into the design of their new school.</p> <p>The intention of these Proposals is to merge the three schools to become one school, with the schools staying on their current sites temporarily until they transfer to the new building.</p> <p>When merging schools into a new building, the Council's approach has been to merge the schools before the new</p>
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		<p>building is ready. This enables the establishment of a new governing body, the appointment of a headteacher and the development of a vision for the new school. It also allows the governors and headteacher of the new school to have direct input into the design of the new building and to ensure that the staffing of the new school is appropriate.</p> <p>All schools are funded to maintain their schools through the funding formula, and this is based on current building condition and size of the building. This provides funding so that schools can meet their responsibility for day-to-day maintenance of school buildings, and the Council also has a Schools Major Improvements Programme to support on-going maintenance in schools.</p>
2.9.2	<p>The decision is being made on money, saving the cost of building multiple new schools and selling off their current sites for development to line The Council's pockets. There are no benefits to the children, staff, or community of Cradoc that could not be achieved in much greater effect by building a new school on its [Cradoc's] current site.</p>	<p>The Council is committed to providing the children and staff of the three schools with a high-quality learning environment, which will include modern, purpose-built facilities and technology fit for the 21st Century, further enhancing the school's ability to implement the new Curriculum for Wales, for the benefit of all pupils. Phase 1 of the Proposals, establishing a new school initially on the current three sites, is a fundamental step in realising the outcome of Phase 2, which is the construction of a new school building as this will enable the school's governors, staff, pupils and parents to have an input into the design of their new school.</p> <p>The intention of these Proposals is to merge the three schools to become one school, with the schools staying on their current sites temporarily until they transfer to the new building.</p> <p>When merging schools into a new building, the Council's approach has been to merge the schools before the new building is ready. This enables the establishment of a new governing body, the appointment of a headteacher and the</p>

		<p>development of a vision for the new school. It also allows the governors and headteacher of the new school to have direct input into the design of the new building and to ensure that the staffing of the new school is appropriate.</p> <p>See 2.1.1</p> <p>While the Consultation Document mentions the potential for a capital receipt, it is not quantified and is not the driver for this proposal.</p>
2.9.3	How will Powys CC protect the Mount Street Infant School building during Phase 1?	The Council has a duty to maintain its school buildings and address any issues that arise, regardless of whether schools are reviewed or not. Schools / buildings are prioritised for maintenance funding using a scoring criteria which can be found in the Council's Schools Asset Management Plan.
2.9.4	Will Powys CC commit to providing funds for the maintenance of Mount Street Infant School building during Phase 1?	See 2.8.10
2.9.5	Whilst there is a 'promise' of a new school will the three current sites be maintained properly or left to fall apart – again disadvantaging the pupils in the interim period.	See 2.9.3
2.9.6	What will happen to the three schools in the interim? Cradoc School is in desperate need of maintenance and repair, in short a new school building is required, why is that not listed as one of your consultation options?	<p>See 2.9.3.</p> <p>'Do minimum – backlog maintenance only' and 'Remodel all primary schools in current location' and options involving rebuilding Cradoc C.P. School were considered within the PBC for the Brecon catchment which was considered by Cabinet in September 2020. An appraisal of all options was carried out, and these options were discounted.</p>
2.9.7	Why amalgamate the schools in Phase 1 if the project was to go ahead why not wait until funding, plans, buildings etc have been put in place before amalgamating in phase 2	When merging schools into a new building, the Council's approach has been to merge the schools before the new building is ready. This enables the establishment of a new joint governing body, the appointment of a headteacher and the development of a vision for the new school. It also allows

		the governors and headteacher of the new school to have direct input into the design of the new building and to ensure that the staffing of the new school is appropriate.
2.9.8	If you want to move these sites to a new school instead of updating the current sites at least build the new school first and then make the move, the mergers before that seems pointless. With no funding available currently for the new school how can this plan even be considered.	As above.
2.9.9	It makes no sense to me to merge the three schools in the consultation whilst remaining on the current school sites. It would make more sense to invest the funding into supporting making the current buildings more suitable for all three of the schools highlighted in the plans for Phase 1.	As above.

2.10 Other concerns about Phase 1

2.10.1	Phase One does not benefit pupils, parents or staff	When merging schools into a new building, the Council's approach has been to merge the schools before the new building is ready. This enables the establishment of a new joint governing body, the appointment of a headteacher and the development of a vision for the new school. It also allows the governors and headteacher of the new school to have direct input into the design of the new building and to ensure that the staffing of the new school is appropriate. See 2.1.1.
2.10.2	Sort out Phase Two first as Phase One is unnecessary!	As above.
2.10.3	Strategically we cannot see either short or long term benefits for children's outcomes or for staff development and opportunities	As above.
2.10.4	I do not see any merit in your proposed Phase 1, you are clearly putting money and reducing your wage bill ahead of the wellbeing of the children and school staff.	As above.

2.10.5	It makes little sense to amalgamate the three schools before they can be joined physically.	As above.
2.10.6	I see no reason not to stick with option 1 - status Quo until such time as funding for new school buildings is secured.	As above.
2.10.7	If you propose to move to a new site in 2024 what is the benefit of closing the schools in August 2022 and reopening a new school in September 2022. Why not do the whole thing in September 2024?	As above.
2.10.8	The new uniform that parents will be expected to buy although this doesn't really affect me but to a lot of families it is a massive expense and uniform is often handed down between siblings and also parents share too!	If the Proposals are agreed, the closure would take place at the end of the academic year, minimising the potential cost implications for parents. Funding is currently available to support low-income families with support for uniform costs.
2.10.9	Parents will move children to other schools if a decision is made to merge the 3 schools.	The intention is to establish the new school initially on 3 sites before eventually moving to a new building. This would mean that provision would continue to be available on the 3 current sites in the short term, which would help with establishing the new school's identity and with transition to the new model. The Council would expect that pupils currently attending the 3 schools would continue to attend these sites following establishment of the new school, however ultimately parents/pupils can apply for a place in any school they choose, and they are entitled to move to other schools if that is their preference.
2.10.10	At a time of rebuilding after Covid and giving children a sense of stability and support, Phase 1 of this proposal will only give uncertainty and cause increased anxiety amongst the whole of the school community.	Comment noted.
2.10.11	PCCs preferred Option 4 will cause two periods of disruption first in Phase 1, amalgamating schools across three sites and secondly in phase 2, when a new school is created. This disruption will be in addition to that already caused by COVID. It is not acceptable to put additional pressure on staff at this point in time with impacts on morale, health and wellbeing and the potential impact on children's learning experiences. In Phase 1 there will be even more responsibility placed on leadership teams in each school with a head teacher stretched over three sites.	Comment noted.

2.10.12	Merging 3 schools at this point is a concern given that the impact of COVID on educational achievement is still unknown but very likely to have increased the educational divide. This is not a time to merge 3 schools – it will inevitably lead to movement of pupils whose parents will seek alternative establishments and this will all need to be managed at the same time as a changing staffing structure.	Comment noted.
2.10.13	The new Phase 1 school in Brecon is proposed to have 420 pupils. In the Phase 2 proposal, the new school at Sennybridge has a planned pupil capacity of 180 but the new school building in Brecon has a planned pupil capacity of 360. This implies a drift of pupil numbers away from the proposed three school merger in Brecon to a school in Sennybridge that has secure staffing and a straightforward rebuild. This matters during Phase 1 because if this is the prediction that Powys CC are making for future attendance, then the three-school merger is the wrong choice and will cause instability for children and job insecurity for staff. The rush to form one new school by this unnatural merger ignores the impact on future pupil numbers.	<p>The Council has identified a risk that there would be ‘uncertainty for staff during the transition period’.</p> <p>The capacity figure provided for the proposed new building is indicative at this stage. As outlined on page 17 of the Consultation Document :</p> <p><i>‘Initially, the new school would operate on the three existing sites, and the capacity would reflect their combined capacities. The capacity of the new primary school would initially be 420.</i></p> <p><i>Based on the PBC approved in September 2020, the intention is that the new school would move to a new building which would accommodate approximately 360 pupils – the capacity of the new school would need to be further assessed during the design stage.’</i></p>
2.10.14	This merger has nothing to offer MSIS and I am struggling to understand why it has been proposed. We are not a small' school, we don't have many surplus spaces, we have a healthy budget, our building could do with updating but nothing that will cost 9,000,000. I have not read or heard any evidence that would suggest anything other than a backwards step in the progress of our school.	The Council is committed to providing the children and staff of the three schools with a high-quality learning environment, which will include modern, purpose-built facilities and technology fit for the 21st Century, further enhancing the school's ability to implement the new Curriculum for Wales, for the benefit of all pupils. Phase 1 of the Proposals, establishing a new school initially on the current three sites, is a fundamental step in realising the outcome of Phase 2, which is the construction of a new school building as this will enable the school's governors, staff, pupils and parents to have an input into the design of their new school.

		<p>The intention of these Proposals is to merge the three schools to become one school, with the schools staying on their current sites temporarily until they transfer to the new building.</p> <p>The reasons why change is needed at Mount Street Infants School are outlined in the Consultation Document published in respect of this proposal and are as follows:</p> <ul style="list-style-type: none"> - Building condition - Last remaining infant and junior school in Powys - Transition arrangements - Staff development opportunities
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2.11 Other questions about Phase 1 of the Proposals

2.11.1	Will the three schools still have the same name?	Should the Council proceed with the Proposals, the three schools would merge to form one new school, initially operating from the three existing sites before moving to a new building in Brecon. A new name would be agreed for the new school – this would be agreed by the temporary governing body for the new school, however often new schools provide opportunities for pupils and/or the wider community to input into the process of agreeing a name.
2.11.2	How will admissions of pupils work in Phase One?	Pupils would apply for a place either in Brecon or in Cradoc. Pupils allocated a place in Brecon would continue to attend provision in Brecon in the Foundation Phase and KS2. Pupils allocated a place in Cradoc would continue to attend provision in Cradoc in the Foundation Phase and KS2.
2.11.3	When a child moves into a Junior year are parents going to have a choice if they go to Mount Street Junior school or Cradoc?? As some children already attend the Infants I would hope they would then get a place in the Junior school as traveling to Cradoc would be very difficult for some!	As above. There would be no expectation for pupils currently attending provision in Brecon to transfer to the Cradoc site.

2.11.4	If there is spare capacity at Cradoc for a year group, is it expected that a pupil who normally attends Mount Street would travel to Cradoc or vice versa? Presumably, Powys CC would then cover the cost of the transport?	As above.
2.11.5	How would admissions work? Would the pupils stay at their present school? What would happen, for example if a family came to MSIS with two Foundation Phase age children and one of the appropriate year groups had space for one child but was full for the other? Would they be expected to take one child to MSIS and the other child to another site? Would this have an impact on the starting times of each site to allow time to travel between three sites? How would that impact on travel costs? What if they were planning on walking to school because they didn't have a car or are mindful of climate change? Would transport be provided? Or would the school age groups be moved to different sites as a whole? But again, there are travel implications. How would this decision be decided? If it's the job of the new Headteacher to decide this with the new Governing Body, there aren't enough positions on the Governing Body to have full representation for all three schools, so how is that fair to each setting when some settings will have more representation than others?	<p>Pupils would apply for a place on the Brecon site, and places would be allocated in accordance with the Council's Admissions Policy. Every effort would be made to accommodate the application, however if there was no place available, a place would be offered at an alternative school/site. Transport would be provided in accordance with the Council's Home to School Transport Policy.</p> <p>It is not anticipated that school age groups would be moved to different sites, however it is possible that the school's governing body may wish to make some changes.</p> <p>The temporary governing body would be made of existing governors at each of the three schools, who would be asked to express interest in being part of the temporary governing body. Every effort would be made to ensure a fair balance between the three school as far as possible and The Council would work with the schools to ensure that balance.</p>
2.11.6	How will a whole school identity be fostered when the pupils aren't able to do things together due to travel costs etc? We have heard from another school that have already been through their transformation that this was a challenging and disruptive process. It would be even more of a challenge in our case as the EYFP sites are not close together.	A creative, innovative headteacher would be able to put arrangements in place to enable whole school activities. There would be a single School Council, which would work together to ensure pupil voice was heard. This could be done remotely. However, it would also be possible to have 'site-specific' sub-committees of the School Council.
2.11.7	What is the plan for the 3+ setting?	<p>The impact on nursery / early years provision is considered on pages 23-25 of the Consultation Document, where the Council states that:</p> <p><i>'It is not anticipated that Phase 1 of the Proposals would impact on the funded early years education provision outlined</i></p>

		<p><i>above, which would continue to operate in the same accommodation under the management of the new school'</i></p> <p>and in respect of Phase 2:</p> <p><i>'Eventually, the intention is that the new school moves to a new building located on the site of the old Brecon High School. Accommodation to provide funded early years education would be provided as part of the new building, and it is anticipated that there would be at least the same number of places available as are currently available at Mount Street Infants School and Cradoc C.P. School. The demand for nursery places in the area will be reviewed as the proposal moves forward, to ensure that sufficient places are provided to accommodate demand. Should all provision move to the new building, this would mean that funded early years education provision and childcare provision would no longer be available at Cradoc, and families currently accessing this childcare at Cradoc would need to travel further in order to access this provision. This could mean that some families currently accessing funded early years education provision and childcare provision at Cradoc may not access the alternative provision in Brecon.'</i></p> <p>The Council is unable to provide definitive information at this stage about the exact provision that would be available following a move to the proposed new building, however this would be considered as part of the design development for the new building, with input from the school and the early years providers.</p>
2.11.8	How will Powys CC protect the MSIS school community from the negative impact of the Covid-19 Pandemic during Phase 1?	Powys County Council officers who support schools would continue to provide support to the new school during Phase 1. The Council would provide support and guidance to the new school in dealing with Covid-19 in the same way as it provides support and guidance to every school.

2.11.9	How will Powys CC protect whole MSIS school community during Phase 1?	Powys County Council officers who support schools would continue to provide support to the new school during Phase 1.
2.11.10	How will Powys CC protect the local Brecon community during Phase 1?	The Proposals' impact on the community is considered in the draft community impact assessments. These will be updated to reflect comments received during the consultation period, and updated versions will be considered by the Council's Cabinet when determining whether or not to proceed.
2.11.11	How will you ensure that there is fair representation on the temporary governing body? How are people elected to the temporary governing body? Would the temporary governing body be structured in the same way as the governing body e.g. local authority representative, staff members, parent governors?	<p>The make up of the temporary governing body would be in accordance with the Government of Maintained Schools (Wales) Regulations 2005 and as outlined in the table on pages 27-28 of the Consultation Document. This would include parent governors, LEA governors, teacher and staff governors.</p> <p>The temporary governing body would be made of existing governors at each of the three schools, who would be asked to express interest in being part of the temporary governing body. Every effort would be made to ensure a fair balance between the three school as far as possible and the Council would work with the schools to ensure that balance.</p>

3. COMMENTS ABOUT PHASE 2 OF THE PROPOSALS

3.1 Funding has not yet been secured for Phase 2

3.1.0	<p>Response from Estyn:</p> <p>While the proposal identifies possible risks based on the uncertainties created by the proposal, it lacks detail regarding how the Council would respond should there be no capital funding available to fund the project.</p>	<p>The Council has included the development of new schools in the Brecon catchment in its revised Strategic Outline Programme for the 21st C Schools Programme. Should the Proposals be approved by Cabinet, then the Council would commission the first stages of the design process, and develop a Strategic Outline Case for the approval of Cabinet and the Welsh Government. It would then further work up the plans through the RIBA stages, and develop an Outline</p>
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		<p>Business Case, again for Cabinet and Welsh Government approval. Following this, a Full Business Case would be prepared, and once approved by Cabinet and the Welsh Government, construction would commence.</p> <p>If the Welsh Government's contribution to the project was not available, the Council would fund the project directly from its own capital programme, through a combination of asset sale and borrowing.</p>
3.1.1	What happens when Phase 2 is not funded?	As above.
3.1.2	It seems to be very risky to amalgamate these 3 schools without funding being in place for the new building. Have the Welsh Government got any money left with the amount that COVID-19 has cost?	<p>The Council is committed to providing the children and staff of the three schools with a high-quality learning environment, which will include modern, purpose-built facilities and technology fit for the 21st Century, further enhancing the school's ability to implement the new Curriculum for Wales, for the benefit of all pupils. Phase 1 of the Proposals, establishing a new school initially on the current three sites, is a fundamental step in realising the outcome of Phase 2, which is the construction of a new school building as this will enable the school's governors, staff, pupils and parents to have an input into the design of their new school.</p> <p>The intention of these Proposals is to merge the three schools to become one school, with the schools staying on their current sites temporarily until they transfer to the new building.</p> <p>The new school building would be funded jointly by PCC and the Welsh Government, through its' 21st C Schools Programme. The Welsh Government decides on its own spending priorities, but the Council is not aware that there have been any changes to the 21st Century Schools programme due to the Covid pandemic.</p>

3.1.3	There is no funding or planning permission for Phase Two of this project to take place. It seems so surreal that Phase One could even go ahead without firm plans in place for Phase Two. We cannot be left with a federation of 3 schools in buildings deemed in 'poor condition', and I have no confidence that Powys County Council will achieve the funding it needs to build this new Super School. These plans should be scrapped until there is a guarantee Phase Two can take place.	The Council is of the view that consulting on the Proposals is the first step that needs to be undertaken to ensure that the views of stakeholders are known before the Council commits to a significant capital investment. There has been no work done yet on the design of the new building, therefore it is too early to submit an application for planning permission.
3.1.4	A new building isn't guaranteed as funding hasn't been applied for and won't be applied for until the schools are amalgamated with the loss of three headteachers.	As above.
3.1.5	It is completely beyond me that a 2nd phase can be even considered, without sufficient funding, planning or environmental considerations having been agreed.	As above.
3.1.6	The promise of a fresh new building is great, however, funding and planning are not yet secure. Thus, it seems ridiculous to consider this until these things are in place.	As above.
3.1.7	I would like to be assured that the new site has funding secured for the proposed new building before any amalgamation process begins.	As above.
3.1.8	IF phase one does go ahead then there is no guarantee that phase two will. There is no guarantee that funding will be secured from the Welsh Government . This potentially means that staff may lose jobs unnecessarily and one head teacher is expected to manage a school from three different sites. This is very worrying as this will undoubtedly have an impact on the children and their education.	As above.
3.1.9	The fact that there is not a suitable site for the proposed new school is a major concern and that the funding has yet to be secured. That will not happen without a site that would get planning permission and I believe that the old Brecon High site will not get the permission needed due to major traffic issues. That leaves us with a three-site school, with one headteacher for the foreseeable future	A site has been identified which is the Penlan site. If the Proposals are implemented, feasibility work would be required to confirm the site's suitability and planning permission would be required. Traffic assessments would be carried out as part of this work.

3.1.10	Phase 2 is very expensive, and completely negates any financial argument for Phase 1. And with no guarantee it will be funded, it might never go ahead. So how can you justify the disruption to all the schools, children and teachers?	When merging schools into a new building, the Council's approach has been to merge the schools before the new building is ready. This requires the establishment of a temporary governing body followed by a new permanent governing body, and appointment of a headteacher. This allows the governors and headteacher of the new school to have direct input into the development of the design of the new building and to ensure that the staffing of the new school is appropriate.
3.1.11	The consultation information clearly indicates there is no guarantee of Phase 2 going ahead if funding is not secured. This in our view is a massive risk and would leave all three schools in a much worse situation with negative impacts on learner outcomes.	The Council has not yet developed a business case for funding prior to consultation to ensure that the views of stakeholders are known before the Council commits to a significant capital investment.
3.1.12	The current Proposals suggest that no funding has been secured to guarantee that a new school building would be built following the merger of the schools. I might accuse Powys County Council of shamelessly dangling a 21st century facilities carrot. However, this donkey is not happy to accept the vague, under planned, no secure funding, no promises proposal.	As above.
3.1.13	Your proposal document refers to 'Phase II' as the erection of a new school building to merge the three schools together on one site. This proposal is yet to obtain planning permission or secure any funding, can it be assumed that this phase possibly may never happen?	The Council is of the view that consulting on the Proposals is the first step that needs to be undertaken to ensure that the views of stakeholders are known before the Council commits to a significant capital investment.
3.1.14	Phase 2 has not secured funding. How can you expect three schools to function well under one head for an indefinite amount of time?	See 2.1.1
3.1.15	What is PCC's plan if the authority is NOT successful in securing funding for a new school?	See 3.1.1
3.1.16	What happens 'if' you do not get the funding, you are stuck with three sites, one head stretched between them deciding on budgets - how will they decide who gets what building maintenance first? In the meantime, the school buildings will be left to ruin as we wait to see 'if' funds appear and 'if' the building	See 3.1.1 The Council has a duty to ensure that all schools are maintained appropriately even if there are plans for a new build.

	work is completed on time and in budget (track record with Council projects has proved this does not happen).	
3.1.17	There are no plans and no funding. There is a very real possibility the incredibly negative impact school amalgamation could be for nothing with long delays before an actual new building is even possible. There will be a loss of schools at the heart of the community with the links and support this brings.	See 2.1.1 and 3.1.1
3.1.18	No guarantee of money I think the critical comment regarding this is that I genuinely believe that it is doubtful Powys will receive funding for phase two, which will mean years down the line there is one school over three sites, which is not beneficial for anyone and harmful for all. In the unlikely event that Powys are successful with funding application, it could be years before the money is received, planning permission is granted, contracts are awarded, and building begins. You are unlikely to invest in the three sites, so they deteriorate, like Brecon High school, and you expect pupils and staff to carry on attending them. There would be enormous pressure on the school leadership team to manage the day-to-day running and maintenance of the three sites and be actively involved in organising and planning a new build.	3.1.1

3.1.19	<p>This proposal is based on the potential of capital funding. This is not guaranteed, how can you implement such huge changes when the new school may not even be funded, leaving the children and staff operating under a one-school-three-sites arrangement indefinitely, which will put larger pressure on the headteacher and deputies, and governing body, and I believe will result in poorer performing schools. The Council consider this period of uncertainty medium likelihood and impact, despite acknowledging it may have a negative impact on standards. How can you possibly consider slipping standards and uncertainty medium impact and likelihood? Without guaranteed funding this is highly likely to occur and would have a detrimental impact on the children and staff. This is particularly concerning as The Council has considered there to be a medium likelihood that they will not receive capital funding for this project, suggesting The Council is willing to allow standards to slip across primary education in Powys, while these pupils wait at the earliest for 3 years, but potentially indefinitely, for a new school building.</p>	See 3.1.1 and 2.1.1
3.1.20	<p>This risk factor has the highest likelihood' scoring in your document, and the impact would be high. It is too risky to proceed with the plans for Phase 1 when there is uncertainty about whether funding will be available for phase 2. As we are just emerging from an international pandemic, and all public sector budgets are likely to be impacted by this for a long time. There is likely to be a continued period of austerity for local councils as we recover. Going ahead without guaranteed funding of around 10m needed for phase 2 is irresponsible and seems incredibly misguided.</p>	See 3.1.1 and 2.1.1
3.1.21	<p>It is unclear where alternative funds would be sought if the extensive business case' needed to draw down the funds from the 21st Century Schools Programme was unsuccessful. This would result in Phase 1, intended as an interim, continuing for many years, with school sites becoming increasingly dilapidated and needing further investment and maintenance. The idea that a</p>	See 3.1.1 and 2.1.1

	new school could be built and ready by September 2024 is unlikely.	
3.1.22	There is no guarantee that Phase 2 will actually go ahead...funding for the new proposal will be a long drawn out battle and in the meantime the children of Cradoc will again be left in limbo. Where does that leave the children of Cradoc, the building is not sustainable in its current state for the long term, and needs investment NOW.	See 3.1.1 and 2.1.1
3.1.23	The second phase, involving the building of a new larger school is not certain, it is based on the assumption that enough funding will arrive. If it doesn't, this will result in Cradoc C.P. School children receiving a sub standard education, due to the current state of the school building, for many years ahead.	See 3.1.1 and 2.1.1
3.1.24	There are simply no guarantees that Phase 2 will materialise. It would be irresponsible for any organisation to cause so many changes that affect so many children without a concrete plan.	See 3.1.1 and 2.1.1
3.1.25	The 2nd Phase of planned merger requires funding from the 21st Century project. None of the sustainability criteria have been met or considered by the Proposals presented to The Councillors. The project is fundamentally flawed.	No plans have yet been developed for the new building planned for Phase 2. If the Proposals were to be implemented, the design of the new school would be required to meet environmental / sustainability standards.

3.2 There is insufficient information about Phase 2 therefore a separate consultation should take place

3.2.1	I feel that to be asked to consult on Phase 2 presently is unacceptable. Anything as complex as the Phase 2 proposal would need its own consultation.	<p>The Council does not agree with this statement. The information provided is in line with the requirements of the School Organisation Code, and is in line with the information provided for the new build element of the reorganisation Proposals for Welshpool. A new school building in itself does not require consultation, however there is a requirement to consult where the new building is located more than one mile from the current location.</p> <p>The Council is of the view that consulting on the Proposals is the first step that needs to be undertaken to ensure that the</p>
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		<p>views of stakeholders are known before the Council commits to a significant capital investment.</p> <p>Should the Council proceed with the Proposals, there would be further engagement opportunities when developing the new building, and further consultation processes would be undertaken as part of this work, including planning processes.</p>
3.2.2	The plans for phase 2 outlined in the Proposals are very vague, therefore it is very difficult to respond to them in any detail.	As above.
3.2.3	To be asked to consult on Phase 2 presently is unacceptable with no funds secured and no site identified. If Phase 1 were to go ahead this would need its own consultation.	As above.
3.2.4	Phase 2 warrants its own separate consultation after a proper evaluation of options for a new school.	As above.
3.2.5	This should not be considered at this point – it is unfair to ask families/ communities to commit to something so uncertain and far away. This is likely to be going on beyond 2024 and the site has no plan in terms of being a real community school.	As above.
3.2.6	There is very little detail about Phase 2 to inform decision making and it is not possible to support Phase 2. It would be better to consult on this much later and I believe lumping the consultation together has been a mistake. A standalone consultation would provide an opportunity for other options to be properly considered. Everyone with an interest should have sufficient detail to make an informed decision with certainty and without a long list of dependencies.	The Council is of the view that consulting on the Proposals is the first step that needs to be undertaken to ensure that the views of stakeholders are known before the Council commits to a significant capital investment.
3.2.7	Given the complexity of the current proposal in terms of scope and the lack of detail for Phase 2 it would have been far better going out in two stages so that people could focus firstly on the specific issues relating to a merger and later the location of a new build if necessary.	As above.
3.2.8	The timescale is so lengthy that factors may have changed and it is therefore not appropriate to consult on phase 2 now.	As above.

	Consultation will be needed when Powys County Council know that Phase 2 if will actually go ahead.	
3.2.9	Phase 2 deserves an honest, genuine, and inclusive conversation to investigate the possible future options for Mount Street Infants. This would be best served with a proper and fair consultation when Powys CC have considered all the options that really are affordable and achievable.	As above.
3.2.10	When will Powys CC hold a second consultation that includes accurate information and also, affordable and achievable options for Phase Two?	The Council currently has no plans to hold a second consultation in respect of Phase Two, however all comments and concerns raised during this consultation will be considered by the Council's Cabinet, who will determine whether to proceed with the Proposals.
3.2.11	There is no assessment of planning, environment, transport, issues, - for the proposed location of the new school site let alone the assessment of risk of managing a site with multiple developments potentially taking place. This lends support to carry out a separate consultation.	Comment noted, these assessments would be carried as part of developing the new building, Should the Council proceed with the Proposals.
3.2.12	There is no guarantee that the move to a new building will happen as there are so many unknown factors in respect of phase 2. There is no guarantee that an application for funding will be successful, there is no guarantee that planning permission will be obtained, the timescale is so long that factors may have changed. Will Powys County Council delay consultation on phase 2 until such time as it is known that phase 2 can become a reality?	See 3.2.1
3.2.13	Because there is a wholesale lack of information about Phase 2 it is impossible make any intelligent decision or comment on this part of the proposal. There are clearly many unknowns including: - No secured funding - Uncertainty over future pupil numbers including no consideration of the impact of nearby new housing developments in Brecon which could see a future demand for school places - No pre-app planning advice including environmental impact assessment and transport - No assessment of how this proposal fits with other services being develop ed or co-located (e.g., Early Years Centre). In my view the overall assessment of Phase 2 is uncertain and high risk and strongly	See 3.2.1

	suggests that Phase 2 warrants its own separate consultation after a proper evaluation of the options for a new school.	
3.2.14	There is insufficient information about Phase 2 to make any intelligent decision or comment. The School Organisation Code (2018) states that from case law one of the four principles for consultation should: “include sufficient reasons and information for particular Proposals to enable intelligent consideration and response”. Based on this alone the information for Phase 2 in the current consultation is wholly lacking and poorly thought through. There are clearly many unknowns – future pupil numbers, no secured funding, no planning, no environmental impact assessment, no assessment to take into consideration other services being developed or co-located (e.g. Early Years Centre). Phase 2 is uncertain and high risk.	See 3.2.1. The information in Consultation Document about Phase 1 and Phase 2 is in line with the requirements of the School Organisation Code.

3.3 Comments about the impact on pupils

3.3.1	Moving pupils from Cradoc school based in Cradoc to a school in Brecon will be detrimental to the children’s well-being and health, journey times for pupils aged 4-11 will increase substantially especially from our locality with bus journeys travelling more than 10 miles one way to go to or from school.	Due to the geographic nature of Powys, many pupils of primary age are transported to school by bus with no detrimental impact. The Council does not consider that the distance or travel times for pupils currently attending Cradoc C.P. School would be excessive.
3.3.2	Pupil mental health & wellbeing; I don’t believe this has been fully taken into account when considering the impact of children who would be forced to leave their current rural education setting within the community and move to a much larger urban school.	The Council recognises that any school reorganisation process creates a period of uncertainty for all involved, including children. The Council is committed to supporting schools and learners, including through periods of change. An experienced member of staff from the Council is supporting school leaders effectively to help them manage possible changes for their learners. It is also expected that school governors, staff and parents support the children to ensure that there isn’t a detrimental impact on their wellbeing.
3.3.3	I’m sure this could affect the education of the pupils for some years as it not as easy as moving into a new building and being taught by a new teacher for students especially younger and newer ones as they don't have the mental capacity to adapt like	As above.

	and adult can so a situation like this could be extremely overwhelming for some, to put it shortly students need structure, routine and an well-known comfortable environut to grow up and mature in!	
3.3.4	The children won't be as comfortable in a much bigger school with other new students and they may not be able to see their friends.	The Council recognises children would need to go through a period of change Should the Council proceed with the Proposals, particularly in respect of implementation of Phase 2 of the Proposals. It also understands that this is a real concern for children. However, children would be able to be become part of new friendship groups. It is likely that many of the existing staff would continue to work in the new school, therefore they, as well as the school's governors and parents, would be able to continue to support the children to ensure that there isn't a detrimental impact on their wellbeing.
3.3.5	Moving to a new school and new class would be distressing for pupils.	As above.
3.3.6	This will cause anxiety and stress to children who might be split up from their friendship groups if the school closes and not everyone goes to the new school.	As above.
3.3.7	The students will lose some of their friends because some might have to move schools since it will be too far away to travel	As above.
3.3.8	We think that some kids won't want to go to school because the school and class will be massive, and there are high chances that friends won't be with friends and this will cause a lot of anxiety and high levels of stress for kids and also parents.	As above.
3.3.9	Concern that the little ones won't be able to find their way around the new school since it will be so big with all the children in it.	The Council notes this concern. Should the Council proceed with the Proposals, staff would support children with the move to the new building, to ensure that they are able to find their way around.
3.3.10	Forcing Cradoc children to go to a massive urban school with no access to the green spaces and forest schooling they flourish in will only have a detrimental effect on their health, wellbeing, and schooling.	The Council recognises that Cradoc C.P. School is located in a rural area and has a large propotion of farming families. All schools deliver education based on the same curriculum and are planning to introduce the new Curriculum, whether they are located in a rural or a town environment.

		The intention is to implement the changes on a phased basis. Initially the pupils would continue attend school in Cradoc, and the school staff would be available to support the children with transition to any new building, to ensure that this does not have a detrimental effect on them.
3.3.11	The proposal talks about the opportunities for the children in the new school however Cradoc children don't want a new school in the middle of town – they want to see tractors passing and animals running in the fields next door and have their learning linked to things that are going on in and around them which the school do so well.	As above.
3.3.12	Pupils don't deserve being uprooted from a nurturing school that is nestled in the midst of the community to being placed in a totally unsuitable, out of town location, open to the elements.	As above.

3.4 Comments about the new building

3.4.1 Comments about the size of the new school

3.4.1.1 The new school will be too big

3.4.1.1.1	I am concerned that the proposed school is much too big, especially for the younger learners who will be overwhelmed by a school of that size. I would also worry that it would mean that the individual children are not known so well to staff and potentially problems including early recognition of additional needs and mental health problems could be missed.	<p>All schools, regardless of size, are able to provide for the needs of their pupils, and are required to support, challenge and nurture all pupils to achieve their full potential. Smaller schools do not necessarily mean that pupils receive a more individual education as there is often a number of year groups and a wider age range of pupils in the class.</p> <p>The intention is to introduce the Proposals on a phased basis, meaning that pupils would initially continue to attend school in the same location. Should the Council proceed with the plans to provide a new building, pupils would transfer to the new building with their existing staff, meaning that these</p>
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		staff would continue to be available to support them with this move.
3.4.1.1.2	Pupils are too young to cope with such a large school and safeguarding issues could go unnoticed and/or unchecked by lack of teacher time which is easier to achieve in smaller individual schools.	As above.
3.4.1.1.3	It will be a similar size to Brecon High, and when I selected the infant and junior schools for my children, I was looking for smaller schools and would not have opted for one with more than 350 students.	As above.
3.4.1.1.4	Do not opt for a 3-way merger which will involve 360-420 on Roll – this is too large compared to our other town schools. Children who need support, for example children from military families who are new to Brecon, children who do not use English as first language, children who are struggling because of the impact of child poverty will get lost.	As above.
3.4.1.1.5	There will be no sense of 'family' at any school of that size. At Cradoc, all the pupils know each other by the end of the first term, creating a real, caring, supporting family atmosphere.	As above.
3.4.1.1.6	Putting so many primary aged children in one centre is in my view unacceptable, especially the mix of rural and town children. Thinking that children in such an environment will receive a better education than in a small rural school is fundamentally flawed. These children all deserve a first-class education and in small community schools that is just exactly what they get.	As above.
3.4.1.1.7	I am not in favour of the Cradoc School being merged with MSI/MSJ – the resulting school will be too large to ensure that children get adequate input and standards are likely to deteriorate. Even if more than 50% of children from Cradoc choose other schools it will be a large school and the percentage of children being unsettled and having their education disrupted will be significant.	As above.
3.4.1.1.8	It will have a huge impact on children who are used to attending a smaller school – yet again where is the consideration for the mental well-being of the children?	As above.

3.4.1.1.9	It will be the complete opposite to the small country school our children are used to.	As above.
3.4.1.1.10	Even moving classes for some students is a huge transition for them, so undoubtedly moving to a whole new school with more/possibly unknown staff and pupils will be very difficult.	As above.
3.4.1.1.11	The sheer numbers of pupils going to the proposed new school will mean less focus on individual pupils 300 plus pupils of under 11's is a vast number and could be overwhelming for many less confident children, along with this there is the increased chance of bullying! At present in Cradoc as all the children know who each 1 is there is less chance of any being singled out and bullied! 300plus children in 1 school will no doubt have a detrimental effect on some	As above.
3.4.1.1.12	How will Powys County Council ensure that all staff have knowledge of the individual needs of 360 pupils?	As above.
3.4.1.1.13	A large town school would make sense financially but does not take into account the unique contribution that Cradoc makes to the farming community, offering a smaller environment which will suit many learners better than a larger one.	As above. The Council recognises that Cradoc C.P. School is located in a rural area and has a large proportion of farming families. All schools deliver education based on the same curriculum and are planning to introduce the new Curriculum, whether they are located in a rural or a town environment.
3.4.1.1.14	I also worry about the increase on bullying in such a large school as there will be such few staff to the volume of children.	There is no evidence of more bullying taking place in larger schools compared to smaller schools. All schools have anti-bullying policies.
3.4.1.1.15	A primary school with 300+ pupils will create a 'mob rule' mentality when the children go on to the neighbouring Brecon High School. Just short of 50% of the annual intake for the high school would come from one primary school.	The Council does not agree that implementation of the Proposals would create a 'mob rule' mentality. All pupils in the catchment schools transfer to Brecon High School and are then become part of that school community.
3.4.1.1.16	Organizing things such as playtimes would be really hard with around 300 students.	It would be possible to organize breaktimes and lunchtimes around the larger number of pupils as happens in the larger primary schools in Powys. Support and guidance for the new headteacher and leadership team would be available if they wished around organizing breaktimes.

3.4.1.1.17	Why would a bigger school with more children be a safe option when small bubbles to reduce contact between people has been made law during the COVID pandemic? No-one can predict how much longer these measures will need to be in place. No one can predict if there is another pandemic on its way. So maybe merging schools should be a thing of the past rather than an obvious answer to reducing costs.	The guidance around operational guidance in schools has been withdrawn by Welsh Government on 20 th September 2021. There is no requirement to maintain class bubbles. However, were schools to return to this situation, it may be possible to establish class bubbles within a larger school in the same way as a smaller school.
3.4.1.1.18	Covid 19 pandemic has led to every school reviewing how when and where pupils arrive at their schools. Merging three schools together meaning all these pupils and parents and teachers all arriving at one location would create a worse situation than the current three schools, should the pandemic continue or a new pandemic develop.	If there were a need to return to the operational guidance of the pandemic, the school would be in a position to offer staggered starts for pupils. These systems have been put in place by other large primary schools in Powys and these arrangements would be shared with the new headteacher and senior leaders to help them to prepare for this situation.
3.4.1.1.19	Significantly increasing the size of a school and the number of people who pass through it, while also making the building as small as guidelines allow goes against all scientific advice.	Powys County Council has worked with all of their schools over the course of the pandemic to ensure that they are compliant with all of the operational guidance issued by Welsh Government .

3.4.1.2 The new building will be too small

3.4.1.2.1	Amalgamation should only happen if and when a school is built that will accommodate all pupils - not only 360, when there are currently around 400 pupils at present.	<p>The capacity figure provided for the proposed new building is indicative at this stage. As outlined on page 17 of the Consultation Document :</p> <p><i>‘Initially, the new school would operate on the three existing sites, and the capacity would reflect their combined capacities. The capacity of the new primary school would initially be 420.</i></p> <p><i>Based on the PBC approved in September 2020, the intention is that the new school would move to a new building which would accommodate approximately 360 pupils – the capacity of the new school would need to be further assessed during the design stage.’</i></p>
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3.4.1.2.2	Current numbers of the three schools are 381. Why then build a school with a maximum capacity of 360? The projected decrease of 4% in pupil numbers by 2025 is across Powys, not the Mount Street and Cradoc catchment area, and in any case, a 4% decrease would result in 366 pupil places needed, without even considering that pupil numbers may actually go up again (and surely if his new school will be so great, more parents will apply to send their children there).	As above.
3.4.1.2.3	Can you please clarify if current numbers on school role between the three schools is 381? Why build a school to cater for 360? There is no flexibility in the system for future fluctuation. Even taking into consideration the proposed 4% decrease there is not enough space. Does this number consider any influx to the area due to new housing development??	As above.
3.4.1.2.4	Your projections on pupil numbers only go to 2025 yet the new school will not open until late 2024 at the earliest. Your projections are based on birth rates and does not appear to take into account the increased housing being built in Brecon with the increased population this will create. ONS stats suggest the population of Powys will grow beyond that and the demand for school places will likely rise. While Powys has an aging population, one of the objectives of PCC is to encourage growth and development. This requires that people are able to move here and grow their own families with facilities for them.	As above.
3.4.1.2.5	Has Powys County Council considered what will happen if the school is over-subscribed? Particularly if housing is built on the existing sites and with the newly built properties opposite the Penlan site?	As above.
3.4.1.2.6	Projected numbers of pupils also expected to go up in the next few years with new estates being planned and built in the proposed new catchment area meaning more pupils than anticipated at present.	As above.
3.4.1.2.7	With housing developments currently ongoing in Brecon there will be an increase in demand for school spaces in the coming years. It only takes a quick internet search of Powys' Planning	As above.

	Portal to find out the housing developments in Brecon that are both ongoing and 'around the corner'.	
3.4.1.2.8	For Phase 2 there is no clear plan other than creating a new school to accommodate a smaller number of pupils overall (420 down to 360). The implied reduction in pupil numbers as stated in the consultation reinforces this is an expected outcome but it is not flagged as a risk. There would need to be further job losses at that stage given the expected fall in pupil numbers.	As above.
3.4.1.2.9	Will children currently attending or planning to attend other schools in Brecon be able to move to the new school, and if so, will the pupils of Cradoc and Mount Street be given priority? What about any younger siblings they may have who are not yet at school age, or will they be placed in a different school, splitting families, and making school drop-off and collection very difficult for parents?	As above.
3.4.1.2.10	Consultation Document on Cradoc says you anticipate that forecasting information suggests pupil numbers may increase'. There is also a new housing development currently being built opposite the leisure centre and phase 2 site: there may be a number of new families moving into the area living there.	As above.
3.4.1.2.11	You are also proposing that Cradoc school children are sent to the new school in Brecon, surely given the amount of extra housing developments that are ongoing and the development plans for the future i.e. housing at Hoggan Park, Beacons Gate, all of which would naturally go to this new school. Given that increase of housing surely by the time the new school would be built that Brecon town on its own would have sufficient children to fill the all the spaces anyway.	As above.
3.4.1.2.12	The area around Brecon High School will need its own school in keeping with the huge housing developments taking place there. Again, there is a link with housing developments but no consideration of population needs.	As above.
3.4.1.2.13	Can I ask where the 40 pupils that are left out of the capacity of the school are we going to ship them off to another school in another area?	As above.

3.4.1.2.14	For Phase 2 there is no clear plan other than creating a new school to accommodate a smaller number of pupils overall (420 down to 360). The implied reduction in pupil numbers as stated in the consultation reinforces this is an expected outcome but it is not flagged as a risk. There would need to be further job losses at that stage given the expected fall in pupil numbers.	As above.
3.4.1.2.15	The ALN strategy advocates further inclusion. Therefore, pupils who would otherwise attend Ysgol Penmaes should be attending mainstream school which will increase pupil numbers (I realise this will have more of an impact on secondary school numbers, but primary schools will be affected).	As above.
3.4.1.2.16	The ALN Bill recommends further inclusion. Has an increased demand from within the current special school setting been taken into consideration?	As above.

3.4.2 Comments about class sizes at the new school

3.4.2.1	It hugely increases the threat to the children's health as there is no way the children can be kept apart as the ratios will likely have incredibly large class sizes to save cash.	<p>The new school would be funded based on the total number of pupils and would be required to ensure an appropriate number of classes / teaching staff.</p> <p>New build primary schools are designed and built to accommodate a maximum of 30 pupils per class. This is in line with Building Bulletin 1999 Briefing Framework for Primary School Projects and Welsh Government requirements. Therefore, it is unlikely that class sizes would exceed 30.</p>
3.4.2.2	Separate primary schools are better for children's education because the classroom numbers will be smaller, as well as asking a teacher to teach 40-50 children is unbelievably cruel and unfair! Super Schools do not work, simple as that!	As above.
3.4.2.3	Putting children in high-capacity classes means they will be missed if they are achieving well, and therefore may not reach their potential.	As above.

3.4.2.4	I know the education department need to save money, but surely there will be too many children in the classroom. Will all the children have the right amount of teaching staff?	As above.
3.4.2.5	Packing three schools into one will make classrooms bigger.	As above.
3.4.2.6	I am for this proposal but obviously concerns will be bigger class sizes and individual support needs for each child. Assurance of teacher ratio still being the same. Staff having the support they need when joining to make a bigger team. Emphasis in supporting children's friendships and feeling safe and secure within this new capacity school.	As above.

3.4.3 Comments about the outdoor space in the new school

3.4.3.1	How will this proposal inspire and motivate pupils without an outdoor environment that has been developed for over 20 years?	The Council develops all primary school buildings in line with Building Bulletin 1999 Briefing Framework for Primary School Projects. This clearly identifies requirements in terms of sporting facilities, and outside areas to include hard and soft play areas, and habitat areas. All the Council's new school builds are design to include outdoor spaces for learning and play, sports facilities including multi use games areas and playing fields, and the Council also sets aside areas that can be developed for forest school provision. It is recognised that the current forest school provision at the three schools have developed over time, but there are ways of providing forest school experiences without the need for a mature woodland area. Should the Proposals be implemented, the governors, staff and pupils of the new school would be able to influence the design of such a space.
3.4.3.2	There is no forest schools area which Mount Street infants does have so immediately you would be losing a great advantage of the current school setup.	As above.
3.4.3.3	The proposed site does not have established Forest school area such as that in Mount Street infants.	As above.

3.4.3.4	Currently the children have a large level field in which to play and a well-established forest school. Neither of these are being proposed for the new site.	As above.
3.4.3.5	Forest School takes many years to establish. How will you ensure that the grounds at the new school will have a powerful impact on our pupils' wellbeing and attitudes to learning from the day of opening?	As above.
3.4.3.6	I cannot see how a Forest School will be created at the new site as I cannot see where feasibly it would be located; it will take years to develop, meaning years of school pupils will miss out on this vital resource.	As above.
3.4.3.7	Our forest school/ outdoor learning will be lost for some years until a new one can reach maturity.	As above.
3.4.3.8	Will a mature Forest School be planted at the Penlan site?	As above.
3.4.3.9	I sent my child to an excellent, town community school due to its excellent reputation and the outstanding grounds and woodland. I do not want my child to go to a large school with a soulless outdoor space when they currently have a woodland, grass space, playgrounds and outdoor classrooms.	As above.
3.4.3.10	Mount Street infants would lose the woodland area which is a key aspect to the children's learning	As above.
3.4.3.11	Loss of high-quality outdoor learning environment; at Mount Street Infants schools we have a Millennium Woodland which is a Joint Project between the school, the National Trust, Brecon Beacons National Park Authority, PTA and pupils where pupils take part in outdoor woodland session every week, by moving to a new build this invaluable facility will be lost!	As above.
3.4.3.12	How will Powys County Council provide a better outdoor environment than our pupils have now at MSIS?	As above.
3.4.3.13	No evidence has been provided that the existing sites can be replicated at the proposed site to enable all pupils to have at least a comparable if not a better learning environment	As above.
3.4.3.14	In the development plans a forest/wild-life area should be included. Being exposed to nature is vital to well-being of pupils	As above.

	of any age. For younger pupils this can continue as a weekly forest school and for older children such area can be used for introduction to environmental and statistical research which will expose them to the academic world and/or agricultural careers.	
3.4.3.15	At this current situation (COVID) is it really responsible to be planning a new school with limited outside space? I think not.	As above.
3.4.3.16	Throughout COVID 19 planning, it has always been recognised that it is safer to be outside and ideally to socially distance, so why would anybody be considering abolishing a safe, rural school, with plenty of outside space?	As above.
3.4.3.17	Where is PCCs assessment of the potential loss of Green Space at Mount Street Infants school (or at any of the schools) that has ensured children have had access to a high quality outdoor learning experience as required by Foundation Phase and the New Curriculum (especially in light of PCCs recognition of the Climate Emergency and the perilous state of Wildlife in the county)?	As above.
3.4.3.18	Will a dedicated, safe car park with many disabled spaces be made available? Cradoc has a dedicated car park which means the children are safe. There are already a huge number of parents using the leisure centre car park for the High School pupils, so this is not a viable option for a primary school too. Not to mention the congestion it will cause for drop offs.	All the Council's new school builds are developed with a specific car parking ratio, including disabled spaces. Should the Proposals be implemented, full consideration will be given to access and car parking at the new school, and traffic assessments will be undertaken.
3.4.3.19	When Powys County Council publicly commends Welshpool Primary School on social media for their Forest Schools outdoor classroom, how can they justify moving this rural school from the grounds which accommodate this learning perfectly and move it to an urban town location?	<p>The Council notes these comments about the grounds at Cradoc School and recognises the importance of forest schools provision to the development and wellbeing of children. Should Cradoc C.P. School close, the Council would ensure that there would be a forest school area at the new school. It is recognised however that this wouldn't be the same as the current forest school area at Cradoc C.P. School for several years.</p> <p>However, the Council believes that forest school provision can be delivered in a variety of ways and does not rely on the availability of an area of mature trees.</p>

3.4.3.20	PCC have currently shown no evidence that they can provide a similar learning environment if the children lose access to such rich outside learning.	<p>The Council has delivered a forest school outdoor classroom area and a new forest area at Welshpool CiW Primary School.</p> <p>Dedicated forest school areas are designed into the Ysgol Gymraeg y Trallwng, Bro Hyddgen Community Campus, Cedewain, and Brynllwarch developments.</p>
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3.4.4 Comments / queries about the facilities in the new building

3.4.4.1	At Mount Street Infants School we already have classrooms, group rooms, early years facilities, staff room, hall, dining facilities, community facilities and sports facilities. What additional facilities will this proposal give Mount Street Infants School?	<p>All new build primary schools are designed and developed in line with Building Bulletin 1999 Briefing Framework for Primary School Projects.</p> <p>Should the Proposals be implemented , the new school would provide similar facilities as currently in Mount Street Infants School, and in accordance with the Building Bulletin requirements, but to a modern design specification.</p>
3.4.4.2	Will the schools have input with the contractor and the Design before approval? Have any plans/ Designs been drawn up? This MUST happen before continuing, so we know what we are agreeing to. All this needs to be fully considered before electing for this location.	<p>The Council takes a proactive and collaborative approach to design development of new build school projects; the school, including pupils, will have input throughout the design process.</p> <p>No plans have been developed, to date, as it is important to understand the views of all stakeholders prior to committing any capital funding to the design process.</p>
3.4.4.3	Given that “no designs for the new building have been developed yet” we are concerned that our children will get less under this proposal than they have now.	<p>All new build primary schools are designed and developed in line with Building Bulletin 1999 Briefing Framework for Primary School Projects.</p> <p>Should the Proposals be implemented , the new school would provide similar facilities as currently in Mount Street Infants</p>

		School, and in accordance with the Building Bulletin requirements, but to a modern design specification.
3.4.4.4	You are asking us to say yes to an 'if' plan where most details are not given- what will the school look like. Will it be open plan classrooms? Will there be a forest school? I cannot see how you expect to say yes to a project that might mean our children and future children get less.	As above.
3.4.4.5	Would the new school still provide pre-school smarties, and the special unit?	Should the Proposals be implemented, the Council will include purpose-built accommodation for early years provision. The inclusion of a specialist unit would be discussed and agreed when the project brief is defined. The new school would also include wellbeing areas and smaller rooms for group work or 1-1 provision. the Council assesses local requirements in terms of early years provision during the development of the project brief through discussion with the providers.
3.4.4.6	You have not made any consideration for the funded 3-year-old placements in your projected numbers, where will that provision go? There is certainly not enough space in local nurseries to pick up the slack as the largest nursery in Brecon (Teeny Tots) has recently been forced to close, leaving the system at capacity already.	As above.
3.4.4.7	I notice, however, that there is no mention in the proposal for a 3 and 4 year old (pre-school) setting at the new school. This is vital for our childrens' development and for them to have an easier transition to full time school.	As above.
3.4.4.8	Cradoc serves our community with a 3+ plus setting and complete wrap around care provided by Cool Kids @ Cradoc before and after school along with school holidays - this level of support has not been guaranteed with the new build in Brecon.	As above. All the Council's new schools are built to ensure sufficient facilities to provide wraparound care.

3.5 Comments about the proposed site

3.5.1 Comments about the suitability of the site

3.5.1.1	The Site has not been assessed for suitability.	No work has yet started on the Proposals for the new school (Phase 2) as it is important to understand the views of all stakeholders prior to committing any capital funding to the design process.
3.5.1.2	There has been no feasibility study at the new site. There has been no environmental impact assessment. There is no guarantee of planning permission being granted.	Should the Proposals be implemented , the design process would begin, following the RIBA stages, the first of which is strategic definition. This includes feasibilities, including ecology studies. Planning consent is normally sought once RIBA 4 (technical design) has been completed. However, the consultancy team liaise early on with the planning department at Brecon Beacons National Park Planning Authority to get an understanding of potential issues that need to be considered prior to issuing the pre-application planning consultation. Only once this has been completed is a full planning application submitted.
3.5.1.3	There has been no feasibility study carried out on the proposed site and no plans drawn up.	As above.
3.5.1.4	Where is PCC's evidence that it will be possible to construct a new school on the site of the Old High School? Of feasibility / suitability / planning / road safety / transport / sustainability / environmental impact?	As above.
3.5.1.5	I am sure that anyone who is involved in this process has visited the proposed site of the new school. It is on the top of a hill, open to the elements and is a horrendous and inhospitable place to put a primary school.	The Council disagrees with this comment. There are, and have been, a number of educational establishments in the proposed area, including Ysgol y Bannau primary school.
3.5.1.6	The site is on the top of an exposed hill, open to the elements and I worry how much playtime would be lost because of the challenging conditions for small children.	Should the Proposals be implemented , the location and situational aspects would be considered in order to design the school in accordance with its environment.
3.5.1.7	Penlan is a very windy area. The new High School has had to replace trees which have snapped in the wind. This is not the correct location for a new primary school.	As above.
3.5.1.8	All we know from this proposal is that the site is big enough, but we don't know whether it is suitable for small children. At the	As above. Generally, the Council's approach to new school builds is to ensure that the site is level and the topography can be adjusted to this effect by levelling out the site.

	moment, the site has several different levels which may not provide a safe play area for the children.	
3.5.1.9	The built up area of Penlan which already includes a leisure centre, High School, college, and a substantial ongoing housing development opposite (Hogan Park) is a far cry from the leafy, quiet surroundings of Cradoc School which nestles in the unspoilt Yscir Valley. The Cradoc School grounds adjoin Pool Farm, which forms part of a vast Farming Estate owned and farmed sympathetically by Messrs Walters. This is a quiet, rural place for educating children. In fact, it is fair to say that it is the perfect setting.	Comment noted.
3.5.1.10	I really do not think that the planners will allow another 300+ school to be built there.	Planning consent is normally sought once RIBA 4 (technical design) has been completed. However, the consultancy team liaise early on with the planning department at Brecon Beacons National Park Planning Authority to get an understanding of potential issues that need to be considered prior to issuing the pre-application planning consultation. Only once this has been completed is a full planning application submitted.
3.5.1.11	IF a new school were to be built in phase two, the site that has been proposed is wholly unsuitable and will not get planning permission due to increased traffic pressures on the area.	As above. Traffic assessments are carried out at feasibility stage to ensure that there is an early awareness of the impact on traffic.
3.5.1.12	The news has reported problems with Wales waterways and new building works will not be given permission. Has this been considered?	The Council will consider the phosphates pollution issue in the River Wye as part of all future developments adjacent to the Wye. Natural Resources Wales and other relevant organisations will be consulted upon as part of the statutory planning process.
3.5.1.13	Safeguarding issues - Strangers/adults from the College and proposed new leisure centre would be able to view the children playing outside. How would the children be kept safe and protected? The proposed site is too easily accessible for the public/adults.	All schools are required to have safeguarding measures in place. The new school would be securely contained and fenced, with the appropriate access security in place.

3.5.2 Concerns about the location

3.5.2.1	Mount street is already up a hill, although not far from town and many of the children and parents walk there. Moving it further away will make it impossible to walk to for many people. I walk to school twice a day and find it fine to do so, but I do not have a small child with me. I have also gone regularly to the college and know what a big difference that extra distance makes on me, as an adult. Expecting small children to cope with that distance is not right. By the time they get there they will be extremely tired, this would not be a good start for the learning day.	The Council fully recognises that the proposed site is slightly further away from the town centre and up a hill. There is already a primary school and early years setting located even further away from the town centre. The Council's view is that the walking route to school is not excessive. Should the Council proceed with the Proposals, ensuring appropriate Active Travel routes to the school would be an important consideration.
3.5.2.2	Mount St Infants have benefitted from the current town location to visit businesses and charities pre Covid and this may be lost on the new proposed site.	As above.
3.5.2.3	Children in MSIS and MSJS can walk to local areas of interest such as church, museum, theatre, cinema as well as a swimming pool. In a new superschool it would cost more time and money especially again safety going on field trips or educational visits.	As above.
3.5.2.4	We want our children educated where they live, not on a large campus in a busy area the other side of Brecon town centre.	As above.
3.5.2.5	The proposed new school location is a long walk and drive from the current school locations. PCC have not considered children that walk to school, disabled family members, inclement weather, traffic congestion or pollution.	As above. The Council has considered these aspects in the draft impact assessments. These will be updated to reflect comments received during the consultation period, and updated versions will be considered by the Council's Cabinet when determining whether or not to proceed with the Proposals.
3.5.2.6	There are already many houses opposite the site and being built. The infrastructure will not be able to take the extra volume.	The Council recognises that there is a housing development happening in that area. Should the Proposals be implemented , consideration will be given to the impact on the infrastructure in the area when developing plans for the new building.
3.5.2.7	I don't think it is a safe place to have another school because there's already two schools and a college and leisure centre up there. It will also have lots of new houses when they finish building the new housing estate.	As above.
3.5.2.8	If the proposal proceeds, three schools will become removed from the communities within which they are based. Mount Street	The Council notes these concerns. The impact of the Proposals on the community has been considered in the draft

	Infants and Junior school have strong community links with Brecon town, and likewise Cradoc with their village.	community impact assessment. This will be updated to reflect comments received during the consultation, and an updated version will be considered by the Council's Cabinet when determining whether or not to proceed with the Proposals.
3.5.2.9	These supposedly 'small' schools are essential to the community of Brecon and Cradoc and I wholly oppose this proposal to merge and build a new school at the old High School site at Penlan.	As above.
3.5.2.10	Pupils will miss out on being in the community - links will have to be re-established and distance of travel will become greater with more pollution and less health benefits.	As above.
3.5.2.11	There will be a loss of community relationships and local support for families and this will impact on safeguarding and wellbeing.	As above.
3.5.2.12	Secondly, the transfer to the new site will remove the schools from their local communities which will take away some of the diversity from Brecon. Indeed, apart from Ysgol-y-Bannau, all the other primary schools are located in the town.	As above.
3.5.2.13	By moving pupils to an 'out of town' location the younger pupils in particular will lose out on all these wonderful opportunities to build ties with the community.	As above.
3.5.2.14	Pupils currently walk to activities in the town e.g. dementia group, cathedral, theatre. Will PCC agree that the proposal to locate a new school a further 0.6/0.7 miles at the top of a very steep hill will make it less likely that pupils will be able to participate in these activities?	As above.
3.5.2.15	Cradoc needs to be in the community, it is an established school and staff which run beautifully and would be upset by being thrown into town - the dynamic of teaching would change dramatically.	As above.
3.5.2.16	To take the schools out of the town is crazy – they need to be part of the local community, not out of town.	As above.
3.5.2.17	The Penlan site is outside of the town of Brecon and therefore you would be taking the school out of a community.	As above.
3.5.2.18	To even consider removing these schools from their community would increase costs to PCC through transport, mental health, resources, construction, maintenance and health & safety.	As above.

3.5.2.19	How will Powys County Council ensure that exemplary links between the community will continue for MSIS pupils especially when you are proposing to build the new school on an out of town site?	As above. The Council would encourage and support the temporary governing body and the permanent governing body to develop strong links with the three current school communities.
3.5.2.20	These children will not be able to walk to town to engage in community links from the new proposed site due to the extra distance from town.	The Council considers Active Travel as part of all new school developments.
3.5.2.21	People with limited mobility have been able to support community events at the schools. This would be more difficult at the new site.	Comment noted.
3.5.2.22	There is no suitable public transport for parents/carers from Brecon town to the Penlan site.	There is public transport to the Penlan site.
3.5.2.23	What consideration has been giving to families without cars who will have to walk the extra distance in all weathers as there is no suitable bus service from Brecon to Penlan?	As above.
3.5.2.24	The new school is likely to be too far to walk for the little ones.	Pupils who can currently walk to school at Mount Street Infants School and Mount Street Junior School should continue to be able to walk to school. The Council considers Active Travel as part of all new school developments.
3.5.2.25	At the moment, most of our little ones walk to school which is encouraged but moving the school further away from the community will result in more cars being used for commuting.	As above.
3.5.2.26	Will the children be able to walk the extra distance up a steep hill to get there?	As above.
3.5.2.27	It is a very steep hill to walk with small children and can add 15/20 minutes onto our journey, I don't agree with moving the school out of town.	As above.
3.5.2.28	Not all parents drive and the site would be a significant walk.	As above.
3.5.2.29	The site is not accessible up a hill and would be away from the surrounding homes and town activity of the MS sites.	As above.
3.5.2.30	If you don't drive or have a car how are you supposed to get children 4-11 to the Penlan area? A taxi every day would be too expensive. If you live in Brecon you can't use a school bus.	As above. There is public transport available to the Penlan site.

3.5.2.31	The location will mean more families will need to travel by car.	Pupils who can currently walk to school at Mount Street Infants School and Mount Street Junior School should continue to be able to walk to school. It is acknowledged that pupils from Cradoc would need to be transported to school, however home to school transport would be provided for eligible pupils. It is also possible that some families living in Brecon would choose to transport their children to school by car instead of walking.
3.5.2.32	As a parent that does not drive, will transport be put on for me to be able to get my child to school, I have a disability and walking up there is not something I will be able to do.	There is public transport available to the Penlan site.
3.5.2.33	Building a third school on the same location as Brecon High school and Ysgol – y- Bannau seems an unusual decision given the fact that Powys is a large county. Common sense would suggest that when dealing with a large geographic area, having schools spread out might be advantageous as there would be more likelihood of a pupil living close enough to their nearest school to be able to walk or cycle to school?	Comment noted. Brecon High School is a secondary school, Ysgol y Bannau is a Welsh-medium primary school and the Proposals are to establish a new English-medium primary school on the Penlan site. They are three different types of schools therefore would serve different pupils.
3.5.2.34	For children who will be able to walk to the new site the Cerrigochion Road is steep and dangerous. Parents/carers with smaller children/pushchairs will struggle and small children simply won't walk up/down that hill with ease.	Comment noted.
3.5.2.35	The proposed site is totally unsuitable for the purpose of an Infant/Junior school as it sits on top of a very steep hill. This in itself proves to be ageist in that elderly relatives (grandparents) who currently walk their children to school (in line with PCC's policy on encouraging walking and cycling to school to reduce the carbon pollution and maintain health and well being) will be unable to do so. Not only the elderly but also any disabled or pregnant parent will be victimised also. The children themselves aged between three and eleven years old will also be expected to walk the extra 0.6km up the very steep gradient.	Comment noted.
3.5.2.36	Historically, the high school students were told that they weren't allowed to use the pavement on Cerrigochion Road as it was deemed too dangerous, yet you are proposing that it is okay to	Comment noted. Should the Council proceed with the Proposals, the provision of safe routes to school would be a key consideration.

	walk toddlers and infants up the same hill. Had you engaged with the community first, then this would have been highlighted.	
3.5.2.37	It will be a dangerous road to walk your children to school on. The main walking route is not safe.	As above.
3.5.2.38	The pavements are not wide enough to allow the overtaking of parents with pushchairs and small children in tow. The safe walk/cycle route will need upgrading and making safe. Has the Highways department been consulted on this possible development?	The Highways Department has not yet been consulted as it is far too early in the process and no decisions have yet been made to proceed with the Proposals. However, the Highways Department, including the Council's Active Travel Officer would be involved in the new development design process. Active Travel must also be considered at planning application stage.
3.5.2.39	The apparently 'safe' walk/cycle route is deteriorating. We use it once a week when we go swimming but travel in single file over parts of the bridge that are collapsing. This will need upgrading and made stronger to withstand the higher volume of pedestrians. Has this cost been included in the £10,000,000 estimate for a new build?	This cost was not included in the business case. There are numerous options for funding Active Travel, this would be considered as the process moves forward.
3.5.2.40	The reality of travelling uphill to a site such as Penlan has not been evaluated for use as a primary school and 3+ setting site.	Comment noted. However, there is already a primary school and a 3+ setting located in the area at Ysgol y Bannau.
3.5.2.41	Whilst you state the site is only 0.6/0.7 miles away from the current Mount Street sites, you do not take into account that some pupils will have already walked more than a mile from home to the existing site.	Comment noted.
3.5.2.42	The proposed site is at the top of a very steep hill which will discourage active travel and encourage parents/carers to drive to the proposed new school. Transport is the highest contributor to carbon emissions and therefore it is a huge disadvantage to propose a site that would encourage parents/carers to drive their children to school. Why have Powys County Council chosen a location outside of the town which will encourage increased use of cars and consequently increased carbon emissions?	The Penlan site has been identified due to it being in Council ownership and close to other education and leisure amenities.
3.5.2.43	The previous school on the site was for unaccompanied pupils aged 11 years – 18 years. It is naive to think that pupils aged 3	No assessments have been carried out regarding access for small children and parents/carers with push chairs. This

	years to 11 years would be able to easily walk to this site. The pupils will be accompanied by parents/carers who may also be pushing prams/pushchairs and would be unable to negotiate the steps to the proposed site. What assessments have been carried out regarding access to the proposed site for small children and parents/carers with push chairs?	would be part of the consideration for Active Travel and Safe Routes to School during the design process.
3.5.2.44	It will be more difficult for the parent & toddler group to access the proposed site. What considerations have Powys County Council given to the impact on parents and toddlers accessing an out of town school at the top of a steep hill?	This will be considered as part of the Active Travel and Safe Routes to School requirements during the design stage for the new building.
3.5.2.45	Nurseries in Brecon walk children to the school to access the 3+ early years setting. They would not be able to walk small children a further 0.6/0.7 miles up a steep hill. Parents will choose to send their children to closer nursery settings and continue their children's education at the same school. Does Powys County Council agree that this could have a negative impact on the numbers of children attending the new school?	This comment is noted and will be further discussed Should the Proposals be implemented . Whilst it is possible that there could be a negative impact on pupils attending the 3+ setting and then the school, it is also possible that people will be attracted to the new building, and there will be an increase in pupil numbers.
3.5.2.46	Currently some staff walk to school but they would probably drive to the new site again increasing carbon emissions. Does Powys County Council agree that this proposal will have a negative impact on those members of staff who do not drive?	Staff that currently walk to school at Mount Street Infants and Mount Street Juniors would be able to continue to walk to the new location. It is acknowledged that staff currently working in Cradoc School who do not drive would no longer be able to walk to school.
3.5.2.47	Some parents /carers may be disadvantaged as due to age or disabilities they may not be able to walk the further 0.6/0.7 miles up a steep hill. What assessments have Powys County Council undertaken with regards access for disabled persons?	The impact of the Proposals on people belonging to the protected characteristic groups is considered in the impact assessments. These will be updated to reflect comments received during the consultation period, and updated versions will be considered by the Council's Cabinet when determining whether to proceed with implementation of the Proposals. Cvaz\
3.5.2.48	The site is not ideal for an Infant and Junior school and it is near the sixth form college, thus there are very serious safeguarding issues to be considered.	The Council considers safeguarding as a priority as part of all new primary school building developments. The new school site will be secure and no unauthorised access to the new site will be permitted.

3.5.3 Comments about co-location with the PRU

3.5.3.1	Putting the PRU by a primary is ill-thought out.	Should the Proposals be approved, the layout of the site at Penlan would be developed to ensure that appropriate safeguarding arrangements are in place. It is the intention that the primary school would be located in a standalone building, and that the PRU would be in a separate standalone building as well.
3.5.3.2	Is it right to have a PRU near a Primary school? I don't think so.	As above.
3.5.3.3	I have heard that this would include a PRU on the same site as primary children. That would give me serious concerns as a parent about child protection issues. Pupils are sent to PRUs for a valued reason. Do not disrupt the learning of young impressionable pupils with the presence of a PRU on the same site.	As above.
3.5.3.4	What is happening with the proposal to also include the PRU into the new building? I hope this has been ruled out, as I would be deeply troubled if my 4-year-old daughter had to share corridors/toilets etc with troubled teenagers.	As above.
3.5.3.5	As the pupils attending the Pupil Referral Unit are aged 11 – 16 years why are Powys County Council proposing to co –locate these pupils, who are not able to attend mainstream school, with primary school pupils aged 3 – 10 years?	As above. The PRU in Brecon provides education for pupils aged 7-18.
3.5.3.6	Should a Pupil Referral Unit be co-located with a primary school? Wouldn't it be better to co-locate a PRU with the High School as the pupils are of the same age group?	As above.
3.5.3.7	Does Powys County Council agree that the better fit would be to co-locate the key stage 3 and 4 pupils in the PRU with the pupils in the new Brecon High School?	As above.
3.5.3.8	The PRU to be 'Co-located'? Does this mean sharing the same site? Surely there is a more appropriate setting for pupils that may have already been unable to cope in a mainstream school and have anxieties around this? Is placing them in a primary setting in the near vicinity to a secondary school appropriate? Maybe Powys should have considered this before selling St Josephs	As above.

	School (Current site of PRU) and then renting it back. How does this make financial sense?	
3.5.3.9	Most pupils in the PRU find it almost impossible to cope in a mainstream school environment. Housing the PRU in or alongside a mainstream primary school could be demeaning to those of secondary school age. For this unit to be in very close proximity to the high school in which students could not cope, may dredge up memories of negative experiences, manifesting themselves in diminished self- esteem, severe behaviour outbursts and disengagement from school. Alternative provision needs to be truly alternative; not bolted onto a mainstream school building. (This is not an argument against inclusion, but when pupils have thoroughly disconnected from mainstream schooling, any kind of sensory experience can result in remembering trauma.)	As above.
3.5.3.10	It is unclear who will manage the Pupil Referral Unit.	The PRU would be managed by the PRU Management Committee and led by the Headteacher of the PRU.

3.5.4 Comments about the proposed swimming pool

3.5.4.1	Why aren't Powys County Council proposing to co-locate the new community swimming pool with the leisure centre? What investigations regarding safeguarding issues has Powys County Council undertaken with regards co-locating a community swimming pool with a primary school? Will the community be able to use the swimming pool during school hours? Who will be managing the community swimming pool; the school or the leisure centre?	It is the intention that the development of a new swimming pool would be part of the redevelopment of Brecon Leisure Centre, replacing the current swimming pool, and would be managed by Freedom Leisure – its usage during school hours by the community would be subject to discussion and agreement with Freedom Leisure.
3.5.4.2	Is the mention of a "Community swimming Pool" being used as an extra to enhance the sale of the new school? A new swimming pool was already agreed!	As above.
3.5.4.3	It would be better to co-locate a swimming pool with the leisure centre. It doesn't seem to make much sense to co-locate a swimming pool with a school when there is a leisure centre on the other end of the site.	As above.

3.5.4.4	Another swimming pool? Who is going to pay for that to be built and the upkeep? Who is going to run it and ensure members of the public to not have access to the rest of the school?	As above.
3.5.4.5	If the proposed build will have a pool can it be clarified whose budget this will be maintained by? With all the financial constraints a school is already placed under how can this be sustainable or cost effective? How will it be staffed and ensure that people who access it are not able to access the rest of school site?	As above.
3.5.4.6	What funding is available for a new swimming pool if PCC are not successful in their application for 21 st century schools funding for a new swimming pool?	If the Council was not successful in obtaining Welsh Government funding for a swimming pool as part of this scheme, then the Council would need to consider other sources of funding e.g. capital borrowing, sale of assets.

3.5.5 Comments about early years provision

3.5.5.1	It's very clear that no thought has been given to the future of the pre-school provision. At the consultation meeting, all questions asked were rebuffed with a 'we can't answer that until phase two', which is when all the big decisions about the schools will have already been made!	<p>The impact on nursery / early years provision is considered on pages 23-25 of the Consultation Document , where the Council states that:</p> <p><i>'It is not anticipated that Phase 1 of the Proposals would impact on the funded early years education provision outlined above, which would continue to operate in the same accommodation under the management of the new school'</i></p> <p>and in respect of Phase 2:</p> <p><i>'Eventually, the intention is that the new school moves to a new building located on the site of the old Brecon High School. Accommodation to provide funded early years education would be provided as part of the new building, and it is anticipated that there would be at least the same number of places available as are currently available at Mount Street Infants School and Cradoc C.P. School. The demand for nursery places in the area will be reviewed as the proposal moves forward, to ensure that sufficient places are provided'</i></p>
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		<p><i>to accommodate demand. Should all provision move to the new building, this would mean that funded early years education provision and childcare provision would no longer be available at Cradoc, and families currently accessing this childcare at Cradoc would need to travel further in order to access this provision. This could mean that some families currently accessing funded early years education provision and childcare provision at Cradoc may not access the alternative provision in Brecon.'</i></p> <p>The Council is unable to provide definitive information at this stage about the exact provision that would be available following a move to the proposed new building, however this would be considered during the development of designs for the new building, which would be developed with input from the school and early years providers.</p>
3.5.5.2	Is there going to be an area for Smarties? Will the capacity be greater as there will be more students with 2 primary schools combining.	As above.
3.5.5.3	Would Smarties have a separate outdoor area and will it be secured as it is now? Will there also be space to hold a playgroup for babies and toddlers?	As above.
3.5.5.4	Nursery provision. In the past 12 months two nurseries in Brecon have closed with a third under threat. There will shortly be NO private nursery provision in the town. It is essential that whatever plans are taken forward, sufficient nursery provision is made available in the town.	As above.
3.5.5.5	How will Powys CC protect Early Years Provision during the process of transformation?	As above.
3.5.5.6	There are not enough vacancies in nurseries around Brecon for all the pre-school children, meaning many working parents would struggle for childcare.	Comment noted.
3.5.5.7	The rural 3@Cradoc 3-year funded placements would be gone.	Comment noted.
3.5.5.8	Shake, rattle and roll music group in Cradoc would be gone.	Comment noted.

3.5.5.9	The rural parent and baby group that meets in Cradoc would be gone.	Comment noted.
3.5.5.10	The impact on Nursery/Early Years Provision will be that parents may decide, due to the uncertain future of Mount Street Infants School, to send their children to other providers. Does Powys County Council agree that these Proposals could have a huge impact on our nursery provision if parents choose to send their children to the additional provisions listed in the Consultation Document ? Will Powys agree that, if children attend Early Years Provision at Sennybridge Nursery, Llanfaes Little Steps, Priory Pre-School or Cylch Meithrin Aberhonddu, it would follow that they would attend these schools for their primary education?	Parents can choose which provision they wish their children to attend. It is possible that parents choosing for their children to attend alternative early years provision would attend these schools for their primary education, however the Council's hope would be that parents that would currently choose to access Mount Street Infants and Cradoc C.P. School would continue to access the provision at the new school, on the existing sites during Phase 1 and at the new building during Phase 2.

3.5.6 Comments about wraparound provision

3.5.6.1	I am concerned that there is no mention in the consultation of the new school providing a breakfast club, after school club or holiday club.	It is expected that the breakfasts club, after school club and holiday club would continue to be available in Cradoc during Phase 1 of the Proposals. Phase 2 of the Proposals includes building a new school which would have integrated early years facilities, and the intention is that this would provide early years education and wraparound provision. It is acknowledged that this could mean that there would be no provision in Cradoc in the future, however it is possible that this provision could continue to be offered in Cradoc. As indicated in the draft Community Impact Assessment: <i>'It is currently unclear where the facilities and services currently provided by the school could be provided should there be no school in Cradoc. However, Should the Council proceed with the Proposals, it would endeavour to work with the community in Cradoc to identify a suitable alternative.'</i>
3.5.6.2	Concern about loss of wraparound care from 7.45am to 6.00pm in Cradoc which will impact on parents/carers.	As above.
3.5.6.3	The Cool Kids wraparound care in Cradoc would be gone.	As above.
3.5.6.4	Concern that there is no provision being made to continue a childcare service in Cradoc. This will be a great loss to families in	As above.

	Cradoc but also families from as far away as Crickhowell, Llangynidr, Sennybridge and Llandovery that currently use the service.	
3.5.6.5	By omitting a childcare facility in Cradoc, the proposal fails to recognise the Welsh Government's Childcare policy that actively encourages parents to return to work or enter into further education. This, the Welsh Government has recognised as a long term, fundamental element in helping to maintain the Welsh economy.	As above.

3.6 Comments / queries about what would happen to the current buildings

3.6.1	The Council is reluctant to tell its taxpayers what exactly is to happen to the existing school sites, with particular reference to Cradoc IF this proposal succeeds what will happen to this site, will there be planning for houses, or are The Council going to abandon the school building letting it crumble to an eyesore and making it a target for vandalism, rural crime is steadily rising and does not need any further opportunities, the building Greystones on Llywel straight is a prime example.	Should the Council proceed with the Proposals in respect of Mount Street Infants, Mount Street Juniors and Cradoc C.P. School, the three school buildings would eventually be declared surplus following the move to a new building. All surplus assets are subject to the process of disposal as outlined in the Council's Asset Management Policy. Whilst it is possible that this could lead to sale of the sites to third parties, some schools that have closed have been transferred to other service areas e.g. housing or to a community - with the latter, this may allow for the space to be retained or developed for community use.
3.6.2	If Cradoc school closes down it will be turned into houses and the village will become a bigger village than it is now.	As above.
3.6.3	Concern that Cradoc school site would be sold off for housing – turning Cradoc into another dead village and nothing other than a glorified soulless housing estate.	As above.
3.6.4	What will happen to the existing school sites? Be sold off to build new executive homes for people to buy?	As above.
3.6.5	The question remains what will happen to the old sites of the three schools? If it is to be housing, then the new High School and this proposed new combined school would probably not be big enough for all the children in the area.	As above.
3.6.6	I presume Cradoc's outdoors facilities will be lost forever?	As above.

3.6.7	<p>If you demolish Cradoc, you will probably harm the wildlife surrounding the property and much more, including: the endangered great-crested newt, frogs, fish and birds. If you demolish the school with the intent of selling the land for property development, you are demolishing the homes of animals too and ruining the view of landmarks like the Crug, Y Gaer and Penoyre.</p>	<p>The Council has no plan to 'demolish Cradoc'. Should the Council proceed with the Proposals in respect of Mount Street Infants, Mount Street Juniors and Cradoc C.P. School, the three school buildings would eventually be declared surplus following the move to a new building. All surplus assets are subject to the process of disposal as outlined in The Council's Asset Management Policy. Whilst it is possible that this could lead to sale of the sites to third parties, some schools that have closed have been transferred to other service areas e.g. housing or to a community - with the latter, this may allow for the space to be retained or developed for community use.</p> <p>The Council notes the concerns about the potential impact on wildlife.</p>
3.6.8	<p>If you knock Cradoc school down you will not just be knocking down our school you will be knocking down creatures homes. We cannot forget about the frog and newt pond, we have many endangered species in there so if you do knock down our school you just might be part of their extinction.</p>	<p>As above.</p>
3.6.9	<p>Both Mount Street Infants and Cradoc School have wonderful grounds which are utilised to enhance learning and should be kept as green sites. What are you planning for these sites?</p>	<p>The Council currently has no plans for any of these sites. Should the Council proceed with the Proposals in respect of Mount Street Infants, Mount Street Juniors and Cradoc C.P. School, the three school buildings would eventually be declared surplus following the move to a new building. All surplus assets are subject to the process of disposal as outlined in the Council's Asset Management Policy.</p>
3.6.10	<p>What will happen to the existing Forest School at Mount Street Infants School?</p>	<p>As above.</p>
3.6.11	<p>Was the land at Mount Street Infants School acquired for the purpose of education and if so, can this purpose be changed?</p>	<p>The Council is not aware of any restrictions relating to the ownership of the land on which the school is located.</p>
3.6.12	<p>Title Matters: There are two relevant conveyances revealed by the land registry title CYM 280557 which relate to the majority of the land in the school title. The first is a Conveyance of 31st August 1940 at entry no 3 in the Proprietorship Register, which relates to the junior school. The Conveyance says the land is "intended to</p>	<p>As above.</p>

	<p>be conveyed which said property is required by the Council for the Purposes of the Education Act 1921". Also it says "The Council are under the said Act authorised to take and use the said property FOR THE PURPOSES THEREOF". Secondly the Conveyance of 31st July 1964 conveys the infant school and playing field (entry 4 in the same register) says "The Council are purchasing the property hereby conveyed FOR THE PURPOSE OF AND IN CONNECTION WITH EDUCATION in accordance with the provisions of the Education Act 1944". Thus The Council's title in relation to both schools is clear that they should be used for educational purposes and not sold for development.</p>	
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3.7 Comments about the impact on the community

3.7.1 Impact on the Cradoc community

3.7.1.1 General concern about the impact of there not being a school in Cradoc

3.7.1.1.1	<p>Losing Cradoc School would be a substantial loss to our community.</p>	<p>The Council has recognised within the Consultation Document and the draft Community Impact Assessment that full implementation of the Proposals would eventually mean that there would be no school in Cradoc, which would have a negative impact on the community.</p> <p>The Community Impact Assessment will be updated to include further information about the impact on the community which has been received during the consultation, and an updated version will be considered by the Council's Cabinet when determining how to proceed with the Proposals.</p>
3.7.1.1.2	<p>Without this local asset which sits at the heart of the rural community in which it is set, the essence of our rural way of life will be lost. It would be devastating for us today and for all future generations to come!</p>	<p>As above.</p>

3.7.1.1.3	The negative impact on the community in Cradoc of closing Cradoc school will be considerable. Cradoc is a rural school, serving a farming community. The school is an important local hub for the community, providing a strong identity for local people. There is currently extensive use of the school building by the local community, and as such, the school has strong positive links with the community.	As above.
3.7.1.1.4	It has been said that the Church, the pub and the school is at the heart of any village. Many a church has gone and COVID seems to have finished the local pub. Only the school remains at the heart of a community and that heart beats strongly at Cradoc.	As above.
3.7.1.1.5	The Council would rip the heart out of our local community by closing Cradoc school.	As above.
3.7.1.1.6	Living in a rural community can be very isolating and removing the school will only exacerbate this issue.	As above.
3.7.1.1.7	Cradoc school is at the heart of the Yscir community and is very much a meeting point for many. Closure will ensure that this rural community becomes even more remote at a time when communities need to be brought together.	As above.
3.7.1.1.8	Our rural school is a lifeline for this community in the Yscir valley which has seen school after school close. Llanfihangel-Nant-Bran, Merthyr Cynog, Pontfaen, Battle and now potentially Cradoc.	As above.
3.7.1.1.9	Schools are one of the last hearts of our communities, has the impact on Cradoc itself of closing Cradoc CP been assessed?	A draft Community Impact Assessment was carried out, with input from the school. This was published with the Consultation Document ation. The Community Impact Assessment will be updated to include further information about the impact on the community which has been received during the consultation, and an updated version will be considered by the Council's Cabinet when determining how to proceed with the Proposals.

3.7.1.2 Concern that the Cradoc community would be split

3.7.1.2.1	If this proposal was to go ahead it would cause a huge divide in our community with children from the top end potentially going to Builth and bottom end dividing between the various schools in Brecon and some of those in the middle going to Sennybridge.	The Council notes this concern that not having a school in Cradoc could mean that pupils living in the area currently served by Cradoc C.P. School could attend different schools in the future. It is the intention that all pupils in the new school would transfer together to the new building in Brecon, therefore it is not expected that pupils would go to other schools, although parental choice is recognised.
3.7.1.2.2	The community would be divided as children would be sent to different schools, this would have an impact within the Yscir community for generations to come.	As above.
3.7.1.2.3	It is a very large community and if there was no school the community would be broken into 3 or 4 ways.	As above.
3.7.1.2.4	The fact that only the children in Cradoc at the time of closure will have a place in the new school will disadvantage the community of Yscir. Children may be placed in either of the two primary schools within the catchment area in Brecon town centre rather than attending the school within their community. This will separate the community as siblings, friends and neighbours may have to attend different schools.	As above.
3.7.1.2.5	It will completely split the present community because those more north will be much closer to Builth than Brecon and likewise some will be near Sennybridge. Social things will be split and the YFC will be losing membership namely Pontfaen the Club of the community because young people will join where their School friends will be namely Builth and Sennybridge.	As above. This concern about the impact on the YFC is noted, however there is no reason why the YFC couldn't continue to run even if there was no school in Cradoc.

3.7.1.3 Concern that the proposal would lead to increased isolation

3.7.1.3.1	Cradoc School is currently the hub of the area, and is often the starting point for many young families to become part of the community. Powys County Council should never underestimate the power of the conversations that can start at the school gate, where it might seem trivial to some, that could be the only contact made for a young family.	The Council has recognised within the Consultation Document and the draft Community Impact Assessment that full implementation of the Proposals would eventually mean that there would be no school in Cradoc, which would have a negative impact on the community.
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		The Community Impact Assessment will be updated to include further information about the impact on the community which has been received during the consultation, and an updated version will be considered by the Council's Cabinet when determining how to proceed with the Proposals.
3.7.1.3.2	When a school closes in such a rural area, the heart can easily leave a community, living in the countryside, when many services to young families have been cut, can be a very lonely place, and going to a local school goes a long way to keeping contacts with other young mothers which is important to many families wellbeing. We are frequently told how important it is to talk to people with similar issues, this would just not happen if your child would be put on school transport and shipped off to a school some considerable distance.	As above.
3.7.1.3.3	Closing Cradoc school would be a blow to the village and the parents who live there, isolating parents who currently meet at the school gate, and form friendships within the village, and surrounding area. Isolating the children too, if they make friends in the bigger new school that do not live near them, how do they play outside of school hours, close friends that do not need the parents to be able to transport them, are so important at this age.	As above.
3.7.1.3.4	Speaking to people who moved to the community not knowing anyone found the school was the main contact with people who lived locally. One couple lived for nearly 5 years without finding friends until they had children and they went to Cradoc.	As above.
3.7.1.3.5	This divide in our community may result in not knowing your neighbours well and, as a largely farming community, we rely so much on our neighbours in times of need when you have an operation, an accident or fall ill.	As above.
3.7.1.3.6	When living a rural farming life, you depend on the community around you for support, removing the school means the early connections and friendships within the farming families around you that are essential for rural life will not be made and this will	As above.

	be incredibly detrimental to the future of the rural farming community.	
3.7.1.3.7	Many of Cradoc School pupils come from an agricultural background, and over the last decade it's an industry that has the shown that one it's highest causes of death is suicide, this is often due to the isolation that is experienced by farmers, and that friendly chat with people of similar backgrounds and lifestyles could well be the life line that is needed.	As above.
3.7.1.3.8	Relationships between families will suffer because they will no longer see each other at the school gates.	As above.
3.7.1.3.9	The loss of opportunities for the community to meet around activities based at the school will have a negative impact on people's mental health and wellbeing.	As above.
3.7.1.3.10	Living in a rural setting can be extremely isolating and by removing the school will only exacerbate this issue. The school is a vital link for community connections. Events such as Sports Day, are for many who work in the agriculture industry (my husband included!) an opportunity to catch up with other parents and members in the community, many of which are friends. If the three schools are merged then I know these types of days will not be the same. There would be a clear divide between those from a rural community and the town, due to difference in lifestyles etc.	As above.

3.7.1.4 Concern about the impact on community facilities

3.7.1.4.1	There are no plans to provide Community facilities in Cradoc if the school were to close. At present the school is utilised for community activities, ensuring the inclusion of all generations supporting wellbeing and reducing isolation.	<p>The Council acknowledges that the Cradoc C.P. School building is used for community activities – this was identified in the draft community impact assessment carried out in respect of these Proposals.</p> <p>The Council notes these concerns about the possible impact on community facilities in Cradoc Should the Council proceed with the implementation of Phase 2 of the Proposals. As stated in the draft community impact</p>
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assessment: *‘it is acknowledged that a move to a new school site in Brecon would mean that there would no longer be a school located in Cradoc, therefore potentially the community facilities provided by the school may no longer be available. It is currently unclear where the facilities and services currently provided by the school could be provided should there be no school located in Cradoc.’*

The draft community impact assessment also states that: *‘an initial search has identified some alternative locations in the area where community events could take place. Should the Council proceed with the Proposals, it would endeavour to work with the community in Cradoc to identify a suitable alternative, initially this could involve discussions with Community Councils in the area about future use of the school building.’*

Should the Council proceed with these Proposals, the Cradoc C.P. School building would eventually be declared surplus following the move to a new building. All surplus assets are subject to the process of disposal as outlined in The Council’s Asset Management Policy. Whilst it is possible that this could lead to sale of the sites to third parties, some schools that have closed have been transferred to other service areas e.g. housing or to a community - with the latter, this may allow for the space to be retained or developed for community use. This could enable the facilities to be retained for community activities.

The draft impact assessments will be updated to reflect feedback received during the consultation period, and updated assessments will be considered by the Council’s Cabinet when determining whether to proceed with these Proposals.

3.7.1.4.2	The school is the only public building in the heart of our rural community, if this was closed, there would no facility for any future social occasions depriving people of all generations.	As above.
3.7.1.4.3	The school is important to a local community where there are no other community buildings in the immediate vicinity.	As above.
3.7.1.4.4	The only community venue in the Yscir ward would be gone.	As above.
3.7.1.4.5	Closing down Cradoc school will have a detrimental effect on the local community meaning no local meeting / focus point.	As above.
3.7.1.4.6	Concern about removal of the only community building in a village which has grown considerably since the school has been there.	As above.
3.7.1.4.7	Another loss for our community. Cradoc has lost many Council Services within the Community over the years e.g., Post Office, Telephone, Churches etc. The school is the only Community building available to them and with the new Car Park Facilities a resource that can be used by all.	As above.
3.7.1.4.8	Since Cradoc was built we as a community have lost a petrol station/ pub/Post offices library and local bus service, the school is the last thing that the Council want to take away from us.	As above.
3.7.1.4.9	Cradoc school is used for community events and gatherings, parties, young farmers events, social evenings, concerts. Closure wouldn't just impact on education, it would impact on the whole community and surrounding valleys.	As above.
3.7.1.4.10	In Cradoc the school is the hub of the community. There are no other meeting places within the community or places to hold community events and should the school move into Brecon this would pose a greater loss to the community at Cradoc than to the communities connected to the two Mount Street schools.	As above.
3.7.1.4.11	The loss of the school in a rural community will be the death knoll of the villages, as it is the only community venue serving Cradoc, Battle and Aberyscir. There would be a loss of play facilities for the local children, who enjoy access to the school playing fields. There are no other play facilities in the three villages.	As above.
3.7.1.4.12	The closure would not only result in a loss of local educational provision but a meeting venue loss for multiple local groups and	As above.

	functions. Not only that, it is the only local facility available between the towns of Brecon and Builth Wells as a children's play area. The playground and fields are regularly used by local children for bike riding, skating and many outdoor sports.	
3.7.1.4.13	There would be no safe play area for children in Cradoc area – there are no playgrounds/parks for children other than the school playground which thankfully has an 'open gate' policy.	As above.
3.7.1.4.14	The school is the focal point for Battle, Cradoc, Aberyscir, Aberbran, Soar – we don't have village halls and now Powys are trying to destroy the school and the heart of the community.	As above.
3.7.1.4.15	The school acts as a 'community hub' to accommodate and support the provision of a range of community services, e.g. health, childcare facilities (before and after school and out of term times), family and adult learning, community education, sport, recreation, social activity. None of these considerations has been referenced in any publicly available material, nor have these groups been consulted.	As above.
3.7.1.4.16	If Cradoc school were to close, what compensatory, similar, safe facilities would the authority provide children within this community?	As above.

3.7.1.5 Concern that people wouldn't want to live in Cradoc

3.7.1.5.1	Think about it...will houses in Cradoc sell once the school has gone?	The Council has prepared draft impact assessments which were published with the Consultation Document ation. These will be updated to reflect feedback received during the consultation period, and updated versions will be considered by the Council's Cabinet when determining whether to proceed with these Proposals.
3.7.1.5.2	Closing Cradoc school could encourage families with school-age children to leave the community or discourage young families from moving to the community. The pandemic which we find ourselves in means we are more reliant on local farmers and produce, with no access to education in the area, there will be a detrimental effect to the local farming community.	As above.

3.7.1.5.3	We think that the community will be affected massively, because with no school there would be no reason for new families with young kids to move here and if you were to build homes on this site then not many people would like to move here.	As above.
3.7.1.5.4	If Cradoc C.P School does close then this will reduce the appeal for young families moving into the area.	As above.
3.7.1.5.5	How would closure of our school attract young families to settle in its beautiful rural location?	As above.

3.7.1.6 Other

3.7.1.6.1	Closing the school would have a devastating impact on the local area, not just in the Yscir community, but in many of the other surrounding areas too.	<p>The Council has recognised within the Consultation Document and the draft Community Impact Assessment that full implementation of the Proposals would eventually mean that there would be no school in Cradoc, which would have a negative impact on the community.</p> <p>The Community Impact Assessment will be updated to include further information about the impact on the community which has been received during the consultation, and an updated version will be considered by the Council's Cabinet when determining how to proceed with the Proposals.</p>
3.7.1.6.2	Concern about the impact on Pontfaen YFC, who have just won Junior and Senior members of the year – Pontfaen would suffer hugely and would struggle to keep afloat due to the lack of members that would be attending – Builth and Sennybridge YFC would benefit. Brecon doesn't have a YFC.	<p>As above.</p> <p>This concern about the impact on the YFC is noted, however there is no reason why the YFC couldn't continue to run even if there was no school in Cradoc.</p>
3.7.1.6.3	Should there be no school in Cradoc, the lifelong rural learning partnership would not have a place to begin or develop.	Comment noted.

3.7.2 Impact on the Brecon community

3.7.2.1 Concern that there would be an impact on links with the community in Brecon

3.7.2.1.1	Loss of a school in the community. Mount Street Infant School is currently in the heart of Brecon and has close links with many organisations within the town. There is a very strong case for maintaining schools in their communities and is central part of Welsh Government policy. How does PCC justify wiping away the years of community links and support that Mount Street Infants school has built up its local area?	<p>These comments about the close links with the community in Brecon are noted. The Council prepared a draft community impact assessment which considered the Proposals' impact on the community. This was published with the Consultation Documentation. The impact assessment will be updated to reflect comments received during the consultation, and the updated assessment will be considered by the Council's Cabinet when determining whether to proceed with the Proposals.</p> <p>The Proposals aim to establish a new school which would continue to be located in Brecon, therefore it would be possible for the new school to establish similar close links within the town.</p>
3.7.2.1.2	The location of these schools within the heart of the community is also of great value and would be sorely missed.	As above.
3.7.2.1.3	This will have several implications that adversely affects each community and Brecon town itself. The wide scope of these Proposals will I hope be outlined and highlighted by many concerned members of the community.	As above.
3.7.2.1.4	The link (close), with the community in Brecon and the benefit of walking trips through the town and to surrounding areas, i.e. the Groves and the canal would be compromised because of the increased distance and associated time involved.	As above.
3.7.2.1.5	Merging Mount Street Infants and Mount Street Juniors into one big school with Cradoc in a different part of Brecon will negatively impact on the community cohesion.	As above.
3.7.2.1.6	There is a danger that the connections / links between Mount Street Infants / Mount Street Juniors and organisations in the community would be lost.	As above.
3.7.2.1.7	Amalgamating the schools and moving them to a new site would destroy the support they have from the local community.	As above.
3.7.2.1.8	Links with the community would have to be re-established but there would be a greater distance.	As above.

3.7.2.1.9	The loss of connection with the local community would be detrimental to both the community and the school. Does PCC agree that it would be detrimental to remove the school from the heart of the community?	As above.
3.7.2.1.10	The impact on the community will be huge as the new school will be situated outside of the community. The latest Estyn report for Mount Street Infants School states “ <i>The school’s links with the community are exemplary</i> ”. The effect of this proposal would be to destroy those exemplary links. Currently pupils from Mount Street Infants School walk to venues in Brecon e.g. a weekly Dementia Matters scheme at Kensington Church, the theatre, the Cathedral and the library. It would be very difficult to walk small children to these venues from an out of town school at the top of a steep hill and back again. Although the distance from the existing Mount Street School is described as minimal it must be emphasised that the extra distance is up a very steep hill.	As above.

3.7.2.2 Concern about impact on the economy in Brecon

3.7.2.2.1	Concern that taking the school out of the town will have an impact on small businesses in Brecon who are already suffering long term repercussions from COVID. Passing trade from parents on the school run would no longer exist as pupils would be traveling up the hill in cars. Brecon town is dying as it is, we do not want to lessen its footfall further. The impact of a move out of town has implications for the wider economy.	These concerns regarding the impact on the Brecon economy are noted. The Proposals’ impact on the economy is considered in the integrated impact assessment. Whilst this impact was not identified when the draft impact assessment was prepared, the assessment will be updated to reflect feedback received during the consultation period, and this concern will be included in the updated impact assessment document, which will be considered by Cabinet when determining whether or not to proceed with the Proposals.
3.7.2.2.2	This could impact on the prosperity of the town as more people travel by car, bypassing the shops and cafes in town. We need to be fostering and safeguarding our vibrant community rather than splitting it up, particularly now as we have experienced the impact of increased separation.	As above.
3.7.2.2.3	Concern about the impact on the Brecon town economy because parents / carers will no longer be “popping” in on their walk home	As above.

	– Brecon is a struggling town and will just struggle even more, every bit of trade is important.	
3.7.2.2.4	Concern about the impact of job losses in phases 2 on the Brecon economy.	As above.
3.7.2.2.5	Concern that this would take business out of the town.	As above.
3.7.2.2.6	Does PCC agree that locating the school so far away from the centre of the town will reduce footfall on Brecon High Street?	As above.

3.7.2.3 Concern about loss of green space in Brecon

3.7.2.3.1	Potential loss of green space in Brecon. The future of the school playing field and woodland area at Mount Street Infants will be of great interest to the surrounding community. This is an important Green Space that should not just be sold at any cost for development.	Comment noted. Should the Council proceed with the Proposals in respect of Mount Street Infants, Mount Street Juniors and Cradoc C.P. School, the three school buildings would eventually be declared surplus following the move to a new building. All surplus assets are subject to the process of disposal as outlined in the Council's Asset Management Policy. Whilst it is possible that this could lead to sale of the sites to third parties, some schools that have closed have been transferred to other service areas e.g. housing or to a community - with the latter, this may allow for the space to be retained or developed for community use.
3.7.2.3.2	Climate change, pollution and the need of green spaces for the wellbeing of residents make it extremely important that this area is retained for the Brecon Community.	As above.
3.7.2.3.3	How will Powys CC protect the school playing field and Millennium Woodland as a valuable green space for the residents of Brecon?	As above.

3.7.2.4 Other

3.7.2.4.1	Many of the residents of the Mount Street area are elderly and enjoy hearing the children playing in the outdoors. Removing the school from the community would have a detrimental effect on the wellbeing of many in the community.	Comment noted.
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3.8 Comments about travel implications

3.8.1 There would be additional travel for pupils

3.8.1.1	If Cradoc C.P. School was to close, resulting in children having to go to new schools in either Brecon or Sennybridge, this would result in far more daily vehicle movements along the single carriageway roads within the Yscir community. This increases the chance of road traffic accidents, increases congestion and puts more wear and tear on our already pot hole ridden roads.	It is acknowledged that implementation of Phase 2 of the Proposals would mean that there would be an increase in travel for pupils currently attending Cradoc C.P. School for whom this is currently the closest school. However, a significant proportion of pupils that attend Cradoc C.P. School live closer to other schools, therefore implementation of the Proposals would reduce the travel required for these pupils. Due to the geographic nature of Powys, many pupils of primary age are transported to school by bus with no detrimental impact.
3.8.1.2	Expecting children as young as 4 to travel from the outskirts of Yscir parish to the other side of Brecon is unacceptable. Some children will be travelling 10 miles to school. This will increase the length of their school day.	As above.
3.8.1.3	Pupils' school day would start a lot earlier and finish later. How is this in the best interests of any child of infant age?	As above.
3.8.1.4	Concern about winter time travelling for very young children.	As above.
3.8.1.5	Transporting children further from their homes increases health and safety issues in relation to road safety and personal safety	As above.
3.8.1.6	A lot of the rural students would have to travel further which is unhelpful because it changes routines and schedules for farmers and other busy parents and could make the students feel less comfortable in a less known environment.	As above.
3.8.1.7	For the young children of the Cradoc Community to travel to the Penlan site would extend their school day by up to an hour per day which is potentially detrimental to their school/life balance and to their wellbeing.	As above.

3.8.1.8	Unnecessary travel and longer days for current pupils of Cradoc school.	As above.
3.8.1.9	Increase in home to school travel times for children living in villages and rural areas. My own children's travel time will at least double	As above.
3.8.1.10	Making children from Cradoc travel to Brecon will increase their travel time considerably. Some rural children already have a long distance to travel to school. This will only increase for them. The consultation report says travel time would not exceed 45 minutes. I don 't feel it's reasonable to expect children as young as 4, or those attending nursery provision, to travel such a long way to school. This also does not take into account traffic jams coming in and out of Brecon during busy times.	As above.
3.8.1.11	The move to a new site will be enormously disruptive for rural families like my own living at the top of the Yscir valley. Journey times to school will have at least another 20 minutes put on to them. This means more time in the car, more vehicles sitting in traffic in Brecon town and more pollution.	As above.
3.8.1.12	Comment is made that Cradoc is only 3 miles from Brecon. True, but the catchment area of Cradoc extends a further 4 or 5 miles away from Cradoc. It is not realistic to expect very young children to have to travel perhaps some 16 miles daily in a bus on narrow country roads. If there was no suitable bus then there would be a noticeable increase in (parental) car traffic.	As above.
3.8.1.13	At a time when keeping your travel to a minimum and social distance has never been more important, you now propose to send our children in some cases over 10 miles away, and this from the age of 4 years old seems quite frankly ridiculous, also have you considered just long a day it would be on those early year pupils.	As above.
3.8.1.14	There is concern about the distance and time involved that children will be on buses travelling further into Brecon especially for the youngest pupils.	As above.
3.8.1.15	Many children get free school transport, but would have to travel another 10+ minutes on the bus to get to the proposed new	As above.

	school. This can be a very long journey for young children, twice a day, particularly with no toilet facility on the bus.																	
3.8.1.16	We think the travel distance to the new school would not only be far for Cradoc kids but mount st kids too it would take up to 17 minutes to get to the new school from Garthbreny Brecon which is longer than to Cradoc.	As above.																
3.8.1.17	Some pupils already have a 20-minute journey to school. This would increase to 40 minutes given the additional traffic.	<p>As Cradoc C.P. School is located in a rural area, it is fully acknowledged that some pupils already travel quite a distance to attend the school, and that implementation of Phase 2 of the Proposals would lead to additional travel for pupils currently attending Cradoc C.P. School for whom Cradoc is their closest school. The furthest travel distance for pupils to attend the new school on the Penlan site would be 9.6 miles, compared with a current maximum travel distance of 6.7 miles to Cradoc C.P. School, based on PLASC 2021 data.</p> <p>The Council acknowledges that a significant proportion of children attending Cradoc C.P. School live closer to other schools.</p> <p>The closest school for the 91 pupils attending Cradoc C.P. School, based on PLASC 2021 data is as follows:</p> <table border="1"> <thead> <tr> <th>Closest school</th> <th>% of pupils</th> </tr> </thead> <tbody> <tr> <td>Cradoc C.P. School</td> <td>50.5%</td> </tr> <tr> <td>Priory C.i.W School</td> <td>24.2%</td> </tr> <tr> <td>Llanfaes C.P. School</td> <td>8.8%</td> </tr> <tr> <td>Sennybridge C.P. School</td> <td>5.5%</td> </tr> <tr> <td>Mount Street Infants School</td> <td>4.4%</td> </tr> <tr> <td>Archdeacon Griffiths C.i.W School</td> <td>3.3%</td> </tr> <tr> <td>Builth Wells C.P. School</td> <td>3.3%</td> </tr> </tbody> </table>	Closest school	% of pupils	Cradoc C.P. School	50.5%	Priory C.i.W School	24.2%	Llanfaes C.P. School	8.8%	Sennybridge C.P. School	5.5%	Mount Street Infants School	4.4%	Archdeacon Griffiths C.i.W School	3.3%	Builth Wells C.P. School	3.3%
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		This suggests that 50% of pupils attending Cradoc C.P. School are attending their closest school, with the remaining 50% living closer to other schools. 37% of pupils choose to travel to Cradoc C.P. School from Brecon town itself. For these pupils, implementation of Phase 2 of the Proposals would reduce the travel time/distance.
3.8.1.18	The proposal would result in children having longer journeys to school, if the school was to close the time would exceed the required time of 40minutes which would impact on both health and well-being.	As above.
3.8.1.19	The schools rural area is a large square mileage who thinks a 5/6 year old should be on a bus for could be well over 40mins one way!!!	As above.
3.8.1.20	Bearing in mind all pick ups and drop off's, how long (distance and time) will the journey be to the proposed location for the pupil who lives the furthest away and how many pupils will see an increase in their journey's?	As above.
3.8.1.21	Parents driving from Cradoc school will be stressed making sure they arrive on time.	Home to school transport would be provided for pupils living in Cradoc in accordance with the Council's Home to School Transport Policy, therefore there would be no need for parents to drive from Cradoc School to make sure children arrive on time.
3.8.1.22	How much does it presently cost the authority to transport Cradoc school children to and from Cradoc and how much would it cost to transport children to the new location?	It currently costs £120k to transport Cradoc school children to Cradoc. It is anticipated that there would be no additional cost of transporting the pupils to the new site, it is assumed that the current transport could be utilised.
3.8.1.23	When the population increases in what is currently the Cradoc catchment area, how is Powys CC planning on funding the additional school transport for children?	If the population requiring school transport in Powys increases at some point in the future, the first step would be to explore whether these learners could be accommodated within the school transport provision that exists at that time. If this is not possible and therefore results in additional transport and funding requirements, these additional funding requirements

		would feed into the Council's medium term financial planning process alongside other future financial pressures and potential savings at that time, which would then be considered by Cabinet during the usual budget setting process.
3.8.1.24	Currently children traveling from Cradoc to Brecon High School meet the bus by the telephone kiosk in Cradoc, a very unsuitable and unsafe position, has The Council taken the care to assess where exactly they intend for our primary school children are going to have to wait for bus? In the country we do not have luxury of wide pavements with good visibility for children to safely get onto transport.	The Council would consider the best and safest location for a pick-up point for primary pupils and would carry out a risk assessment as required. If a new pick-up point is required, the Council would then take appropriate action.
3.8.1.25	Many people - even in year six - have parents who don't want them to go on vehicles such as buses because of strangers, so I doubt Infant students would be able to use buses.	Due to the geographic nature of Powys, many pupils of primary age are transported to school by bus with no detrimental impact.
3.8.1.26	The insurance industry's statistics tell us that the chances of being involved in an accident is directly linked to time spent in travel. The additional time spent in travel puts children at considerable additional risk.	As above.

3.8.2 Concern about the environmental impact

3.8.2.1	You should be providing every opportunity for pupils to get to school in a sustainable way, walking cycling etc.	The Council fully acknowledges the need to provide opportunities for walking and/or cycling to school. As indicated in the Consultation Document published in respect of these Proposals, <i>'Should the Proposals be implemented, the new school would initially be established on the sites where Mount Street Infants School, Mount Street Junior School and Cradoc C.P. School are currently located, therefore during Phase 1, walking routes to the new school would be the same as the current walking routes to these three schools. Eventually, the intention is that the school would move to a new building located on the site of the old Brecon High School, Penlan, Brecon, LD3 9SR. Active travel is a key consideration when developing new school buildings, therefore every effort would be made to encourage walking / cycling to school when</i>
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		<p><i>developing the new building...</i> It is acknowledged that implementation of Phase 2 of the Proposals would make it more difficult for pupils living in Cradoc to get to school in a sustainable way, however a high proportion of pupils accessing Cradoc C.P. School live closer to schools in Brecon, therefore implementation of Phase 2 of the Proposals would mean that it was more likely that these pupils would be able to walk / cycle to school.</p> <p>The potential increase in the proportion of pupils currently accessing Mount Street Infants School and Mount Street Junior School using their cars to access the proposed new school site was also identified in the draft community impact assessment: <i>'the new school building would be located approximately 0.6/0.7 miles from the current school buildings, and would be located up a hill, which could mean that parents would be more likely to drive their children to school rather than walk / cycle.'</i></p>
3.8.2.2	Travelling to school having to use a car is not environmentally friendly.	<p>The potential environmental impact of additional transport is recognised in the draft impact assessment: <i>'Implementation of Phase 2 of the Proposals would require additional travel for pupils currently attending Cradoc School. This would have a negative environmental impact as more home to school transport would need to be provided to transport pupils to their nearest school.'</i></p> <p>However, 50% of the children currently attending Cradoc C.P. School live closer to other schools and therefore are not eligible for free home-to-school transport. This suggests that there is already a significant amount of pupils being transported to the school in cars already.</p>
3.8.2.3	Many families will use the car and that means more carbon.	As above.

3.8.2.4	Less people would be inclined to walk to the new site due to the extra distance which will increase car travel and environmental impact.	As above.
3.8.2.5	This would mean young children and parents travelling miles further every day, which will have an impact on not only the wellbeing of those involved but also negatively affect the environment. This will greatly increase the carbon footprint of hundreds of families across the Brecon area, at a time when we should all be looking to decrease.	As above.
3.8.2.6	Will the additional travel required not increase the carbon footprint and adverse environmental impacts??	As above.
3.8.2.7	The increase to traffic would result in higher rates of pollution. This does not meet with Powys County Council's target to reach carbon net zero by 2030 and also fails to meet with the other requirements of the motion put forward to The Council last September, whereby we should be working with all stakeholders and the public to encourage them to adopt environmentally friendly activities.	As above.
3.8.2.8	Powys County Council is aiming to be Carbon Net Zero by 2030, yet the proposed school would force further travel, therefore contravening that objective.	As above.
3.8.2.9	Additional transport leads me onto the obvious environmental impacts that further travel will incur. A school location further away will obviously increase both traffic and environmental damage in the town of Brecon. I understand PCC's aim is to be 'carbon net zero' by 2030, surely this proposal contradicts this aim?	As above.
3.8.2.10	Pollution and carbon emissions would be greatly increased...many will choose to drive, so carbon emissions will be greatly increased again.	As above.
3.8.2.11	In the current environmental emergency I feel it is The Council's duty to consider the environmental impact of increased emissions.	As above.
3.8.2.12	There will be more pollution. In light of the climate crisis, we should be encouraging people to drive less, by creating more locally available amenities.	As above.

3.8.2.13	Has Powys County Council forgotten its commitment to their carbon footprint, this proposal seems to be a complete contradiction to the cause.	As above.
3.8.2.14	Concern about more pollution in Brecon.	As above.
3.8.2.15	What is the increased carbon footprint and/or other adverse environmental impacts associated with this proposal? What mitigation and/or enhancements will the authority be providing in order to comply with their legal duties?	There is minimal environmental impact in Phase 1 of the Proposals. The Council has recognised that there could be a potential negative environmental impact in Phase 2 due to additional travel, particularly for those pupils currently attending Cradoc C.P. School. However, the new school building will be built as a carbon zero school which would have environmental benefits compared with the current buildings.

3.8.3 Pupils currently able to walk to school would be unable to do so

3.8.3.1	Many parents who walk to Cradoc School will now be forced to drive.	<p>The Council fully acknowledges that implementation of Phase 2 of the Proposals would lead to additional travel for pupils currently attending Cradoc C.P. School for whom Cradoc is their closest school.</p> <p>Free home to school transport would provide to eligible pupils in accordance with the Council's Home to School Transport Policy, therefore it is not true that parents would be 'forced to drive.'</p>
3.8.3.2	When the weather allows, we along with some other families walk our children to Cradoc School. This has great benefits for all of us as we spend time together, enjoy the fresh air, is great for our well being, helps us keep fit and healthy and reduces the number of cars on the road. If you moved our School to the other side of Brecon town centre it would not be safe, nor possible for us to walk our children to school.	As above.
3.8.3.3	I am also concerned about the increased distance children will have to walk to school, which could result in increased car use for school runs.	As above.

3.8.3.4	In years gone by, nearly all children used to walk or cycle to school but this will be impossible for the majority, and the proposed closure of Cradoc will further worsen this – impacting upon the health and welfare of our current and future generations.	As above.
3.8.3.5	I very much doubt you will get a 4 - 11-year-old walking or cycling to school from some places within town let alone Cradoc and further up the valley. I would love to see your safe walking or cycle path you have in place from a rural area?	As above.
3.8.3.6	A school located in Brecon town would also take away the option of any pupils walking or cycling to school.	<p>The Council identified in the draft community impact assessment that Phase 2 of the Proposals could mean that less pupils currently attending Mount Street Infants School and Mount Street Junior School would walk to school: <i>‘the new school building would be located approximately 0.6/0/7 miles from the current school buildings, and would be located up a hill, which could mean that parents would be more likely to drive their children to school rather than walk / cycle.’</i></p> <p>However, as indicated in the Consultation Document published in respect of these Proposals, <i>‘Should the Proposals be implemented, the new school would initially be established on the sites where Mount Street Infants School, Mount Street Junior School and Cradoc C.P. School are currently located, therefore during Phase 1, walking routes to the new school would be the same as the current walking routes to these three schools. Eventually, the intention is that the school would move to a new building located on the site of the old Brecon High School, Penlan, Brecon, LD3 9SR. Active travel is a key consideration when developing new school buildings, therefore every effort would be made to encourage walking / cycling to school when developing the new building...’</i></p>
3.8.3.7	There will be less active travel for children and parents which is unhelpful in terms of mitigating against mental and physical health.	The Council fully acknowledges that implementation of Phase 2 of the Proposals would lead to additional travel for pupils currently attending Cradoc C.P. School for whom Cradoc is

their closest school. However, according to data from PLASC 2021, Cradoc is only the closest school for 50.5% of the pupils with 37% of pupils already living closer to schools in Brecon. For these pupils, implementation of Phase 2 would reduce the travel time/distance, and would improve their ability to walk/cycle to school.

The Council identified in the draft community impact assessment that Phase 2 of the Proposals could mean that less pupils currently attending Mount Street Infants School and Mount Street Junior School would walk to school: *'the new school building would be located approximately 0.6/0.7 miles from the current school buildings, and would be located up a hill, which could mean that parents would be more likely to drive their children to school rather than walk / cycle.'*

However, as indicated in the Consultation Document published in respect of these Proposals, *'Should the Proposals be implemented, the new school would initially be established on the sites where Mount Street Infants School, Mount Street Junior School and Cradoc C.P. School are currently located, therefore during Phase 1, walking routes to the new school would be the same as the current walking routes to these three schools. Eventually, the intention is that the school would move to a new building located on the site of the old Brecon High School, Penlan, Brecon, LD3 9SR. Active travel is a key consideration when developing new school buildings, therefore every effort would be made to encourage walking / cycling to school when developing the new building...'*

The impact assessments will be updated to reflect the comments received in the consultation responses, and the updated versions will be considered by the Council's Cabinet when determining whether to proceed with the Proposals.

3.8.3.8	It's unlikely that any child would be able to walk or cycle to a new school.	As above.
3.8.3.9	It is more likely that parents will choose to drive their children to school, rather than walk. This goes against Welsh Govt active travel plans which are predicated upon promoting a healthier lifestyle for all people in Wales.	As above.
3.8.3.10	Active travel will not be encouraged in fact it will be discouraged. No parent of a young child would actively encourage them to cycle up a steep hill with a relatively narrow road at rush hour especially when there is the possibility of an ambulance travelling at speed from the ambulance station. With all the traffic on the road from the High School, the leisure centre, the Welsh medium school, the college, the hospital, the 120 new houses & the proposed 360 pupil primary school parents/carers will be actively discouraging cycling to school.	As above.
3.8.3.11	Cerrigochion Road has never been a good active travel link between the school & the town centre. When I attended Brecon High School 11 to 18year old pupils were prohibited from walking down Cerrigochion Road as it was deemed to be too dangerous even though there were less cars using this road then. The other routes to the school could be considered good for an unaccompanied 11-18 year old pupil but they are certainly not good for 3-11 year old pupils. There are steps along the other routes which parents/carers with prams or pushchairs and people in wheelchairs would not be able to negotiate. There are also ponds in the area which would present a danger for small children.	As above.
3.8.3.12	What plans do Powys County Council currently have for the improvement of the walking routes to the Penlan site?	The Council has not developed any plans for safe walking routes yet as it is too early in the process, however as indicated in the draft Community Impact Assessment: <i>'Active travel is a key consideration when developing new school buildings, therefore every effort would be made to encourage walking / cycling to school when developing the new building.'</i>

3.8.3.13	Pupils can currently cycle to school in Cradoc or arrive on horseback but they won't be able to do this if the school is in Brecon.	The Council fully acknowledges that implementation of Phase 2 of the Proposals would lead to additional travel for pupils currently attending Cradoc C.P. School for whom Cradoc is their closest school, and that pupils that currently walk or cycle to school, or travel to school on horseback, would be unable to do so.
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3.8.4 Concern about the impact on traffic in Brecon

3.8.4.1	It will mean many more people will drive their children to school, creating more traffic.	These concerns about the impact on traffic in Brecon are noted. Should the Council proceed with the Proposals, further consideration would be given to this aspect when developing plans for the building. This would include an assessment of the impact on traffic in Brecon.
3.8.4.2	Concern that there would be more transport on the already busy Brecon Roads	As above.
3.8.4.3	There would be more cars driving through / around town at school pickup/drop off times.	As above.
3.8.4.4	It would increase congestion in Brecon	As above.
3.8.4.5	Concern about all the traffic – it will be hectic with traffic for the high school, leisure centre and the new housing developments.	As above.
3.8.4.6	It would lead to travel disruption in Brecon town with more vehicles travelling at the same time along narrow roads.	As above.
3.8.4.7	Increased congestion and waiting times would also occur on the streets of Brecon during school drop off and collection times.	As above.
3.8.4.8	At present we are living in a lockdown situation with many working home, when this ends we will soon see extra traffic on our roads and the time when you can spend getting from the outskirts of town to the proposed site will be significantly increased.	As above.
3.8.4.9	I'm just glad I don't live in Llanddew or Cwm Anod! That single track road is going to be a nightmare as parents avoid the Brecon traffic at the busiest times of the day.	As above.

3.8.4.10	Strategically this is a flawed plan. It will create something like 100 additional traffic movements (staff, children, service vehicles, etc.) over the two already busy Honddu bridges twice a day at peak times. There will be queues up past Brecon Cathedral and Cradoc Road and along the Struet. Has nobody looked at a map?	As above.
3.8.4.11	On an already dangerously busy and overcrowded road which comprises a large High School, Ysgol y Bannau, Brecon Leisure Centre, Hoggan Park housing estate, the ambulance station and Brecon Hospital, it is sheer lunacy to add any more traffic, both foot and vehicular to this bottleneck in Brecon.	As above.
3.8.4.12	At busy times of the day there will be traffic from the new Brecon school, the leisure centre, the new housing estate, NPTC, Ysgol Y Bannau, Belle Vue residents, Camden Road Residents and not to mention the emergency vehicles of the hospital and the fire station all using the same road!	As above.
3.8.4.13	We do not think that consideration to the volume of traffic that already exists in Brecon at the start and end of school has been recognised. There are several places in Brecon at those times of day that make travel challenging and sometimes dangerous, Cerrigchocion Road, Cathedral Hill and Llanfaes especially. Moving the school to the proposed site would increase the volume of traffic considerably when there is a desire for a low carbon society.	As above.
3.8.4.14	Everybody from Cradoc would need to drive past Priory school and possibly Ysgol y Bannau to go to the new site. This will undoubtedly have a detrimental effect on the traffic in Brecon as children from Cradoc will need to be transported across the river from the Cradoc side of Brecon to the new site. This extra traffic will presumably be using the already congested route into town and then add to the considerable queues at the junction at the bottom of Priory Hill? The more direct route via Llandew is unviable for minibuses due to it largely being a single carriageway road. Together with not being environmentally friendly, this would disadvantage al pupils as they would be forced to travel further.	As above.

3.8.4.15	<p>When travelling into Brecon town in the morning anywhere between 8am and 9am congestion is a major issue. I am one of many that would have to travel via Priory Hill and past the Cathedral to reach the new school site. The road along Priory Hill is more often than not a single lane road due to parked vehicles on the one side and passing during any time of the day can be time consuming and difficult. If the new school does go ahead then this will add to congestion levels in town which in turn will increase carbon emissions. In addition the stretch of road from the Cathedral down to the Struet has a very narrow pavement in places which is already dangerous for pedestrians. The footfall along this stretch of road is likely to increase during busy periods (8 am to 9am and 3pm to 4pm) with parents etc walking to the new school site, which in turn creates an even more dangerous situation. The pavement is not passable in places without the need to actually walk on the road.</p>	As above.
3.8.4.16	<p>Have the decision makers at Powys you tried driving through Brecon (either over Watergate Bridge or down The Cathedral Pitch) which are the two main routes to Penlan? Both routes are very congested already at The School run times. There is a tremendous amount of traffic, noise pollution, fumes and wasted time stuck bumper to bumper in vehicles already. Surely The Council does not want to be adding to this. Is Powys County Council aware of how busy the Penlan area of Brecon is without adding to it further as per their Proposals? At the moment, this is one of the main routes out of Brecon Town Centre. In addition, there is a leisure centre, High School, athletics track and a large housing development opposite (Hogan Park) which will carry on for some time. Extra traffic will bring extra problems and road safety issues to this area.</p>	As above.
3.8.4.17	<p>It is unlikely that current road and access infrastructure will cope with having the High School, Ysgol Y Bannau, Leisure Centre, College and 3 Primary schools plus the athletics complex effectively on the same site. Traffic at the junction of the B4602</p>	As above.

	and the B4061 and Camden Road traffic lights would be gridlocked every morning and evening.	
3.8.4.18	A 360 pupil school on the proposed site will increase congestion in this area, make it more difficult for ambulances to negotiate along the road in emergencies and create rat runs in the Belle Vue & Cerrigcochion Lane areas of Brecon & increase journey times for pupils. Have Powys County Council taken into consideration the extra traffic that will be on Cerrigcochion Hill and the impact this will have on the ambulance station?	As above.
3.8.4.19	The B4520 travelling south into Brecon at 'rush hour' morning and evening can already be considered as congested; this proposal is only going to increase this issue.	As above.
3.8.4.20	A very high risk of traffic accidents as the infrastructure is already showing signs of weakness, e.g. giving road safety issues and public highway problems.	As above.
3.8.4.21	Increase of vehicles posing further risk to those children who would walk or cycle.	As above.
3.8.4.22	More parents driving their children to school rather than walking/cycling would have a huge impact on Brecon which is already suffering from traffic tail backs. The reason for the resurfacing work in Brecon being moved from day time to evening was said by Powys County Council to be "due to the sheer volume of traffic now in Brecon". Those parents/carers coming through the Llanfaes part of Brecon will have to go through 8 sets of traffic lights and a zebra crossing to get to the Penlan site. Two of the set of traffic lights are used by parents walking their children to Llanfaes School. There are already very long tail backs in Llanfaes and the extra traffic will exacerbate the situation. To avoid two sets of traffic lights parents/carers could choose to drive through Brecon which would again increase the traffic in the centre of the town.	As above.
3.8.4.23	So much traffic in one place can't be good for the air quality.	As above.
3.8.4.24	Traffic will also be increased in the Priory area of Brecon which will impact on parents/carers taking their children to Priory School.	As above.

3.8.5 Concern about pupils' ability to access after-school activities

3.8.5.0	<p>Response from Estyn:</p> <p>The proposal does not detail how it proposes to address travel issues related to after school activities</p>	<p>The Council has recognised within the draft Community Impact Assessment that it may be challenging for pupils currently attending Cradoc C.P. School to access after-school activities following implementation of Phase 2 of the Proposals. However, schools can offer extra-curricular activities during the school day as well as after school. It would be an expectation of the new Curriculum that schools provide additional experiences for their pupils.</p> <p>Many schools in Powys have pupils who are using home-to-school transport, and are experienced in ensuring that all pupils are able to participate in extra-curricular activities. Schools can work with families to provide an appropriate level of extra-curricular activities for pupils, including clubs within the school day, shared transport with other parents etc.</p>
3.8.5.1	Due to this additional travel distance, children from outside Brecon are less likely to be able to access after school activities.	As above.
3.8.5.2	Pupils may not be able to access afterschool clubs and activities.	As above.
3.8.5.3	The clubs and activities which are so much a part of the school could be inaccessible to those who have to travel longer distances by bus; working parents would have to rely on this transport.	As above.
3.8.5.4	The Council acknowledges that there could an impact on pupils' ability to access after-school activities for the children in the Cradoc area. This does not strike me as an enhanced opportunity.	As above.
3.8.5.5	Cradoc school provides excellent wrap around care for local children, many of whom are from rural families. To expect parents to drop off and pick up from the Penlan site will involve excess travel and wasted time, as well as cost.	As above.

3.8.6 Queries about The Council's transport policy

3.8.6.1	I understand Powys County Council's current free school transport policy is to offer children free transport to their nearest school, a school on the Penlan site would not be the nearest school, Priory would. Who will fit the bill for the 'additional transport' required to the new school?	<p>As stated in the Consultation Document published in respect of this proposal:</p> <p><i>'Initially, home to school transport would continue to be provided to eligible pupils to the three existing sites in accordance with The Council's transport policy which is available at https://en.powys.gov.uk/article/7223/Home-to-School-and-College-Transport-Policy</i></p> <p><i>Upon the opening of the new build, transport will be provided for eligible pupils attending the school at the time to the new building. Following the move to a new building, transport would be provided to eligible pupils in accordance with the home to school transport which is in operation at that time.'</i></p> <p>Once the new school is established, the Council will redefine its catchment, and transport would be provided to the new school for all pupils living within its catchment.</p>
3.8.6.2	As funded school transport is only available to the nearest school, does that mean those who are currently using the service will only be taken as far as Priory School rather than the proposed site of the new school in Brecon.	As above.
3.8.6.3	Free school transport is only provided to the nearest school: if Cradoc were to close, that would then make Priory School the closest. Can you guarantee free transport to the new school to all future siblings?	As above.
3.8.6.4	The nearest school to the majority of Cradoc pupils would be Priory School, so would that indicate that siblings could find themselves attending different schools as Powys would not be under any obligation to transport them other than to the nearest school, this would lead to a huge dilemma for parents if they needed to collect children at the end of a school day.	As above.

3.8.6.5	This new school won't even be the closest school to many children as there are two schools that would be closer. How is this going to affect the free travel that the children are entitled to?	As above.
3.8.6.6	Cradoc children will be nearer other schools – next you will lose appeals for others to have transport to schools further away. Beware, you will regret it in the future.	As above.
3.8.6.7	You will open a can of worms transporting children past their nearest school.	As above.
3.8.6.8	If the proposed location (old Brecon H.S site) is further away than a child's nearest alternative school, will The Council continue to pay school transport indefinitely to that further school location, for current and all future pupils of our catchment?	As above.
3.8.6.9	Free transport is provided to the nearest school and for many Cradoc pupils that will not be the new Penlan site school, will these pupils then attend Sennybridge or Priory?	As above.
3.8.6.10	What is your policy on distance a child should travel to school?	The Council does not have a defined maximum distance for children travelling to school. As stated in the Council's Home to School Transport Policy: <i>'Journey times: In assessing the travel needs of learners, the local authority will consider the fact that travel arrangements must be safe and reasonable. In accordance with the Learner Wales Operational Guidance, the authority will aim to ensure that, except in exceptional circumstances, a learner being transported to their nearest mainstream school/site will have an appropriate journey time for the school they are attending, and the geographical area they live in.'</i>
3.8.6.11	The statement by officers in the GB meeting that the catchment area map would be produced for Cabinet when in fact it has been in existence for several months has not been shared in the consultation. From comments made it appears that the catchment area map can be redrawn at will and transport policies adapted to suit.	Catchment maps are not currently available to the public as The Council is currently in the process of agreeing the final definitions before further consultation with schools.

3.9 Pupils would transfer to other schools

3.9.1	Parents won't walk past Priory or Llanfaes Schools to then walk further up a steep hill to the Penlan site.	Comment noted. Parents can apply for a place at whichever school they choose, and should the Council proceed with the Proposals, parents could apply for places at Priory or Llanfaes Schools should that be their preference. Places will be allocated in accordance with the Council's Admissions Policy.
3.9.2	School buses will be passing Priory School on the way to the Penlan site, so Priory School is a better fit for a merger with Cradoc School.	Comment noted.
3.9.3	Powys are going to see a massive impact financially – as per the Community Impact Assessment a number of parents will move their children to Sennybridge with the possibility of them then going a school out of the area will be a huge financial impact on The Council.	Comment noted. Parents can apply for a place at whichever school they choose, and Should the Council proceed with the Proposals, parents could apply for places at Sennybridge School should that be their preference. Places will be allocated in accordance with The Council's admissions policy.
3.9.4	I would not send my 3 children back to a town primary school, they'd have to get to Sennybridge which will cause added stress to me as a working mother too.	As above.
3.9.5	It is a significant risk that rural children will go to Sennybridge school and the new school at Penlan will have surplus spaces.	As above.
3.9.6	Some of them would be bussed to Builth/ some would choose to take them to another Brecon school, some would go to Sennybridge or maybe a Welsh school.	Comment noted. Parents can apply for places at whichever school they choose, and Should the Council proceed with the Proposals, parents could apply for places at alternative schools should that be their preference. Places will be allocated in accordance with the Council's Admissions Policy.
3.9.7	Some parents may choose to send their children to another school, probably an alternative rural school, which will split friendship groups, providing even more instability for the children.	As above.
3.9.8	If this was to happen, I would have no alternative but to move my children from mount street to a school closer to me as the site is 2 miles from where I live.	As above.
3.9.9	The top area of the are currently served by Cradoc School would be bussed to Builth, the West would probably go to Sennybridge and the rest would choose one of the town schools. Friends that are made in Primary school can stay with you throughout your life	As above.

	and this wouldn't be an option in a divided community which would happen if Cradoc School were to close.	
3.9.10	If as is planned separately - a new school is built in Sennybridge it is very likely pupils from Cradoc will transfer there as opposed to coming to a new school in Brecon which won't be as accessible. This appears to be born out in the figures proposed that PCC is building a 180 place school in Sennybridge which currently only has 126 pupils on roll. The proposed new school (Phase 2) in Brecon is indicated to have only 360 places when the total of all pupils currently attending the three schools (Cradoc, MSJ, MSI) is 420.	The capacity figure provided for the proposed new building is indicative at this stage. As outlined on page 17 of the Consultation Document : <i>'Initially, the new school would operate on the three existing sites, and the capacity would reflect their combined capacities. The capacity of the new primary school would initially be 420.</i> <i>Based on the PBC approved in September 2020, the intention is that the new school would move to a new building which would accommodate approximately 360 pupils – the capacity of the new school would need to be further assessed during the design stage.'</i>
3.9.11	If the school were to close the next nearest primary school for the majority of pupils would be Priory Church in Wales School in Brecon (not the proposed new school on the Penlan site). With this in mind does Priory have space for these prospective new pupils?	As of 1 st October 2021, Priory C. in W. School's NOR is 154. The school's capacity is 165.

3.10 Queries about admissions arrangements

3.10.1	Would future siblings even get a place in the new school as the proposal states "Future pupils would apply for a place in accordance with the usual admission arrangements."? If Priory is the closest school, would future pupils not come under that catchment? Would our children have priority over other placements?	If the school is oversubscribed, the Council's Admissions Team would consider applications based on the over-subscription criteria outlined in the School Admissions Policy, which includes siblings already in the school.
3.10.2	Parents of the children from Cradoc School will be passing either Priory or Llanfaes schools on their way into Brecon. It follows therefore that they will send their children to those schools. What will happen if Priory and Llanfaes schools become over-subscribed and the new school is empty?	As above.

3.10.3	Although pupils currently attending the 3 schools would be allocated places at the new school, can Powys County Council guarantee that their siblings will be able to attend the new school?	As above.
3.10.4	The Council are not giving any guarantee that the children of Cradoc will even have a space at this new school	As above.
3.10.5	There is a lack of clarity about the admission criteria for the new school and Yscir Community Council is concerned that some area of the ward may not gain a place or free transport to the new school.	Parents would be able to apply for a place for their child at any school. If Priory and Llanfaes become oversubscribed, The Council's Admissions Team would consider applications based on the oversubscription criteria outlined in the School Admissions Policy, which includes siblings already in the school.
3.10.6	The proposal to close Cradoc School would have a devastating impact on an already impoverished area of Powys. To have no rural school in that area and then not to be able to guarantee that children from Cradoc would always have priority into the new school is disgraceful.	All pupils currently attending the three affected schools would have a place in the new school should it be established.

3.11 Other comments / queries

3.11.1	Merging 3 primary schools into one super primary school is an incredibly asinine and short-sighted idea!	<p>The Council is committed to providing the children and staff of the three schools with a high-quality learning environment, which will include modern, purpose-built facilities and technology fit for the 21st Century, further enhancing the school's ability to implement the new Curriculum for Wales, for the benefit of all pupils. Phase 1 of the Proposals, establishing a new school initially on the current three sites, is a fundamental step in realising the outcome of Phase 2, which is the construction of a new school building as this will enable the school's governors, staff, pupils and parents to have an input into the design of their new school.</p> <p>The intention of these Proposals is to merge the three schools to become one school, with the schools staying on their current sites temporarily until they transfer to the new building.</p>
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		<p>Estyn, in its response to this consultation, has stated:</p> <p><i>'The proposer notes the enhanced opportunities for pupils and staff and the wider range of facilities that will be available in the new school. It also refers to the benefits to staff and pupils that would arise as a result of sharing staff expertise and good practice. It is fair to assume that it is likely that experiences for learners would improve with a modern, purpose-built school as proposed in phase two of the development.'</i></p>
3.11.2	All three schools have expensive apparatus, some of it very new and built in to the grounds, meaning it would waste money if we just abandon them and move to a different building.	Comment noted.
3.11.3	My child has THRIVED in MSIS and I know he would not do as well in the "clinical" environment you want to provide. Our children should be put first ALWAYS! this new school is in no of their best interests.	Comment noted. The aim of the Council's Strategy for Transforming Education is to improve learner entitlement and experience for pupils, now and in the future.
3.11.4	I felt that from the cabinet meeting, there were some sweeping statements made about how this new school would ultimately benefit all of the children. I wholeheartedly disagree. A shiny new building may sound appealing to some, with state of the art equipment. However, I believe that there is far more to a school than bricks and mortar. A primary school is a place where children from the age of four, spend seven years, the most influential years of their lives, and so this decision to close Cradoc should not be considered without realising every consequence. I believe that the children of Cradoc deserve better. They have the right to attend a smaller, rural school, in the heart of their community.	<p>The Council fully acknowledges that a building alone does not improve the performance of a school / pupils. However, the children of these schools deserve to be taught in a high-quality learning environment, which will include modern, purpose-built facilities and technology fit for the 21st Century, further enhancing the school's ability to implement the new Curriculum for Wales, for the benefit of all pupils.</p> <p>Estyn, in its response to this consultation, has stated:</p> <p><i>'The proposer notes the enhanced opportunities for pupils and staff and the wider range of facilities that will be available in the new school. It also refers to the benefits to staff and pupils that would arise as a result of sharing staff expertise and good practice. It is fair to assume that it is likely that experiences for</i></p>

		<p><i>learners would improve with a modern, purpose-built school as proposed in phase two of the development.'</i></p> <p>The intention is to introduce the Proposals on a phased basis, meaning that pupils would initially continue to attend school in the same location. Should the Council proceed with the plans to provide a new building, pupils would transfer to the new building with their existing staff, meaning that these staff would be available to support the transition to the new building.</p>
3.11.5	It would seem that PCC are trying to offer a shiny new school to tempt everyone into thinking that the performance of the schoolchildren will improve with a new building. This is not the case, in my view performance and the excellence of a good education comes with the quality of teachers and the environment in which the children are taught.	As above.
3.11.6	I don't see how the new building has any positive impact on the children's education. Children learn best with nurturing. It isn't about the equipment or the technology, it is about the time spent with teaching staff.	As above.
3.11.7	Your timescales of having a new school built by 2024 are unrealistic and hugely underestimated, take your Welshpool School project as an example, the plan was approved in 2015 and you have only now just completed it 6 years later. You have also gone massively over budget.	Comment noted. The timescales provided were indicative and are always subject to change. Should the Council proceed with the Proposals, the timescales will be reviewed and updated timescales will be provided in the Statutory Notice, should there be a need to publish a Statutory Notice.
3.11.8	Powys County Council is not confident of the timescale as it is stated September 2024 at the earliest.	As above.
3.11.9	The only apparent benefit Phase 2 of the Proposals would yield, would be that the daft situation resulting from Phase 1 of the proposal would end.	Comment noted.
3.11.10	I hope these new builds will be more environmental with better standards than most cheap new builds and leave existing mature trees where they are.	Ensuring the highest possible environmental standards is a key factor when developing new buildings.

3.11.11	<p>If this new school could provide better parking area for drop off and pickups, that would help really. Currently, Mount Street Junior and Infant Schools have massive problems with that. For example, I have two kids, and one at each school and there are 4 different time for pickup/drop off with the window of 10 min. That is a massive problem to manage especially with not enough parking spaces.</p>	<p>Comment noted. Providing appropriate arrangements would be a key consideration when developing a new building.</p>
3.11.12	<p>Powys County Council are unsure how many pupils they will be building a new school for. Numbers vary from 349 to 414.</p>	<p>The capacity figure provided for the proposed new building is indicative at this stage. As outlined on page 17 of the Consultation Document :</p> <p><i>'Initially, the new school would operate on the three existing sites, and the capacity would reflect their combined capacities. The capacity of the new primary school would initially be 420.</i></p> <p><i>Based on the PBC approved in September 2020, the intention is that the new school would move to a new building which would accommodate approximately 360 pupils – the capacity of the new school would need to be further assessed during the design stage.'</i></p>
3.11.13	<p>The creation of a new school building to accommodate a smaller number of pupils overall (420 down to 360) implies that the Local Authority has assumed that pupils will transfer to other schools in the amalgamation period. This would lead to job losses at this stage given the expected fall in pupil numbers and could result in potentially 2 teachers and TAs losing their jobs.</p>	<p>As above.</p>
3.11.14	<p>We currently have approx. 400 pupils across all 3 sites but the outline plan for the new school is 360. This indicates that if the amalgamation is to go ahead the new school will lose pupils to other schools. It would seem pertinent to point out at this time, the new plan for Sennybridge school is well over current capacity so one can only assume that this implies an assumption that if the amalgamation were to go ahead a large percentage of pupils would transfer to Sennybridge school. With 40 less pupils this would be at least 2 teaching jobs and possibly teaching assistants</p>	<p>As above.</p>

	too. Even in the time before the new school is built (if ever) the anxiety of possible changes always causes parents to make changes around their choices for school.	
3.11.15	No clear thinking and outcomes about the other services and community facilities being proposed in Brecon – for example early years centre, new community pool, pupil referral unit and how these might affect all the other schools in the Brecon Catchment or be better linked to or aligned with the overall education provision and accessibility to services within Brecon – ie demonstrating a joined up approach to improving services and education across the board.	Comment noted.

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4. OTHER COMMENTS

4.1 GENERAL COMMENTS ABOUT THE IMPACT ON PUPILS

4.1.1	It seems that the mental well-being of children have most certainly not been taken into consideration. Very disappointing.	<p>The Council fully acknowledges that all school reorganisation proposals cause a period of uncertainty for those affected by the Proposals, including pupils, and that the Covid-19 pandemic has caused further challenges over the last 18 months or so. Whilst acknowledging that it would have been preferable had the consultation taken place at a time when there wasn't an ongoing pandemic, it has been necessary for the Council to continue with the development and consultation on Proposals during the current pandemic in order to address the issues raised by Estyn regarding the organisation of its schools.</p> <p>The Council is committed to supporting schools and learners, including through periods of change. An experienced member of staff from the Council is supporting school leaders effectively, to help them manage possible changes for their learners. It is also expected that school governors, staff and parents support the children to ensure that there isn't a detrimental impact on their wellbeing.</p> <p>The intention is to introduce the Proposals on a phased basis, meaning that pupils would initially continue to attend school in the same location. Should the Council proceed with the Proposals, pupils would transfer to the new building with their existing staff, meaning that these staff would be available to support the transition to the new building.</p>
4.1.2	I have concerns that the plans are not in the best interests of the mental or physical health of the children affected. Mental health - Change of staffing, uniform, school identity, school location and size, parental discontent and anxiety- will unsettle children greatly.	As above.

	It is vital to account that this cohort are living through the biggest global disruption to society since the Second World War.	
4.1.3	This proposal will affect the well-being of all pupils at Cradoc School. Pupils have been through enough recently during the global pandemic there need to be a dog is on pupil well-being and mental health.	As above.
4.1.4	The children of Cradoc school, like any other child is experiencing a Global pandemic (Covid19). In addition to this, Cradoc school children are now experiencing the distress of the 'unknown'; will their school be closed? Will they be separated from friends and family? What will happen to their teachers? I feel upset that these Proposals are being made during such troubled times and the impact it may be having on the children's wellbeing.	As above.
4.1.5	Surely this past 12 months with the Pandemic has been enough of a hardship for the children, to now take away their safety of their school and their friends is abhorrent. I urge you to consider the children. At present it is all about money, not the children's wellbeing.	As above.
4.1.6	The children who attend these schools have gone through unprecedented times in the last 12 months - no one knows what impact these last 12 months will have on the mental well-being of the children in the near future, not to mention the amount of school education time that has already been lost due to coronavirus. I find it staggering that instead of investing resources into dealing with the fallout from the pandemic, Powys County Council are putting a proposal like this forward. Children need stability in their school lives to be able to thrive and I feel this proposal will not provide that.	As above.
4.1.7	The last 14 months has had a significant impact on all of us, our children even more so. They have already lost out on so much over the last year, educationally and socially. Was this really the time to start these proceedings? Having experienced the effects of a global pandemic children are now prospectively facing the closure of their school, creating a sense of worry and concern for them. Was the well-being of our children seriously considered when the timing of these Proposals were announced?	As above.

4.1.8	Pupils have already gone through the upheaval of a pandemic and have a lot of catching up to do, so less change at the moment would be better for them.	As above.
4.1.9	The disruption of the last 12 months will have a long-term impact on children attending these schools. The Covid pandemic is far from over and the impact on the children's education will be ongoing. The children will be attempting to catch up, build on educational progress and foster emotional development and wellbeing, against a background of uncertainty. Surely PCC's priority must be on settling the children back into education as opposed to further disruption? There will be ongoing impact of the disruption from both COVID and this proposal for PCC as well as the children in terms of outcomes and educational reputation.	As above.
4.1.10	The Covid-19 pandemic has had a devastating impact on the school community and changed forever the formative experiences of the children. The focus of the school staff, families and children needs to be on the establishment of routines to rebuild progress in skills across the whole curriculum. This proposal potentially will cause years and years of continued disruption for these children.	As above.
4.1.11	The affect that Covid 19 has had upon children who have not yet entered education system is still an unknown. Many children will not have interacted with adults or children of their own age. No playgroups, playdates, or exposure too many different environments and experiences with little support given by Health Visitors and professionals over this challenging time. We envisage children entering school over the next few years, who will need more nurturing in smaller groups than ever before. We would hope that you will think carefully about the impacts of an amalgamation while we grapple with the consequence of children being in lockdown in their first years of life.	As above.
4.1.12	COVID-19 has caused huge disruption for our children and to cause another 2 periods of disruption is totally unacceptable. We will be reaping the educational repercussions of COVID-19 for decades. The well-being of pupils at Mount Street Infants School must be paramount. Anxiety levels amongst pupils and parents continue to	As above.

	be high due to the pandemic and these Proposals are adding to those anxiety levels. Does Powys County Council agree that during a global pandemic is not the correct time to cause further anxiety for our pupils?	
4.1.13	Will an assessment be undertaken to determine the impact of COVID on children's education before embarking on further change which could prove detrimental to their educational progress?	The Council is monitoring the impact of Covid on all pupils.
4.1.14	Covid is here to stay and children are likely to remain an un-immunised group for at least the medium term, and uptake is likely to be less in this group if vaccination becomes policy. Could PCC please explain its plans and accountability strategy with the above in mind?	The Council would provide support and guidance to the new school in dealing with Covid-19 in the same way as it provides support and guidance to every school.
4.1.15	<p>Response from Estyn:</p> <p>The proposal does not address how the wellbeing of the children in the village will be sustained when the only play area in the village is lost with the closure of the school.</p>	Should the Council proceed with these Proposals, then the Cradoc C.P. School building would eventually be declared surplus following the move to a new building. All surplus assets are subject to the process of disposal as outlined in the Council's Asset Management Policy. Whilst it is possible that this could lead to sale of the sites to third parties, some schools that have closed have been transferred to other service areas e.g. housing or to a community - with the latter, this may allow for the space to be retained or developed for community use. This could enable the facilities to be retained for community activities, including as a play area.

4.2 GENERAL COMMENTS ABOUT THE IMPACT ON STAFF

4.2.1 Concern that headteachers will lose their jobs

4.2.1.1	What will happen to the three headteachers?	Ensuring that staff are treated fairly throughout any process is a fundamental and important principle. Should the decision be to go ahead with the Proposals, then the Council would
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		<p>work with the temporary governing body, which would be responsible for agreeing the staffing structure. Its first task would be to appoint a headteacher to the new school, and followed by the senior leadership team and then the whole school staffing structure.</p> <p>Once a staffing structure has been developed, all staff would enter into a formal period of consultation outlining all the positions available in the new school and the process by which staff move into those roles.</p> <p>The Council has produced a Management of Change Principles document, that all temporary governing bodies are requested to adopt, so that staff can be transferred to positions where this is possible. This work is carried out in conjunction with all the recognised unions for both teaching and non-teaching staff. HR work alongside staff through the formal process, and also informally to offer support, recognising that any period of change can be unsettling.</p> <p>Until any new staffing structure is prepared for consultation, it is not possible to know the impact on current staffing levels, however, it is expected that there would be minimal for current staff during Phase 1 of the Proposals, although it is recognised that there would be an impact on the current headteachers from the start of Phase 1.</p> <p>However, there would be opportunity for the current headteachers to be considered for any posts within the new school. A temporary governing body can, under certain circumstances, ringfence the positions of headteacher and deputy headteacher to those currently in these positions, rather than go to a national advert (as would normally be the case for a headteacher position). This would therefore be a decision for any temporary governing body.</p>
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		However, there would need to be a formal consultation process to ensure that the process was carried out fairly and legally and to try and avoid any compulsory redundancies.
4.2.1.2	All three head teachers could end up LOSING THEIR JOBS.	As above.
4.2.1.3	I feel very sorry for the 3 headteachers of the respective schools as it is plainly obvious that all their jobs will be at risk as there will only be 1 headteacher needed for this amalgamation.	As above.
4.2.1.4	It is also immoral that at least 2 Headteachers will lose their jobs.	As above.
4.2.1.5	Two head teachers will lose their jobs.	As above.
4.2.1.6	We could lose all three brilliant head teachers as you would need to open the advertisements to the new head teacher post nationally and there would be no guarantee that any of them would be retained.	As above.
4.2.1.7	Two heads will lose their jobs (possibly all three as the posts will be externally advertised).	As above.
4.2.1.8	Given the current pandemic and the rurality of Powys, making potentially three people redundant is not supporting The Council's residents or helping to keep money in the area.	As above.
4.2.1.9	In the Welshpool Consultation report November 2016 it states "Once the shadow governing bodies have been established, one of their first priorities will be to appoint Headteachers. They can decide to advertise the position or they can ringfence the position to the current headteachers". In a meeting with Powys County Council Officers staff were told that the Headteacher's position and the deputy Headteacher's position would not be ringfenced. Why has the advice changed from 2016?	As above. The advice has not changed but it is a decision for any temporary governing body to make and therefore not a decision that would not have been made yet.

4.2.2 Concern that other staff will lose their jobs

4.2.2.1	There is insecurity for staff as regards their jobs also.	Ensuring that staff are treated fairly throughout any process is a fundamental and important principle. Should the decision be to go ahead with the Proposals, then the Council would work with the temporary governing body, which would
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		<p>be responsible for agreeing the staffing structure. Once a staffing structure has been developed, all staff would enter into a formal period of consultation outlining all the positions available in the new school and the process by which staff move into those roles.</p> <p>The Council has produced a Management of Change Principles document, that all temporary governing bodies are requested to adopt, so that staff can be transferred to positions where this is possible. This work is carried out in conjunction with all the recognised unions for both teaching and non-teaching staff. HR work alongside staff through the formal process, and also informally to offer support, recognising that any period of change can be unsettling.</p> <p>Through the current Management of Change Principles, it is advised that posts are ringfenced to those already employed across the current schools and it is within the Council's policies to avoid compulsory redundancies if at all possible.</p> <p>Until any new staffing structure is prepared for consultation, it is not possible to know the impact on current staffing levels, however, it is expected that there would be minimal for current staff during Phase 1 of the Proposals, although it is recognised that there would be an impact on the current headteachers from the start of Phase 1.</p> <p>Once any school reorganisation proposal is approved by Cabinet, HR officers work with schools to ensure that there is flexibility in staffing - for instance recruiting to existing vacancies on a fixed term basis to provide greater security for permanent members of staff.</p>
4.2.2.2	The merger of all 3 schools is already causing all staff to feel undervalued with a loss of job security.	As above.

4.2.2.3	The plans will result in teachers losing their jobs and will impact on staff morale.	As above.
4.2.2.4	I feel that a number of highly experienced and effective teachers will be lost through this process.	As above.
4.2.2.5	There is a risk that not all staff will secure positions in the new school.	As above.
4.2.2.6	Will there be opportunities for voluntary redundancy is staff do not want to work in the new school or with a different headteacher?	As above.
4.2.2.7	Where is the consideration for the teaching staff in the 3 schools? It is plainly obvious that some of them will lose their jobs from this proposal. It is assumed by Powys County Council that teachers will benefit from teaching in the new prospective school – how will they benefit if they have lost their jobs I ask you?	The Proposals' impact on staff is considered on page 23 of the Consultation Document , and is also considered in the draft impact assessment document. The draft impact assessment document will be updated to reflect comments received during the consultation period, and an updated version will be considered by the Council's Cabinet when determining whether or not to proceed with the Proposals.
4.2.2.8	Do all new staff have to reapply for their jobs? This has been branded as a positive for staff. How is risking job security a positive?	All temporary governing body are requested to adopt the Management of Change Principles. Once a new staffing structure is developed and consulted upon, there may be opportunities for roles not available in smaller schools e.g. TLR positions; middle management roles. Staff may need to apply for any new roles but, through the current Management of Change Principles, it is advised that posts are ringfenced to those already employed across the current schools.
4.2.2.9	If the schools were to be amalgamated, I feel the teaching positions should be offered to the teachers and teaching assistants currently working there first. They need to have priority and shouldn't have to go through a full interview process, together with other teachers who never worked at any of the schools before. It would be unfair to take away their jobs and tell them they all have to interview again. They are all doing a fantastic job and need to be treated with respect!	As above.

4.2.2.10	Teachers will have to find a new school to teach or find a new job altogether and that may be hard.	As above. In addition support is given in the management of change process for staff to consider redeployment or other positions if this were required.
4.2.2.11	Concern about loss of a well-established team of Foundation Phase experts.	Any new staffing structure would look to build and consolidate expertise from amongst the current staff.
4.2.2.12	Most teachers won't be able to get to the new school and will lose their jobs.	Any specific staffing issues would need to be addressed during the formal staffing consultation when staff would be able to raise any particular issues.
4.2.2.13	The job loses that this will create are coming at an entirely wrong time, just as we are attempting to rebuild our economy following the crisis of the past year.	Until any new staffing structure is prepared for consultation, it is not possible to know the impact on current staffing levels, however, it is expected that there would be minimal for current staff during Phase 1 of the Proposals, although it is recognised that there would be an impact on the current headteachers from the start of Phase 1.
4.2.2.14	The health and well-being of the remaining staff and the uncertainty of jobs in the new setting would have a huge impact of the remaining time as individual entities. Even-though their individual professionalism will still continue their empathy for the establishment will be affected.	<p>The Council recognises that all school reorganisation proposals create a period of uncertainty for all involved, including staff. Should the Proposals be implemented, then HR officers would work alongside school staff through the formal process, and also informally, to offer support whilst recognising that any period of change can be unsettling.</p> <p>Staff would also be able to receive support from their unions and they will also have access to the Employee Assistance Programme for Powys currently delivered through Carefirst.</p>
4.2.2.15	The emphasis on improved professional learning and career progression for teachers is misleading. This could easily be obtained through better working links and staff sharing arrangements between the schools. They don't need to merge for this to happen.	The Council is of the view that the opportunities for professional learning for all staff would be greater if the schools were merged as one school as this would be a regular aspect of staff training and INSET.
4.2.2.16	I realise the plan is to give more leadership to other members of staff, eventually, but this is not something that the staff themselves want. They already have so much to do that having extra responsibilities would be overwhelming for many and mean that	Whilst there would be more opportunities for leadership roles and TLRs for those that wished to take on these roles, staff would have an opportunity to comment on specific jobs and roles during the formal staffing consultation period.

	their attention is removed from what really matters, and that is the education and welfare of the children.	
4.2.2.17	I am concerned that staff well-being will also be negatively impacted, especially when a new leadership structure will mean a change of role for a number of staff.	As above.
4.2.2.18	It seems that the mental well-being of the staff have most certainly not been taken into consideration. Very disappointing.	The Council recognises that all school reorganisation proposals create a period of uncertainty for those involved, including staff. Should the Proposals be implemented, then HR officers would work alongside school staff through the formal process, and also informally, to offer support whilst recognising that any period of change can be unsettling. Staff would also be able to receive support from their unions and they would also have access to the Employee Assistance Programme for Powys currently delivered through Carefirst.
4.2.2.19	Does PCC have the resources to provide adequate support for staff and the schools for a transition of 4-5 years or longer?	Each school has HR support ongoing to support such transition.
4.2.2.20	It will also not provide stability for teachers who will have to get used to another way of running the school.	Comment noted
4.2.2.21	Education staff have been amazing through the pandemic and this is how you plan to repay them!	Comment noted
4.2.2.22	Staff will be able to apply for positions at the new school but can Powys County Council guarantee that all current staff who desire a position will be able secure a position?	All temporary governing bodies are requested to adopt the Management of Change Principles prior to developing a new staffing structure. Once a new staffing structure is produced and consulted upon, there may be opportunities for roles not available in smaller schools e.g. TLR positions; middle management roles. Staff may need to apply for any new roles but, through the current Management of Change Principles, it is advised that posts are ringfenced to those already employed across the current schools and it is within the Council's policies to avoid compulsory redundancies if at all possible.

4.2.2.23	The Proposals would unnecessarily make hard working staff members who care about the children they teach and support redundant.	Until any new staffing structure is prepared for consultation, it is not possible to know the impact on current staffing levels, however, it is expected that there would be minimal for current staff during Phase 1 of the Proposals, although it is recognised that there would be an impact on the current headteachers from the start of Phase 1.
4.2.2.24	Will all jobs be ringfenced?	All temporary governing bodies are requested to adopt the Management of Change Principles prior to developing a new staffing structure. Once a new staffing structure is produced and consulted upon, there may be opportunities for roles not available in smaller schools e.g.TLR positions; middle management roles. Staff may need to apply for any new roles but, through the current Management of Change Principles, it is advised that posts are ringfenced to those already employed across the current schools.
4.2.2.25	Where do staff that are on temporary contracts stand in the recruitment process?	Staff that are on temporary contracts would be part of any formal consultation on the new staffing structure.

4.2.3 Other

4.2.3.1	The most recent Estyn report for MSIS states that “Professional learning opportunities for staff are excellent”. How will this proposal improve on excellent professional learning opportunities for our staff?	As excellent practitioners there would be an expectation that teachers shared their expertise. Working across a larger group of staff would be excellent professional learning for all staff.
4.2.3.2	COVID-19 has caused huge disruption for our staff and to cause another 2 periods of disruption is totally unacceptable. The well-being of staff should be of great importance to Powys County Council. The Education Minister has acknowledged the anxiety COVID-19 has caused and continues to cause staff. This proposal is adding to those anxiety levels as there is no guarantee that all staff will gain a position in the new school structure. Staff have shown dedication and determination during the pandemic. They have put aside their own anxieties to work initially in the hubs,	<p>The Council acknowledges that the Covid pandemic has caused disruption for staff, and acknowledges the role school staff have played in responding to the pandemic. The Council also acknowledges that any school reorganisation period causes a period of uncertainty for those affected by the Proposals,</p> <p>An experienced headteacher is working for the Council to support school leaders to help them manage possible</p>

<p>prepare home learning, to teach children of keyworkers and now they have all the children back in school. It does not show Powys County Council to be a caring employer when they reward such fantastic commitment and dedication with the additional worry and stress that this ill-conceived proposal is causing. This is also the case for catering and cleaning staff who have continued to work during the pandemic and now have the worry of job losses. Will Powys County Council admit that these Proposals are causing extra anxiety and stress for their staff during an already anxious time never before experienced by any living person?</p>	<p>changes for their staff and learners. In addition, staff wellbeing will be supported through the process by the HR team, their unions and they will have access to the Employee Assistance Programme for Powys currently delivered through Carefirst.</p>
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4.3 COMMENTS ABOUT THE IMPACT ON PARENTS / FAMILIES

4.3.1 Financial cost to families

4.3.1.1	<p>The amalgamation will possibly mean a financial cost for families if new uniforms are required.</p>	<p>It is acknowledged that should the Council proceed with implementation of the Proposals, there would be a cost to families in order to purchase new uniforms. Agreeing a new uniform would be a matter for the temporary governing body and the cost implications for families would be a consideration for the temporary governing body, both in terms of the design of the new uniform and the arrangements for phasing in the new uniform.</p>
4.3.1.2	<p>Will this merge require children to wear a new uniform? That would be extremely costly for parents, particularly of they are families of multiple children and if the child only has a short period left in the school before high school.</p>	<p>As above.</p>
4.3.1.3	<p>Changing the name and uniform will have an unnecessary cost implication for families with the introduction of new uniforms (also negating the option to obtain clothes second hand or pass down to siblings), many of whom are already struggling financially. This is also not ecologically sound to dismiss all uniform for three whole schools so flippantly.</p>	<p>As above.</p>

4.3.2 The proposal would remove choice for families

4.3.2.1	Children and their families should have the right to choose the school they wish to attend. By combining the schools you are unfairly taking away that right to equality and choice.	The Council recognises that parents can choose to apply for a place for their child(ren) in any school they wish, however there is no requirement for the Council to provide a choice of schools of certain types. There are currently 7 schools which provide primary education in the Brecon catchment. The current proposal is proposing to merge 3 of these schools, however there would still be 5 schools in the catchment which would continue to provide choice. This includes community primary schools, Church in Wales provision, a Welsh-medium primary school and a school located in a rural area.
4.3.2.2	I am angry that PCC is trying to restrict my choice of primary schools to two schools! I want to send my child to Cradoc school, not a church school or a superschool!	As above.
4.3.2.3	Parents should have a choice if they want their children to go to a town school or a country school:	As above.
4.3.2.4	Parents are having their choices taken away.	As above.
4.3.2.5	All pupils should have the right to an education in their home community. Parents and pupils have the right to choose.	As above.
4.3.2.6	The loss of each individual school which all have different strengths is taking away people's choices.	As above.
4.3.2.7	You will be removing parents' choices, please leave it alone!	As above.
4.3.2.8	Merging the schools together is REMOVING CHOICE for parents when choosing a school in Brecon. Llanfaes school is oversubscribed, so unless you live in that catchment area you will only be left with this new school or Priory school to choose from, and that is a church school!	As above.
4.3.2.9	If this school is closed my choice of schools for my child will be very limited. I will be left with a choice between this merged school and Priory school which is a church school. I don't want to send my child to a church school or a superschool, I want my child to go to her	As above.

	local school in her local community. The other closest school is oversubscribed so I can't choose that one.	
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4.3.3 Impact of loss of after school provision on families

4.3.3.1	There is no proposal for wrap-around care. Cool Kids @ Cradoc is an outstanding childcare facility which is very well used. Many working parents wouldn't manage without breakfast club, after school club and/or holiday club, all of which are run to such an excellent standard. I can personally say that my children absolutely love going and would happily go to holiday club all week, whether I am working or not!	<p>During Phase 1 of the Proposals, the current wraparound provision at Cradoc could continue to operate from the current site.</p> <p>Following implementation of Phase 2 of the Proposals, the intention is that pupils move to a new building located on the Penlan site in Brecon. Whilst no work has yet started on the designs of the proposed new building, the expectation would be that wraparound provision would be provided in the new building. It is acknowledged, however, that this would not be available in Cradoc – parents living in Cradoc would need to travel to Brecon to access this provision.</p>
4.3.3.2	Another great concern is the loss of the excellent Holiday/ Breakfast and After School Club provision offered at Cradoc, Cool Kids @ Cradoc. As a working parent I am heavily reliant on this service. Also, the potential loss of our excellent pre-school setting, 3@Cradoc. Powys does not provide transport for children of pre-school age and given the reduced hours of FPN provision currently offered there is the potential that families resident within our widespread catchment will be unable to transport their children themselves for these short periods, seeing children lose their FPN education entitlement through no fault of their own.	As above.

4.4 COMMENTS ABOUT THE IMPACT ON PROTECTED CHARACTERISTIC GROUPS

4.4.1 Impact on pupils with ALN

4.4.1.1 Reference to ALN Units

4.4.1.1.1	The schools have excellent units for SEN pupils.	The Council agrees with this comment.
4.4.1.1.2	Adequate provision needs to be given to children with learning difficulties, i.e., an ALN unit should be included. Both Mount Street Infants and Juniors are currently doing a fantastic job and have wonderful ALN units! They must remain and adequate funding must be given to give the children the support they need to remain in mainstream schools throughout their school careers.	<p>The Council recognises the value of the support provided by specialist provisions across the local authority. It has established a clear vision and strategy for SEN/ALN which aims to provide appropriate specialist education for pupils with ALN as close to their home as possible. The provision for pupils with the most complex needs has recently undergone a review and the Council has already begun a programme of improved provision.</p> <p>The Council has also been further reviewing the provision provided by its specialist centres and will produce a report of its findings in this area. This report will include the evaluation of specialist provision in the Brecon cluster. Any recommendations will be based on the needs of children and young people in the area. Having listened to the views of schools, the Council is currently reviewing the funding of specialist centres.</p>
4.4.1.1.3	Concern about loss/disruption to current units – ALN at MSI rated as excellent.	As above.
4.4.1.1.4	MS Infant School has an exceptional Additional Learning Needs provision – again borne out by the last school inspection. To see these vulnerable children, thrive in as “normal a school environment as possible” is heart-warming. I have witnessed many concerts/shows where they have performed in front of the whole school and audience (parent/grandparents and others) is a joy to behold and the joy that this brings to them is exceptional. There is a danger that this unit would be lost and the extremely vulnerable and disadvantaged children would suffer enormously.	As above.
4.4.1.1.5	My child is in the SEN class and I feel there is no thought given to the needs of these children. We have been told that there will be a provision but you cannot tell us what that is. It is not good enough! These are the most vulnerable children in the school	As above.

	and you have put NO consideration into their needs. It is disgusting!	
4.4.1.1.6	It is very concerning about the SEN Unit which is located at Mount Street infants and junior school being left underfunded and supported with no concrete plans within the report to secure its future with funding as it is a fundamental asset of the school. Will the funding be secured for the SEN unit and what will the SEN provision be like for staff and students when the 3 sites of the school combine?	As above.
4.4.1.1.7	Mount street infants has special needs unit which from the current proposed plans there is no mention of whether this will remain as part of the merger or new school.	As above.
4.4.1.1.8	Mount Street obviously have specialist centres which need to be accessible to all pupils.	As above.
4.4.1.1.9	Both Mount Street Infants and Juniors have ALN provision and specific expertise to educate pupils with severe and specific educational needs. They have separate units which without them pupils would have to travel a significant distance to attend school. For many the provision is so good that they can eventually reintegrate pupils into mainstream in the juniors if and when suitable.	As above.
4.4.1.1.10	Will the teachers currently teaching in the SSC (unit) class for children with learning difficulties etc still be teaching if the move goes ahead?	This will be considered as part of the review of the specialist provision.
4.4.1.1.11	The specialist provision in Brecon also serves the Gwernyfed catchment.	Comment noted.

4.4.1.2 Other comments about the impact on pupils with ALN

4.4.1.2.1	The impact on the individual learning needs of children with individual needs would be great if a larger school with a smaller ratio of staff were to be formed. These children need to feel safe and happy that their needs are to be met.	The Council will ensure that the needs of pupils with ALN are considered in the planning of any new school.
4.4.1.2.2	No thought for the impact on our most vulnerable and ALN pupils.	As above

4.4.1.2.3	Concern that this would be detrimental to most pupils with additional needs who need smaller classes, provision of 1:1 staff etc.	As above
4.4.1.2.4	When class sizes increase it's impossible to give the time and love to all pupils in the class as there isn't the time. Children with disabilities will suffer.	The Council's opinion is that pupils with ALN and those with disabilities would be equally well supported by larger schools. Where schools have larger classes with a high number of pupils with additional needs, there are processes and mechanisms within the Council to provide additional support and guidance as appropriate.
4.4.1.2.5	I think merging the schools together will be hard for pupils especially then with learning difficulties or get upset with change in routine. Moving schools will upset these children even more.	The Council accepts this comment. It will provide support for the transition of pupils with additional needs.
4.4.1.2.6	Concern about a loss in excellent practice in supporting children with additional needs, attachment difficulties and disabilities at MSI.	The Council is of the opinion that the good practice that currently exists will be shared at the new school.
4.4.1.2.7	How will ALN and SEN provision be improved? Will we have more staff to be able to give children better opportunities? At the infants we are very lucky that our headteacher focuses heavily on staffing to make sure we have high levels of staff to ensure that children are receiving the help they need in regards to ALN support within class.	The Council has a clear strategy for improving the provision for pupils with additional learning needs. The comments about the skills of the headteacher in deploying staff successfully to support pupils with ALN are accepted.
4.4.1.2.8	Concern that SEN provision would change due to the amalgamation. At present Mount Street Infants has a head teacher who has special interest in SEN and is a completely inclusive school. This is so reassuring and important for any parent, but the amalgamation and period of uncertainty changes that, and now there is cause for concern over what the future may hold.	As above.
4.4.1.2.9	Mount Street provides a great deal of support to children with additional needs and to move them to a bigger school will be of great concern to parents and children alike. Mount Street is a wonderful school where it is.	The Council does not accept this comment. Larger schools are also able to provide very effective support for pupils with additional learning needs.
4.4.1.2.10	No concrete plan has been provided for SEN children and the fact that they struggle to adapt in everyday situations. A possible new school / teachers/ bigger classes is not taking their needs	The Council recognises the value of the support provided by specialist provisions across the local authority. It has established a clear vision and strategy for SEN/ALN which

	and feelings into consideration and is quite frankly cruel. This would set them back in their learning progress as it could take months for them to adjust to the new surroundings and circumstances.	aims to provide appropriate specialist education for pupils with ALN as close to their home as possible. We have reviewed the provision for pupils with the most complex needs and have already begun a programme of improved provision. The Council has been further reviewing the provision provided by its specialist centres and will produce a report of its findings in this area. This report will include the evaluation of specialist provision in the Brecon cluster. Any recommendations will be based on the needs of children and young people in the area. Having listened to the views of schools, the Council is currently reviewing the funding of specialist centres.
4.4.1.2.11	There are no firm Proposals regarding the specialist unit. Why are facilities for vulnerable groups, including children with special educational needs only anticipated? Has PCC forgotten about our vulnerable groups?	As above.
4.4.1.2.12	Concern about the impact on pupils with autism from being in a larger school – in many cases children with autism do not respond well to such large places. According to statistics autism is greatly under diagnosed and children on that spectrum do not perform well in large noisy groups and find school very difficult, and there are many children that would find such a facility very difficult to deal with, mainstream education needs to be appropriate for all children.	The Council does not accept this comment. Larger schools are also able to provide very effective support for pupils with additional learning needs, including those with autism. The Council accepts that specialist support is needed for pupils with autism.
4.4.1.2.13	Mount Street Infants is currently recognised as a Learning with Autism school. This will be much harder to achieve in the larger school where overstimulation, sensory overload and meltdowns will be much more likely due to will additional processing required to process all the additional people on site.	As above.
4.4.1.2.14	Concern that there will be less support for the parents of children that have autism, who have relied on the current heads for support.	As above.
4.4.1.2.15	Concern that children with undiagnosed additional needs may slip through the net in a school of the proposed size as they won't be known as well and those with diagnosed needs won't	The Council does not accept this comment. Larger schools are also able to provide very effective identification, assessment and support for pupils with additional learning

	have the same level of continuity which is so important to enable them to their full potential.	needs. This is evident in other authorities in Wales where there are mainly larger schools and fewer small school.
4.4.1.2.16	Children with more complex needs may not get the extra support they need in a larger school and become lost in the system. This may put a bigger strain on schools such as Penmaes.	The Council does not agree with this comment. Larger schools are equally able to support pupils with additional needs. The Additional learning Needs and Education Tribunal Act (Wales) expects that most pupils with additional learning needs will access their local mainstream school. Special schools, such as Ysgol Penmaes, are for pupils with the most complex needs. The Proposals would not affect the numbers attending Ysgol Penmaes.
4.4.1.2.17	Children with Special Educational Needs have already been hugely impacted by the disruption in their education due to COVID-19 and are in desperate need of stability. These Proposals will mean another 2 periods of disruption which will negatively impact on vulnerable groups. Why are Powys County Council not preserving every little bit of stability for our children whose education has been disturbed as never before?	<p>The Council fully acknowledges that all school reorganisation proposals cause a period of uncertainty for those affected by the Proposals, including children with SEN, and that the Covid-19 pandemic has caused further challenges over the last 18 months or so. Whilst acknowledging that it would have been preferable had the consultation taken place at a time when there wasn't an ongoing pandemic, it has been necessary for the Council to continue with the development and consultation on Proposals during the current pandemic in order to address the issues raised by Estyn regarding the organisation of its schools.</p> <p>The Council is committed to supporting schools and learners, including through periods of change. An experienced member of staff from the Council is supporting school leaders effectively, to help them manage possible changes for their learners. It is also expected that school governors, staff and parents support the children to ensure that there isn't a detrimental impact on their wellbeing.</p> <p>Should the Council proceed with implementation of the Proposals, pupils would continue to attend school at the same location during Phase 1, which would provide a period of stability for them.</p>

4.4.2 Comments about English as an Additional Language

4.4.2.1	Mount Street is set up to cater for a large number of EAL students, and this would need to be protected.	Comment noted. Should the Proposals be implemented, then this would need to be a key part of the new school.
4.4.2.2	English as an Additional Language (EAL). The Consultation Document did not initially take into account the provision of the need to engage with and communicate with parents of children with.	The proportion of EAL pupils at each school is included in the Consultation Document, and the impact on these pupils is considered in the draft impact assessments. The draft impact assessments will be updated after the consultation period to reflect comments received during the consultation, and updated versions will be considered by the Council's Cabinet when determining whether or not to proceed with the Proposals.
4.4.2.3	Children who use English as a second language will not have the current level of support which they have in schools with a roll of 110/170	The Council does not agree with this comment. All schools are required to support children who use English as a second language, regardless of their size.
4.4.2.4	English as an Additional Language (EAL) how will this be supported across three schools fairly?	The new school's Headteacher and Governing Body would be required to ensure that support is distributed fairly across the three sites during Phase 1 of the Proposals.

4.4.3 Comments about race / ethnicity

4.4.3.1	Bullying due to race may be an issue for children in a bigger school.	There is no evidence of more bullying taking place in larger schools compared to smaller schools. All schools have anti-bullying policies.
4.4.3.2	Pupils from various backgrounds including mixed heritage are supported and encouraged at Mount Street Infants School. There have been no incidents of bullying and they have always been treated equally, encouraged to learn about other cultures and supported to learn about the culture in Wales.	The Council notes these comments about the provision at Mount Street Infants School. The Council would expect all schools to support and encourage pupils from various backgrounds including mixed heritage, to treat pupils equally and to encourage pupils to learn about other cultures and the culture of Wales. Should the Council proceed with these Proposals, it would expect this to also be the case at the new school.
4.4.3.3	The percentage of 'ethnic minority' pupils is included in the Brecon Catchment Business Plan but is not referred to in other	Information about the national identity and ethnic group of pupils attending the three schools was included in the

	documents. Why did PCC NOT engage with the Mount Street Infants School early on to obtain a clear understanding of the school community and its needs?	<p>Consultation Document issued in respect of this proposal, as well as information about the proportion of EAL pupils attending each school, and is also considered in the draft impact assessments prepared.</p> <p>The Council recognises that earlier engagement with all the schools would have provided a greater level of local information at an earlier stage. However, the Council has gained a greater awareness of all three school communities through this formal consultation exercise.</p>
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4.4.4 Comments about the Nepalese community

4.4.4.1	Mount Street's ethos incorporates all learners' especially our Nepalese community.	Comment noted.
4.4.4.2	There is a large Gurkha community which is celebrated in the current Mount Street schools.	Comment noted.
4.4.4.3	There is a large Nepalese community at Mount Street Infants and Juniors and these schools have built a great relationship with this community which could easily be lost with Current Proposals.	Comment noted.
4.4.4.4	Children from the Nepalese community may be living permanently in Brecon or be part of the Services/MoD community. Over many years Mount Street Infants has strived to make sure that language is never a barrier to the children's learning. Many languages are spoken or read by the parents of the children, including Nepalese or other dialects spoken in Nepal, and English. The best communication is achieved when talking face to face with the parents. During COVID one of the schools Teaching Assistants, with Nepalese as her first language, was able to explain verbally the safeguarding COVID regulations and she has also supported many families with home learning.	Comment noted.
4.4.4.5	The Gurkhas have been a big part of MSI and MSJ. Will they still have the same support?	Should the Proposals be implemented, then the expectation is that staff currently employed at Mount Street Infants, Mount Street Junior and Cradoc C.P.School would transfer to the new school, therefore they would be able to continue to

		support the Gurkhas. This support would need to be a key part of the new school.
4.4.4.6	The proposal would lead to a loss in the close supportive network and links for the Nepali community.	As above.
4.4.4.7	We have a number of Nepalese children at our school, some of whom have limited English. The small, personal nature of Mount St Infants means teachers can spend time with these pupils ensuring they understand what is asked of them. Larger schools with bigger classes make this more difficult.	As above. Teachers would still be able to spend time with all pupils, including Nepalese pupils, to ensure that they understand what is asked of them.
4.4.4.8	There are a significant number of pupils from a Nepalese background. They chose Mount Street as it is small, and inclusive. They also have staff who speak Nepalese. These families are often very quiet and would find a larger school intimidating.	The Council notes this concern. Should the Proposals be implemented, then supporting this community would need to be a key consideration for the school.
4.4.4.9	Children from our Nepali and BAME communities needing language and learning support will find it harder in large 360-420 school.	As above.

4.4.5 Comments about the impact on armed service pupils

4.4.5.1	Mount street is wonderful with Army families. They understand the needs of children from an army background. It is diverse and multi-cultural and feel this will be lost.	Comment noted. The expectation is that many of the staff currently employed at MSI, MSJ and Cradoc Schools would transfer to the new school, therefore they would be able to continue to support the children from an army background.
4.4.5.2	Being a school with a high transient pupil population I am concerned that the relationships we have built with the military families will be affected without a headteacher on site daily to keep these relationships relevant.	Whilst the new school's staffing structure would be determined by the temporary governing body, it would be expected that there would be a deputy headteacher / teacher in charge on each site who would be available to support the headteacher, staff, pupils and families when the headteacher is not on site. This would ensure that there was a consistent leadership presence on each site to develop relationship with all families, including military families.
4.4.5.3	Armed Service pupils are now recognised by the Senedd as a 'vulnerable group'. Mount Street Infants and Juniors have worked incredibly hard to develop very close connections with Service families, with staff work hard to foster close links with families and	Comment noted.

	applying for grants and extra funds to support their pupils. The Service families appreciate these smaller schools and how they are welcomed into the school community. By making a much larger school spread out over three sites this will be diluted or even worse, lost.	
4.4.5.4	There appears to be no consideration given to children experiencing a high level of transience at our school including those who are from the Services/MoD or from Travellers communities. MSI currently has 25 % of its school role as Service Children. On average only 60 % of pupils who begin at the school in Reception remain with us until the end of Year 2. Many of these children experience high levels of stress when moving from a different locality, sometimes from a different country and really need the nurturing support that is offered at a friendly' school with excellent outdoor provision. These children and their families have reported the positive impact of learning outside in the school woodland as part of parental questionnaires. Why has PCC not included an evaluation of impact on transient pupils in this consultation?	Comment noted. The draft impact assessments will be updated to reflect comments received during the consultation period, and updated versions will be considered by the Council's Cabinet when determining whether or not to proceed with these Proposals.

4.4.6 Comments about disability

4.4.6.1	Disability. Access on foot/ public transport could be more difficult than previous site.	The impact on people with disabilities is considered in the draft impact assessments. These will be updated to reflect comments received during the consultation period, and updated versions will be considered by the Council's Cabinet when determining whether to proceed with the Proposals.
4.4.6.2	This will discriminate against parents with a disability as the site is too far out of town.	As above.
4.4.6.3	Increasing travel to school distances will disproportionately affect those with disabilities, directly and because they are less likely to be able to afford costs of e.g. increased travel to collect children & attend mtgs and events at school.	As above.
4.4.6.4	Disability discrimination. There appears to be no consideration of the impact on families with children or adult carers with a	As above.

	disability. This further supports our suggestion to carry out a separate consultation for Phase 2.	Should the Proposals be implemented, then significant engagement would take place with the school community during the design stage as part of Phase 2.
4.4.6.5	Disability – the new Brecon High School site entrance is a very long walk from the car park!	As above. The new school would be designed with integrated car parking facilities, including disabled spaces.
4.4.6.6	Penlan is a poor site for disabled people to access without a car	As above.
4.4.6.7	Pupils with sight impairments feel more confident and supported in a smaller school, this type of school is less daunting and more nurturing for children especially if they have special educational needs due to a disability or impairment.	As above. During the design stage of any new school, significant input is given by the Council's ALN specialists, including officers who specialise in sensory matters.
4.4.6.8	Concern that the schools merging and proposed new site will be intimidating and overwhelming for people that are visually impaired.	As above.
4.4.6.9	There would be additional travel for disabled children from Cradoc which would have an adverse impact on their well-being.	As above.
4.4.6.10	The current school locations provide opportunities for those with disabilities. The reputation and standards associated with disability are extremely high associated with Mount St.	As above.

4.4.7 Comments about age

4.4.7.1	Age discrimination. There appears to be no assessment of impact on older people who currently walk to the school and back home with their grandchildren or great grandchildren. This further supports our suggestion to carry out a separate consultation for Phase 2.	<p>The draft impact assessments published as part of the Consultation Document ation consider the impact on the protected characteristic of age, however this impact was not identified at the time. The impact assessment will be updated to reflect feedback received during the consultation period, and the updated version will be considered by Cabinet when determining whether or not to proceed with the Proposals.</p> <p>Should the Proposals be implemented, then significant engagement would take place with the school community during the design stage as part of Phase 2.</p>
4.4.7.2	Older grandparents will struggle to walk up that hill with their grandchildren.	As above.

4.4.7.3	This will discriminate against elderly people who may not be able to walk the further distance up a steep hill to take their grandchildren to school.	As above.
4.4.7.4	Mount Street is a historical school site which can be easily accessed by the elderly community. Community support is essential. Small children cannot physically walk from the Watton, Camden Road or the Uplands to a new school site at Penlan.	The draft impact assessments published as part of the Consultation Document ation consider the impact on the protected characteristic of age, however this impact was not identified at the time. The impact assessment will be updated to reflect feedback received during the consultation period, and the updated version will be considered by Cabinet when determining whether or not to proceed with the Proposals.

4.4.8 Comments about pregnancy / maternity

4.4.8.1	Pregnancy and maternity discrimination. Many of our families have more than one child and will often have only a few years between each sibling. Therefore, it is common for a family to be walking to our school with their infant age child and a toddler in a pushchair. Therefore, this needs to be taken into proper consideration. This again further supports our suggestion to carry out a separate consultation for Phase 2.	The draft impact assessments published as part of the Consultation Document ation consider the impact on the protected characteristic of pregnancy/maternity, however this impact was not identified at the time. The impact assessment will be updated to reflect feedback received during the consultation period, and the updated version will be considered by Cabinet when determining whether or not to proceed with the Proposals.
4.4.8.2	Pregnancy and maternity discrimination. This needs to be taken into proper consideration with many young mums having to walk young children to school.	As above.
4.4.8.3	It would be more difficult for pregnant women to access the site.	As above.

4.4.9 Comments about the socio-economic duty / impact on pupils from low-income families

4.4.9.1	Concern about the impact on children from deprived backgrounds in terms of access to the new Penlan site and the socio-economic duty implications.	The draft impact assessments published as part of the Consultation Document ation consider the socio-economic duty. The impact assessments will be updated to reflect the comments received during the consultation period, and an updated version will be considered by Cabinet when determining whether or not to proceed with the Proposals.
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4.4.9.2	Concern about having families who are in the flying start catchment area having to walk all the way up there	As above.
4.4.9.3	Consideration for families who do not drive or own a car with small children who would have to walk the proposed distance to the phase 2 proposed building site. The strain of getting a child and infant to school to the outskirts of Brecon is unfair to ask of so many in a similar situation. Especially as the existing walkways to this area are along a busy road or a unlight country path with a pond (not easily accessible for prams)	As above. Active Travel and Safe Routes to School would be considered during the design stage for the new school.

4.4.10 Other comments

4.4.10.1	The Proposals to amalgamate Mount Street Infants, Mount Street Juniors and Cradoc school will be detrimental to people with protected characteristics	The Council published an impact assessment document as part of the Consultation Document ation. This included an integrated impact assessment which considered the Proposals' impact on people with the protected characteristics and a separate equalities impact assessment. The impact assessment will be updated to reflect comments received during the consultation period, and an updated version will be considered by Cabinet when determining whether to proceed with the Proposals.
4.4.10.2	All Proposals will have an impact on people with protected characteristics, the less impact to their lives has to be a priority.	As above.
4.4.10.3	The proposal will potentially detrimentally affect all people with protected characteristics.	As above.
4.4.10.4	In general equality has not been considered the impact of amalgamating the schools would have a heavy impact on current characteristics from partnerships, pregnancy and religion.	The Council published an impact assessment document as part of the Consultation Document ation. This included an integrated impact assessment which considered the Proposals' impact on people with the protected characteristics and a separate equalities impact assessment. The impact assessment will be updated to reflect comments received during the consultation period, and an updated version will be considered by Cabinet when determining whether to proceed with the Proposals.

4.4.10.5	If anything, smaller schools tend to be kinder to those in their community with protected characteristics.	Children belonging to protected characteristics groups are supported, challenged and nurtured to achieve their full potential in all schools.
4.4.10.6	Equality of opportunity is best monitored in small local communities.	As above.

4.5 COMMENTS ABOUT SMALL / RURAL SCHOOLS

4.5.1 Comments about small schools

4.5.1.1	In the primary sector it has been shown again and again that small is beautiful.	<p>The Council notes these comments about the benefits of small schools. However, as stated in the Council's Strategy for Transforming Education in Powys 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. The Council's Strategy is intended to improve equity across the education system and to ensure an improvement for every pupil's learning entitlement and experience.</p> <p>The Council's education professionals are of the view that it will be significantly more challenging, and will place significantly greater demands on teachers in 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>Teachers 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</p>
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		<p>shared understanding of learner progression, including expectations around what progression may look like and the pace at which learners progress.</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 small school.</p> <p>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>
4.5.1.2	The teaching in small schools is often of a very high standard	As above.
4.5.1.3	I like it that my children are in a smaller school and smaller groups.	As above.
4.5.1.4	Child learn better in smaller class size	As above.
4.5.1.5	All pupils and all staff know everyone in small schools.	As above.
4.5.1.6	Smaller schools have so much more to offer	As above.
4.5.1.7	I believe, through personal experience and professional knowledge, that children have a more positive experience in smaller schools.	As above.
4.5.1.8	These small community schools are a huge part of our history and have supported generations of families in their local area for many years.	As above.
4.5.1.9	Small schools provide better well-being.	As above.
4.5.1.10	The future lies in small + local. Better for learning and well-being and environmentally sensible.	As above.

4.5.1.11	As a parent, local schools – small, personable: work. Superschools for kids this age don't work so well.	As above.
4.5.1.12	Early education age pupils tend to do better in smaller environments and surrounded by similar age group children.	As above.
4.5.1.13	Small schools are proven to be the best for childhood development. My son had some behavioural problems which were dealt with very well, it's hard to keep the personal touch especially with such young children as schools get bigger.	As above.
4.5.1.14	The benefits of smaller schools to children in their formative years must not be underestimated. Their emotional development, their learning path, their social skills, their general sense of belonging to a community are nurtured, developed and no child is left behind!	As above.
4.5.1.15	In a small school there is no tolerance for any kind of bullying amongst children because they are different. In larger schools such actions are never even noticed.	As above.
4.5.1.16	A 2009 study by Ofsted reported on the comparative performance of small schools which it defined as being smaller than 100. It found that they achieved markedly better test results. Ofsted argued "the quality of teaching in small schools is generally better than in larger schools". Inspectors concluded that their "positive ethos" and "important place in the community" meant that there was "a good case" for small schools. In short, they tick all the boxes for Every Child Matters.	Comment noted. The Council acknowledges that there are good examples of small schools, as well as good examples of larger schools.
4.5.1.17	Small schools foster citizenship, leadership, and social emotional skills through increased student engagement. Students at small schools are more likely to be highly engaged in their school community, leading to a sense of personal responsibility for the community. Students begin to internalize values of care and respect and model a critical and engaged citizenship. [11] Students in small schools demonstrate an increased sense of personal responsibility, including feeling confident helping their peers problem solve, resolve conflicts, and work in teams.[12] Community service and personal accountability also tend to be more prevalent in small schools.[13] Finally, students at small schools generally have more opportunities to participate in clubs,	As above.

	<p>athletics, and the arts, allowing them to develop leadership skills in a greater diversity of situations. - http://www.tenneyschool.com/5-social-advantages-of-smallschools/ https://hopelands.org.uk/2019/05/03/the-benefits-of-small-class-sizes/</p>	
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4.5.2 Comments about rural schools

<p>4.5.2.1</p>	<p>A rural school is not just a school. It is the hub of the community and the lifeline for many families. Children from a rural background have significant different needs, both educationally and mentally. They need to be educated in an environment that suits their future lives and their future careers.</p>	<p>The Council recognised the importance of Cradoc School to the local community in the draft community impact assessment. This will be updated to reflect feedback received during the consultation period, and an updated version will be considered by the Council's Cabinet when determining whether or not to proceed with the Proposals. All schools are important to their community, regardless of their size or whether they are rural or urban.</p> <p>The Council acknowledges that Cradoc School is identified in the School Organisation Code as a 'rural school'. The School Organisation Code includes additional steps to be undertaken in respect of rural schools. The Council has complied with these requirements when developing these Proposals and will continue to comply with the requirements should the Proposals proceed. notes these positive comments about rural schools.</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</p>
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		<p>and the local community to understand and contribute to its development. It should also draw on a wider range of experts and stakeholders who can contribute to learning.</p> <p>All pupils will have the benefit of being part of the implementation of the new Curriculum for Wales, regardless of whether they attend a school in a rural setting or an urban setting. The Brecon area is rich and diverse and well suited to the 'Cynefin' aspect of the new Curriculum. A school would explore the community it serves rather than just its local community. Therefore, the pupils would not lose the Cradoc community as part of their curriculum experience. They would use this alongside the locality of the whole Brecon area.</p>
4.5.2.2	Please leave our rural schools alone. They are very important to the local community and to the rural way of life.	As above.
4.5.2.3	I feel rural schools are so important to their local communities.	As above.
4.5.2.4	Rural schools sit uniquely within their communities, often acting as much more than schools. They are polling stations, WI meeting places, places for Pilates and Yoga classes to take place. They are hubs for mums and babies, for local children to use the playground outside of school hours. They are so much more than just schools.	As above.
4.5.2.5	I wish my children's education to continue in a rural school in a rural environment. Rural schools are at the heart of community life and if Cradoc School is closed then this will be lost forever.	As above.
4.5.2.6	When a rural village school closes you SNUFF OUT A COMMUNITY. It then becomes God's waiting room, sucking prosperity and any future new blood developing.	As above.
4.5.2.7	Country schools are a huge bond I still have my same school friend nearly 30 years on our parents are also still friends today from that school connection, rural areas are one big family and during this last year neighbours and friends couldn't have been more needed.	As above.

4.5.2.8	Rural schools are a dying breed. The views, peace and togetherness just isn't the same with schools in built up areas.	As above.
4.5.2.9	Rural schools in rural communities have a distinct mix of values that is missing from the urban experience.	As above.
4.5.2.10	People move mountains to join village schools because of the environment and results.	As above.
4.5.2.11	The rural schools are golden.	As above.
4.5.2.12	I believe that learners from rural schools have a greater sense of belonging and well-being and are keen to participate in more extra-curricular activities, which supports well-being and mental health.	As above.
4.5.2.13	Research shows that rural school schools have higher levels of pupil well-being, the pupils are more willing to and happier to learn.	As above.
4.5.2.14	What a child needs more than the latest technology, is continuity, security, to feel comfortable and safe, and nurturing. All of these would be better achieved in their smaller rural school.	As above.
4.5.2.15	Country schools need to be maintained as a steppingstone for our children's future wellbeing.	As above.
4.5.2.16	We need to protect and be proud of our rural schools. Its in your hands - please make the right choice. You know the right choice is to keep these schools where they are.	As above.
4.5.2.17	Moving away from unique setting rural school is a bad idea.	As above.
4.5.2.18	What are you doing going against keeping rural schools alive? And this is the last one in the community.	As above.
4.5.2.19	The rural families have been forgotten about - this is why you have rural schools to accommodate these families.	As above.
4.5.2.20	We are against the closure of rural and local schools. Children are best placed to be taught and grow within their local community.	As above.
4.5.2.21	Rural communities deserve to have their children educated in that community. Their very identity, values and principles will be destroyed if their children are bussed out of that environment and the community will have lost their future, their heritage and their identity.	As above.

4.5.2.22	In 2019 ERW produced a report that Powys County Council contributed to which demonstrated that rural schools' pupils scored more highly on wellbeing and the desire to learn to urban schools.	The Council notes the content of the ERW report.
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4.5.3 Concerns about larger schools

4.5.3.1	Bigger school does not necessarily mean a better school.	<p>The Council fully acknowledges that a larger school is not necessarily better than a smaller school, and that there are good examples of smaller schools and good examples of larger schools.</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.</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 learners across the county. That vision, as the education professions 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.</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</p>
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two-class schools. This does not mean that it would be impossible to deliver the new Curriculum in these schools but it is clear that the skills required by teachers will need to be very wide ranging to support the full and effective fulfilment of the curriculum's high ambitions.

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.

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.

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. Smaller schools not only have fewer qualified teachers in school to

		<p>design the curriculum, but generally the limited numbers of staff will in all probability between them have a narrower range of disciplinary-specific expertise for the learners in that school than would probably be the case in a larger 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.</p> <p>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>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, as is often the case in smaller schools.</p>
4.5.3.2	Big is not always beautiful.	As above.
4.5.3.3	Making larger schools does not mean better.	As above.
4.5.3.4	Big schools can be overwhelming for some children and wellbeing should be your top priority.	As above.
4.5.3.5	The big spaces for smaller children tend to be daunting.	As above.
4.5.3.6	If all schools in Powys become big the children will all be the same whereas keep some village schools and you get unique education.	As above.
4.5.3.7	Every child is different and has their specific needs. Some of these needs could be best met in a larger schools, but others are far more suited to a smaller, rural school.	As above.
4.5.3.8	We should be trying to preserve the heart of our communities and not dilute the attachments and opportunities they create for local people, communities and families by trying to force them into	As above.

	larger groups which will not help to forge those bonds between all age groups.	
4.5.3.9	Concern about pupils being in a huge school – parents would look to drive them further afield which isn't good financially or for the environment.	As above.
4.5.3.10	Please can you explain how having only one far larger school is expected to benefit children's learning experiences?	As above.

4.5.4 Parents should be able to choose a rural school

4.5.4.1	There should be a choice for parents to send their children to a large primary or smaller school and this amalgamation will remove that.	The Council recognises that parents can choose to apply for a place for their child(ren) in any school they wish, however there is no requirement for the Council to provide a choice of schools of certain types or of certain sizes. There are currently 7 schools which provide primary education in the Brecon catchment. The current proposal is proposing to merge 3 of these schools, however there would still be 5 schools in the catchment which would continue to provide choice. This includes community primary schools, Church in Wales provision, a Welsh-medium primary school and a school located in a rural area.
4.5.4.2	There must in our education system be different schools to provide for the differing needs of children from differing areas at primary level.	As above.
4.5.4.3	This would take away choice for the children and their families.	As above.
4.5.4.4	By closing smaller, rural schools and only building larger town schools, Powys CC are denying parents this chance to choose and removing the chance for children to attend a school that is part of their larger community.	As above.
4.5.4.5	Having a range of different schools gives parents and children the chance to choose the education setting that best suits their child and family.	As above.
4.5.4.6	A child needs to be comfortable in their learning environment in order to achieve their potential. The differences between a small rural school (around a hundred or more children) and a large	As above.

	(several hundred children attending the school) are stark. Some children thrive in large institutions while others became lost. This is why the element of parental choice is so important.	
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4.6 COMMENTS ABOUT OTHER SCHOOLS / PROPOSALS

4.6.1 Sennybridge

4.6.1.1	<p>If as is planned separately – a new school is built in Sennybridge it is very likely pupils will transfer there as opposed to coming to a new school in Brecon which won't be as accessible. This appears to be born out in the figures proposed that PCC is building a 180 place school in Sennybridge which currently only has 126 pupils on roll. The proposed new school (Phase 2) in Brecon is only 360 places when the total of all pupils currently attending the three schools (Cradoc, MSJ, MSI) is 420. Why was an amalgamation for instance between Cradoc and Sennybridge not considered in the options appraisal? Why is it acceptable to have 54 surplus places at Sennybridge when PCC state that change is needed because of decreasing pupil numbers in other schools?</p>	<p>The Programme Business Case for the Brecon catchment, which was considered by the Council's Cabinet in September 2020, considers a range of options for Mount Street Infant, Mount Street Juniors, Cradoc C.P. School and Sennybridge CP School. This included an option to merge Sennybridge and Cradoc schools in a new building in a new location.</p> <p>Following an appraisal of all options, three options were shortlisted which were as follows:</p> <ul style="list-style-type: none"> • <i>Option 1 – Do minimum – Backlog maintenance only</i> • <i>Option 4A – New build Sennybridge, New build Brecon primary school, close Cradoc</i> • <i>Option 5A – New build Sennybridge, establish new all-through school in Brecon with new build primary, close Cradoc.</i> <p>The capacity figures provided in the PBC for the proposed new buildings at both Sennybridge and Brecon are indicative at this stage. Further work would be undertaken to establish the capacity required when developing the brief for the new building(s) and when preparing the business cases required in order to secure capital funding.</p> <p>Amalgamation with Sennybridge was not considered as an option within the further options appraisal carried out in</p>
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		respect of Mount Street Infants School, Mount Street Juniors School and Cradoc C.P. School or in the Consultation Document published in respect of the current Proposals, as options involving Sennybridge had been discounted in the Programme Business Case. However, the consultation included an opportunity for consultees to suggest alternative options. All alternative options suggested are outlined in this consultation report, and a further assessment will be carried out in accordance with the requirements of the School Organisation Code.
4.6.1.2	Why is a new build at Sennybridge planned to have 54 surplus places?	As above.
4.6.1.3	Powys County Council is proposing building a 180 place school in Sennybridge when there are currently only 126 pupils on roll and pupil numbers are expected to decrease by 9.3% (11.718 pupils) over the next 5 years. Why is it acceptable to have 54 surplus places at Sennybridge when Powys County Council state that change is needed because of decreasing pupil numbers and surplus places?	As above.
4.6.1.4	It makes no sense to combine Cradoc with Mount Street Juniors and Infants. Most pupils from Cradoc are likely to transfer to the nearest rural school in Sennybridge. I believe you are aware of this, seeing as the figures for the new school are less than the combined numbers currently at the three schools, and the numbers for the new Sennybridge school are higher than they now have on the roll – why is this?	As above.
4.6.1.5	Sennybridge school is set to receive a new school building, yet both schools were inspected in 2017 when Sennybridge had 133 pupils and Cradoc had 131 pupils, so surely both schools are of a similar size and therefore Cradoc should receive a new building?	<p>The Programme Business Case for the Brecon catchment which was considered by the Council's Cabinet in September 2020 considers a range of options for Mount Street Infants School, Mount Street Juniors School and Cradoc C.P. School. As well as various remodelling options, this includes the following new build options:</p> <ul style="list-style-type: none"> • <i>Option 4A – New build Sennybridge, new build Brecon primary school, close Cradoc</i>

		<ul style="list-style-type: none"> • <i>Option 4B – New build Cradoc, new build Brecon primary school, close Sennybridge</i> • <i>Option 4C – New build Sennybridge, new build Brecon primary school, new build Cradoc</i> • <i>Option 4D – Close both Sennybridge and Cradoc, build new school on alternative site, new build Brecon primary school</i> • <i>Option 5B – New build Cradoc, establish new all-through school in Brecon with new build, primary, close Sennybridge</i> • <i>Option 5C – New build Sennybridge, establish new all-through school in Brecon with new build primary, new build Cradoc</i> <p>An appraisal of all options was carried out, and options 4C and 5C were discounted at this stage.</p> <p>The following three options were shortlisted:</p> <ul style="list-style-type: none"> • <i>Option 1 – Do minimum – Backlog maintenance only</i> • <i>Option 4A – New build Sennybridge, New build Brecon primary school, close Cradoc</i> • <i>Option 5A – New build Sennybridge, establish new all-through school in Brecon with new build primary, close Cradoc.</i>
4.6.1.6	Sennybridge serves a rural and farming community like ours, why are they being treated differently to us?	As above.
4.6.1.7	Please can you tell me how Sennybridge School is able to have a new school and not be part of consideration of any other alternatives? Is this because it has a Welsh stream to it? Well doesn't that discriminate against our school that doesn't have a Welsh stream – I would hate for The Council to be looking at Sennybridge and thinking they can't touch them because they are Welsh speaking.....it really wouldn't sit well legally!	<p>There are currently 7 primary schools in the Brecon catchment area. There are 2 other English-medium primary schools located in Brecon that are not affected by these Proposals.</p> <p>As explained in the Programme Business Case for the Brecon catchment which was considered by the Council's Cabinet in September 2020, 'Of the schools within this</p>

		<p><i>catchment, several operate within buildings that are assessed as being of a condition A standard, with no outstanding backlog maintenance issues. These schools are Llanfaes C.P. School, Priory Church in Wales School, Ysgol y Bannau and Brecon High School...for the purposes of this PBC, all Condition A primary schools within the catchment have been considered out of scope, as they present only limited drivers for capital investment.'</i></p> <p>The Programme Business Case goes on to consider a range of options for the 4 remaining schools, which include new buildings in Sennybridge and / or Cradoc and / or Brecon. Following an appraisal of all options, three options were shortlisted which were as follows:</p> <ul style="list-style-type: none"> • <i>Option 1 – Do minimum – Backlog maintenance only</i> • <i>Option 4A – New build Sennybridge, New build Brecon primary school, close Cradoc</i> • <i>Option 5A – New build Sennybridge, establish new all-through school in Brecon with new build primary, close Cradoc.</i> <p>It is not the case that English language schools are being treated less favourably than those providing Welsh-medium education.</p>
4.6.1.8	Have you considered Cradoc fairly, in comparison to Sennybridge School because they are getting a new school on the current site, as a Welsh education provider but Cradoc is not?	As above.
4.6.1.9	You are rebuilding Sennybridge, why not Cradoc? Because its Welsh medium? That would be discriminatory, because Kirsty William's children attend? Again discriminatory.	As above.

4.6.2 Gwernyfed catchment

4.6.2.1	Schools feeding Gwernyfed High School such as Archdeacon Griffiths Church in Wales School in Llyswen and Clyro Church in Wales, (the latter now has the capacity for 120 pupils despite only having 85 pupils, which is less than Cradoc, at the time of refurbishment), have had new school buildings on the original sites, serving their communities so it is utterly unfair to not offer the same to Cradoc.	The capital investment in schools in the Gwernyfed area was a result of an area school reorganisation which saw the number of schools reduce from 10 to 5.
4.6.2.2	How have the schools in the Gwernyfed cluster like Llangorse, Llyswen, Talgarth, Hay-on-Wye and Clyro been allowed to have new schools when there seems to be no real thought to this within the Brecon cluster. Seems like you are discriminating against those in the Brecon cluster who have less rural schools and so we should be trying to keep as many open rather than close them. Why should our children suffer for the money spend on other schools in other catchments?	As above.
4.6.2.3	New schools have been very successfully constructed at Clyro, Llangorse and Llyswen - all three of which have larger schools a few miles away. The situation here is the same.	As above.
4.6.2.4	So many primary schools in Powys have been given new builds and have NOT had to combine with another school. So why should Cradoc and Mount Street be any different? Llangorse, Clyro and others were given new builds. So why cant Cradoc? The numbers will be there! With 25 expected to join over the next few years.	As above.
4.6.2.5	There has been much investments made by Powys County Council in education to schools located south of Brecon i.e. Llyswen, Talgarth and Hay-On-Wye all of which have had new schools built. Can The Council justify why these are as have qualified for new schools, when Cradoc who has over 100 pupils (when the numbers for 3-year-olds is included) is proposed for closure. It seems as though there is a different set of rules depending on location.	As above.
4.6.2.6	Are you giving church schools such as Llyswen and Clyro more beneficial treatment than Cradoc? Are Cradoc, MSI and MSJ being negatively impacted because they are not attached to a faith?	As above.
4.6.2.7	Powys County Council has built new schools that are too big which has resulted in surplus spaces. The newly built Clyro school has	Comment noted.

	capacity for 119 pupils & has 33 surplus spaces. Llangors C in W school has capacity for 175 pupils & has 14 surplus spaces. Hay on Wye school has capacity for 210 pupils and has 41 surplus spaces. Ysgol Y Mynydd Du has capacity for 147 pupils and has 43 surplus spaces. In these 4 schools alone there are 131 surplus spaces. The newly built Brecon High School has capacity for 888 pupils but the Admissions document states that there are only 474 pupils on roll. This is a staggering 414 surplus spaces.	
4.6.2.8	The same applies to the closure of Bronllys Primary School and merger with Talgarth. This determined pattern of closing little local schools is so short sighted. Already there are not enough places at Talgarth - and the building development should be taken into account as more young families move into these areas... where is the forward planning for education based on local population?	Ysgol y Mynydd Du in Talgarth has a capacity of 150 pupils. There are currently 103 pupils attending the school. It is not correct that 'there are not enough places at Talgarth'.
4.6.2.9	I would like to know, if these Proposals do go ahead, what will happen to the empty buildings left behind? It would be a great shame to have even more useless empty buildings, such as Llanigon and Glasbury schools!	Should the Council proceed with these Proposals, then the Cradoc C.P. School building would eventually be declared surplus following the move to a new building. All surplus assets are subject to the process of disposal as outlined in the Council's Asset Management Policy. Whilst it is possible that this could lead to sale of the sites to third parties, some schools that have closed have been transferred to other service areas e.g. housing or to a community - with the latter, this may allow for the space to be retained or developed for community use. This could enable the facilities to be retained for community activities.

4.6.3 Brecon High School

4.6.3.1	Do not build a new school which is likely to have surplus places – we already have a number of new builds in this position. Is the plan likely to involve using the surplus places in Brecon High School to create a 4-18 Through School? This was briefly mentioned and discounted on the basis that BHS is still recovering from poor Estyn	Should the Proposals be implemented, the Council would consider in detail the number of school places available at all schools in the area, housing developments, pupils projections, in order to ascertain the final size of the school. It is essential that the Council builds in some surplus places
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	<p>Inspection. Why then would PCC risk a 3-way merger post COVID knowing that the education of a significant number of children could be further disrupted and that this will land at the doors of the High School in due course.</p>	<p>in all its new school buildings as there are fluctuations in pupil numbers over time. The Proposals are to merge the three schools and build a new primary school. It is not the intention to use any surplus places at Brecon High School for primary provision, although the Council would support improved collaboration and shared use of facilities at Brecon High School. Ultimately, there may be a case for an all-age school in Brecon but this would need to consider all schools in the catchment, potentially on a multi-site arrangement rather than on a single site. However, this is not the current proposal.</p>
4.6.3.2	<p>It is evident from the recent new build of Brecon High School that children, teachers and families are disadvantaged in a new school. The current high school footprint is so small that it is unsustainable. Using this format for all new schools in Powys proves that there is no prior planning and little understanding of education and learning. Children at Brecon High School call the new school a 'jail' or 'factory' as the building is so unappealing. The outdoor space is minimal and there is no space to play. Ancient trees, shrubs, plants and flowers are not included in new school designs in Powys. Most schools are particularly sterile and uninspiring.</p>	<p>The Council disagrees with this comment.</p> <p>The building has been designed according to Building Bulletin 1998 Schools Building Framework, and in line with Welsh Government funding requirements. The outdoor spaces are also aligned to the building bulletin and Sports Wales requirements.</p> <p>The leadership of the school were heavily involved in developing the designs and provided input from an education and pedagogical perspective.</p> <p>It must also be noted that the new Brecon High School has replaced a very poor building at the old Brecon High School and that the learning environment is far superior to the old one.</p> <p>The staff and pupils have also benefited from new, state of the art specialist ICT, STEM, drama, music, and sports equipment and facilities as part of the project.</p>
4.6.3.3	<p>We have seen the trees that were planted at the new Brecon High site and they are dying already due to the exposed nature of the site and the brutal winds. Our pupils deserve more than that.</p>	<p>Comment noted.</p>

4.6.3.4	If the new school would be similar to the new Brecon High school that is not an inspiring building looking more like a factory rather, it doesn't give much hope for welcoming learning environment for primary children.	Brecon High School facilities include brand new ICT facilities, specialist STEM equipment, wellbeing rooms, a drama studio, and new sporting facilities which includes a dedicated gym, all in a modern learning environment, fit for the 21 st Century. It must also be noted that the new Brecon High School has replaced a very poor building at the old Brecon High School and that the learning environment is far superior to the old one.
4.6.3.5	The COVID disruption and this proposal will land at the doors of the High School in due course. The attempts to make the new high school a centre of excellence will be seriously undermined if their intake over the coming years is blighted by children having had their education disrupted for most of their foundation to key stage 2, either from COVID and/or transformation. This will be so bad for our children and the High School could end up back in the same situation that it has recently escaped from i.e. poor reputation and parents running to an alternative. Disruption from COVID is likely to continue for several years.	The Council recognises that all school reorganisation proposals create a period of uncertainty for all involved, and that the pandemic has added another layer of uncertainty. However, the three schools must be congratulated for providing consistency and support to children throughout the pandemic and also during the consultation. However, the Council does not agree that Brecon High School would be negatively impacted by the intake from these three schools.

4.6.4 Welshpool

4.6.4.1	In a meeting with Powys Officers on 16 th March 2021 the officers referred to the recent Welshpool Schools Project and said "There is a sense of awe at four schools being put together as two separate schools and they are both new builds". In fact, a recent quote in the County Times said "There have been many obstacles that we have all had to face over the last 3 years to get to our new building". "Building work started 3 years ago and was due for completion by September 2019, however construction company Dawnus went into administration causing a delay." "A new construction company Pave Aways began again in January 2020 and the building was due for completion in September 2020." Welshpool Church in Wales Primary School opened its doors for children on January 6 th 2021. The consultation process for this new	<p>The Council is fully aware that the Welshpool catchment project faced unforeseen challenges, including Cadw listing, main contractor liquidation, and a global pandemic.</p> <p>The Council is currently preparing to submit a project closure report specifically relating to the Welshpool CiW Primary School project to Welsh Government, this report will include lessons learned.</p> <p>Project closure reports are usually sent to the Welsh Government following the 12-month defect period, which for</p>
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	<p>school commenced in 2016. Has a formal review taken place with all the stakeholders in the process for Welshpool Schools to evaluate the strengths and weaknesses of the process? If not, why not? If it has why hasn't it been published alongside these Proposals?</p>	<p>this scheme, will be after January 2022. The same process will apply for the Ysgol Gymraeg y Trallwng project.</p>
4.6.4.2	<p>The representatives for the project kept referring to Welshpool's new school. I have been there and was very disheartened by what I saw. A big wooden clad building with identical yards of black tarmac from each classroom and a tiny playing field at one side. The rest of the space was given over to hundreds of car park spaces! Basically, another replica of the new high school. I do not want this for mount street. I would rather our old-fashioned building than a lot of tarmac.</p>	<p>The Council does not agree with these comments about the new school in Welshpool.</p> <p>The Welshpool CiW Primary school building offers high quality, modern provision for the pupils of Welshpool which includes a grass pitch, MUGA, direct outdoor learning spaces from classrooms, a forest school area, and a cycling loop.</p> <p>The building was the first Passivhaus School build in Powys, and provides a different energy standard to Brecon High School. Passivhaus buildings can be part of the solution in tackling the Climate Change Emergency.</p>

4.6.5 Ysgol Calon Cymru

4.6.5.1	<p>A merger on current sites is unlikely to work well – using other examples, YCC for example is struggling to maintain the kind of leadership and educational standards that the separate schools enjoyed prior to the merger as splitting across the two sites is logistically difficult.</p>	<p>The intention of these Proposals is to merge three schools to become one school, with the schools staying on their current sites temporarily until they transfer to a brand new building in Brecon.</p> <p>Ysgol Calon Cymru is a two sited secondary school based in Llandrindod Wells and Builth Wells, which opened in 2018 following the merger of Builth Wells High School and Llandrindod High School. The two schools were in Estyn Special Measures at the time. Ysgol Calon Cymru has made significant improvements in improving leadership and standards since it was established. However, the Council recognises that there are other issues that need to be</p>
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		addressed at Ysgol Calon Cymru, including the current dual-sited model not being the most effective in terms of supporting the school's improvement journey, poor building condition and the need to improve Welsh-medium provision, and a new vision has been developed for the school, including a new campus and a new Welsh-medium all-age school.
4.6.5.2	With all due with respect, this was done with Llandrindod and Builth High Schools, and nothing has seriously improved at either of those schools since the pointless change in name. Hell, you didn't even get to the latter stage of the changes for Llandrindod and Builth High Schools in merging the schools into one site!	As above.

4.6.6 Other

4.6.6.1	You have closed too many rural schools throughout Powys.	Over the last few years, The Council has carried out a number of school reorganisation processes which have affected a range of schools across Powys. Whilst this has included the closure of some rural schools, this has also included Proposals which have affected schools located in town environments.
4.6.6.2	You have set the precedent for all other local rural schools getting a new school building on its original site, so why are you treating Cradoc differently?	The capital investment in schools in the Gwernyfed area was a result of an area school reorganisation which saw the number of schools reduce from 10 to 5.
4.6.6.3	You are proposing to strip the heart and lifeblood out of the Cradoc community when what you should be doing is treating it like all the other rural community school's you have recently built new schools for.	As above.
4.6.6.4	How can Powys County Council justify closing any school, when the communities involved were assured in 1969 (when the amalgamation of the original remote village schools took place) that the new school's future would be secured for the long term?	The Council has a duty to manage its schools estate for the benefit of current and future learners, and therefore any historical assurances given by previous authorities half a century ago are not The Council's main priority.
4.6.6.5	Moving children into a new building does not guarantee improved provisions or standards. Recent Estyn inspections in Powys quite	The Council agrees that moving children into a new building does not automatically guarantee improved provision or standards. However, the Council believes that all pupils

	<p>clearly demonstrate this, where new-build schools with brand new facilities have not received very favourable reports.</p>	<p>should have the opportunity to be educated in a learning environment that is modern, fit-for-purpose, with the appropriate facilities and technology to support their learning.</p>
<p>4.6.6.6</p>	<p>I lived in Blaenau Gwent when my son attended a smaller primary school. This was closed and amalgamated with three other primary schools. Ebbw Fawr Learning Community was created. The irony for this is within its name. The word 'Community' in the new 'super school', is the very thing that it has failed to achieve. The new community school has put up walls both physically and metaphorically. The sheer number of pupils, (a similar number to that proposed by PCC for the new school at Penlan), means that the operation of the school is far more regimented and institutional to anything that any of the children had experienced before. This, unlike Cradoc, was three urban schools, amalgamating as one. For Cradoc, this transition would be so much worse. It wouldn't only be the transition which is of issue, but the whole ethos of a rural school would be lost. Those physical walls took the form of fences. In an urban setting, it is understandable why there needs to be extra securities around a school building. However, the logistics of a larger school meant that those fences were a physical and mental barrier which kept parents apart from staff and children. Opportunities for communication were lost. Those serendipity chats at drop off and home time to keep a continuity between staff and parents, to deal quickly with issues, all escalated. As a teacher, I understand the importance of nipping issues in the bud as soon as they are raised, words of warning from parents to explain any family issues or problems that are happening at home. All these communications immediately became formal, by appointment only, or by emails. Siblings and older children within primary schools also play a vital role in the child's confidence and securities within a primary school. Sometimes, a child is upset, but a chat with a big brother or sister in the playground can often settle a whole manner of problems. This would be lost. With the sheer scale of children, break times and areas would have to be segregated, and fences,</p>	<p>The Council acknowledges the experiences of this respondent of an amalgamation in a neighbouring authority. However, not all school amalgamations are the same. The Council would work with the new governing body to ensure that the school ethos is supportive, inclusive and open.</p>

	would once again be built between young children and their close friends and relatives.																									
	<p>Response from Estyn:</p> <p>The proposal has not looked in sufficient detail at the possible impact of the proposal on other schools should parents choose not to send their pupils to the new proposed school. It is unclear whether the Council have conducted a survey of parents' views on the location of the school and their possible choice of school should the new build go ahead.</p>	<p>Whilst the Council recognises that there is a risk that parents may choose other schools in the area rather than the new school, it is expected that pupils would remain on their current sites as part of the new school, with their current teachers and other staff. They would then transfer together to the new building along with their teachers who would be able to provide support and consistency for pupils during the transition. The Council has not carried out a survey of parents' views on the location of the school apart from gathering information through this consultation exercise.</p> <p>The current capacity of other primary schools in the Brecon catchment are as follows:</p> <table border="1" data-bbox="1240 735 2029 1220"> <thead> <tr> <th>School</th> <th>Capacity</th> <th>Current NOR (TC 1 Dec)</th> <th>Projected NOR 2026</th> </tr> </thead> <tbody> <tr> <td>Priory C.i.W Primary School</td> <td>165</td> <td>155</td> <td>172</td> </tr> <tr> <td>Llanfaes C.P. School</td> <td>205</td> <td>217</td> <td>186</td> </tr> <tr> <td>Sennybridge C.P. School</td> <td>125</td> <td>128</td> <td>127</td> </tr> <tr> <td>Ysgol y Bannau</td> <td>162</td> <td>114</td> <td>98</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	School	Capacity	Current NOR (TC 1 Dec)	Projected NOR 2026	Priory C.i.W Primary School	165	155	172	Llanfaes C.P. School	205	217	186	Sennybridge C.P. School	125	128	127	Ysgol y Bannau	162	114	98				
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4.7 FINANCIAL IMPLICATIONS

4.7.1 Comments about costings / estimated savings

4.7.1.1	Can PCC state precisely the finance savings or benefits of Option 4?	<p>As set out in the Consultation Document, it is anticipated that the lifetime costs of the status quo option, which would include undertaking the large-scale backlog maintenance at the existing schools, would be £97,990,442 over a 60-year investment period. This is compared with the lifetime costs of the move to a new school building which would be £92,772,215 over a 60-year investment period, generating a saving of £5,218,227.</p> <p>Savings estimates are based on the best information available at the time they are calculated and are subject to change, for example, due to changes in pupil numbers, parental choice, staff changes etc. The calculations are reviewed by a range of officers and sensitivity analysis is also carried out.</p>
4.7.1.2	Can PCC define what the actual expected overall costs are for Phase 1?	<p>The intention is to initially establish a new school on the current sites of Mount Street Infants, Mount Street Juniors and Cradoc C.P. School. It is estimated that this would result in annual revenue savings to the Council of £16,181 per annum. There would be no additional transport costs associated with this phase, although there would be some additional set-up costs. Based on previous primary school mergers, this is estimated to be in the region of £50k.</p> <p>The Council is currently revising its funding formula for schools. Should Cabinet approve the new formula, the savings would need to be recalculated.</p>
4.7.1.3	The document indicates that Phase 1 will result in an annual revenue saving of £16,181 per annum but the set-up cost will be in the region of £50k. Therefore, if the new school opens in 2024,	The estimated savings set out in the Consultation Document are recurring savings that the Council will benefit from each year. The £50k estimated additional setup costs would be a

	<p>phase one will have cost Powys County Council at least £16,000. There is no guarantee of funding for a new school, and this means that Phase 1 has no guaranteed Plan B.</p>	<p>one off cost. If the new school then opens in 2024 there would be additional savings that would offset this cost.</p> <p>The Council is currently revising it's funding formula for schools. Should Cabinet approve the new formula, the savings would need to be recalculated.</p> <p>The Council recognises that no funding has been allocated to this project yet in order for the Council to fully understand the views of stakeholders before it commits capital funding. However, should the Proposals be supported, the Council would develop a Strategic Outline Case for submission to the Welsh Government 's 21st Century Schools Programme.</p>
4.7.1.4	<p>The Critical Success Factors indicate that Option 4 is value for money but the report states there are no finance savings with amalgamation (ref Section 18 vi). The report indicates there will be no budget savings in the short term as it states annual revenue savings estimated as £16,181 pa and set up costs estimated as £50,000. Can PCC clarify if the £50,000 stated is a per annum or a one off cost?</p>	<p>It is anticipated that the £50k estimated additional setup costs would be a one off cost.</p>
4.7.1.5	<p>Option 4, the preferred choice of Powys CC, offers no real finance gains in the short term – as indicated in the consultation report. The Critical Success Factors show that the proposed option 4 merger is said to provide value for money despite no financial saving. The document suggests that set up costs of £50,000 will be set against only £16,181 estimated savings. In the long-term there are likely to be increased budget and staff pressures if pupils disperse from Cradoc to other rural schools in the transition period – placing pressure on the Governing Body in the future to make staff redundant.</p>	<p>See 4.7.1.3</p>
4.7.1.6	<p>It does not make sense to be incurring additional costs when budgets are so tight and when, for example, Mount Street Infants has recently been through the pain of budget cuts and staff redundancies. It is frustrating to see a proposal that is incurring additional costs that is not leading to any immediate improvement</p>	<p>The Council can justify the additional costs incurred in Phase 1 of the Proposals because Phase 1 is an inherent and necessary part of the process to achieve the outcome of Phase 2 which is to providing the children and staff of the three schools with a high-quality learning environment, which</p>

	for children's education or for staff development. How does PCC justify additional costs when schools are penalised for going into deficit budgets?	will include modern, purpose-built facilities and technology fit for the 21st Century, further enhancing the school's ability to implement the new Curriculum for Wales, for the benefit of all pupils.
4.7.1.7	It does not appear to be value for money to amalgamate the 3 schools at an estimated cost of £50k.	These are the estimated one-off costs and would deliver recurring annual savings.
4.7.1.8	Realistically it is likely to take 4-5 years to realise and implement phase two. In the interim the existing schools will still need to be adequately maintained. Why has PCC not factored school maintenance costs over the transition period into the consultation proposal?	See 2.9.1
4.7.1.9	The report states that a move to one new building would result in estimated revenue savings in delegated funding amounting to £184,306 per annum and £35,760 for catering functions. This may be based on current pupil numbers and a vague indication that the new school will cater for 360 pupils. It does not take into consideration the fact that most pupils from rural areas attending Cradoc school are likely to disperse to other rural schools - either Sennybridge or Builth. Those coming from Brecon may well disperse to closer schools in Llanfaes or Priory. This could leave the school with a very difficult budget scenario if all staff are kept on as proposed with fewer pupils than expected. The Governing Body will be left to oversee further restructuring and redundancies. Can PCC explain how the expected savings in delegated funding are calculated given this is likely to change with the vagaries of school budget calculations and uncertainty over projected future pupil numbers?	<p>See 4.7.1.1</p> <p>The budget for the new school would be funded through the funding formula based on the pupil numbers as at the count date. During the financial year, there would be an adjustment made for any pupil movements in year.</p> <p>Part of the ongoing role of the Governing Body would be to ensure that the budget and staffing structure were aligned, based on pupil numbers and need.</p> <p>The formula funding savings are calculated by comparing the formula funding required for the current school structure with the formula funding required for the Proposals. Estimates would be updated as time moves on and there is greater clarity around pupil numbers. Should pupils move to alternative schools within Powys, formula funding would still be required for those pupils at those schools.</p>
4.7.1.10	How will Powys CC protect public spending during Phase 1?	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>Powys schools also strive to run as efficiently as possible.</p> <p>The new governing body and the new headteacher would be supported in their planning, budget setting and monitoring.</p>
4.7.1.11	<p>There is a significant cost to the schools of the merger. Rebranding costs, wastage in the form of current uniforms in circulation, book bags, parking permits, websites, staff documentation to name but a few. Plus, the schools would lose all current statuses and funding arrangements, so need to reapply for funding including but not limited to; Healthy Schools Status, Thrive, Nurture, Army Funding etc. Also, promoting a person to be deputy part of the week also has a cost implication.</p>	<p>It is correct that there are costs related to establishing the school in Phase 1 - the majority of these costs would be one off costs and would be included in the £50k estimated setup costs, which would be funded by the Council.</p> <p>If the Proposals are agreed, the closure would take place at the end of the academic year, minimising the potential cost implications for parents. Funding is also currently available to support low-income families with support for uniform costs.</p> <p>The Council notes the comments regarding the current statuses. Although the schools may lose their current statuses, they could reapply using the evidence that they have from the three schools.</p>
4.7.1.12	<p>For an estimated saving of 5million over 60 years (and that is without an escalation of building costs, which always happens), is it really worth it?</p>	<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. However, reducing the range of funding per pupil will allow for reinvestment across the authority.</p>
4.7.1.13	<p>In previous change projects calculations of overall savings in individual schools have not always turned out to be accurate. This is, of course, easy to say with the benefit of hindsight and is no reflection on the professionalism of the officers making these calculations. To help stress test these calculations can they be shared with the Schools Forum at the next meeting please?</p>	<p>See 4.7.1.1</p> <p>It is not appropriate to share the detail of individual calculations of specific projects as they include confidential information but the methodology could be shared.</p>

4.7.2 Comments about Capital funding

<p>4.7.2.1</p>	<p>We strongly suggest that PCC reviews its approach to how 21st Century Funding is used. The Minister for Education in a recent Senedd Plenary (16/03/2021) included a statement on the 21st Century Schools and Colleges Programme. Their words “there is a misapprehension that the only way to draw down twenty-first century schools money is to have a new building. That’s not the case. The programme also allows for the refurbishment of existing facilities or, indeed, the refurbishment and the extension of facilities as well”. The funding could be effectively used to refurbish existing excellent schools like Mount Street Infants – which would keep the school in their current location. This in the long-term would actually cost the authority less, be hugely less disruptive to the school and provide a different way of resolving the issue with building condition that does not completely wipe away decades of a school’s identity and investment in learners.</p>	<p>The case for change is clearly set out in the Consultation Document . The Council is facing the combined challenges of a high proportion of small schools, decreasing pupil numbers, high numbers of surplus places, issues with building condition of some schools and ongoing financial pressure combined with inequity of provision. The Strategy for Transforming Education in Powys 2020-2030 sets out The Council’s priorities in addressing these challenges which includes the aim to “improve learner entitlement and experience’ and this aim includes an objective to ‘rationalise primary provision’. The decision to consult on the merging of the schools to create a new primary is in line with these priorities.</p> <p>Whilst the 21st C Schools Programme supports remodelling of schools as well as new build, the Council is committed to providing the children and staff of the three schools with a high-quality learning environment, which will include modern, purpose-built facilities and technology fit for the 21st Century, further enhancing the school’s ability to implement the new Curriculum for Wales, for the benefit of all pupils. However, remodelling three schools would</p> <p>As set out in the Consultation Document, it is anticipated that the lifetime costs of the status quo option, which would include undertaking the large-scale backlog maintenance at the existing schools, would be £97,990,442 over a 60-year investment period. This is compared with the lifetime costs of the move to a new school building which would be £92,772,215 over a 60-year investment period, generating a saving of £5,218,227.</p> <p>The Council is of the view that building one larger school rather than remodelling three smaller schools in on area provides a better value-for-money solution.</p>
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	<p style="text-align: center; opacity: 0.3; font-size: 48px; font-weight: bold;">DRAFT</p>	<p>However, whilst to learners and staff of having an improved learning environment, there are also benefits from being part of a larger school. There would be the opportunity to share good practice across all sites, meaning that provision would benefit from shared expertise from all teachers. With the introduction of the new Curriculum, this approach will have a positive impact on improving outcomes for pupils.</p> <p>Each school brings its own individuality, however, there are also many areas where, by amalgamating, staff would benefit from working together, sharing good practice, sharing knowledge and experiences in preparation for the implementation of the new Curriculum, ensuring consistency in approaches to literacy and numeracy, for example.</p> <p>All three schools currently provide good quality education and are self-improving schools. It is recognised that they have different strengths, however, this will be a benefit to a new school as the school will be able to meet the needs of all pupils.</p> <p>With an amalgamation of the three schools, the strength in leadership and excellence identified by Estyn and The Council would be shared within the new school, impacting positively on standards and leadership.</p>
4.7.2.2	Access to 21 st Century Schools Funding is available to refurbish existing facilities. You do not have to build a new school to access 21 st Century Schools Funding. Why have Powys County Council	See 4.7.2.1

	not applied for 21 st Century Funding to refurbish the existing buildings? Spending £9m to £10m on a new build school is not as much as a saving to the Local Authority as applying for 21 st Century Schools Funding to refurbish the schools would be. As the outstanding works required to Mount Street as described in the building condition survey have been costed at £115,086.95 does Powys County Council agree that refurbishing the buildings with 21 st Century funding or with Capital Maintenance Funding from Welsh Government is a much cheaper option?	
4.7.2.3	Why has PCC not carried out a proper evaluation to use the 21st Century Schools funding to improve the infrastructure of the schools in this consultation or to rebuild them?	See 4.7.2.1
4.7.2.4	The consultation states an estimated capital cost of a new school building of approximately £9m to £10m. Why has PCC not included an option to draw down 21st Century Schools funding to repair and improve the three schools as they currently stand?	See 4.7.2.1
4.7.2.5	The financial saving is not significant enough to justify spending £9m - £10m to build a new school.	See 4.7.2.1
4.7.2.6	Welsh Government has earmarked an extra £50m funding for large scale maintenance projects. PCC has been allocated £2.2m of the original £50m. This money could be used to sustainably refurbish the existing schools in this consultation and allow the authority to focus on higher priority areas for school transformation.	See 4.7.2.1
4.7.2.7	There is no guarantee of funding for a new build so the Proposals are currently, at best, a hope. Funding of £2.2m has already been secured for the maintenance of schools in Powys and the Education Minister announced on 16 th March 2021 that an additional £45m was being allocated to schools across Wales to support revenue maintenance costs. Has Powys County Council applied for a share of the additional £45m funding and, if so, how much has been allocated to Powys? Why hasn't the securing of £2.2m for maintenance of schools been listed as one of the strengths of options 1, 2a, 2b, 3a and 3b?	See 4.7.2.1 Additional funding was announced by the Welsh Government in March 2021 to support large scale maintenance projects in schools. Powys County Council was allocated £2.2 million from this funding. The funding hadn't been allocated when the options appraisals were prepared.
4.7.2.8	What is PCC's plan if the authority is NOT successful in securing funding for a new school?	The Council has included the development of a new school in Brecon in its revised Strategic Outline Programme for the

		<p>21st C Schools Programme. Should the Proposals be approved by Cabinet, then the Council would commission the first stages of the design process and develop a Strategic Outline Case for the approval of Cabinet and the Welsh Government. It would then further work up the plans through the RIBA stages, and develop an Outline Business Case, again for Cabinet and Welsh Government approval. Following this, a Full Business Case would be prepared, and once approved by Cabinet and the Welsh Government, construction would commence.</p> <p>If the Welsh Government's contribution to the project was not available, then the Council would fund the project directly from its own capital programme, through a combination of asset sale and borrowing.</p>
4.7.2.9	There is no doubt that it would cost less money to build one new school in Brecon, to house both Mount Street and Cradoc schools, rather than a new school for two mount street schools and a separate new one for Cradoc. However, it has been made clear that financial implications should not be taken into account when considering our children's education. I therefore repeat my request for a new proposal to build a new school in Cradoc, together with a separate impact assessment.	See 4.7.2.1
4.7.2.10	Powys CC are putting money above the needs and wellbeing of its constituents. There is only one reason that this proposal has come about, why pay for 3 new schools to be built when you can cut corners and build 1?	See 4.7.2.1
4.7.2.11	I believe funding is available to build community halls/centres for the benefit of communities throughout the country. This option should have been considered, to include a new school building as part of the same project, to reduce costs and increase community facilities within the Yscir ward.	The Council is not aware that any funding of this type is available.

4.7.3 Comments about funding received from the MOD

4.7.3.1	<p>There will be a loss of Ministry of Defence (MoD) funding support to Teaching Assistants. At least 2 of the schools in question have recently applied for and received various grants from the MoD which in total are worth in excess of £60K pa (including ESF, Covenant etc.). Given that these grants are issued school by school, rather than pupil by pupil, an amalgamation of the three schools would see those grants effectively reduce by 1/3. These are significant amounts of money and, for example, if the new school were to apply for 3 TAs to look after the Nepalese and military families it is unlikely to be forthcoming. However, if each of the current 3 schools applied then the chances are, they would. Therefore, the Proposals are directly, negatively impacting on (reducing) the provision of support to the military community. Are PCC aware of the impact this loss of MOD funding will have on pupil outcomes and made any assessment to mitigate this loss of funding?</p>	<p>As far as the Authority is aware only Mount Street Infants have applied for the funding, and have done on an annual basis, being successful each year.</p> <p>Should the grant continue to be available from the MoD, the new school will be able to apply for it. The application process would require the school to set out how the grant will support military children and the school would need to apply the grant in line with that application, if successful. Given the success of the existing schools in accessing this funding, The Council does not foresee difficulties in future applications.</p>
4.7.3.2	<p>How will funding for our TAs be affected once our M.O.D grants no longer exist or are halved because they are allocated to each school not per pupil?</p>	<p>As above.</p>

4.7.4 Suggestions that the only reason for the Proposals is to save money

4.7.4.1	<p>This is purely a money saving initiative.</p>	<p>See 4.7.2.1</p>
4.7.4.2	<p>This is all about short term financial savings.</p>	<p>See 4.7.2.1</p>
4.7.4.3	<p>Saving money is the only reason this is being proposed by Powys, regardless of the fact that Cradoc is a thriving rural community school.</p>	<p>See 4.7.2.1</p>
4.7.4.4	<p>This is only being done to save costs for Powys, with absolutely no regard to a rural community or a thriving school. We have no post office, shops, bus services... all have gone.</p>	<p>See 4.7.2.1</p>
4.7.4.5	<p>Is The Council considering the children's education or is this just a money saving exercise?</p>	<p>See 4.7.2.1</p>

4.7.4.6	Cost cutting by Powys County Council is just going to make class sizes bigger and affect the quality of education.	See 4.7.2.1
4.7.4.7	Powys County Council's main objective appears to be to save money. However they spent thousands of pounds on a new car park at Cradoc C.P School a few years ago and now seem content to close the school. How is this good management of using funds by Powys County Council?	The Council has a duty to maintain its school buildings and address any issues that arise, regardless of whether schools are reviewed or not.

4.7.5 Comments about the potential sale of sites

4.7.5.1	It is clear these Proposals are being developed based on solely financial benefits rather than it being the best solution for our children. Rationalising primary schools will release valuable real estate which will be sold at a profit for The Council.	The Council currently has no intention to sell any land to developers. Should the Council proceed with the Proposals in respect of Mount Street Infants, Mount Street Juniors and Cradoc C.P. School, the three school buildings would eventually be declared surplus following the move to a new building. All surplus assets are subject to the process of disposal as outlined in the Council's Asset Management Policy. Whilst it is possible that this could lead to sale of the sites to third parties, some schools that have closed have been transferred to other service areas e.g. housing or to a community - with the latter, this may allow for the space to be retained or developed for community use. Any capital receipts realised from sale of any of the sites would be re-invested in The Council's corporate budget, which in turn supports education.
4.7.5.2	Concern that the main attraction of closing Cradoc School is to gain a capital receipt for the land for housing development and to avoid investment in a good school. As well as the loss of the only area for children to play, the lack of existing parking for residents and the narrow roads to and from Cradoc make this a very bad idea and unsafe.	See 4.7.5.1
4.7.5.3	It is obvious that the Council want to sell off the Cradoc school site as they are under massive financial pressure. THIS IS NOT ACCEPTABLE.	See 4.7.5.1

4.7.5.4	Everyone knows The Council is in a financial mess. Selling the Cradoc school site is not a respectable way out for The Council.	See 4.7.5.1
4.7.5.5	We all know Cradoc school site is valuable for housing, thus the motive I presume.	See 4.7.5.1
4.7.5.6	If Powys County Council were to sell the Mount Street Infant School site, there would be a loss of a green space in the heart of Brecon.	The Council notes this concern about loss of green space in the heart of Brecon. Should the Council proceed with the Proposals in respect of Mount Street Infants, Mount Street Juniors and Cradoc C.P. School, the three school buildings would eventually be declared surplus following the move to a new building. All surplus assets are subject to the process of disposal as outlined in The Council's Asset Management Policy. Whilst it is possible that this could lead to sale of the sites to third parties, some schools that have closed have been transferred to other service areas e.g. housing or to a community - with the latter, this may allow for the space to be retained or developed for community use. Should the site eventually be sold to a third party, The Council would have no control over what would happen to the site in the future.
4.7.5.7	Can Powys County Council sell the land in Brecon? Was the land gifted to The Council for the purposes of education by the Cobb estate?	The Council is not aware of any restrictions relating to the ownership of the land on which the school is located.

4.7.6 Comments about where any savings will go

4.7.6.1	The proposal clearly states that any savings will go back into The Council's corporate budget and not the school system. Therefore, the pupils will not benefit from the sale of these sites.	The revenue savings and capital receipts received from the sale of the sites would go back into the Council's corporate budget, which, in turn, supports education. Education is one of the highest priorities for the Council and the corporate budget allocations will reflect its priorities.
4.7.6.2	There is a common sentence in each of the reports which says "Any savings would be reinvested in The Council's corporate budget and any reinvestment in the schools' system would be agreed as part of the annual budget planning cycle". This falls a long way short of guaranteeing that the savings will be retained within the overall schools' delegated budget. Essentially this means	See 4.7.6.1 The funding formula is under constant review to ensure it is fit for purpose. Budget pressures for the schools delegated budget are identified and considered alongside all other budget pressures of the Council.

	that it will be up to The Council each year to decide on whether the funding should be retained for schools or not. This approach is very worrying as it could lead to the overall schools' delegated budget being reduced as a result of The Council deciding that savings should be reinvested elsewhere. That runs very much against the overall plan to share the existing resources amongst a smaller number of schools and could result in the same problem we have now – not enough funding to run all the schools.	
4.7.6.3	When reporting back to the Cabinet on the results of the consultations for each of these schools, can you please report the concerns of the Schools' Forum as set out above and change the approach to how savings are to be treated, i.e. that they are ring fenced for use within the schools' delegated budget.	The concerns of the Schools Budget Forum will be reported back to Cabinet when considering the consultation reports. However, it is not appropriate to recommend ring-fencing any potential savings for use within the schools' delegated budget. As stated above Education is one of the highest priorities for The Council and corporate budget allocations will reflect its priorities.

4.7.7 Other comments

4.7.7.1	Why did Powys recently spend over £100,000 on a new car park, if they intended to close it?? This would definitely be seen as a waste of taxpayers' money.	The Council has a duty to maintain its school buildings and address any issues that arise, regardless of whether schools are reviewed or not.
4.7.7.2	The fact that Powys CC only recently spent large sums of money upgrading the car park at Cradoc school demonstrates how poorly the limited resources they have available have been managed. Building a car park on a greenfield site that was a school playing field, only to then close the school, does not seem particularly environmentally friendly, or an efficient use of public money?	See 4.7.7.1
4.7.7.3	It seems that of the primary schools around Brecon that have been rebuilt, many have been built to incorporate extravagant and expensive design features that probably were not strictly necessary. As a result of these extra costs and poor management of budgets, Powys CC do not now have enough money left in the pot to rebuild Cradoc as everyone would have reasonably expected them to. This is Powys CC's mistake and Powys CC should be made accountable for years of poor decisions. It is not fair on the staff,	The Proposals to close Cradoc School is not being made 'as a result of mistakes made by Powys CC'. The primary schools that have been rebuilt in the Gwernyfed and Ystradgynlais catchment were rebuilt following an area school reorganisation in those catchment areas, which resulted in a reduction in the number of schools in the catchments. The schools were built in accordance with the latest guidance and Building Bulletin information, and it is

the pupils (current, former or future) or the wider community to close Cradoc as a result of mistakes made by Powys CC.	untrue that they 'incorporate extravagant and expensive design features that probably were not strictly necessary.'
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4.8 COMMENTS ABOUT COUNCIL / WELSH GOVERNMENT STRATEGIES

4.8.1 Comments about The Council's Strategy for Transforming Education in Powys

4.8.1.1	I am concerned about the number of nearby Powys schools threatened with these Proposals. I feel strongly that children should be able to attend their local school, with its strong link to the community.	<p>Comment noted. The Council's Strategy for Transforming Education in Powys was developed following extensive engagement with a range of stakeholders. The Strategy aims to transform the Powys education system in order to provide the best possible opportunities to Powys learners now and in the future, to 'improve learner entitlement and experience.'</p> <p>The engagement carried out when developing the Strategy clearly identified that there are too many schools in Powys, and in particular, that there is a high proportion of small schools.</p>
4.8.1.2	The Powys transforming education is a misguided process, the basics need learning with a child and smaller schools drive this home. In 50 years will there be 1 school for the whole of Brecon-that's the natural progression for this idea.	As above.
4.8.1.3	Why do Mount Street and Cradoc have to be the guinea pigs for The Council's new centralisation strategy?	Whilst the current Proposals are among the first Proposals to be taken forward since approval of the new Strategy, school reorganisation has been ongoing in Powys for many years. The reorganisation of the Ystradgynlais area saw the number of primary schools in the catchment reducing from 10 to 4 and the reorganisation of the Gwernyfed catchment saw the number of schools reducing from 10 to 5.
4.8.1.4	Powys County Council state that their vision for 2025 includes schools being the focal point of their communities, promoting community cohesion in line with Welsh Government guidance; the current proposal is contrary to this.	The Council's impact on community cohesion is considered in the impact assessment. The Council has also carried out a community impact assessment with input from the affected schools. These assessments will be updated at each stage of the process to reflect comments received, and updated

		versions will be considered by the Council's Cabinet when determining whether or not to proceed with the Proposals.
4.8.1.5	The Enabling Action 1 is to provide opportunities for wider community activity, including where possible childcare services, early years, ALN, multi-agency support and community and leisure facilities is entirely counter-productive. You are taking from a community, (Cradoc) that depends on the school to provide the facilities for community activities and provides early years learning, to place a new facility in Brecon, where there are already community facilities available, for instance the new High School building very near to the proposed site, or the existing Mount street buildings and at least three community halls, which would mean that some families currently accessing funded early years education provision and childcare provision at Cradoc may not access the alternative provision in Brecon. Therefore, not achieving EA1, rather, directly reducing the opportunity for these services.	Comment noted. The Proposals impact on the community in Cradoc is considered in the draft impact assessments published with the Consultation Document ation. These will be updated to reflect comments received in the consultation responses, and updated versions will be considered by the Council's Cabinet when determining how to proceed in respect of this proposal.

4.8.2 Comments about the New Curriculum

4.8.2.1	The new Curriculum has a focus on Cynefin and Wellbeing. If The Council moves the pupils of Cradoc Community school to a school out of their community their Cynefin will have less meaning to them; all their current Cynefin that they feel and experience will be lost.	The Brecon area is rich and diverse and well suited to the Cynefin of the new Curriculum for Wales. A school would explore the community it serves rather than just its local community. Therefore the pupils would not lose the Cradoc community as part of their curriculum experience. They would use this alongside the locality of the whole Brecon area.
4.8.2.2	"The (new) curriculum does, however, place great emphasis on the local area, or what it calls Cynefin. According to the new Curriculum, Cynefin is defined as: "the place where we feel we belong, where the people and landscape around us are familiar, and the sights and sounds are reassuringly recognisable. Though often translated as 'habitat', Cynefin is not just a place in a physical or geographical sense: it is the historic, cultural and social place which has shaped and continues to shape the community which inhabits it." Your current plans ignore this WG statement totally.	As above.

4.8.2.3	The Welsh Government 's new school curriculum mentions Cynefin, which is defined as “The place where we feel we belong, where the people and landscape around us are familiar, and the sights and sounds are reassuringly recognisable. Though often translated as ‘habitat’, Cynefin is not just a place in a physical or geographical sense: it is the historic, cultural and social place which has shaped and continues to shape the community which inhabits it.”. If Cradoc C.P. School children are forced to move to a different school then not only will this meaning be lost, it will have a detrimental impact on children, which is in breach of the new Curriculum.	As above.
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4.8.3 Other comments

4.8.3.1	Powys should abide by the Welsh Government 's position that closure of Rural Schools should be the last option considered. Please take on board the following: (from https://gov.wales/sites/default/files/publications/2018-10/rural-education-action-plan-1.pdf) "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."	The Council fully acknowledges the role of rural schools in their communities. The Council has complied the requirements of the School Organisation Code’s ‘presumption against closure of rural schools’ in respect of the Proposals.
4.8.3.2	The proposal that will result in pupils having to be driven to school is contradictory to the ‘Taking Wales Forward 2016-2021’ Welsh Government policy which contains a clear pledge to ensure better access to active travel to all, as well as the Active Travel (Wales) Act 2013 which sets Wales on a path to “help transform our country into an active travel nation”.	Comment noted.
4.8.3.3	The Well-being of Future Generations (Wales) Act 2015 requires public bodies in Wales to consider the impact of their decisions to collaborate in order to prevent persistent issues such as “poverty, health inequalities and climate change”. The proposed closure of Cradoc Primary School by Powys County Council is contradictory to	The Proposals’ impact on the factors outlined in the Well-being of Future Generations (Wales) Act is considered in the Impact Assessment carried out as part of the process. The Impact Assessment will be updated throughout the process to reflect comments received in the consultation

	these legal requirements and must be held accountable to the impact this closure will have on future generations.	responses, and updated versions will be considered by the Cabinet when determining whether or not to proceed at each stage.
4.8.3.4	Sian Gwenllian MS said in the Senedd recently “a school is not a building; a school is a group of children and young people learning together, led by skilled teachers who can inspire future generations.” Does Powys County Council agree that a school is more than a building?	The Council fully agrees that a school is more than a building.
4.8.3.5	The health of the children in our community needs to be a priority. Welsh Government and Powys County Council have the policies in place to acknowledge this, but the proposal to close Cradoc Primary School does not adhere to these policies. Action needs to be taken now. We cannot carry on as we have been doing due to the impacts on climate change, physical health and mental health and well-being.	Comment noted.
4.8.3.6	Welsh Government guidance and Powys County Council policy is to promote community cohesion; the current proposal is completely contrary to this. Rather, Powys County Council should seek to rebuild the school at the heart of the community, including providing a Community hall that can be separately accessed by the school or the Community and retain this focal hub with its new parking and playground equipment.	The Council's impact on community cohesion is considered in the impact assessment. The Council has also carried out a community impact assessment with input from the affected schools. These assessments will be updated at each stage of the process to reflect comments received, and updated versions will be considered by the Council's Cabinet when determining whether or not to proceed with the Proposals.
4.8.3.7	The Council aims to bring more people to Powys to live and work and yet seem to be dismantling good education and resources. This will hardly encourage young people to move here.	The Council's Strategy for Transforming Education in Powys is intended to improve learner entitlement and experience and to ensure equity across the system. The Council is committed to ensuring that all pupils are able to be educated in the highest quality learning environments.

4.9 CRITICISM OF POWYS COUNTY COUNCIL

4.9.1 Criticism of The Council's approach to buildings

4.9.1.1	The condition of school buildings is poor due to neglect by Powys County Council over the years. If maintenance isn't prioritised, any new school would also fall into disrepair relatively quickly.	The Council's schools maintenance funding has steadily reduced over the last few years, and The Council has to prioritise its funding accordingly. Schools are prioritised using a scoring criteria which can be found in The Council's Schools Asset Management Plan.
4.9.1.2	The buildings, had they been better maintained by the Council over the years, would not now need such a lot of work. This seems like an all too familiar story with Powys County Council. It neglects its assets for so long that the only option seems to be to throw out the proverbial baby with the bath water.	As above.
4.9.1.3	It is only through poor building maintenance by Powys County Council over many years that the buildings have been allowed to get into such a poor state of repair that we have come to this point where these rushed and ill thought-out Proposals have been put forward with no consideration taken for the effect it will have on the school children, teachers and the surrounding communities.	As above.
4.9.1.4	Why does PCC have so many buildings that have been left to deteriorate – MSJ was built in 1987 – what message does this give to children in terms of care and conservation of assets?	As above.
4.9.1.5	I am also bewildered at the need to destroy a perfectly good building like the Junior's school which is only 30 years old. It is still in a good condition and any problems can surely be fixed easily enough. It seems that the whole idea is just to prevent having to rebuild or mend three schools which all cater for many different parts of the community in their own way, and possibly saving some money on staff and building, which I doubt is what will happen given Powys Councils record of rebuilding and modernising structures.	As above.
4.9.1.6	I feel Powys has acted very unprofessionally to the community by not making any investment in the structure of the building, is that, so it gives them a better argument for its closure. It has always seemed that a new building was on its way for Cradoc, and we just had to wait our turn, but maybe The Council has always had a different plan.	As above.
4.9.1.7	Is Powys behind the curve on this in the sense that they are still locked into new buildings being the answer to problems	The Council's Strategy for Transforming Education in Powys is intended to improve learner entitlement and experience

		and to ensure equity across the system. The Council has a duty to maintain its schools estate and an ambition to ensure that all pupils have the learning environments that they deserve. .
4.9.1.8	The PRU is already housed in a purpose-built school. That the Council chose to sell off that school building for a pittance and now has to rent it back is due to the short-sightedness of previous PCC administrations and should not be paid for by pupils of the schools in Brecon.	<p>The school where the PRU is located was a Roman Catholic school. The building was owned by the Diocese of Menevia, not by the Council.</p> <p>Following its closure the Diocese of Menevia sold the building on the open market, and The Council have subsequently leased it back for the PRU.</p>

4.9.2 Criticism of The Council's treatment of rural communities

4.9.2.1	The Council need to support rural areas and rural schools more.	<p>The Council fully acknowledges the rural nature of Powys, which brings with it a number of challenges – as explained in The Council's Strategy for Transforming Education in Powys, which was developed following extensive engagement with schools and other stakeholders: <i>'Delivering services across such a large, sparsely populated area is challenging and expensive. This is particularly true for education.'</i></p> <p>The Council fully recognises the need to develop an education provision which fully meets the needs of all learners, including those living in towns and in more rural areas. The Council's aspirations are outlined in the Vision and Guiding Principles which are included in the Strategy for Transforming Education in Powys, and the first of the guiding principles is 'A world class rural education system that has learner entitlement at its core.'</p> <p>The Council is taking forward a number of Proposals to implement its Strategy, some of which affect schools in small villages whilst others affect schools in larger villages or in towns. For any Proposals affecting the closure of schools</p>
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		<p>identified as 'small schools' in the School Organisation Code, The Council has complied with additional requirements outlined in the Code.</p> <p>In addition, The Council carries out Community Impact Assessments in respect of any Proposals undertaken, with input from the affected schools. These are updated throughout the process to reflect any feedback received, and the latest versions are considered by the Council's Cabinet when determining whether or not to proceed with each proposal.</p>
4.9.2.2	I hope that the decision makers will support life in rural Breconshire, rather than close Cradoc School and give our whole rural community a big kick in the teeth and make life much harder for us.	As above.
4.9.2.3	You go against all your policy's supporting rural and the communities you are taking everything and expecting our taxes to increase!	As above.
4.9.2.4	Your role as leaders is to protect the local community. Council members should not be looking at a balance sheet, but the community itself.	As above.
4.9.2.5	At the end of the day the proposal of Powys CC seems much more about serving their own interests than those of the community they are supposed to serve.	As above.
4.9.2.6	The Council have major financial problems....so closing and selling off Cradoc school site in the future is not treating our rural community with respect.	All surplus assets are subject to the process of disposal as outlined in The Council's Asset Management Policy. Some schools that have closed have been transferred to other service areas e.g. housing or to a community - with the latter, this may allow for the space to be retained or developed for community use. In other case they have been sold to third parties. This provides The Council with a capital receipt that is then re-invested in The Council's corporate budget, which in turn supports education.
4.9.2.7	There is no plan to provide community facilities in Cradoc if the school were to close. Does The Council wish to be branded in the same way as during the Epynt relocations – Cofio'r Epynt!	The Council acknowledges that the Cradoc C.P. School building is used for community activities – this was identified

		<p>in the draft community impact assessment carried out in respect of these Proposals.</p> <p>The Council notes these concerns about the possible impact on community facilities in Cradoc Should the Council proceed with the implementation of Phase 2 of the Proposals. As stated in the draft community impact assessment: <i>'it is acknowledged that a move to a new school site in Brecon would mean that there would no longer be a school located in Cradoc, therefore potentially the community facilities provided by the school may no longer be available. It is currently unclear where the facilities and services currently provided by the school could be provided should there be no school located in Cradoc.'</i></p> <p>The draft community impact assessment also states that: <i>'an initial search has identified some alternative locations in the area where community events could take place. Should the Council proceed with the Proposals, it would endeavour to work with the community in Cradoc to identify a suitable alternative, initially this could involve discussions with Community Councils in the area about future use of the school building.'</i></p> <p>Should the Council proceed with these Proposals, the Cradoc C.P. School building would eventually be declared surplus following the move to a new building. All surplus assets are subject to the process of disposal as outlined in The Council's Asset Management Policy. Whilst it is possible that this could lead to sale of the sites to third parties, some schools that have closed have been transferred to other service areas e.g. housing or to a community - with the latter, this may allow for the space to be retained or developed for community use. This could enable the facilities to be retained for community activities.</p>
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4.9.3 Other comments

4.9.3.1	The cabinet of Powys County Council needs to be more diverse - for example most of the cabinet members live north of Llandrindod Wells. The people of Powys need cabinet members from a wider area. They will then get to know the problems that Brecon faces (such as traffic). Then they will realise that their Proposals are bad for the community. Selling Cradoc School site is not the answer to The Council's financial problems. Rural areas and schools need supporting. Let's see what Powys is made of.	<p>The Council's Cabinet currently includes 2 members that represent wards in Brecknockshire, 2 members that represent wards in Radnorshire and 4 members that represent ward in Montgomeryshire. This reflects Powys' population.</p> <p>The aim of the consultation exercise is to enable all stakeholders to let the Council know their views on the Proposals and to enable any issues to be identified and taken into consideration.</p>
4.9.3.2	The majority of the cabinet members do not live in the Brecon area. Firstly, they do not know firstly how much of an impact closing Cradoc School would have on our scattered rural community.	As above.
4.9.3.3	Who is driving this approach? Are they educationalists or committed to the welfare of children? I doubt it! So please show the costs involved and be open with your communities in Powys...and earn yourselves some approval and support.	The current Proposals have been developed by a number of officers, including officers from the Council's School Improvement Team who are primary education specialists along with specialist officers from the ALN team, finance and HR, as well as officers from the Transforming Education Team. All officers are committed to the welfare of children across Powys. The estimated savings associated with the Proposals for Mount Street Infants, Mount Street Juniors and Cradoc School are included in the Consultation Document .
4.9.3.4	The treatment of staff and pupils appals me, where is the duty of care? Given the Powys track record with the amalgamation of schools, the plan does not bode well; few I know have been deemed a success and not resulted in a waste of money.	The Council acknowledges that any school reorganisation proposal leads to a period of uncertainty for the staff and pupils involved. The Council's HR officer offered support to the three schools to provide an opportunity for them to ask

		<p>informal questions / raise concerns, however this offer was not taken up.</p> <p>The Council is committed to supporting schools and learners, including through periods of change. Children experience change in a vast range of areas, from family life to technology. An experienced headteacher is working for The Council to support school leaders to help them manage possible changes for their staff and learners.</p> <p>However, 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>
4.9.3.5	<p>Bad idea, Powys education officers have a terrible history for coming up with decisions that are blatantly poor. This is yet another and needs to be stopped. This is a step backwards for education in this area. I understand why people travel out of the county as soon as they can to continue their education.</p>	<p>The Council does not agree with this statement. The aim of The Council's Strategy for Transforming Education in Powys is to improve learner entitlement and equity and to ensure equity across the system. This Strategy was developed with extensive engagement from the school communities themselves.</p>
4.9.3.6	<p>I think Powys CC should be made accountable for its mistakes and electing to proceed with this consultation when there is so much opposition to it only goes to demonstrate how out of touch with the public Powys CC is.</p>	<p>The aim of the consultation exercise is to enable all stakeholders to let The Council know their views on the Proposals and to enable any issues to be identified and taken into consideration. All issues raised in the consultation responses received will be considered by the Council's Cabinet when determining whether to proceed with the Proposals.</p>
4.9.3.7	<p>Our ancestors didn't fight two world wars so you could jeopardise education even more especially trying to emerge out from a pandemic. MESS THIS UP AT YOUR PERIL. Elections or not I will be monitoring very closely.</p>	<p>The Council does not agree that it is 'jeopardising education'. The Council does not agree with this statement. The aim of the Council's Strategy for Transforming Education in Powys is to improve learner entitlement and equity and to ensure equity across the system. This Strategy was developed with extensive engagement from the school communities themselves.</p>
4.9.3.8	<p>Powys County Council's main objective appears to be to save money. However, they spent thousands of pounds on a new car</p>	<p>The Council's main objective isn't 'to save money'. The Council has a duty to maintain its school buildings and</p>

	park at Cradoc C.P School a few years ago and now seem content to close the school. How is this good management of using funds by Powys County Council?	address any issues that arise, regardless of whether schools are reviewed or not.
4.9.3.9	PCC should reduce the number of middle managers at PCC to save money. Stop cutting down trees and mowing grass unnecessarily.	Comment noted.
4.9.3.10	It seems no coincidence that Powys CC has decided to push through as many school closures during COVID-19 restricted times when it is more difficult for communities to get together and object. I fear that this decision, whilst ultimately enforced by Government underfunding and poor financial management at Powys CC will be legally challenged.	The Council recognises that any school reorganisation proposal creates a period of uncertainty and concern for local stakeholders. However, in order to address the issues raised by Estyn regarding the organisation of its schools, it has been necessary for The Council to continue with the development and consultation on Proposals during the current pandemic. The Welsh Government provided non-statutory guidance for local authorities to manage consultations during period of lockdown, which The Council has taken into account. The level and detail of responses received to all recent consultations outlines that stakeholders have engaged fully in the consultations, even though there have been restrictions in place.
4.9.3.11	I have been appalled all the way through from initially finding out about these Proposals at the way Powys County Council have conducted themselves. They have used the current pandemic situation as a way of pushing through these Proposals without being held to proper public scrutiny.	It is not true that the Council has used the pandemic 'as a way of pushing through these Proposals without being held to proper public scrutiny.' The Proposals have been taken forward in accordance with the requirements of the School Organisation Code.

4.10 COMMENTS ABOUT THE CONSULTATION PROCESS

4.10.1 Comments about consulting during the Covid pandemic

4.10.1.1	Given the current pandemic I feel now is not the right time to consult and start putting in changes for our children and the staff. All consultation is online this puts many people at a disadvantage.	The Council recognises that any school reorganisation proposal creates a period of uncertainty and concern for local stakeholders. However, in order to address the issues raised by Estyn regarding the organisation of its schools, it has been
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		necessary for The Council to continue with the development and consultation on Proposals during the current pandemic. The Welsh Government provided non-statutory guidance for local authorities to manage consultations during period of lockdown, which The Council has taken into account. The level and detail of responses received to all recent consultations outlines that stakeholders have engaged fully in the consultations, even though there have been restrictions in place.
4.10.1.2	Covid 19 has had a major impact on the way we have been able to communicate while the consultation has been ongoing. As a result, The Council should apologise and put the consultation process in hold until lockdown is fully lifted.	As above.
4.10.1.3	Covid 19 has had an impact on the way we have been able to do things and communicate - The Council need to treat our community and school fairly and they haven't done so by running it during pandemic.	As above.
4.10.1.4	It seems ludicrous that in a time of global pandemic, when children need security and stability, they are being told that they may lose their school and head teacher. As a Mount Street Infants parent, I would have serious concerns about this!	As above.
4.10.1.5	The stress that Powys County Council has placed on families and local communities during the pandemic and through this consultation is a disgrace.	As above.
4.10.1.6	Covid 19 has had a major impact on our lives and the way we have been able to live our lives for the last 14 months. For Powys County Council to be even taking this action and running this consultation period during such a difficult time when our lives are constrained is not giving us a fair chance.	As above.
4.10.1.7	Powys County Council needs to give all parties a fair chance to communicate through whichever their preferred method of communication is. This can only be done when Covid 19 restrictions are fully lifted.	As above.

4.10.1.8	For Powys County Council to be even taking this action and running this consultation period during such a difficult time when our lives are constrained is not giving us a fair chance.	As above.
4.10.1.9	The timing of this consultation comes when people have had a lot to deal with through the pandemic and further change and uncertainty poses more undue stress on the people of the community and its pupils.	As above.
4.10.1.10	This seems like a particularly ill-timed proposal in the wake of the Coronavirus pandemic.	As above.
4.10.1.11	Powys County Council should rethink and stop this process of closure, or at the very least, pause the process until staff, students and their families are able to recover from the high anxiety already suffered as a result of this terrible pandemic before starting a consultation on such high-impacting changes.	As above.
4.10.1.12	I am appalled at the poor timing of this consultation. Pupils, parents and teachers, along with other school staff (Teaching Assistants, secretaries, cooks, cleaners), have had such a tough time during this pandemic, I dread to think of the extra stress and anxiety this is causing. At a time when mental health is paramount, this is the last thing we all need. It has caused unnecessary worry and upset when they are already feeling the strain: please take into consideration the health and wellbeing of the staff and pupils who are so passionate about our school.	As above.
4.10.1.13	We feel disadvantaged that the timing has not permitted us with the ability to fully interact with our wider community due to travel restrictions and social distancing to communicate the Proposals and involve all of those effected with your consultation process fully.	As above.
4.10.1.14	Under normal circumstances, the public would have the right to hold meetings to discuss the Proposals and form a cohesive community response. That right has been taken away from them by holding this consultation process during the Covid-19 lockdown period.	As above.
4.10.1.15	Regarding the consultation process, I strongly object to this being carried out in a time of lockdown, which has prevented parents,	As above.

	in particular, meeting face to face in both formal and informal settings. This will prevent a rounded approach to consultation.	
4.10.1.16	If Powys County Council wants to run a consultation on the closure of this or any other school then they should do it properly. It can only done properly when people do not have massive restrictions on the way that they can live and communicate.	As above.
4.10.1.17	Powys County Council needs to give all parties a fair chance to communicate through whichever their preferred method of communication is. This can only be done when Covid 19 restrictions are fully lifted.	As above.
4.10.1.18	The Covid pandemic has made it more difficult for the local community to come together, as is usual in these cases, to discuss these Proposals, surely in these extraordinary times reference and considerations should have been made to this in your Proposals.	As above.
4.10.1.19	We are appalled that schools at this time are consulting on school closures during the continuing pandemic. We would highlight that this is not the time for Local Authorities to be undertaking school closure procedures. We would ask that all proposed and future closure plans cease and do not resume until education is on a more normal footing. It is difficult to conceive and justify that school staff are facing redundancy in a situation where there is money available to hire extra staff to support the wider opening of schools.	As above.
4.10.1.20	Having to rely on technology (due to the pandemic) hasn't provided an equal opportunity for the less technically adept people in our community to voice their opinion, which is totally unfair. Internet connections are not good in all places and many would wish to voice their concerns in a public meeting to which the dynamics of discussion are better suited. PCC should have delayed in pushing the proposal forward due to this inequality.	As above.
4.10.1.21	You are extremely callous in choosing, despite multiple requests to halt from MP's and the local community, to allow this project to continue to consultation whilst we are all amidst this global pandemic. We are restricted from congregating face to face in a	As above.

	public meeting and you have not made any amendments for our current unique circumstances of a rural population with no access to the internet. You have not ensured those amongst us in this situation can be involved, informed, and have their say to make it a fair and accurate representation of the community.	
4.10.1.22	Please hold this consultation until life is back to normal. When I enquire about The Council services, I am told you are working on business critical - at the moment this falls outside business critical and is future plans. To pass this through in the current state would show how meaningless the consultation is as it excludes many people. It would show this is simply a tick box exercise and you have already decided.	As above. The consultation is not 'simply a tick box exercise'. All responses received to the consultation have been considered and the issues raised have been included in this consultation report. The consultation report will be considered by the Council's Cabinet, who will determine whether to proceed with the Proposals.
4.10.1.23	Welsh Government published new guidance on best practice in regard to consultation on school organisation Proposals during the pandemic. Within the document it recommends consultation periods should be lengthened to allow as many people as possible to consider the proposal and have their say. Carmarthenshire has decided to extend all consultations for reviewing the number and type of schools until July 16th. Similar action in Powys could help the school community take action to secure educational recovery and ensure everyone has an opportunity to express their opinion. During this consultation virtual meetings have been held with staff, governors and children but parents have been denied this vital opportunity to explain their opinions. The voice of the parents and wider community has been weakened as the use of ICT does not capture all opinions.	The original consultation period was six weeks, which is longer than the minimum period required by the School Organisation Code. The consultation was subsequently extended during the consultation period to enable Consultation Documentation to be provided in Nepalese. In total, the consultation period lasted 76 days, which is in excess of the minimum length of time required by the School Organisation Code.
4.10.1.24	Welsh Government guidance on school organisation Proposals during the coronavirus pandemic states: "Local authorities and other proposers should take the implications of the restrictions into account and take all steps possible to ensure consultations are fair and inclusive recognising the unique circumstances in which they are taking place during the coronavirus pandemic." Powys County Council Officers have stated that no meeting will	The consultation has been carried out in line with the requirements of the School Organisation Code.

	<p>be held with parents, not even via Zoom or Teams meetings, Powys County Council have forgotten about our Nepalese community, teaching staff are very anxious and have undertaken additional work due to the pandemic, parents have been juggling home working with home schooling, governors are supporting the schools through the pandemic. Due to the additional work and stress caused by COVID-19 does Powys County Council agree that it is impossible that consultation on this proposal will have been fair, thorough and inclusive?</p>	
4.10.1.25	<p>Where is PCC's strategy to deal with the impact of school reorganisation during a worldwide pandemic on educational standards of the children and the wellbeing of the whole school community?</p>	<p>The Council fully acknowledges that all school reorganisation proposals cause a period of uncertainty for those affected by the Proposals, including pupils, and that the Covid-19 pandemic has caused further challenges over the last 18 months or so. Whilst acknowledging that it would have been preferable had the consultation taken place at a time when there wasn't an ongoing pandemic, it has been necessary for The Council to continue with the development and consultation on Proposals during the current pandemic in order to address the issues raised by Estyn regarding the organisation of its schools.</p> <p>The Council is committed to supporting schools and learners, including through periods of change. An experienced member of staff from the Council is supporting school leaders effectively, to help them manage possible changes for their learners. It is also expected that school governors, staff and parents support the children to ensure that there isn't a detrimental impact on their wellbeing.</p>

4.10.2 Comments about consultation meetings

4.10.2.1	<p>The consultation has not been full and fair as there have been no meetings with parents or members of the community.</p>	<p>Virtual meetings have been held with pupils, staff and governors at the three schools. The School Organisation Code (2018) does not require public meetings to be held as part of statutory Proposals. However, the scale of the</p>
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		responses received indicate that the consultation has been widespread.
4.10.2.2	PCC should hold a public meeting so they can see the community and answer the questions face to face.	As above.
4.10.2.3	How are parents supposed to engage in this complex process without any 'meetings' or 'advisors' to turn to when COVID has taken over every aspect of their lives for more than a year and still counting?	As above.
4.10.2.4	With no opportunity for 'public' meetings the whole community is limited in access to the process, an unfair advantage for The Council to go ahead with plans relatively unchallenged.	As above.
4.10.2.5	It is concerning that no engagement meetings with the school community or the residents of Brecon have been undertaken by the Council.	As above.
4.10.2.6	Why have parents, prospective parents, carers, and guardians not been invited to a zoom meeting along the same lines as school staff and governors?	As above.
4.10.2.7	I would have liked to liked Powys County Council to have held a public meeting even if it had to be a zoom meeting. I don't think that this has therefore been an open and fair consultation.	As above.
4.10.2.8	To set out this proposal during a pandemic also means there has been no opportunity for a public meeting – which I have no doubt would be packed – and many in our rural communities don't have a good enough internet connection to join zoom/TEAMS meetings or even reply to the consultation online. This is very disappointing.	As above.
4.10.2.9	I also wish to state that trying to put this proposal forward at a time when parents, governors, teachers and residents of the area cannot meet is very underhand, the meetings that have taken place to oppose this proposal have been well attended but in normal conditions would be a fraction of people that would attend a public meeting, not everybody has access to social media and cannot put their views across.	As above.

4.10.2.10	The consultation should be delayed until such a time that a proper meeting can be arranged where there will be no public meeting because of covid (how convenient is that)?	As above.
4.10.2.11	I think safely convened public meeting could be organised before any major decisions are made.	As above.
4.10.2.12	I did ask if there would be a meeting with the Transformation people so we could ask questions but was told no. Not very helpful. So I don't have much faith in them being able to understand what is best for my child's future education when they can't even be bothered to explain why they want to change it.	As above. The reasons for the Proposals are outlined in the Consultation Documentation published as part of the consultation, as well as in the introductory presentation which was included on The Council's website throughout the consultation period.
4.10.2.13	Powys does not appear to value the opinions of parents as they will not even entertain holding an online meeting with them.	As above. The Council does value the opinions of parents. All parents at the three school have had the opportunity to respond to the consultation. All issues raised in the consultation responses received are included in this consultation report along with The Council's response to those issues. These issues will be taken into consideration by the Council's Cabinet when determining whether or not to proceed with the Proposals.
4.10.2.14	In 'normal' times, questions can be asked and answered at meetings and parents/staff can discuss and get clarity on the school yard, however we now don't have that opportunity.	Comment noted. However the consultation has been carried out in accordance with the requirements of the School Organisation Code (2018).
4.10.2.15	The Council must evidence that this consultation is going to achieve the standards required as set out in the Schools Organisation Code (SOC) which states 'there will be circumstances where proposers will consider that meeting with certain groups of consultees will assist greatly in the dissemination of information'.	The Council is satisfied that the consultation was carried out in accordance with the requirements of the School Organisation Code. The quoted text from the Code is part of a longer sentence which reads as follows: ' <i>There is no requirement for proposers to hold consultation meetings although there will be circumstances where proposers will consider that meeting with certain groups of consultees will assist greatly in the dissemination of information and provide a suitable platform for the consultees to make their views known.</i> ' During the consultation period virtual meetings were held with pupils, staff and governors at the three schools.

4.10.2.16	The Governing Body were able to have a virtual meeting with Powys CC on March 16th but did not receive minutes from the meeting until the end of April. The minutes provided by Powys CC were incorrect. Sections had been added and also some discussion had been left out. This is very unfortunate as it becomes more and more difficult to believe in the fairness of this process.	The minutes were not incorrect. The minutes were verbatim minutes prepared by the Council using a recording of the meeting. Whilst not all of the introductory presentation was included in the minutes, all of the questions raised in the meeting were included in the minutes, as well as the verbatim responses provided by the Council.
4.10.2.17	Cradoc C.P. School pupils were only given 5 working days to respond to the minutes of a meeting between Powys County Council and the school council. I do not believe this is in line with article 12 of the UN convention on the rights of children.	<p>The draft minutes of the meeting with the School Council were sent to the school, with a request that any amendments were provided within a week, however this was not a set deadline.</p> <p>Communication was received back from the school stating that it would be difficult to provide feedback within a week, to which officers responded asking that the school 'get back to us as soon as you are able.'</p>
4.10.2.18	My child sits on the school council, it took PCC weeks to produce the minutes of their meeting with the school council however the same courtesy was not afforded to the pupils to respond, please remember these are children aged 4 to 11, PCC gave them a total of five school days to consider and respond. This at a time when they are working in bubbles and teachers have the additional Covid considerations to allow any response to be made. I don't consider this fair, as the timescale was too tight and the children have a right to be able to consider their response and to be heard.	As above.
4.10.2.19	The difficulties in giving the pupils a fair chance to look at the minutes for their School Council deliberations and comment – PCC had weeks to produce the minutes but they gave the School Council, some of whom are as young as four years old, five school days to consider and reply. This has made it extremely difficult for the pupil's opinion to be heard, which is a breach of their rights under Article 12 of the United Nations Convention on the Rights of the Child.	As above.

4.10.3 Comments about consultation with the Nepalese community

4.10.3.1	There has been a lack of consultation on the proposal especially with Nepalese community.	<p>Members of the Nepalese community who are pupils, parents, governors or members of staff at the affected schools would have been informed of the consultation in the same way as all other pupils, parents, governors and members of staff.</p> <p>Following comments made by governors at Mount Street Infants School at the consultation meeting held with them, arrangements were made for some of the documentation and the consultation response form to be translated into Nepalese. Stakeholders were informed of the availability of these document on the 13th April 2021.</p>
4.10.3.2	Although pupils for whom English is an additional language are mentioned in this proposal it is disappointing that the proposal document was not initially made available in Nepali so that our Nepalese community were fully included.	As above.
4.10.3.3	The consultation has not been properly considered or properly approached for the demographics of the area especially during COVID by applying a standard template approach to the matter (e.g. lack of Nepalese translation).	As above.
4.10.3.4	What provision has been made for this consultation to be extended to the Nepalese community who live in Brecon and use the schools?	As above.
4.10.3.5	There was no early appraisal of the school community in respect of language and therefore the need to provide information in Nepalese which had to be addressed at a later stage leading to PCC having to extend the consultation period. Why was the full Consultation Document not translated into Nepalese?	<p>As above.</p> <p>The Council translated the Consultation Response Form, the summary presentation which gave an overview of the consultation, the Young People's Version and the Children's Version of the Consultation Document into Nepalese. The Council's view is that translation of these documents was reasonable.</p>
4.10.3.6	It is not acceptable that not all the Consultation Documents were translated into Nepali and that only a Summary of the Proposals	As above.

	was made available in Nepali not the complete Consultation Document .	
4.10.3.7	Why was only a summary of the Consultation Document provided in Nepali?	As above.
4.10.3.8	Why weren't the Draft Equalities and Community Impact Assessments translated into Nepali?	As above.
4.10.3.9	This proposal has impacted on the Nepalese community as, although a Polish version was available at the start of the Welshpool consultation, no version in Nepali was available until requested. This resulted in the consultation process being extended to 12th May.	Comment noted.
4.10.3.10	Why has there been no attempt to meet with the Nepali Community to ensure that their specific needs are considered and to allow their views to be known?	All members of the community were able to respond to the consultation, including any members of the Nepali community. The School Organisation Code does not require consultation meetings to be held as part of consultation processes.
4.10.3.11	Our substantial Nepali community have been overlooked.	The Council does not agree with this comment. All members of the community were able to respond to the consultation, including any members of the Nepali community.
4.10.3.12	Why did the consultation have a closing date of May 12th, giving the Nepali community less than 42 days which contravenes section 3.4 of the SOC?	The consultation period ran for a total of 76 days. Members of the Nepali community could have responded to the consultation at any time during this period.
4.10.3.13	Why wasn't the consultation period extended to 25th May which would have given the Nepalese community the required 6 weeks from publication in Nepali to respond to the consultation?	As above.
4.10.3.14	The Nepalese community had only four weeks to read the translated copy of the children's and young person's version of the Consultation Document and were not provided with a full translated version of the Consultation Document .	As above. The Council translated the Consultation Response Form, the summary presentation which gave an overview of the consultation, the Young People's Version and the Children's Version of the Consultation Document into Nepalese. The Council's view is that translation of these documents was reasonable.
4.10.3.15	Why was the closing date for the consultation 5th April 2021 on the Nepali Consultation Response Form?	The originally published documentation was translated. Communication was issued to all stakeholders as required by

		the School Organisation Code to advise that the consultation period had been extended.
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4.10.4 Comments about the presumption against closing rural schools

4.10.4.1	Cradoc C.P School is a rural school and paragraph 1.8 of the School Organisation Code establishes a procedural presumption against the closure of rural schools. It states that the case for closure must be strong and all viable alternatives to closure must have been conscientiously considered by the proposer, including federation. Powys County Council HAS NOT considered all viable alternatives. This needs to be addressed.	The Council has the addressed the requirements of the 'presumption against closing rural schools' as outlined in the School Organisation Code (2018) when developing this proposal.
4.10.4.2	PCC have failed to consider the status of Cradoc school under the School Organisation Code 2nd Edition. Cradoc School has protected rural school status. By the fact that PCC have clumsily included Cradoc in a merger plan with two urban schools, without considering every possible solution, it has in fact breached this legal requirement.	The Council is fully aware that Cradoc is identified in the School Organisation Code as a 'rural school', and that there are additional steps which The Council is required to undertake in order to take forward Proposals to close rural schools. These additional steps have been undertaken.
4.10.4.3	Cradoc C.P. School is a medium sized rural school serving the wide rural Yscir ward and beyond. Welsh Government guidance states that rural schools should be treated differently to urban schools when considering closure as they have a protected status. The project proposal to close Cradoc C.P. School includes the closure of Mount Street Juniors and Mount Street Infants schools, then merge all three into one new school in Brecon. As the project involves two urban schools and one rural school, no extra consideration has been given to Cradoc C.P. School's rural status, as Powys County Council are treating all three schools as one 'project'	As above.
4.10.4.4	Welsh Assembly government advise they intend to keep rural schools open and yet PCC are trying to close Cradoc C.P. School?	As above.
4.10.4.5	Cradoc is a rural school and under Welsh Government legislation you must consider all other options before closing a rural school, I do not believe this has been undertaken.	As above.

4.10.4.6	The Welsh Government guidance states that everything possible should be done to retain rural schools with closure being the last option; there is however no plan on the table to follow this direction.	As above.
4.10.4.7	PCC have failed to consider the status of Cradoc school under the School Organisation Code 2nd Edition. Cradoc Community Primary School has protected rural school status. By the fact that PCC have clumsily included Cradoc in a merger plan with two urban schools, without considering every possible solution, it has in fact breached this legal requirement.	As above.
4.10.4.8	Cradoc is part of the Rural Schools Protection Status which the town schools clearly are not. This is purely a cost cutting exercise if our Rural Status is not taken into account, the education and welfare of the children is secondary.	As above. It is not true that this is 'purely a cost cutting exercise'. The Proposals are being taken forward as part of The Council's Strategy for Transforming Education in Powys, which aims to transform the Powys education system in order to provide the best possible opportunities to Powys learners now and in the future.
4.10.4.9	How can Powys County Council justify closing any rural school going against its own Rural Schools Policy on closures?	The Council does not have a 'Rural Schools Policy'.

4.10.5 Comments about impact assessments

4.10.5.1	Separate assessments should be carried out for each school as the current Community Impact Report does not reflect the three differing communities.	The draft impact assessment document which was published as part of the Consultation Document ation includes a draft community impact assessment which includes a separate section for each of the three affected schools.
4.10.5.2	The way The Council lumped all 3 schools together into 1 community impact assessment was staggering as was the lack of accuracy in the actual impact assessment. Cradoc School is a rural school so how its impact can be assessed in the same way as 2 town schools shows a complete lack of understanding by Powys Council of the situation.	As above.
4.10.5.3	Powys County Council has not carried an individual impact assessment on the closure of Cradoc School.	The Council is carrying out one consultation on one set of Proposals which affect three schools. It is true that one overall

		<p>draft impact assessment was carried out which considered the impact of the Proposals. The draft impact assessment document which was published as part of the Consultation Documentation includes a draft community impact assessment. This includes a separate section for each of the three affected schools.</p> <p>During the consultation, a number of comments have been received suggesting that separate impact assessments should be carried out for the three schools to understand the impact on each school community separately.</p> <p>The updated impact assessments consider the impact of the Proposals on a number of different factors, and where the impact is deemed to be different for the different schools/communities, then this is outlined in the document. In particular, the community impact assessment shows the impact on the three school communities separately.</p>
4.10.5.4	<p>Cradoc CP in nature is a very different school to both town schools and I feel we should have our own Impact Assessment. Without this many issues will be lost/overlooked in a joint Impact Assessment.</p>	As above.
4.10.5.5	<p>As the three schools within the Proposals are considered as one project, only one impact assessment has been created by Powys County Council. This impact assessment does not take into account any of the differences between the three schools or, the impact on Cradoc village's community cohesion. The impact on community cohesion should be taken into account when preparing school closure Proposals in line with Powys County Council and Welsh Government guidance and policy.</p>	As above.
4.10.5.6	<p>Rather than asking the consultees of Brecon Town Schools to make a decision about Cradoc it would make more sense for PCC to set the parameters and deal with the school separately with a</p>	As above.

	separate impact assessment. It appears that the issues which support an alternative to Option 4 are diluted in the Impact Assessment and the issues which support it are enhanced.	
4.10.5.7	Has PCC performed a detailed and stand alone children's rights assessment (CRIA) on the plans? If so please may I have a copy. This is recommended by the Childrens Commissioner for Wales as best practice for public bodies prior to decisions involving children.	The Council has not carried out a standalone children's rights assessment (CRIA) on the plans.

4.10.6 There should be separate consultations for each school

4.10.6.1	Why have we not had separate consultations for each school.	The current Proposals are to merge the three schools in order to establish one new school, initially on the three current sites but eventually moving to a new building in Brecon. As it is one proposal, one consultation had been carried out. However, separate consultation meetings were held with staff, governors and pupils at the three schools, which provided the opportunity for each school community to give their views on the Proposals.
4.10.6.2	My view is that Mount Street Schools should have a separate consultation and not be involved at all with Cradoc School. The cultural aspects of the 2 communities are quite distinct.	As above.
4.10.6.3	This consultation process hugely devalues each schools status in assessing them under one consultation. Mount Street Infants is an excellent school as evidenced by the latest Estyn report. We have major concerns that this consultation is evaluating three schools as if they were already one school. They are three schools and should be being assessed separately. Summarising the schools data and community impact assessments into one summary is just diluting the value each school has.	As above.

4.10.7 Suggestions that the legal process has not been followed

4.10.7.1	Despite legal protections, The Council team seem set on a specific course and a pre-determined set of actions.	The Council has not 'set on a specific course and a pre-determined set of actions'. The Council has carried out consultation on Proposals for Mount Street Infants, Mount Street Juniors and Cradoc C.P. School in accordance with the requirements of the School Organisation Code. The issues raised in the consultation period will be considered by the Council's Cabinet when determining how to proceed in respect of the Proposals.
4.10.7.2	The Council is likely to face legal action if it continues with the closure of Cradoc School. It has handled the proposed closure of the school poorly.	The current consultation has been carried out in accordance with the requirements of the School Organisation Code. The issues raised in the consultation period will be considered by the Council's Cabinet when determining how to proceed in respect of the Proposals.
4.10.7.3	Where is the evidence that this consultation is going to achieve the standards required as set out in the Schools Organisation Code? (SOC)	As above.
4.10.7.4	Does PCC believe that this has achieved an 'intelligent consideration and response' in line with section 3.1 of the School Organisation Code?	As above.
4.10.7.5	I would provide you with advise that not following the legal basis for the closure of a rural school with the correct level of legal veracity may cause the venture to fail.	As above.
4.10.7.6	I'm concerned about the lack of process and honesty concerning the planning options considered. This proposal is not in a position where it should be passed to The Council leaders to consider, based on the legal obligations set out in the school organisational code and the revision relation to Cradoc as a rural school.	As above.
4.10.7.7	As a community member I can confirm that we are now considering all options to ensure that our rural community school and way of life survives. We would prefer to do this without challenging The Council at every turn, without attacking individuals roles in this activity but if as a collective you are unwilling to act lawfully, you leave us with no alternative.	As above.
4.10.7.8	The document set out in law ensures that before you start to consult (causing disruption), all viable options are considered.	A range of options have been considered before commencing consultation on these Proposals. This includes options

		considered in the Brecon catchment PBC which was considered by the Council's Cabinet in September 2020 as well as a number of options for Mount Street Infants, Mount Street Juniors and Cradoc C.P. School which was considered in the options appraisal / Consultation Document .
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4.10.8 Comments about the 'Brecon Catchment Business Case'

4.10.8.1	It would appear from the "Brecon Catchment Business Case" document that option 4C (new-build Cradoc, new-Build Sennybridge and new-build Brecon Primary school) has been omitted. Could you please provide this missing information so that costs associated with re-building Cradoc school become available and transparent? If a new school was built at Cradoc, how much would it cost? Is there any reason why funding cannot be made available for rebuilding the school at Cradoc?	<p>On the 15th December 2020, Cabinet received a Proposal Paper in respect of Mount Street Infants, Mount Street Juniors and Cradoc C.P. School. This noted the omission of option 4C from the Programme Business Case that went to Cabinet on the 29th September 2020, and included a SWOT assessment of this option.</p> <p>The option was discounted in the business case, and therefore hasn't been costed.</p>
4.10.8.2	The "Brecon Catchment Business Case" states that a particular disadvantage to a new Build at Cradoc is "substantial disruption to Cradoc primary school during construction". Can you please confirm where it has been proposed to site the new Cradoc school as if Proposals suggest it is constructed upon the playing field to the north of the existing building then I would dispute this statement.	The Brecon Catchment PBC considers a number of options which would involve a new building in Cradoc, however no site is identified.
4.10.8.3	In the original business case, there is a lack of strategic view and link to other changes being proposed in the Brecon area, and no proper evaluation of the costs and achievability of all options considered in the original Business Case.	The original Programme Business Case was developed by an external company who specialise in the development of HM Treasury's 5 Case Business Model. The scope of the PBC is clearly defined and options have been costed and assessed in accordance with the HM Treasury guidance.
4.10.8.4	Queries about the disadvantages listed under options 4C in the Brecon Catchment Business Case: i) Potential disruption to Cradoc and Sennybridge schools during construction – There is space to build a new school in Cradoc alongside the current building which would cause minimum disruption; ii) Would	<p>Option 4C – new build Sennybridge, new build Brecon primary school, new build Cradoc.</p> <p>i) A full feasibility of the sites would need to be undertaken to be able to say definitively that there</p>

	<p>potentially require temporary relocation of pupils during construction along with associated costs – There would be no need to relocate Cradoc children during construction; Does not maximise efficiencies – What does this mean?; Does not provide opportunities for staff from being part of a larger school – Surely this is more of a threat? Would all current staff have jobs at the new, merged school?; Does not maximise opportunity for capital receipts – What does this mean?</p>	<p>would be no disruption to pupils at any of these schools during construction, therefore it is justifiable to suggest that there may be ‘potential disruption’.</p> <p>ii) As above – until a full feasibility of the sites are undertaken, it is not possible to rule out the possibility of having to decant pupils.</p> <p>iii) Does not maximise efficiencies means that this option isn’t the best in terms of costs and value-for-money as it is rebuilding four schools.</p> <p>iv) This option replaces the four schools as they are – no additional benefits from being part of a larger group of staff.</p> <p>v) This means that there wouldn’t be an opportunity to receive a capital receipt through selling the sites.</p>
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4.10.9 Concern about lack of engagement as part of the process

4.10.9.1	<p>Concern about lack of early engagement with the school as part of the process.</p>	<p>Comment noted. The process has been carried out in accordance with the School Organisation Code (2018), which does not require early engagement to take place. The current Proposals are being taken forward in order to contribute to the implementation of The Council’s Strategy for Transforming Education in Powys, which was developed following extensive engagement with a range of stakeholders, including the public.</p>
4.10.9.2	<p>There was no engagement with the schools prior to the consultation.</p>	<p>As above.</p>
4.10.9.3	<p>Concern about the lack of engagement from Powys County Council (PCC) with our parents</p>	<p>As above.</p>
4.10.9.4	<p>Your team have been unable to engage with the school because of Covid restrictions; this is reason enough to delay the process so a full and inclusive formal engagement process can take place.</p>	<p>As above.</p>
4.10.9.5	<p>This sort of transformation needs civic input throughout. State the problem to parents, teachers and governors, and build a solution</p>	<p>As above.</p>

	together. This process has stated a problem and then applied a wildly inappropriate answer which seems to have the aim only of getting Welsh Assembly money, rather than meeting the needs of the children.	
4.10.9.6	The process has been pretty awful and for a modern Local Authority we would have hoped that PCC would have had early engagement with the schools concerned and their professional staff to help inform the transformation process and to ensure the consultation was based on achieving positive outcomes for children and that information presented at consultation was accurate.	As above.
4.10.9.7	Initial phase of discussions did not include any fixed ideas or suggestions or indication that leisure facilities would be part of the plan. The 'preferred option' within SOC is the option chosen by PCC, with NO input from the wider community. If PCC want to provide facilities for the community - they should get early input from the community and in Brecon from BBNPA planners to carry out place planning – there may be very different ways that people want to access facilities – they don't all have to be in one location	Comment noted.
4.10.9.8	How does PCC know what facilities the community needs or wants when there has been no engagement with the local community?	Should the Council proceed with the Proposals, there would be opportunities for the schools and other stakeholders to input into the process, to ensure that the facilities provided at any new build reflect the needs of the community.

4.10.10 Comments about communication during the consultation process

4.10.10.1	During and throughout the consultation period the flow of information from PCC can be described as poor at best. So many of our community have written to Powys County Council and not received a response to any of the questions raised.	All issues raised in the consultation responses received are included and responded to in this consultation report.
4.10.10.2	Poor communication and provision of information leading up to and during the consultation.	Comment noted.
4.10.10.3	Concern about poor communication during the process	Comment noted.

4.10.11 Queries about who The Council has consulted with

4.10.11.1	Where is the consultation with parents/staff and local community?	Consultation has been carried out in accordance with the requirements of the School Organisation Code (2018), which provided an opportunity for parents / staff and all other interested parties to provide their comments on the Proposals by filling in the online response form, the written response form, or providing written comments. In addition, a consultation meeting was held with staff at the three schools.
4.10.11.2	Powys should reconsider their plans and speak to parents and pupils face to face.	Virtual consultation meetings were held with governors, staff and pupils at all three schools. The School Organisation Code (2018) does not require public meetings to be held.
4.10.11.3	We feel that the Council has not made an adequate effort to consult with the community, and that it has used the period of both lockdown and social distancing in an effort to prevent open and honest public debate about the plans.	Consultation has been carried out in accordance with the requirements of the School Organisation Code (2018). The Code does not specifically require consultation with 'the community', however the consultation was an open consultation, therefore anyone who wanted to respond was welcome to do so.
4.10.11.4	Why have Powys CC chosen to proceed with this consultation in a manner that excludes proper and thorough discussion with the local community who actually live, work and raise their families in Brecon?	The consultation has been carried out in accordance with the requirements of the School Organisation Code (2018). Any members of the community who wanted to respond to the consultation was welcome to do so.
4.10.11.5	I live in the community but there has been no engagement with members of the community. I only found out about these Proposals recently.	As above.
4.10.11.6	Have you consulted the teachers, non-teaching staff, classroom assistant, and other staff on this, what is quite frankly, a RIDICULOUS proposal?? What about the teachers unions?	All staff at the affected schools and teachers unions have been informed of the consultation. In addition, a virtual consultation meeting was held with staff at all three schools.
4.10.11.7	Has the town council been informed of the possible amalgamation and proposed new site?	As required by the School Organisation Code (2018), information about the consultation was sent to 'any community or town council for the area served by/intended to be served by any school which is the subject of the proposal.' This included Brecon Town Council. A consultation response was received from Brecon Town Council, and the issues raised in this response have been included in this consultation report.

4.10.11.8	Are Powys CC liaising with Brecon Town Council on the impact of taking school out of the heart of the community?	As above.
4.10.11.9	Have initial discussions taken place with National Parks planning department and Welsh Waterways concerning the high levels of prosperous in the River Usk and its impact on large planning developments?	Should the Proposals be implemented , the design process would begin, following the RIBA stages, the first of which is strategic definition. This includes feasibilities, including ecology studies. Planning consent is normally sought once RIBA 4 (technical design) has been completed. However, the consultancy team liaise early on with the planning department at Brecon Beacons National Park Planning Authority to get an understanding of potential issues that need to be considered prior to issuing the pre-application planning consultation. Only once this has been completed is a full planning application submitted.
4.10.11.10	It is not very likely that Brecon Beacons National Park will give you planning permission. Have you even notified them or/and completed a site feasibility study? Surely this needs to be part of a new consultation as it is a separate issue.	As above.
4.10.11.11	Has Powys County Council consulted with the Ambulance Service of Powys Teaching Health Board given that the ambulance station and the hospital are located on Cerrigochion Road?	The Council has not consulted with the Ambulance Service of Powys Teaching Health Board. This is not a requirement of the School Organisation Code. Should the Proposals be implemented , The Council would consult with residents and organisations in the locality.
4.10.11.12	The sale of the land to developers has not been discussed or consulted with the local community.	The Council currently has no intention to sell any land to developers. Should the Council proceed with the Proposals in respect of Mount Street Infants, Mount Street Juniors and Cradoc C.P. School, the three school buildings would eventually be declared surplus following the move to a new building. All surplus assets are subject to the process of disposal as outlined in The Council's Asset Management Policy. Whilst it is possible that this could lead to sale of the sites to third parties, some schools that have closed have been transferred to other service areas e.g. housing or to a community - with the latter, this may allow for the space to be retained or developed for community use.

4.10.11.13	How far will the consultation with children go? If they decide they want to keep their school where it is, what would your options be?	The comments received from pupils are outlined in this document and will be taken into consideration when determining whether or not to proceed with implementation of the Proposals.
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4.10.12 Comments about consultation dates

4.10.12.1	Were all the consultees advised that the consultation period had been extended until 12th May 2021 and given the reasons for the extension?	<p>Consultees listed on pages 27-28 of the School Organisation Code (2018) were advised that the consultation had been extended. A press release was also issued to advise of the change to the closing date.</p> <p>The communications issued to inform consultees of the extension did not give the reasons for the extension.</p>
4.10.12.2	How was the extension period communicated to the wider community of Brecon?	Consultees listed on pages 27-28 of the School Organisation Code (2018) were advised by letter that the consultation had been extended. A press release was also issued to advise of the change to the closing date. This was shared on The Council's social media channels and was also published in the local press.
4.10.12.3	Why wasn't the response date on the consultation response form changed from the 15th April 2021 to 12th May 2021 when it was decided to extend the consultation?	<p>Apart from one minor amendment made on the first few days of the consultation period following comments received from one of the affected schools, no amendments were made to the published Consultation Document ation throughout the consultation period.</p> <p>Whilst the documentation was not changed to reflect the amended closing date, consultees were advised by letter that the consultation had been extended, and a press release was also issued. The Council's website was also amended to show the revised closing date.</p>
4.10.12.4	Do Powys County Council agree that by not changing the date on the consultation response form some consultees may not have responded as they would have assumed the consultation period had closed; especially when the date of 15th April 2021 is in bold	The Council does not agree with this statement. The Council's website clearly stated the closing date had been extended, and this was communicated to consultees by letter and via a press release. A further press release was also

	and the form states that “All responses must be received by this date”?	issued on the 28 th April 2021 to remind consultees that the consultation would be closing on the 12 th May 2021. 190 consultation responses were received between the 15 th April 2021 and the 12 th May 2021, suggesting that people in the local area were aware that the consultation had been extended.
4.10.12.5	Welsh Government advice on school organisation Proposals during the pandemic states “ <i>Where possible, proposers should consider whether to postpone consultations at this time or to lengthen consultation periods to allow as many people as possible to consider the proposal and have their say...</i> ” However, the only reason this consultation has been extended is because PCC forgot about our Nepalese community and had not made a Nepali translation available, not because they wanted to allow as many people as possible to have their say.	The original consultation dates provided 7 weeks (49 days) for stakeholders to submit consultation responses. This provides an additional week compared with the requirements of the School Organisation Code (2018), which states that: ‘The Consultation Document must be published on a school day of the school or schools subject to the proposal and consultees must be given at least 42 days to respond to the document, with at least 20 of these being school days.’ It is correct that the closing date was subsequently extended in order to provide access to Consultation Document ation in Nepalese. This meant that in total, the consultation period ran for 76 days.
4.10.12.6	Carmarthenshire have taken on board Welsh Government advice and have extended their consultation period for schools so that all their stakeholders feel included and that their opinions are valued.	As above.

4.10.13 Comments about timescales

4.10.13.1	Why is the consultation only happening now at this late stage after PCC has already submitted a Programme Business Case to Welsh Government and recommendation has been agreed by Cabinet?	The Programme Business Case which was considered by the Council’s Cabinet in September 2020 is the first part of a lengthy business case process which The Council is required to complete in order to access 21 st Century Schools funding. The Programme Business Case has not yet been submitted to Welsh Government . The Programme Business Case provides an indicative preferred way forward for the catchment, however the papers
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		<p>considered by Cabinet were clear that consultation would be required before any final decisions were made to proceed. The recommendation agreed by Cabinet was 'To bring back a further report to Cabinet by December 2020 outlining the school reorganisation proposals required. Full consultation will be undertaken before any final decisions are made.'</p> <p>A further paper was considered by Cabinet on the 23rd December and the 26th January requesting Cabinet approval to commence the statutory process on the Proposals for Mount Street Infants, Mount Street Juniors and Cradoc C.P. School. Whilst the Cabinet agreed to carry out consultation on the Proposals, there are two further Cabinet decisions which would need to be made before the Cabinet had 'agreed' the recommendation to proceed with the Proposals.</p>
4.10.13.2	Why, when the Consultation Proposal is not listed for discussion by PCC Cabinet until 21st September has there been a drive to consult during a stage 4 lockdown?	In order to address the issues raised by Estyn regarding the organisation of its schools, it has been necessary for The Council to continue with the development and consultation on Proposals during the current pandemic.
4.10.13.3	The implementation timescale of February 2021 to September 2024 is unachievable. The process in Welshpool took 5 years and, with Brecon being in a national park, the target date for opening of September 2024 is totally unrealistic, especially so when there is no guarantee of funding for a new building. Why has Powys County Council set an unrealistic timescale?	Comment noted. The timescales provided were indicative and are always subject to change. Should the Council proceed with the Proposals, the timescales will be reviewed and updated timescales will be provided in the Statutory Notice, should there be a need to publish a Statutory Notice.
4.10.13.4	What are the new dates for the consultation process given that delays have already occurred? The suggested dates for the proposal are unrealistic and have already been delayed by the need for Powys CC to acknowledge the need for documentation to be translated for the Nepalese community at Mount Street infants. The Consultation Report was originally to be published by 25th May but now will not be available until 21st September. A delay of 4 months.	As above.
4.10.13.5	The process for consultation was poorly communicated with lack of clarity over timescales, the dates for information going to	As above.

	cabinet were changed at short notice and it was not made clear how the school governors could engage with those meetings.	
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4.10.14 Comments about The Council's website

4.10.14.1	The website times-out whenever one of our parents tries to fill in a response form.	The Council was not aware of any issues with the website during the consultation period. 167 online response forms were completed during the consultation period, which suggests that parents and other consultees were able to successfully use the online response form.
4.10.14.2	Cradoc's name is not even acknowledged in the name of the new proposed school on the Powys Schools Transformation website (Please see the Mount Street School consultation response form - Powys County Council).	The title of The Council's webpage which is used to host the documentation is titled 'Mount Street Infants School, Mount Street Junior School and Cradoc C.P. School.' All three names are also included in the webpage address, and all three names are included within the Consultation Document issued as part of this proposal. All three schools are of equal importance.
4.10.14.3	Firstly, I want to know why this consultation is titled Mount Street School consultation response form, as that implies immediately that Cradoc School is not equally important?	As above.

4.10.15 Requests for The Council to consider the views raised during the consultation period

4.10.15.1	Please listen to the local community and listen to what they have to say.	All responses received during the consultation period have been analysed and collated into this report. The issues raised in the consultation will be considered by the Council's Cabinet when determining whether or not to proceed with the Proposals.
4.10.15.2	The pupils, staff, parents and surrounding communities know these schools best – please listen and heed their opinions fully.	As above.
4.10.15.3	It is so important that Powys listen to the voice of the people living in these rural areas so that we can ensure this becomes the right decision for the people.	As above.

4.10.15.4	I hope that the wishes of the families are heard and considered as ultimately it is us who face the challenges and upheaval.	As above.
4.10.15.5	The whole point of a consultation is for your views to be spoken and heard. I hope that you will listen to our voices and not pass this as a done deal.	As above.
4.10.15.6	It is so important that Powys listen to the voice of the people living in these rural areas so that we can ensure this becomes the right decision for the people.	As above.
4.10.15.7	Please listen to current staff, parents and local community and of course children	As above.

4.10.16 Other concerns / queries about the consultation process

4.10.16.1	How will Powys CC protect the integrity of the consultation process?	The consultation has been carried out in accordance with the requirements of the School Organisation Code (2018).
4.10.16.2	In a rural authority such as Powys with poor Wi-Fi coverage and an aging population, you cannot surely consider this a fair consultation which has allowed the effected community to thoroughly engage.	The consultation has been carried out in accordance with the requirements of the School Organisation Code (2018).
4.10.16.3	As this is a merger not a closure, is this just a devious way of closing Cradoc, a rural school, via the back door?	This is not 'just a devious way of closing Cradoc...via the back door.'
4.10.16.4	Information given to Governors about the process at a meeting on 7th Dec 2020, stated that objections could be placed as part of the consultation but when consultation was launched in Jan 2021 it was clear that this can only happen at the objection phase after the Cabinet has made a decision on the PCC's Consultation Report.	The process is clearly outlined on pages 42-43 of the Consultation Document . Many of the consultation responses received indicate that the respondents do not agree with the Proposals, however it is correct that 'objections' can only be submitted during the 28 day objection period which would follow the publication of a Statutory Notice.
4.10.16.5	This consultation is so difficult to understand it is also unfair on many people - particularly those without internet such as the elderly - to read let alone respond to.	The Consultation Document ation has been prepared in accordance with the requirements of the School Organisation Code. Whilst acknowledging that the full Consultation Document is lengthy and may be difficult for some stakeholders to understand, a number of simpler versions were also prepared, including a children's version, a young people's version and a presentation which provided an overview of the Proposals.

4.10.16.6	It isn't clear to parents what is being consulted on.	As above.
4.10.16.7	This feels very much like change for the sake of it and the language is difficult – what does 'Learner Entitlement' mean?	As above.
4.10.16.8	This proposal is complex involving 2 phases over at least 4 years, a 3-way merger of village and town schools as well as a Pupil Referral Unit and Pool.	The Council acknowledges that this is a complex proposal.
4.10.16.9	Powys CC have blatantly not even entertained the idea of rebuilding Cradoc school as was demonstrated at the publicly broadcast meeting where The Council officer appeared to have been instructed not to answer the question when asked explicitly whether or not there was space to rebuild Cradoc school at Cradoc.	<p>It is incorrect that the Council has not considered rebuilding Cradoc School. The following options which would provide a new building in Brecon and Cradoc were considered in the PBC for the Brecon catchment which was considered by the Council's Cabinet in September 2020:</p> <ul style="list-style-type: none"> • <i>Option 4A – New build Sennybridge, new build Brecon primary school, close Cradoc</i> • <i>Option 4B – New build Cradoc, new build Brecon primary school, close Sennybridge</i> • <i>Option 4C – New build Sennybridge, new build Brecon primary school, new build Cradoc</i> • <i>Option 4D – Close both Sennybridge and Cradoc, build new school on alternative site, new build Brecon primary school</i> • <i>Option 5B – New build Cradoc, establish new all-through school in Brecon with new build, primary, close Sennybridge</i> • <i>Option 5C – New build Sennybridge, establish new all-through school in Brecon with new build primary, new build Cradoc</i> <p>An appraisal of all options was carried out, and options 4B, 4C, 4D, 5B and 5C were discounted at this stage.</p>
4.10.16.10	The preferred option expressed by many in the Cradoc community would be to save and rebuild Cradoc C.P. School. During the consultation process this preferred option was presented to Powys County Council's education department, but not included as part of the Proposals. I believe the exclusion of	As above.

	<p>this option is grossly unfair and gives decision making cabinet members the impression that this option is not worthy of consideration. That is not true, a new proposal should be drawn up to replace the current one, with this option included and fairly assessed, taking into account the wishes of the Yscir community, parents, the governing body and community councils. If Powys County Council are unwilling to prepare such Proposals, to include plans for a new school, with costings and an impact assessment, then I, together with the assistance of members of the community, will do it for you.</p>	
4.10.16.11	<p>This proposal has been rushed and has not been compiled with thought or direction.</p>	<p>The Council does not agree that the Proposals have been rushed. The initial Programme Business Case was considered by the Council's Cabinet in September 2020. Consultation did not start until February 2021.</p>
4.10.16.12	<p>You state in the Consultation Document that Powys is a rural authority, yet you have entered into this consultation at the busiest time of year (lambing) for many rural communities and in the middle of a global pandemic which has prevented a public meeting to discuss such plans.</p>	<p>The Council acknowledges that it would have been preferable had the consultation not taken place during the pandemic, however the consultation has been carried out in accordance with the requirements of the School Organisation Code (2018). The School Organisation Code does not require Councils to take account of lambing when planning timescales for statutory Proposals.</p>
4.10.16.13	<p>We need good decision makers in Powys County Council and decision makers who treat rural communities and rural schools fairly.</p>	<p>The Council is committed to providing the best possible educational opportunities to all Powys learners, whether they live in rural areas or in towns. Any proposals which involve the closure of schools identified as rural schools will be taken forward in accordance with the requirement of the School Organisation Code.</p>
4.10.16.14	<p>When will Powys allow full involvement of the school community in the consultation process?</p>	<p>All members of the school community at each of the three affected schools have had the opportunity to contribute to the consultation process. Should the Council proceed with publication of a Statutory Notice, there would be a further opportunity for the school communities to let The Council know if they don't agree with the Proposals by submitting written objections. Should the Council proceed with implementation of the Proposals, there would be numerous</p>

		opportunities for members of the school communities to be involved in the process of establishing the new school, for example opportunities to be part of the temporary governing body, opportunities to contribute to the process of agreeing a name / logo / uniform for the new school and engagement opportunities as part of developing any build.
4.10.16.15	When will Powys CC commit to a new consultation to decide the future of Mount Street Infants using accurate data and acknowledging the value of the whole school community?	The current consultation has been carried out using accurate data and the issues raised in all responses received from members of the three school communities have been included in the consultation report.

4.11 COMMENTS ABOUT THE CONSULTATION DOCUMENT ATION

4.11.1 Comments about Data

4.11.1.1	The pupil number information in the report is inconclusive and contradictory with no estimates included for the effect of the additional housing being built in the Brecon area. What is the projected housing growth in the Brecon Area over the period covered (next 60 years)? What estimates do you have for additional pupil numbers arising from housing growth in the Brecon area? Is anything allowed for additional pupils from new housing in the figures in the report?	Should the Proposals be implemented , the Council will consider the size of the new build school, and will consider the impact of housing developments. The Council is aware of the housing developments in the area, and the planning department use a pupil yield ratio of 0.45 per house. However, the Council's pupil projections do not include estimates from housing developments.
4.11.1.2	Based on PCC figures on page 7 of the Consultation Document it states the proposed new school would accommodate 360 pupils. However on pages 26 & 27 of the Consultation Document the projected pupil figures show 362. So in reality you are proposing to build a school that is already too small. This is without increased pupils numbers from housing developments in and around Brecon.	On page 17 of the Consultation Document The Council states: <i>'Initially, the new school would operate on the three existing sites, and the capacity would reflect their combined capacities. The capacity of the new primary school would initially be 420.</i> <i>Based on the PBC approved in September 2020, the intention is that the new school would move to a new</i>

		<i>building which would accommodate approximately 360 pupils – the capacity of the new school would need to be further assessed during the design stage.’</i>
4.11.1.3	When calculating the surplus of school places, did The Council consider in their calculation the growing number of residential developments occurring in Brecon?	The information on surplus places provided in the Consultation Document is based on actual pupil numbers at the three schools and therefore does not consider residential developments in Brecon.
4.11.1.4	There are too many inaccuracies and inconsistencies in the proposal especially regarding pupil numbers.	The Council does not agree that there are ‘inaccuracies and inconsistencies in the Proposals especially regarding pupil numbers’.
4.11.1.5	The budget data for Mount Street Infants is incorrect and claims “Mount Street Infants is projecting to be in a deficit budget position during 2020/21, 2021/22 and 2022/23”. This statement was proved to be incorrect and Powys County Council had to issue an addendum to the Consultation Document stating that an error had been made and the word ‘not’ had been added.	This is correct.
4.11.1.6	Another inaccuracy in the Consultation Document was the initial statement that “Mount Street Infants is projecting to be in a deficit budget position during 2020/21, 2021/22 and 2022/23”. This statement was proved to be incorrect and Powys County Council had to issue an addendum to the Consultation Document stating that an error had been made and the word not had been added. Why didn’t Powys County Council change the wording to “Mount Street Infants is projecting to be in a surplus budget position in 2020/21, 2021/22 and 2022/23 in line with the wording used to describe Cradoc C.P. School’s budget?	The Council was alerted to an error in respect of the information provided for Mount Street Infants soon after the start of the consultation period. This was amended to correct the error, and an addendum was issued to advise stakeholders of this.
4.11.1.7	Information within the Consultation Document concerning the condition of the building and the source of the data is not consistent. The Mount Street Infant School Governors were informed that the 2009 Building Condition Survey was used for the report, which gave the building an overall B. However, the building is given C in the Consultation Document. Why have Powys not used all the information from the 2009 Buildings Condition Survey in an honest and consistent manner? Mount Street Infant School Governors waited until April 20th for the 2020 Building Conditions Survey	<p>Mount Street Infants School was reassessed in 2016, which indicated that the school building condition was C. This assessment has subsequently been included in The Council’s annual return to Welsh Government. The reference to the 2009 survey in the Consultation Document is incorrect.</p> <p>The Building Condition Survey carried out in 2020 assessed the building condition as C-.</p>

	(carried out in October), having repeatedly requested this information. It transpires that some information from this updated building survey has been used which conflicts with information given to the governors during the transformation meeting, March 16th 2021, with Powys CC.	
4.11.1.8	Building condition information. We understand that the data for comparison for Building condition was taken from a 2009 survey. However, for MSI that survey gave a school condition rating of B. The consultation report states a condition rating of C which is the score taken from the 2020 survey. This is inconsistent and misleading. Can PCC provide an explanation for this inconsistency in Building Condition scoring?	As above.
4.11.1.9	Welsh Government 's School Organisation Code states that the Consultation Document must contain the following information: "information about the quality of accommodation at all existing schools likely to be affected by the Proposals including reference to the local authority's most recent condition survey using the categories or the original 21st Century Schools Survey." Has Powys County Council used the most recent condition survey for Mount Street Infants School in the Consultation Document ?	As above.
4.11.1.10	Welsh Government 's School Organisation Code states that the Consultation Document must contain the following information: "information about the quality of accommodation at all existing schools likely to be affected by the Proposals including reference to the local authority's most recent condition survey using the categories or the original 21st Century Schools Survey." Why has Powys County Council used 2009 survey for Mount Street Infants School in the Consultation Document when there is a survey from October 2020?	As above.
4.11.1.11	Many of the repairs and improvements listed in the 2009 and 2020 build condition reports have already been rectified. The Headteacher will never allow the building to be unsafe or in disrepair, but reassurance is needed that the school will be maintained during Phase 1.	Comment noted. The Council has a duty to maintain its school buildings and address any issues that arise, regardless of whether schools are reviewed or not. This would continue to be

		the case during Phase 1 Should the Council proceed with the Proposals.																
4.11.1.12	<p>The below/attached table taken from the cabinet paper includes the additional temporary portacabins which suggests that pupil figures are low but this is NOT an accurate account of the capacity of the permanent school building:</p> <p>i) Capacity</p> <p>The following table provides information about the current capacities of school and the capacity:</p> <table border="1"> <thead> <tr> <th></th> <th>Current Capacity⁹</th> <th>Currently Filled</th> <th>Surplus Capacity</th> </tr> </thead> <tbody> <tr> <td>Mount Street Infants School</td> <td>129</td> <td>113 (87.6%)</td> <td>16 (12.4%)</td> </tr> <tr> <td>Mount Street Junior School</td> <td>172</td> <td>173 (100.6%)</td> <td>-1 (0.5%)</td> </tr> <tr> <td>Cradoc C.P. School</td> <td>175</td> <td>95 (54.3%)</td> <td>80 (45.7%)</td> </tr> </tbody> </table>		Current Capacity ⁹	Currently Filled	Surplus Capacity	Mount Street Infants School	129	113 (87.6%)	16 (12.4%)	Mount Street Junior School	172	173 (100.6%)	-1 (0.5%)	Cradoc C.P. School	175	95 (54.3%)	80 (45.7%)	As indicated in the Consultation Document , the capacity figure of 175 is the school's total capacity, as reported in The Council's School Places Return to the Welsh Government in August 2020.
	Current Capacity ⁹	Currently Filled	Surplus Capacity															
Mount Street Infants School	129	113 (87.6%)	16 (12.4%)															
Mount Street Junior School	172	173 (100.6%)	-1 (0.5%)															
Cradoc C.P. School	175	95 (54.3%)	80 (45.7%)															
4.11.1.13	The Consultation Document displays a lack of knowledge about school community and has included incorrect budget data and incorrect information regarding condition of school buildings. This information should be correct for this consultation to have any genuine honest value.	The information provided in the Consultation Document is correct.																
4.11.1.14	The summaries of the last Estyn inspections of the three schools shows the vast differences between the schools with Mount Street Infants achieving Excellent and Good and Cradoc C.P. School achieving Adequate. This supports the view that the quality and standards of education are different at the three schools.	Comment noted. The School Organisation Code requires local authorities to include the findings of the latest Estyn inspections of schools in Consultation Document s, however, Estyn inspections provide information about the provision at each school at the time when the inspection was carried out, therefore cannot be used to directly compare the provision at each school. Quality of provision at any of the three schools is not one of the reasons for these Proposals.																

4.11.1.15	<p>Pupil Places Capacity – The current capacity at Mount Street Infants School is 129, Mount Street Junior School has a current capacity of 172 and Cradoc C.P. School has a capacity of 175; a total of 476 pupils. Will Powys County Council provide an explanation as to why they propose that the capacity of the new school operating over 3 sites should be 56 less than the number currently attending the 3 schools?</p>	<p>The figure of 476 is the combined capacity of the three current schools, not the number of pupils attending. The total pupil numbers that were attending the three schools in November 2020 was 381, as indicated in the Consultation Document .</p> <p>The proposed capacity of 420 for the new school operating across the three existing sites is based on the projected pupil numbers at the three schools.</p>
4.11.1.16	<p>The report states that the intention is that the capacity of the new building would be approximately 360. However, your figure for the current number of pupils at the 3 schools on page 7 totals 381. This figure then changes to 362 on pages 26/27 and the projected figure for January 2024 is a total of 349 pupils. It is difficult to understand the figure of 349 as the yearly figures from 2021 to 2024 for the Infants School increase but the figures for the Junior School decrease. The projected finance figure for January 2024 on page 46 is 386. If this figure is correct there will be 26 pupils without a place at the new school. The Primary Schools, Transforming Education 2020 document states that Mount Street Infants School has 150 pupils, Mount Street Junior School has 152 pupils and Cradoc C.P. School has 112 pupils which gives a total of 414 pupils. If these figures are correct then there will be 54 pupils without a place at the new school. Are Powys County Council expecting 54 pupils from Cradoc C.P. School, Mount Street Infants School and Mount Street Junior School to fill the 54 surplus spaces at the new school in Sennybridge? Does Powys County Council really know how many children they are proposing to build a new school for?</p>	<p>The Council has not yet commenced any designs for the proposed new building. The actual capacity of the new building would be confirmed at this stage.</p> <p>As stated on page 17 of the Consultation Document :</p> <p><i>‘Initially, the new school would operate on the three existing sites, and the capacity would reflect their combined capacities. The capacity of the new primary school would initially be 420.</i></p> <p><i>Based on the PBC approved in September 2020, the intention is that the new school would move to a new building which would accommodate approximately 360 pupils – the capacity of the new school would need to be further assessed during the design stage.’</i></p>
4.11.1.17	<p>The report only mentions additional travel for pupils from Cradoc School. This, however, is not the case. Pupils from Mount Street Infants School will also have additional travel. The draft impact assessments state that the average travel distance for pupils at Mount Street Infants School is 1.2 miles. Adding 0.6 miles will increase the travel distance to 1.8 miles which will mean that some</p>	<p>Comment noted.</p>

	<p>children from Mount Street Infants School will need school transport. The average travel distance for pupils from Mount Street Junior School is 1.3 miles. Adding 0.7 miles will increase the travel distance to 2 miles which will mean that some Mount Street Junior School pupils will need school transport.</p>	
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4.11.2 Comments about ‘Why Change is Needed in Powys’

4.11.2.1 High Proportion of Small Schools

4.11.2.1.1	<p>Mount St Infants and Juniors are NOT small schools they have 113 and 170 on roll respectively as at 6/1/20. The numbers of children fluctuate at these schools because of the military intake and can be higher.</p>	<p>The Council does not claim that Mount Street Infant School, Mount Street Junior School or Cradoc C.P. School are small schools. A ‘High proportion of small schools’ is one of the challenges facing education in Powys as outlined in The Council’s Strategy for Transforming Education in Powys, and was included in the Consultation Document as part of the section on ‘Why change is needed in Powys.’</p>
4.11.2.1.2	<p>Mount Street Infants is NOT a small school. Powys County Council’s Admissions Information and Arrangements 2021-22 document and the Primary Schools, Transforming Education 2020 document state that Mount Street Infants School has 150 pupils on roll. The newly built primary schools in the last four years at Clyro, Llangorse, Hay on Wye, Talgarth and Llyswen are small schools. It states in the Admissions document that Clyro (combined Infants & Juniors) has only 86 pupils on roll, Llangors C in W School (combined Infants and Junior) has 161 pupils on roll, Hay on Wye CP School (combined Infants & Juniors) has 169 pupils on roll, Ysgol Y Mynydd Du, Talgarth (combined Infants & Juniors) has only 104 pupils on roll and Archdeacon Griffiths C in W School Llyswen (combined Infants & Juniors) has 148 pupils on role. Compared to these schools Mount Street Infants School cannot be classed as a small school. A more accurate comparison would be to combine the pupil numbers at Mount Street Infants and Mount Street Juniors. The combined numbers would be 302 pupils which would mean that the number of pupils</p>	<p>As above.</p>

	attending Mount Street Infants School and Mount Street Junior School are the second highest in Powys. Will Powys County Council admit that Mount Street Infants School is not a small school?	
4.11.2.1.3	The high proportion of small schools is listed as a main challenge of The Council, so why then when there are 21 schools with fewer than 50 pupils in Powys are you impacting three schools that are all above this number? Surely it would be more cost effective to amalgamate some of those schools. In addition, according to the Consultation Document issued by the Council, forecasting information suggests pupil numbers may increase in Cradoc School. Therefore, I fail to understand how Powys County Council has identified this school as an appropriate one to include in this proposal.	As above.
4.11.2.1.4	Neither Cradoc or Mount Street schools fall into this category, which the document states is usually classed as under 50 pupils.	As above.
4.11.2.1.5	Your Consultation Document talks about there being too many 'small schools' in Powys. While many will argue that small schools are a good thing, I would like to point out that with over 100 pupils, Mount Street is NOT a small school and with 95, Cradoc JUST counts as small. Your OWN forecast then suggests numbers in Cradoc are set to rise.	As above.
4.11.2.1.6	The point is made about small schools costing more per pupil. The figures in appendix A give the Cradoc budget per pupil as £4,226, which is hardly extortionate.	As above. The Council doesn't suggest that the Cradoc budget per pupil is 'extortionate'. The only reference to the schools' budget share per pupil is in the budget share per pupil column in the 'cost per pupil' table on page 50 of the Consultation Document . This shows that the budget share per pupil at Cradoc C.P. School is lower than the Powys average for primary schools.

4.11.2.2 Decreasing pupil numbers

4.11.2.2.1	Mount Street Infants does not have a falling roll.	<p>The Council does not claim that Mount Street Infant School has a falling roll – the projected pupil information included in the Consultation Document shows that pupil numbers at Mount Street Infants School are expected to increase slightly over the next few years.</p> <p>‘Decreasing pupil numbers’ is one of the challenges facing education in Powys as outlined in The Council’s Strategy for Transforming Education in Powys, and was included in the Consultation Document as part of the section on ‘Why change is needed in Powys.’</p>
4.11.2.2.2	Several newly built schools in Powys have surplus places but surplus places are not evidenced in the Consultation Document in relation to the roll of Mount Street Schools. There can be fluctuation of 10% but this is the result of military movement and is offset as the school benefits from financial support from MOD.	As above.
4.11.2.2.3	Page 27 in the Consultation Document shows an increase in pupil numbers at Mount Street Infants School from 2021 to 2025. The Primary Schools, Transforming Education shows a 3.1% increase in the pupil numbers over the next 5 years at Mount Street Infants School. The same document shows a decrease of 9.3% in pupil numbers over the next 5 years at Sennybridge CP School. Will Powys County Council admit that Mount Street Infants School does not fall into the category of decreasing pupil numbers as evidenced by these Powys County Council documents?	As above.
4.11.2.2.4	The projected pupil numbers for Mount Street Infants School are shown to be increasing and, therefore, is another one of the reasons for change that does not apply to Mount Street Infants School.	As above.
4.11.2.2.5	According to the Consultation Document the numbers for Mount Street Infants increase between 2021-25.	As above.
4.11.2.2.6	Later in the document The Council admits that there is little evidence for this at Cradoc and in fact numbers are expected to either remain static or even grow.	The information on page 13 of the Consultation Document shows that pupil numbers at Cradoc C.P. School have decreased over the last few years, from 141 in January 2014 to 112 in January 2020. However, the Council also

		acknowledges in the Consultation Document that 'forecasting information suggests pupil numbers may increase.'
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4.11.2.3 High number of surplus places

4.11.2.3.1	Mount Street Infants School does not have a high number of surplus places. Due to the school being attended by military children pupil numbers fluctuate throughout the school year.	The Council does not claim that there is a high number of surplus places at Mount Street Infants School. This is one of the challenges facing education in Powys as outlined in The Council's Strategy for Transforming Education in Powys, and was included in the Consultation Document as part of the section on 'Why change is needed in Powys.'
4.11.2.3.2	The Primary School, Transforming Education 2020 document lists Mount Street Infants school at 116% capacity. Will Powys County Council admit that Mount Street Infants School does not have surplus capacity?	As above.
4.11.2.3.3	Point iii on page 9 states that one of the main reasons why change is needed is because of a high number of surplus places. Later on in the document, however, it states "there would be no impact on surplus places in the area". Why are Powys County Council making these Proposals if there will be no impact on the number of surplus places?	As above. There would be no impact on surplus places in the area because Phase 1 of the Proposals is to initially establish the new school in the buildings currently occupied by the 3 existing schools, therefore there would no change to the current capacity.

4.11.2.4 Building condition

4.11.2.4.1	The Council mentions 'building condition' as a reason for much-needed change. However, the poor state of property belonging to Powys County Council is surely the responsibility of Powys County Council? This is a problem of The Council's own making and a poor excuse for the upheaval they're proposing.	Comment noted.
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4.11.2.5 Financial Pressure

4.11.2.5.1	The savings are not sufficient to support the proposal. Mount Street Infants School is projecting a surplus budget during 2020/21, 2021/22 and 2022/23. Does Powys County Council agree that the “significant variations in the budget share per pupil across Powys schools” are caused by flaws in the fairer funding formula introduced by Powys County Council?	The Council does not agree with this statement. The Funding formula that was introduced in April 2019 was developed with input from Schools representatives and all schools were consulted on the principles. The funding formula remains under annual review to ensure that it remains relevant.
4.11.2.5.2	The savings are not sufficient to support the proposal. Mount Street Infants School is projecting a surplus budget during 2020/21, 2021/22 and 2022/23. The Governors of Mount Street Infants have taken prudent steps to ensure good financial management at the school. The cost per head is £4427 per head, categorised in the green area in Powys latest SWAY report.	It is anticipated that the lifetime costs of the status quo option, which would include backlog maintenance would be £97,990,442 over a 60-year investment period. This is compared with the lifetime costs of the move to a new school building would be £92,772,215 over a 60-year investment period, generating a saving of £5,218,227. This is considered sufficient to support the Proposals.
4.11.2.5.3	The initial Consultation Document stated that Mount St Infants was facing a deficit budget over the next 3 years – This was incorrect, and the consultation was reissued – they will show a surplus over the next 3 years. Unit costs in Primary Schools in Powys range from £3127 - £7,877. The Mount Street Schools are £4,618 (MSI) £3,821 (MSJ). Whilst MSI is just above the Powys Primary average of £4,264 we do not see this as a sufficiently strong financial driver for change – particularly if balanced against the Estyn reports on quality in the 2 schools. MSI Excellent/Good and MSJ Good.	Comment noted
4.11.2.5.4	Another reason given is 'financial pressures.' The Council's disastrous management or mis-management of large scale, large budget projects is near legendary. The fiasco that is the Brecon Cultural Hub was wildly over budget and years late. The public's incredulity and indignation at such wanton profligacy with public funds has resulted in precious few answers or even contrition from The Council. The much-delayed Brecon High School followed a similar path to ignominy. These skeletons in The Council's closet are fresh in people's memories and do not inspire much confidence for the next vanity project...	The Council notes these concerns

4.11.2.6 Inequality in access to Welsh-medium education

4.11.2.6.1	This proposal does nothing to address this as Powys County Council are proposing an English medium school.	The Council does not claim that the Proposals address 'Inequality in access to Welsh-medium education'. This is one of the challenges facing education in Powys as outlined in The Council's Strategy for Transforming Education in Powys, and was included in the Consultation Document as part of the section on 'Why change is needed in Powys.'
4.11.2.6.2	This proposal is for English Medium.	As above.
4.11.2.6.3	The new school is to be English-medium so this point is entirely irrelevant for Cradoc and Mount Street schools.	As above.

4.11.2.7 Limited post-14 and post-16 offer

4.11.2.7.1	Not applicable as this proposal does not affect post 14 or post 16 offer.	The Council does not claim that the Proposals address 'Limited post-14 and post-16 offer'. This is one of the challenges facing education in Powys as outlined in The Council's Strategy for Transforming Education in Powys, and was included in the Consultation Document as part of the section on 'Why change is needed in Powys.'
4.11.2.7.2	This is not relevant as this proposal is for a primary school.	As above.

4.11.2.8 Inequality in access to SEN provision

4.11.2.8.1	There is SEN provision at Mount Street Infants and the provision is rated as excellent (see ESTYN report).	The Council does not suggest that there are any concerns about the SEN provision at Mount Street Infants School. 'Inequality in access to SEN provision' is one of the challenges facing education in Powys as outlined in The Council's Strategy for Transforming Education in Powys, and was included in the Consultation Document as part of the section on 'Why change is needed in Powys.'
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4.11.2.9 Historical lack of political decision making

4.11.2.9.1	Not applicable as this refers to decisions made by Councillors not to close small schools. Mount Street Infants is not a small school.	This is one of the challenges facing education in Powys as outlined in The Council's Strategy for Transforming Education in Powys, and was included in the Consultation Document as part of the section on 'Why change is needed in Powys.'
4.11.2.9.2	Picked up by Estyn but not applicable as it relates to delays/avoidance of small school closures and MSI/MSJ are not small schools. There are 21 schools in Powys with less than 50 pupils and MSI/MSJ are not in this category.	As above.
4.11.2.9.3	It also stated that the Council's failure to implement a number of high-profile Proposals is a reason for proposing this amalgamation. Frankly, that is not the problem of these communities, and Powys County Council's previous failures are not a reason to close three well performing schools and decimate Cradoc's community.	As above.

4.11.2.10 Other general comments about this section

4.11.2.10.1	Mount Street Infants School only meets one of the nine reasons for change i.e. building condition. Powys County Council could apply for 21st Century Schools Funding to repair the building. This would be a less costly option than building a new school and having to maintain it.	These factors are not 'reasons for change', they are the challenges facing education in Powys as outlined in the Strategy for Transforming Education. The reasons why change is needed in Mount Street Infants, Mount Street Juniors and Cradoc are outlined in section 4 of the Consultation Document on pages 12-13.
4.11.2.10.2	Apart for building condition none of the main challenges facing The Council can be applied to Mount Street Infants School.	As above.
4.11.2.10.3	Based on the above we do not see that any of the 9 drivers for change apply to MSI/MSJ.	As above.
4.11.2.10.4	The so-called justifications behind why change is needed in Powys bear very little relevance to either Cradoc or Mount Street Schools.	As above.
4.11.2.10.5	The problem identified by PCC (case for change) and the solutions do not match.	As above.
4.11.2.10.6	The reasons given for why change is needed in Powys are very poorly thought through and are either not applicable at all to these	As above.

	schools or merely serve to hold up a mirror to Powys's neglect and mismanagement of its own assets.	These challenges were identified following extensive engagement with a range of stakeholders when developing the Strategy.
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4.11.3 Comments about 'Why Change is Needed in Mount Street Infants and Mount Street Juniors'

4.11.3.1 Building condition

4.11.3.1.1	The building condition is rated as poor because Powys County Council has not maintained the buildings. In the case of Mount Street Junior School this is a criminal waste of tax payer's money as the school was only built 34 years ago, is a brick building and was built by a reputable firm of local builders.	The Council has a duty to maintain its school buildings and address any issues that arise. However, the Council's schools maintenance funding has steadily reduced over the last few years, and The Council has to prioritise its funding accordingly. Schools are prioritised using a scoring criteria which can be found in The Council's Schools Asset Management Plan. £150,500 of maintenance funding was spent on the Mount Street Juniors building between 2012 and 2019.
4.11.3.1.2	The Mount Street Infants School building condition survey carried out in October 2020 indicates two elements which have been graded priority 3 - essential work required within 2 years. These are i) replacing vinyl and carpet and ii) redecoration. This will require Powys County Council to spend £55,272.12 on Mount Street Infants School by October 2022. This will leave only £59,814.83 in outstanding repairs. Will Powys County Council to use the £2.2m already secured from Welsh Government to undertake the repairs amounting to £59,814.83 at the Mount Street Infants School?	The Council has allocated just under £58,000 in this year's Major Improvements budget for works to Mount Street Infants School, and also an additional £21,000 in next year's budget.
4.11.3.1.3	The Consultation Document states that the current building condition of Mount Street Infants School is categorised as C. Of the 10 fabric elements graded 8 are graded B and only 2 are graded C. The two Condition C fabric elements are i) carpets and vinyl showing signs of age and ii) marks & scuffs in the decoration. The priority given to the C graded elements is priority 3. The document states that priority 3 is "essential work required within 2 years". This work will therefore need to be undertaken by 2022.	The condition survey was prepared by an external surveyor, and provides The Council with information about the condition of schools and recommendations about the prioritisation of work required. It is then the decision of The Council to prioritise maintenance work within the funding available.

	Will Powys County Council guarantee that the recommended works will be carried out by October 2022?	The Major Improvements Programme is reviewed on a year by year basis. As indicated above, nearly £80,000 has been allocated for works at Mount Street Infants School over the next 2 years, however this doesn't include the elements identified in the consultation response.
4.11.3.1.4	Of the 11 M&E elements 9 are graded B and 2 graded C. The 2 Condition C M&E elements are i) low surface temperature radiators and ii) gas fired cabinets and distribution ductwork. As the heating system was replaced with electric heating in October 2020 the two condition C M&E elements are no longer applicable. Why has the building condition survey not been updated to reflect the new heating system when issue 1 of the report was written in December 2020 and issue 2 in February 2021?	The report was prepared by an external surveyor, and was based on a visit which took place on the 22 nd October 2020.

4.11.3.2 Last remaining infant and junior school in Powys

4.11.3.2.1	This is a positive for the children at Mount Street Infants School. When the Year Two children are the oldest in the school it provides a unique opportunity to encourage great leadership skills, entrepreneurship, independence, accountability, mentoring skills and decision making. Also, both parents and pupils enjoy and benefit from the end of year 2 celebrations that are held before the children move on to the Junior School and the next phase of their education.	The skills of leadership, entrepreneurship, independence, accountability, mentoring skills and decision making are all part of the approaches of the new Curriculum. Therefore all pupils would develop these skills.
4.11.3.2.2	Instead of seeing a separate Infants School as a negative Powys County Council should be celebrating the "excellent quality of the school's care, support and guidance" (Estyn Report) and protecting its uniqueness.	Powys County Council has recognised the good standards achieved by pupils at Mount Street Infants School.
4.11.3.2.3	In Finland children attend pre-school before joining a primary school at the age of seven and it is well documented that the education system in Finland is among the best globally.	Comment noted
4.11.3.2.4	Will Powys County Council agree that there are benefits of separate Infants and Junior Schools? Why isn't Powys County	The Council has recognised the good standards achieved by pupils at Mount Street Infants School and Mount Street

	Council declaring Mount Street Infants School a centre of excellence?	Junior School, however the Council is of the view that a single primary school model of education brings additional benefits and reduces the number of transition stages for children. Within a primary school the need for transition is reduced as similar processes and strategies would be employed throughout the school
4.11.3.2.5	The proposal states that 'evidence' shows that primary through schools are better for pupils. Where is this evidence? I personally think the move from Infants to Juniors school was a positive experience for my children. There are good transition projects between the two schools, and it puts pupils in good stead for transition when they move from Primary to Secondary school.	PCC recognise that for this parent the transition from Infant to Junior schools has been positive..
4.11.3.2.6	What evidence does Powys CC have on the impact on transition from Mount Street Infants to Mount Street Juniors on pupil wellbeing and educational standards?	Each school will track the educational progress of pupil. The Junior School will have evidence of the impact of transition for standards and wellbeing for all pupils. When the school sets targets for educational development of their pupils they do recognise that transition does impact on pupil progress as pupils adjust to the transition to the Junior School.

4.11.3.3 Transition arrangements

4.11.3.3.1	Transition is seen by Powys County Council as a negative but by the parents and children of Mount Street Infants School it is seen as a positive. Past pupils have told us that they enjoyed the transition to the Junior School, it was seamless and they found it beneficial. Does Powys County Council agree that transition should not always be seen as a negative given the experiences of Mount Street Infants School pupils and parents?	Transition between schools can affect pupils in different ways. There can be positive and negative aspects to transition. However, to keep the number of transitions a pupil's experiences throughout their education would have a more beneficial impact on pupil progress.
4.11.3.3.2	Transition between Mount Street Infants and Mount Street Juniors is seen by the authors of this proposal as a negative when in fact it is seen by those who experience it, our pupils and parents, as a positive. Will Powys County Council agree that our pupils find the transition very beneficial?	Please As above comment.

4.11.3.3.3	We strongly challenge and disagree with the statements made against transition between Mount Street Infants and Mount Street Junior School. There is no evidence to support that transition is having a negative impact. From parental experience a separate infant school has provided an excellent setting for the Year 2 pupils to step up and be more than prepared for transition and improved their confidence later on in transition to the High School. Where is the evidence that transition between Mount Street Infants and Juniors has a negative impact on pupil's progress?	Each school will track the educational progress of pupil. The Junior School will have evidence of the impact of transition for standards and wellbeing for all pupils. When the school sets targets for educational development of their pupils they do recognise that transition does impact on pupil progress as pupils adjust to the transition to the Junior School.
4.11.3.3.4	A negative presented by PCC in the consultation was transition between Infants and Juniors. This is presented as difficult for children in terms of the emotional challenges of moving between schools. This is arguably a preparation for life and one which pupil at all schools should be coached for as these are staging posts in life.	We note the comment from the respondent.
4.11.3.3.5	There is not necessarily a problem with current transition between the infant and junior schools: As a parent who has recently experienced my child transitioning between the two Mount Street schools, I object to the assumption that the current transition arrangements are a problem. The transition was managed well, despite the pandemic. There is a good working relationship between the two schools and in normal times a detailed period of transition takes place during year 2 which leaves pupils well prepared and happy to move schools.	We note the comment from the respondent.
4.11.3.3.6	One of the benefits' of joining the schools together is seen as removing the transition between buildings, but I have never seen this as an issue. Many children do find moving from reception to year two a difficult one as they would moving up a year from then on, but this is because of the increased challenges of the curriculum. I never found moving to the juniors an issue and I was a very shy child, so I do not consider the transition to a different location, which is very close by, much of a negative issue, in fact it is a small learning curve for children as they will have to undergo a much harder transition when they move to high school.	We note the comment from the respondent.

4.11.3.3.7	Pupils enjoy the transition from the Infants School to the Junior School. For the pupils at Mount Street Infants this is very positive. Will Powys County Council agree that transition can result in positive outcomes for pupils?	Transition between schools can affect pupils in different ways. There can be positive and negative aspects to transition. However, to keep the number of transitions a pupil's experiences throughout their education would have a more beneficial impact on pupil progress.
4.11.3.3.8	The transition arrangements for pupils between Mount Street Infants School and Mount Street Infants School involves completing a form and this was introduced by Powys County Council. It would be very easy to revert to the previous arrangements where no form was completed. As both parents and pupils see transition as a positive why do Powys County Council insist on portraying transition as a negative?	As above comment.

4.11.3.4 Staff Development Opportunities

4.11.3.4.1	The Mount Street Infants Estyn Report in January 2020 stated "Professional learning opportunities for staff are excellent", "the school has best foundation phase practice at its heart". Amalgamating three schools will not improve the already excellent learning opportunities for staff at Mount Street Infants School. Why isn't Powys County Council encouraging specialist knowledge in a foundation phase?	The Council notes Estyn's comments in respect of the professional learning opportunities available for staff at Mount Street Infants School. Being part of a larger all-through primary school would provide staff with more opportunities outside of the Foundation Phase. There would be an opportunity in the new school for Mount Street Infants School's excellent practice in delivering Foundation Phase education to be shared more widely.
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4.11.4 Comments about the options considered

4.11.4.1	Why was the amalgamation of the two rural schools in the Brecon Catchment (Sennybridge, Cradoc) not considered in the optional appraisal?	The Programme Business Case for the Brecon catchment which was considered by the Council's Cabinet in September 2020 considers a range of options for Mount Street Infant, Mount Street Juniors, Cradoc C.P. School and Sennybridge CP School. This included an option to merge Sennybridge and Cradoc schools in a new building in a new location.
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		<p>Following an appraisal of all options, three options were shortlisted which were as follows:</p> <ul style="list-style-type: none"> • <i>Option 1 – Do minimum – Backlog maintenance only</i> • <i>Option 4A – New build Sennybridge, New build Brecon primary school, close Cradoc</i> • <i>Option 5A – New build Sennybridge, establish new all-through school in Brecon with new build primary, close Cradoc.</i> <p>Amalgamation with Sennybridge was not considered as an option within the further options appraisal carried out in respect of Mount Street Infants School, Mount Street Juniors School and Cradoc C.P. School or in the Consultation Document published in respect of the current Proposals, as options involving Sennybridge had been discounted in the Programme Business Case – these papers were focussed on options for the three schools. However, the consultation included an opportunity for consultees to suggest alternative options. All alternative options suggested are outlined in this consultation report, and a further assessment will be carried out in accordance with the requirements of the School Organisation Code.</p>
4.11.4.2	We would like to know whether any consideration was given to consulting on the rural schools together given the new build in Sennybridge? Possibly considering the MS schools together.	As above.
4.11.4.3	As rural schools are treated differently under the School Organisation Code (2018) then it would appear to have made sense to consider options for Sennybridge and Cradoc School together. An amalgamation of these schools could make more sense with the potential to build a new school on a new site better located to support both communities. This would also resolve the 54 surplus places the new school in Sennybridge will apparently have.	As above.

4.11.4.4	Why is the rebuilding of Cradoc School not a proposal for consideration?	<p>Options involving rebuilding Cradoc School were considered and assessed in the PBC for the Brecon catchment which was considered and approved by Cabinet in September 2020. As well as various remodelling options, this includes the following new build options:</p> <ul style="list-style-type: none"> • <i>Option 4B – New build Cradoc, new build Brecon primary school, close Sennybridge</i> • <i>Option 4C – New build Sennybridge, new build Brecon primary school, new build Cradoc</i> • <i>Option 4D – Close both Sennybridge and Cradoc, build new school on alternative site, new build Brecon primary school</i> • <i>Option 5B – New build Cradoc, establish new all-through school in Brecon with new build, primary, close Sennybridge</i> • <i>Option 5C – New build Sennybridge, establish new all-through school in Brecon with new build primary, new build Cradoc</i> <p>An appraisal of all options was carried out, and options 4B, 4C, 4D, 5B and 5C were discounted at this stage.</p> <p>However, the consultation included an opportunity for consultees to suggest alternative options. All alternative options suggested are outlined in this consultation report, and a further assessment will be carried out in accordance with the requirements of the School Organisation Code.</p>
4.11.4.5	The document also states that the condition of the current Cradoc buildings is poor, and making fuller use of the buildings would not address this. However, rebuilding Cradoc School on the current site would address this and allow for fuller community use of the building, which is an option that has not been considered by the Council.	As above.

4.11.4.6	As a the only rural school in this proposal you seem determined to close Cradoc school, it is to you a foregone conclusion, nowhere in your documentation have you even considered provision of a new rural school for Cradoc on its current site.	As above. The Council is not 'determined to close Cradoc school'. The Council is consulting on a proposal, and all issues raised during the consultation will be considered by the Council when determining how to proceed in respect of this proposal.
4.11.4.7	The School Organisation Code – under 1.8 of the code it clearly states 'It is important to ensure that all reasonable alternatives identified are properly explored before the proposer decides to proceed to consult on closure'. Please explain where the other alternatives are in this case e.g. Building a new school at Cradoc or consideration of merging with another rural school in the area (Sennybridge). It's disappointing that we have to point out these failings because as far as this is concerned Powys have failed in following this code.	As above.
4.11.4.8	Cradoc C.P School is a rural school and paragraph 1.8 of the School Organisation Code establishes a procedural presumption against the closure of rural schools. It states that the case for closure must be strong and all viable alternatives to closure must have been conscientiously considered by the proposer, including federation. Powys County Council HAS NOT considered all viable alternatives. This needs to be addressed.	The Council has complied with the requirements of the presumption against closure of rural schools. Any reasonable alternative options identified in the consultation responses received will be assessed and considered when determining how to proceed in respect of this proposal.
4.11.4.9	Why has Powys CC not included an option to draw down 21st Century Schools Funding to repair and improve the schools on the current sites?	'Do minimum – backlog maintenance only' and 'Remodel all primary schools in current location' were considered within the PBC for the Brecon catchment which was considered by Cabinet in September 2020. An appraisal of all options was carried out, and these two options were discounted at this stage.
4.11.4.10	The Education Minister has advised that 21st Century School funding is available for the refurbishment of existing facilities or the refurbishment and the extension of facilities. Why hasn't the option of applying for 21st Century Schools funding for refurbishment of the buildings been considered?	As above.

4.11.4.11	<p>If this proposal was truly seeking to transform education for the Brecon catchment then a full appraisal of all future school provision in the Brecon catchment should have been carried out to review school strengths / areas for support, development / expansion of existing schools, pupil numbers, capacity, transport alongside supporting services such as the new early years centre and other community support services. If PCC is truly committed to improving the education provision for all pupils in the Brecon Catchment – where is the joined up approach for this provision?</p>	<p>The PBC for the Brecon catchment reviewed all provision in the catchment. However, as identified in the PBC, <i>‘Of the schools within this catchment, several operate within buildings that are assessed as being of a condition A standard, with no outstanding backlog maintenance issues...For the purposes of this PBC, all Condition A primary schools within the catchment have been considered out of scope, as they present only limited drivers for capital investment...’</i></p>
4.11.4.12	<p>Whilst the view of PCC is that a new build on Penlan would meet long term goals of future generations there is not sufficient evidence at this stage to launch such a plan and there are other options which can be considered. According to the analysis of options there is very little which precludes 3a/3b. In respect of 3a/3b the main argument against this option is ‘impact on staff losing jobs. This is a risk with any amalgamation/ new build because one of the drivers is to reduce costs. The remainder of negatives in relation to 3a/3b all relate to issues concerning the impact on Cradoc school which is why we made the point at the onset that this rural school should have been considered in conjunction with Sennybridge and deserves a separate solution. If the issues of Cradoc are taken out of the analysis, then it would only leave only benefits which could be achieved by joining the MSI/MSJ schools and finding a way to retain them on existing sites with a new build in the future on these sites. This should be scoped and considered given the benefits of retaining a community school in the heart of Brecon where it is well established and where active travel can more easily be achieved. As noted above the Penlan site will involve more environmental pollution, children will lose out on Forest School. MSI/MSJ have a history together and could work closely to ensure that all the benefits of the Infants and Junior education are maximised if there is a future MS Primary School. Please consider these two schools together and ensure that decisions taken will benefit the children and that solution fits the problem to be solved.</p>	<p>Comment noted.</p>

4.11.4.13	There is no evidence that any options (including 4) have been sufficiently explored to give confidence that the project can be carried through in a reasonable timescale. There is a huge emphasis on building condition being poor but no information as to what this means.	Should the Proposals be implemented, the Council would need to review the timescales for implementation of both phases, and these would be included in any Statutory Notice published. Information about the condition of the school buildings is provided in the Consultation Document .
4.11.4.14	You are specifically required to consider whether the establishment of multi-site schools might be considered as a means of retaining sites, buildings and community.	The Council has considered a range of options relating to the three schools and Sennybridge C.P. School in the Consultation Document and in the PBC for the Brecon catchment. These include federation options and options which would result in the retention of individual sites. Phase 1 of the Proposals would see the establishment of a multi-sited school initially, before eventually moving to a new building located in Brecon.
4.11.4.15	Option 3a has been dismissed as funding to rebuilt Cradoc would be difficult to obtain, however if significant improvements in community use were proposed, then that would be a major factor when applying for 21st century schools and colleges grant funding. The way the local community has backed Cradoc school in response to this consultation would indicate that more people may be keen to use a community facility housed in the school.	Options involving rebuilding Cradoc School were considered and assessed in the PBC for the Brecon catchment which was considered and approved by Cabinet in September 2020. As well as various remodelling options, this includes the following new build options: <ul style="list-style-type: none"> • <i>Option 4B – New build Cradoc, new build Brecon primary school, close Sennybridge</i> • <i>Option 4C – New build Sennybridge, new build Brecon primary school, new build Cradoc</i> • <i>Option 4D – Close both Sennybridge and Cradoc, build new school on alternative site, new build Brecon primary school</i> • <i>Option 5B – New build Cradoc, establish new all-through school in Brecon with new build, primary, close Sennybridge</i> • <i>Option 5C – New build Sennybridge, establish new all-through school in Brecon with new build primary, new build Cradoc</i>

		<p>An appraisal of all options was carried out, and options 4B, 4C, 4D, 5B and 5C were discounted at this stage.</p> <p>However, the consultation included an opportunity for consultees to suggest alternative options. All alternative options suggested are outlined in this consultation report, and a further assessment will be carried out in accordance with the requirements of the School Organisation Code.</p>
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4.11.5 Comments about the preferred option

4.11.5.1	<p>This is not the preferred option for staff, governors, parents or most importantly for pupils. A merger with Cradoc School is not in the best interest of the children of Mount Street Infants School. Cradoc School is a rural school and should not be amalgamated with an urban school.</p>	<p>Comment noted. The Proposals being consulted on are The Council's preferred option, which was identified following consideration of a range of options. The consultation process provides an opportunity for the staff, governors, parents and pupils of the three affected schools to provide their views on the Proposals. The comments received during the consultation period will be considered by the Council's Cabinet, who will determine whether or not to proceed with the Proposals.</p>
4.11.5.2	<p>Powys has agreed that Option 4 –an amalgamation of Mount Street Infants, Mount Street Juniors and Cradoc C.P. School is the best option. In my opinion this is not the best option for Mount Street Infants School and has several significant risks. Mount Street Infants is categorised as a GREEN school and received GOOD to EXCELLENT in all areas in its last inspection in 2020. It has a well-established team of committed and experienced staff.</p>	<p>As above.</p>
4.11.5.3	<p>I fail to see how option 4 was selected as the preferred option. It doesn't achieve any of the stated objectives, apart from replacing old buildings (and for MSJS to be counted as old is disappointing when it's only around 40 years old).</p>	<p>The Council has carried out a number of options appraisal exercises in order to identify the option currently being consulted on. A number of options were considered in the PBC for the Brecon catchment which was considered by the Council's Cabinet in September 2020, and a further options appraisal document which considered options for Mount Street Infants, Mount Street Juniors and Cradoc was considered by the Council's Cabinet in December 2020 and</p>

		January 2021. The Council does not agree that the preferred option 'doesn't achieve any of the state objectives' – the assessment of the options against the critical success factors which is included on page 60 of the Consultation Document shows that option 4 meets all of the critical success factors.
4.11.5.4	We would like to know why Option 4 is the preferred option when it involves a more complicated expensive project and options 3a/3b have been ruled out.	As above.
4.11.5.5	Does Powys County Council agree that, as there is uncertainty at this stage as to whether applications for funding or planning will be successful, Option 4 cannot be the preferred option?	As above.

4.11.6 Comments about the SWOTs

4.11.6.1	SWOT analysis illustrates that Powys CC have indeed selected the sae option as both their preferred and possible options (Options 4 and 3b respectively). Ultimately these equate to exactly the same outcome – pupils from all three schools will be expected to attend a single new school and all three schools close. The only subtle difference being what the school is called. To illustrate the extent of the absurdity of the SWOT analysis, if these were treated as the single option which in reality they are, the next highest score would be Option 6 which is to close all three schools! Surely there is not sufficient capacity in other neighbouring schools to accommodate all pupils from Mount Street Juniors, Mount Street Infants and Cradoc schools?	It is correct that there is insufficient capacity within other neighbouring schools to accommodate all pupils from the three schools – this is why option n6 was scored 'x' in respect of 'Potential achievability'.
4.11.6.2	In the Consultation Document , Pages 56 and 57, option 4 does not expect job losses to be a problem, but job losses are acknowledged to be a weakness for option 3a and 3b. This is misleading as Option 4 does not secure jobs within the three schools as Powys CC have already confirmed that there will be fewer pupils by Phase 2 and fewer pupils means fewer staff.	Should the Council proceed with this proposal, all staff at the existing schools would be part of a management of change process, and would have the opportunity to secure positions in the new school. It is acknowledged that in the longer term, following the planned move to a new building, there could be a reduction in the number of staff needed. Initially the proposal is to establish the school over the three existing sites, therefore the expectation is that pupil

		numbers and staffing requirements would remain as they currently are during this period. Whilst it is possible that there would be some change in staffing requirements following a new build in the future, this would not happen for some years, which would provide an opportunity to protect the positions of existing staff.
4.11.6.3	Why are job losses listed as a weakness in Option 3a but not in Option 4? There may not be job losses in Phase 1 but potentially there would be in phase 2.	As above.
4.11.6.4	It is not difficult to apply for a place at the Junior School and parents do not find this arduous. Historically parents did not have to apply for a place at the Junior School; this was something that was introduced by Powys County Council. Does Powys County Council acknowledge that they caused parents to have to apply for admission to the Junior Phase?	<p>The Council does not state that the process of applying for a place at the Junior School is arduous. The Council states in the Consultation Document that a benefit of the Proposals would be that 'Parents of pupils currently attending Mount Street Infants would not have to re-apply for admission to the junior phase'. This statement is correct.</p> <p>The Council is required to comply with the statutory regulations related to school admissions in order to ensure there is a clear, transparent process.</p>
4.11.6.5	'fairer to staff' - you claim your preferred option is 'fairer to staff' But given that you will be reducing the number of head teachers how can this be the case. You may or may not maintain staff numbers in the short term in Phase 1 but at least 2 staff members will be demoted. and phase 2 will inevitably see job losses.	The preferred option to merge the three schools would provide an opportunity for staff at all three schools to secure a position in the new school, compared with options such as option 3B, which would see the two Mount Street schools merging and Cradoc school closing. In this case, as identified in the SWOT analysis, the current staff at Cradoc C.P. School would be in a redundancy situation.
4.11.6.6	Phase 2 is presented as Fairer for staff – 'all staff at the three schools would have the opportunity to secure positions in the new school' – they already have a position at their existing school. This is a disingenuous way of framing the distinctly negative effect of all staff having to reapply for their own jobs.	As above.
4.11.6.7	Another reason given is fairer for staff. I am unsure how it is considered fairer or an opportunity for personal development for staff to have to compete for their jobs, leaving some unemployed.	As above.

4.11.6.8	Why hasn't the successful award of £2.2m from Welsh Government for school's maintenance been listed as a strength in Options 1, 2a, 2b or 3a?	The £2.2 million has already been allocated for projects in accordance with the priority scoring matrix in the Schools Asset Management Plan.
4.11.6.9	Why hasn't the opportunity to apply for 21st Century School funding been listed as an opportunity in Options 1, 2a, 2b or 3a given that the Welsh Education Minister has stated that 21st Century Funding is available for large scale maintenance.	As above.
4.11.6.10	Why is "Building condition would continue to deteriorate" a threat in Option 1? Powys County Council has been awarded £2.2m for school maintenance and the Education Minister has made a further £45m available. The current buildings will need maintenance work undertaken within the next 2 years in accordance with the Building Condition Surveys. Whilst children are learning in the existing buildings then the buildings will need to be maintained. If the buildings are maintained doesn't it follow that the condition will not continue to deteriorate?	As above. The Council has a duty to maintain its school buildings and address any issues that arise, regardless of whether schools are reviewed or not. This would continue to be the case during Phase 1 Should the Council proceed with the Proposals.
4.11.6.11	Why is "Each school would retain its own character, ethos and identity" a strength in options 2a and 2b but not in option 1?	Comment noted, these factors would also be a strength in respect of option 1.
4.11.6.12	A major threat to option 4 is that there is no guarantee that Powys County Council will be successful in their application for 21st Century School funding for a new build but this has not been listed as a weakness or a threat. Why is this not identified as a weakness or a threat?	'No capital funding available to fund the project' is identified as a risk in the Consultation Document .
4.11.6.13	The proposal states that any surplus sites would be disposed of in accordance with The Council's asset management policy. Selling the land & building at Mount Street Infants School would entail selling a green space in the town. The future generations commissioner wants to see changes to towns to make sure no-one in Wales lives more than 300m from a public green space. This could mean that Powys County Council will not be able to sell the land. Why has the inability to dispose of land or buildings not been listed as a weakness in option 4?	The consultation document states that any surplus sites 'would be disposed of' – this does not necessarily mean that the Council would be seeking to sell the sites. All surplus assets are subject to the process of disposal as outlined in The Council's Asset Management Policy. Whilst it is possible that this could lead to sale of the sites to third parties, some schools that have closed have been transferred to other service areas e.g. housing or to a community - with the latter, this may allow for the space to be retained or developed for community use. At this stage,

		there is no evidence that the Council would be unable to dispose of the site in this way.
4.11.6.14	A major threat to option 4 is that planning permission may not be granted. Why is this not listed as a threat or a weakness in Option 4?	All The Council's new build projects are subject to the relevant planning processes. Should the Proposals be implemented, the school design stage would begin, and planning permission is usually sought after RIBA 4 stage has been completed.
4.11.6.15	Why are all the weaknesses listed in Option 4 related to phase 2. Why are there no weaknesses related to Phase 1 e.g. one headteacher covering 3 schools?	The SWOTs relate to the long term plan for the schools.
4.11.6.16	Why is "One new larger school would be established which would offer enhanced opportunities for pupils" listed as a strength in option 4 but not in Option 3b?	Option 3b would result in merging Mount Street Infants School and Mount Street Junior School only.
4.11.6.17	Why does Option 4 only list weaknesses in respect of Cradoc C.P. School and the Cradoc community and none for either of the Mount Street Schools or for the community of Brecon?	<p>The main impact identified by the Council in respect of Option 4 is that there would be no longer be provision in Cradoc, which would impact on the community in Cradoc, whilst provision would continue to be available in Brecon.</p> <p>As well as the SWOTs, The Council has prepared draft Community Impact Assessments with input from the affected schools which considers the impact of the Proposals on the community. These will be updated to reflect comments received during the consultation period, and updated versions will be considered by the Cabinet when determining how to proceed.</p>
4.11.6.18	In the 'Advantages and Disadvantages' listed for the preferred option, it is wrong to state that it would only be Cradoc School and the community of Cradoc that would be disadvantaged. Why has The Council not listed any disadvantages for MSI and MSJ and the impact on the community of Brecon?	As above.
4.11.6.19	The disadvantages of the preferred option for MSI / MSJ / Brecon include: Loss of Forest School; Loss of connection with the local community; Distance from the community; Less likely that pupils will be able to walk to activities in the town; Less likely that parents/carers will drive their children to school; the site was	These additional perceived disadvantages in respect of the preferred option are noted.

	previously for high school aged children so may not be suitable for pupils aged 3 to 11; some parents/carers may be disadvantaged as due to age or disabilities they may not be able to walk the additional distance up a steep hill; more difficult for parent & toddler group to access the proposed site; staff that currently walk to school would probably drive to school; nurseries Brecon would not be able to walk children to the school to access the 3+ early years setting.	
4.11.6.20	There is no guarantee that the proposed redundant sites would realise a capital receipt. The Consultation Document states “could realise a capital receipt “and therefore is acknowledging that this is not guaranteed. At the Mount Street Infants site this would mean selling a green field and a wooded area. The site would be subject to planning permission from Brecon Beacons National Park and with no guarantee that planning permission would be granted the site may not sell. Will Powys County Council agree that this is a risk and being unable to realise a capital receipt should be listed as a threat to Option 4 in the SWOT and Critical Success Factor Analysis?	The Council does not agree that being unable to realise a capital receipt is a threat to the Proposals. Implementation of the proposal is not dependent on receiving a capital receipt from sale of the sites.

4.11.7 Comments about the Critical Success Factors

4.11.7.1	The consultation report does not apply the assessment of risk fairly when comparing the options against success criteria. PCC’s preferred Option 4, when scored in the evaluation of Critical Success Factors does not match the information contained within the Consultation Document – specifically where funding and achievability were scored. Our view is that both these factors are unknown for Option 4 and should be scored as “Could Meet” which changes the scoring and outcomes significantly. Can PCC explain how Option 4 was scored so positively when two of the five Critical Success Factors achievability and affordability were in fact uncertain?	<p>The Council’s view is that the Proposals are achievable – the Council has a vacant site available in Brecon which is large enough to accommodate the proposed development, however it is acknowledged that there are a number of processes that would need to be completed in order to achieve this, including business case process, feasibility work, design and planning.</p> <p>It is anticipated that the lifetime costs of the status quo option, which would include backlog maintenance would be £97,990,442 over a 60-year investment period. This is compared with the lifetime costs of the</p>
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		move to a new school building would be £92,772,215 over a 60-year investment period, generating a saving of £5,218,227.
4.11.7.2	The potential achievability, potential affordability and value for money assessments of option 4 should be assessed as COULD MEET the Critical Success Factors as, at this stage, without the guarantee of 21st Century Schools funding, without a feasibility study, planning consent or an environmental impact assessment option 4 does NOT meet the Critical Success Factors. This then means that Option 3 becomes the preferred option.	As above.
4.11.7.3	What factual information has been used by Powys CC to assess the affordability and achievability of option 4? If information from the Consultation Document was used to assess option 4 against the Critical Success factors, it is unclear how factors linked to funding and achievability are currently considered to be positive as this information is unknown.	As above.
4.11.7.4	Can PCC please explain how they have scored the outcomes for Option 4 so highly when clearly two of the critical success factors are currently unachievable or affordable based on the content of the consultation information?	As above.
4.11.7.5	Option 4 does not meet all the Critical Success Factors. At this stage, without a feasibility study and without a planning application having been made, Powys County Council does not know that Option 4 has potential achievability. Therefore, the assessment in Appendix B should be Could meet.	As above.
4.11.7.6	Without having applied for 21st Century Schools Funding Powys County Council does not know whether Option 4 has potential affordability. Therefore, the assessment in Appendix B should be Could meet.	As above.
4.11.7.7	In the critical success factors table, option 3a also has three question marks against it (rather than crosses), which would indicate that it has not been fully explored.	It is correct that the assessment of Option 3a indicates that the option is 'possible'. This is an error in the document.
4.11.7.8	The assessment on page 60 states that the potential achievability of option 4 MEETS the Critical Success Factors but that Option 3b COULD MEET the Critical Success Factors. Also, it states that the	As above.

	Potential Affordability of option 4 MEETS the Critical Success Factors but Option 3a COULD MEET the Critical Success Factors.	
4.11.7.9	Pg 60 of document refers Option 3a as having three? next to the criteria and has therefore been discounted. Can you clarify what investigations/thought process has been taken to get to a? Has this been fully investigated and if so how and by whom?	The scoring of the critical success factors is carried out in discussion with officers from a range of services and the scoring is agreed by consensus. As indicated in the Consultation Document , a '?' indicates that the option could meet the criteria.
4.11.7.10	The assessment of the Critical Success Factors is biased.	The Council does not agree with this statement.

4.11.8 Comments about risks

4.11.8.1	Page 19 – Powys CC acknowledges that the merger of Mount Street Infants and Mount Street Juniors is at low risk of changing parental choice. The option of merger between Mount Street Infants and Mount Street Juniors in not part of this consultation and has nothing to do with option 4 as set out in the Consultation Document . If Powys CC wish to consult on a two-school merger a new consultation should be started.	The Council is not consulting on merging Mount Street Infants and Mount Street Juniors. The risk acknowledges that there would be a difference in the delivery model for parents of pupils currently attending Mount Street Infants and Mount Street Juniors as pupils would no longer be attending separate infant / junior schools. This is not the case for pupils attending Cradoc, as they already attend a primary school.
4.11.8.2	Page 19 – Powys CC states that the risk of parents moving children to other schools to avoid attending a new school on three sites is low. However, they later in the Consultation Document state that the new school building would be designed for 60 pupils less than the current total.	The capacity figure provided for the proposed new building is indicative at this stage. As outlined on page 17 of the Consultation Document : <i>'Initially, the new school would operate on the three existing sites, and the capacity would reflect their combined capacities. The capacity of the new primary school would initially be 420.</i> <i>Based on the PBC approved in September 2020, the intention is that the new school would move to a new building which would accommodate approximately 360 pupils – the capacity of the new school would need to be further assessed during the design stage.'</i>
4.11.8.3	Powys County Council state that the risk of parents not wanting their children to attend the new school, so move them to	The Council does not agree that this risk should be high likelihood and high impact. There is limited capacity

	<p>alternative schools is low likelihood and low impact. However, it is highly likely that, as the closest schools for many of the children will be Priory School or Llanfaes School, parents will choose alternative schools. This will result in spare capacity at the proposed new school and cuts in budget. Decisions will have to be made by the Governing Body regarding staff redundancies and how the heating and the rates of the new 360 school are to be paid for. Does Powys County Council agree that this risk should be high likelihood and high impact? If not, why not?</p>	<p>available at Priory School and Llanfaes School, should there be no places available at these schools, places would continue to be available to pupils at the new schools.</p>
4.11.8.4	<p>The Council suggests there are a number of other registered early years providers in the area which parents could access instead should there be no provision in Cradoc. Suggesting parents should send their children to one provider, for example Priory (which many Cradoc parents will drive past to reach the new school site), where they will become settled in their surroundings and comfortable with staff until the age of four and then move them to the new school when they reach school age. Yet they have stated the risk of parents sending their children to another school as low. This is completely unrealistic and frankly proves how out of touch The Council is with the communities they serve and how ill-thought-out this proposal is.</p>	<p>The Council does not suggest that 'parents should send their children to one provider...then move them to the new school when they reach school age'.</p> <p>The Council's intention is that early years provision would be provided as in the planned new building – as explained on page 24 of the Consultation Document , <i>'Accommodation to provide funded early years education would be provided as part of the new building, and it is anticipated that there would be at least the same number of places available as are currently available at Mount Street Infants School and Cradoc C.P. School.'</i></p> <p>Information about other registered early years providers was included in the Consultation Document to illustrate that there other early years providers available in Brecon which parents could access instead of the new provision at the new building in Brecon, should that be their preference. However, the Council's intention would be that pupils would access the provision at the proposed new school.</p>
4.11.8.5	<p>Page 20 of the Consultation Document states that the risk that staff may leave is low! This is completely false. The risk is not just uncertainty and a negative impact on well-being but a real threat to job security during Phase 1.</p>	<p>The Council's view is that the assessment of this risk is appropriate. During Phase 1, there would be a need to continue to operate across three sites, therefore it is likely that the staffing requirements will remain similar to the current requirements.</p>

4.11.8.6	Uncertainty for staff during the transition period, may result in some staff leaving is considered low likelihood and a low impact. Staff leaving should be considered at least as medium likelihood and medium impact. It is highly likely that staff, without the guarantee of a position in the new build school, will be looking to secure positions in other schools. Will Powys County Council amend the likelihood and impact of the risk to medium?	As above.
4.11.8.7	Page 20 – Powys CC states that the likelihood of no capital funding is a medium risk, and the impact of this risk is high. A very high risk for all three schools.	It is correct that the Council has assessed the likelihood of no capital funding as ‘medium’, and the impact of the risk as ‘high’. The Council does not agree that this is ‘a very high risk for all three schools.’
4.11.8.8	After reading the Consultation Document , I am very concerned at the 'medium' risk given to the new build receiving funding to go ahead. The meeting I attended with Powys CC did not convince me that this money will be available or that it will be a quick process. We could therefore end up remaining in our schools under one leadership team for a very substantial period of time.	Comment noted.
4.11.8.9	No capital funding available to fund the project is listed as being a risk with medium likelihood and high impact. This is a high risk and, as there is no plan B, the risk is too high. A much safer proposal would be to use the £2.2m already awarded for large scale maintenance projects to improve the building on the current Mount Street Infant school site. Another much safer proposal would be to apply for 21st Century Schools Funding now to make improvements to the building. The risk of amalgamating the 3 schools and then not receiving the funding for a new build is a risk even a gambling person would not take.	Comment noted.
4.11.8.10	Page 20 – Powys CC make it difficult to understand if they are considering the risks for two or three schools. ‘Period of uncertainty for the affected schools whilst the statutory process is being carried out and implemented may have a negative impact on the standards at the two schools.’ The risk is stated to be medium, but I would argue that the risk is high if Powys CC cannot decide how many schools are to amalgamate!	Comment noted. This is a typo in the Consultation Document and should read ‘may have a negative impact on the standards at the three schools.’

4.11.8.11	The creation of a new school building to accommodate a smaller number of pupils overall (420 down to 360) implies that the Local Authority has assumed that pupils will transfer to other schools in the amalgamation period. This would lead to job losses at this stage given the expected fall in pupil numbers and could result in potentially 2 teachers and TAs losing their jobs. Can you explain why this is not flagged as a risk in the report?	<p>The Council has identified a risk that there would be 'uncertainty for staff during the transition period'.</p> <p>The capacity figure provided for the proposed new building is indicative at this stage. As outlined on page 17 of the Consultation Document :</p> <p><i>'Initially, the new school would operate on the three existing sites, and the capacity would reflect their combined capacities. The capacity of the new primary school would initially be 420.</i></p> <p><i>Based on the PBC approved in September 2020, the intention is that the new school would move to a new building which would accommodate approximately 360 pupils – the capacity of the new school would need to be further assessed during the design stage.'</i></p>
4.11.8.12	Mount Street Infants is an exceptional school with an extremely strong team of staff and an outstanding Headteacher. There is a RISK that this could all be lost if this proposal is taken forward. Do Powys County Council agree that it is a MAJOR RISK to amalgamate 3 schools with no certainty that a new school will be built?	The Council does not agree that this is a major risk. There are other examples in Powys of headteachers operating across more than one site, including examples of headteachers operating across three sites.
4.11.8.13	One new, larger school would not provide enhanced opportunities for ALL pupils. Does Powys County Council agree that there is a RISK that some pupils will not thrive in a large out of town school? Will Powys County Council agree that there is a RISK that staff will lose their specialist knowledge of foundation phase education?	The Council does not agree that these are risks.
4.11.8.14	Will Powys County Council agree that there is a RISK that not all staff will secure positions in the new school?	The Council has identified a risk that there would be 'uncertainty for staff during the transition period.'
4.11.8.15	Will Powys County Council agree that there is a RISK that staff will not have the "excellent development opportunities" (Estyn report) that they currently have at Mount Street Infants School?	The Council does not agree that this is a risk. There is no reason to believe that staff would not continue to have 'excellent development opportunities' at the proposed new school.

4.11.8.16	To mitigate the risks associated with the proposal to amalgamate the 3 schools Powys County Council states “Engagement with parents to take place throughout the process”. How can Powys County Council justify quoting engagement with parents as a mitigating action and then refuse to hold any meetings with parents? The risk cannot be mitigated as, apart from issuing the Consultation Document , you are not engaging with the main stakeholders, the parents.	All parents at the three schools have had the opportunity to contribute to the consultation process. Should the Council proceed with the Proposals, there would be further opportunities for engagement with parents as part of the transition process, including opportunities to be part of the temporary governing body, opportunities to contribute to the process of agreeing a name and logo for the new school, and opportunities to contribute to developments relating to the proposed new building.
4.11.8.17	Why has Powys County Council not listed no guarantee of obtaining planning permission as a risk?	Comment noted. There are many risks associated with any building project. Should the Council proceed with the Proposals, these risks would be captured and managed as part of the construction of the new school.
4.11.8.18	Although amalgamating the schools is not dependent on 21st Century Schools Funding, a new building is dependent on 21st Century Schools funding however funding has not yet been applied for and there is no guarantee that the application will be successful. If funding is not made available 3 schools will have been amalgamated over 2 separate sites with no plan B. Does Powys County Council agree that this is an unacceptable risk for our children?	The Council has identified ‘No capital funding available to fund the project’ as a risk.

4.11.9 Comments about costings / financial information

4.11.9.1	The document indicates that Phase 1 will result in an annual revenue saving of £16,181 per annum but the set-up cost will be in the region of £50k. Therefore, if the new school opens in 2024, phase one will have cost Powys County Council at least £16,000. There is no guarantee of funding for a new school, and this means that Phase 1 has no guaranteed Plan B.	<p>The estimated savings set out in the Consultation Document are recurring savings that the Council will benefit from each year. The £50k estimated additional setup costs would be a one off cost. If the new school then opens in 2024 there would be additional savings that would offset this cost.</p> <p>The Council is currently revising it's funding formula for schools. Should Cabinet approve the new formula, the savings would need to be recalculated.</p>
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4.11.9.2	It is stated that there would be no additional transport costs as current bus routes can accommodate this model but there is not currently a bus route for primary school children that runs from Cradoc and the surrounding areas to Brecon and the current bus routes in place would be required further to town and therefore this would increase the transport cost.	Transport costs are based on current costs and routes. Some assumptions are necessary and all calculations are worked through with School transport colleagues, involving detailed work which examines current pupils' home addresses and the distance to their nearest alternative school and takes account of existing transport routes.
4.11.9.3	After phase 2 more pupils would need to be bussed into school and transport budget costs would go up. Have read that in the Consultation Document PCC does not expect them to go up, but you cannot transport more pupils without an increase of costs in some kind.	See 4.11.9.2
4.11.9.4	Additional transport costs could be occurred where the nearest suitable school e.g. Llanfaes or Priory is full and unable to admit a learner. If the next nearest suitable school that has room to take the child is the proposed new school and is 2 miles away from the home address, then free transport will have to be provided. Will Powys County Council confirm that additional transport costs could be incurred?	See 4.11.9.2
4.11.9.5	Although the current cost per pupil is reported there is no information on the projected cost per pupil for the new build. How can consultees know whether the cost per pupil will be less, the same or more per pupil without this information?	Comment noted
4.11.9.6	The costings provided have to be accepted as there is no evidence to support the figures quoted. However, amalgamation will not result in any initial finance savings as the setup costs are estimated as being approximately £50k whilst the savings are only £9,438.92 in 2022/23 and £6,742.08 in 2023/24.	The annual savings estimated from Phase 1 are £16,181. The Council is currently revising it's funding formula for schools. Should Cabinet approve the new formula, the savings would need to be recalculated.
4.11.9.7	This report does not take into account loss of funding from the Ministry of Defence (MOD). Mount Street Infant School & Mount Street Junior School have applied for and received grants from the MOD which total more than £60k per annum. As these grants are issued on a school basis rather than a pupil basis an amalgamation of the schools would see these grants reduced.	Should the grant continue to be available from the MoD, the new school will be able to apply for it. The application process would require the school to set out how the grant will support military children and the school would need to apply the grant in line with that application, if successful. Given the success of the existing schools in accessing this

	What mitigation will there be for the potential loss of MOD grant funding?	funding, The Council does not foresee difficulties in future applications.
4.11.9.8	The only recurrent costs identified in the Consultation Document are an extra £14,000 increased rates charge. How has this figure been arrived at when “no designs for the building have been developed yet”?	This is an estimate based on the non-domestic rates charged for a similar sized new build school.
4.11.9.9	Regarding capital funding, the proposal states “The Council would need to go through an extensive business case process in order to draw down funding. Should 21st Century Schools funding not be available, The Council could consider utilising alternative funding sources”. The Powys County Council website states “A huge 70% of our money comes from Welsh Government , so since they are cutting that funding year on year the task of balancing our budgets gets harder.” “There are tough challenges ahead”. Will Powys County Council agree that it is impossible to guarantee that alternative funding sources would be available?	Should the Council proceed with these Proposals, and should funding not be secured in the future, The Council would need to review the plans and determine how to proceed. This could involve identifying an alternative funding source, such as Council funding, capital receipts, borrowing.
4.11.9.10	Phase one will result in a saving of £9,438.92 in 2022/23 and £6,742.08 in 2023/24 but the set up cost will be in the region of £50k. Therefore, if the new school opens in 2024, phase one will have cost Powys County Council at least £33,819.00.	The annual savings estimated from Phase 1 are £16,181. The Council is currently revising it's funding formula for schools. Should Cabinet approve the new formula, the savings would need to be recalculated.
4.11.9.11	It is estimated that the capital cost of the new school will be approximately £9m to £10m. Although the estimate of repairs in the Building Condition Survey is £115,086.95, the outstanding repairs at Mount Street Infants and Mount Street Juniors estimated in the proposal to amount to £1.7m. As funding of £2.2m has already been secured for large scale school maintenance, it would be a much cheaper option to repair the schools. Why has repairing the schools not been listed as a strength in the SWOT analysis for option 1 or option 3?	As set out in the Consultation Document , it is anticipated that the lifetime costs of the status quo option, which would include undertaking the large-scale backlog maintenance at the existing schools, would be £97,990,442 over a 60-year investment period. This is compared with the lifetime costs of the move to a new school building which would be £92,772,215 over a 60-year investment period, generating a saving of £5,218,227.
4.11.9.12	The saving of £5,218,227 between the lifetime costs of the status quo option and a new school building over a 60 year period does not justify the cost of the new build. Will the new build last for 60 years? None of the 3 schools in this proposal is 60 years old and	The lifetime saving of £5.2 million takes into account the total capital investment and lifecycle costs of both the status quo and the new build school.

	<p>Powys County Council wants to replace them. In fact, Mount Street Junior School is a new build and opened in November 1987, only 34 years ago. Given Powys County Council's history of not maintaining their buildings what guarantees can be given that a new building will be maintained and in 34 years time there won't be a proposal to replace it?</p>	<p>The responsibility for maintaining the building is shared between the school and the authority.</p>
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4.11.10 Other comments about the Consultation Document

4.11.10.1	<p>The Consultation Document states that performance is GOOD across all 3 schools when actually in the appendix the performance of each school is detailed and it can only be described as variable. When questioned about this in the staff meeting with the LA, officers replied that the average of the 3 schools was taken. This is misleading at the very least and does not give a true picture.</p>	<p>Comment noted. The comment that 'Standards of education an progress at all three schools are currently good' is an overall judgement on the three schools affected by this consultation. Information about the outcome of the latest Estyn inspection for each school is also provided in the Consultation Document , however it must be noted that there is nearly four years between the earliest inspection and the latest inspection.</p>
4.11.10.2	<p>The consultation report provides evidence on performance of three schools – which is summarised as GOOD, whereas the reality is that performance ranges from excellent to adequate. There are clearly inspection areas which need focus for improvement and these issues are not addressed in the consultation report.</p>	<p>As above.</p>
4.11.10.3	<p>The statement that “Standards of education and progress at all three schools are currently good” is misleading. It is based on an average of all 3 schools together. The true picture can be seen in Appendix A pages 48 & 49. The latest Estyn inspection report rates Mount Street Infants School as EXCELLENT across 2 inspection areas and GOOD across 3 inspection areas. Mount Street Junior School is rated as GOOD across all 10 inspection areas and Cradoc C.P. School is rated as ADEQUATE across all 10 inspection areas. Will Powys County Council agree that standards of education and progress in the 3 schools are not all currently good?</p>	<p>As above.</p>

4.11.10.4	The Consultation Document states that Standards across the three schools are GOOD. However, this is untrue. The three schools are not equal. Further scrutiny of the document reveals that standards are in fact VARIABLE across the three schools, with MSIS having the best standards and the best school categorisation.	As above.
4.11.10.5	Throughout the Consultation Document there is a significant emphasis placed on the term 'Improve Learner Entitlement' but there is not an explanation of what more a child will gain in this regard. However, they would be losing the benefits of an average sized town school, with Good/Excellent Estyn Status, Forest and Eco School status and an environment which has nurtured and developed children from a diverse cross section of the community for decades. Any change must provide more and not less in terms of education. The recent Estyn Inspection described MSI as having an 'exceptionally calm, nurturing atmosphere and inclusive environment'.	Comment noted.
4.11.10.6	I am not convinced that this is a necessary in order 'improve learner entitlement' or to ensure long term future proofing.	Comment noted.
4.11.10.7	The Proposals do not make clear how merging these schools into a new location out of the communities which they serve will improve learner entitlement and experience for such young children. They seem to ignore the basic need to supply support and care close to home.	The Council recognises the role of schools in their communities. The impact of the Proposals on these communities is considered in the draft impact assessments, which will be updated to reflect feedback received during the consultation period. There is no requirement to provide access to provision close to a pupils' home. In a rural county such as Powys, many pupils travel to school.
4.11.10.8	It is maintained throughout the document that enhanced opportunities for pupils is a reason for this merger. What enhanced opportunities will this provide? It will increase travel time, in particular for pupils currently attending Cradoc C.P. School, it is likely to increase class size due to higher pupil numbers, may potentially split friendship groups if parents chose to move pupils to a different school in town, Sennybridge or even Builth Wells or Llyswen which is entirely possible given the areas	Comment noted.

	Cradoc school serves. Therefore, I believe The Council to be incorrect when they considered this scenario a low likelihood.	
4.11.10.9	Why is it not acknowledged in the report that amalgamating the schools could have a negative impact on the skills of all pupils, including literacy, numeracy and ICT?	<p>The impact of the Proposals on pupils' skills is considered on page 28-9 of the Consultation Document , where The Council states that <i>'It is also anticipated that amalgamating the three schools would have a positive impact on the skills of all pupils, including literacy, numeracy and ICT, through improved opportunities to share staff expertise and resources across, and through improved ability to monitor pupil progress in these aspects.'</i></p> <p>The Council does not believe the Proposals would have a negative impact on pupils' skills.</p>
4.11.10.10	The document states that the provision of skills is strong in all three schools, again this is an incorrect statement. If, however, the provision is strong how would amalgamating the schools strengthen something that is already strong? Isn't it possible that the strength could be weakened?	As above.
4.11.10.11	The statement: 'Leadership is good at all three schools, however, amalgamating the three schools would provide an opportunity to further enhance this'. Can you clarify why amalgamating three schools will provide further opportunity to enhance this? Surely every school whether amalgamating or not has opportunity to enhance this? By amalgamating schools surely heads will lose jobs or posts being re-advertised causing a schools leadership team to have increased pressure/workload?	<p>From experience within Powys, we have a headteacher that is a headteacher of a three-school federation across three school sites. This has been successfully implemented with standards being maintained across each of the schools. The headteacher would divide their time between the three schools. It would be possible to run the three schools alongside the leadership teams established across the schools.</p> <p>It is acknowledged that any school reorganisation proposal leads to a period of uncertainty for those affected, including staff / headteachers. All staff affected by the changes, including the headteachers, would be fully consulted.</p>
4.11.10.12	The statement that wellbeing and attitudes to learning are currently strong is misleading. Whilst the Estyn report rates Mount Street Infants as excellent, Mount Street Juniors is rated as good and Cradoc C.P. School as adequate. Will Powys County	Estyn inspections provide information about the provision at each school at the time when the inspection was carried out, therefore cannot be used to directly compare the provision at each school.

	<p>Council again acknowledge that their statement is incorrect? Wellbeing and attitudes to learning at Mount Street Infants School are rated as excellent by Estyn. It is stated in the Consultation Document that “there would be an impact on pupil wellbeing during transition to the new operating model” and “there would also be an impact on pupil wellbeing during the transition to the new building”. Why are Powys County Council knowingly negatively impacting on the excellent wellbeing and attitudes of our children?</p>	<p>The Council recognises that any school reorganisation process creates a period of uncertainty for all involved, including children. The Council is committed to supporting schools and learners, including through periods of change. An experienced member of staff from the Council is supporting school leaders effectively to help them manage possible changes for their learners. It is also expected that school governors, staff and parents support the children to ensure that there isn't a detrimental impact on their wellbeing.</p>
4.11.10.13	<p>The statement that the quality of teaching is currently good in all 3 schools is again not correct. The quality of teaching is good at both Mount Street Infants School & Mount Street Junior School but is only adequate at Cradoc C.P. School. Will Powys County Council correct their statement?</p>	<p>Estyn inspections provide information about the provision at each school at the time when the inspection was carried out, therefore cannot be used to directly compare the provision at each school.</p> <p>All three schools provide good quality education, the amalgamation of the three schools should not have a negative impact on standards.</p>
4.11.10.14	<p>Care, support and guidance is already rated as excellent at Mount Street Infant School. You cannot improve on excellent so what would be the benefits to the pupils of Mount Street Infants School from this proposal?</p>	<p>The Proposals would maintain the excellence in Wellbeing and Care, support and guidance identified by Estyn in Mount Street Infants inspection report in January 2020.</p> <p>All three schools have strengths and the amalgamation of the schools should bring these strengths together rather than be detrimental to any of the schools.</p>
4.11.10.15	<p>Leadership and Management – once again the Estyn reports have been “amalgamated” and an average rating reported on. Leadership & management are good at Mount Street Infants School & Mount Street Junior School but are only adequate at Cradoc C.P. School. Will Powys County Council correct this statement as well?</p>	<p>Estyn inspections provide information about the provision at each school at the time when the inspection was carried out, therefore cannot be used to directly compare the provision at each school.</p>
4.11.10.16	<p>Mount Street Infants already has a non-teaching Headteacher. Operating across 3 sites would not enable increased focus on leadership. It will enable increased stress levels for the</p>	<p>From experience within Powys, we have a headteacher that is a headteacher of a three-school federation across three school sites. This has been successfully implemented with</p>

	<p>Headteacher, less support for staff & pupils as the Headteacher would not be onsite every day & increased work load for the Headteacher. The proposal states “operating across 3 sites could cause challenges for the school’s leaders during this phase”. What it fails to say is that these challenges could continue for many years if 21st century funding for a new build is not secured. How is it in the best interest of the pupils, parents, Headteachers, teachers, support staff, cooks, cleaners or governors for this proposal to proceed?</p>	<p>standards being maintained across each of the schools. This is a permanent arrangement. In this example, there is a deputy headteacher / teacher in charge on each site that supports the headteacher and staff when the headteacher is not on site.</p>
4.11.10.17	<p>Although the Proposals state that amalgamation should result in some efficiencies it then goes on to say that it could lead to inefficient use of resources. When school budgets are so stretched why are Powys County Council proposing an inefficient use of resources?</p>	<p>The Council is not proposing an inefficient use of resources. When considering the potential impact of the Proposals on use of resources, The Council notes that <i>‘there would be a need to maintain all three buildings in the short term, which would result in the duplication of resources and could lead to inefficient use of resources in the short term.’</i> However, the Council would expect all schools to maximise the resources available to them and to operate as efficiently as possible.</p>
4.11.10.18	<p>It has been acknowledged that Mount Street Infants School is well placed to deliver the requirements of the new Curriculum. Whilst Powys County Council states that “the provision available for pupils would be at least equivalent to the current provision” this does not mean that our pupils would have a better provision than they have currently. How is a new building going to improve the provision of a full curriculum for the children of Mount Street Infants School?</p>	<p>The Council fully acknowledges that a new building alone would not ensure the provision of a fully curriculum.</p>
4.11.10.19	<p>It has been acknowledged that Mount Street Infant School is well placed to deliver the requirements of the new Curriculum. What evidence is there that a new school would be better placed to do this? It will depend on the new staffing structure and the new governing body & especially the new Headteacher, none of which are yet in place. Do Powys County Council agree that it is teachers who will ensure provision of the new Curriculum is developed not buildings?</p>	<p>The Council fully acknowledges that it is teachers that will ensure provision of the new Curriculum is developed, not buildings. However, pupils now and in the future deserve to be taught in learning environments that are modern, fit-for-purpose, with the appropriate facilities and technology required to support the new Curriculum for Wales.</p>

4.11.10.20	The document provided fails to specifically highlight what enhanced opportunities will be provided for pupils. Can you explain what subject provision or facilities you are promising the children and staff of Cradoc and Mount Street, or are these also hypothetical just as the funding for this project?	As no designs have yet been developed for the proposed new building, it is not possible to give definitive information about the facilities and opportunities that would be available. Should the Council proceed with the Proposals, there would be an opportunity for the governing body / headteacher of the school to be involved in developing these designs.
4.11.10.21	Although the Consultation Document states it is not anticipated that implementation of the proposal will impact on any pupils attending other schools in the Brecon catchment there will be an impact on pupils as parents are highly likely to send their children to schools closer to their homes when there is so much uncertainty regarding the future of Mount Street Infants and Junior Schools. 40% of children currently attending Mount Street Infants School live closer to Priory Church in Wales School in Brecon but choose to send their children to our school. Does PCC agree that these Proposals could impact on pupils attending other schools in the Brecon catchment?	The Council's intention is that pupils currently attending Mount Street Infants, Mount Street Juniors and Cradoc would continue to attend the new school. It is possible that some pupils may choose to transfer to alternative schools in the area, however should this happen, the expectation is that the numbers would be small, therefore this would not have a significant impact on the schools to which they transfer.
4.11.10.22	Although Powys County Council state that it is not anticipated that implementation of the Proposals would impact on pupils attending any other schools not in the catchment area there will be an impact for pupils as parents could chose to send their children to other schools when there is so much uncertainty regarding the future of Mount Street Infants. 3.5% of the children currently attending Mount Street Infants School live closer to Ysgol Y Mynydd Du in Talgarth. Will Powys County Council agree that these Proposals could impact on pupils attending other schools not in the Brecon catchment?	As above.
4.11.10.23	Why have Powys CC assumed that this unnatural merger would have no impact on other schools in the Brecon Catchments Area?	As above.
4.11.10.24	We are concerned that the Consultation Document did not highlight the fact that Cradoc was a rural school serving a huge local area, not a little village school on the outskirts of Brecon, as was inferred by the totally inadequate map on page 6. Was it intended to deceive the Cabinet members and other Councillors	The Council notes the concerns regarding the map included on page 6 of the Consultation Document . The map was not intended 'to deceive the Cabinet members and other Councillors'.

	who would be unaware of the local geography and the fact that some pupils are already travelling 8 miles from the more remote areas of the catchment?	
4.11.10.25	The proposed number of teacher governors (1 or 2) will not be a fair representation of all 3 schools during Phase 1 of the proposal. The proposed number of teacher governors (1 or 2) and staff governors (1) will not be a fair representation of all 3 schools during phase one of the proposal. As the temporary governing body would be responsible for appointing a Headteacher and for developing a new staffing structure this imbalance could have an impact on the decisions made by the temporary governing body. Does Powys County Council agree that the structure of the temporary governing body presents an imbalance which could impact on the decisions made?	As explained in the Consultation Document , the proposed composition for the governing body is based on the Government of Maintained Schools (Wales) Regulations 2005.
4.11.10.26	The proposal states that “the preferred option would impact on any pupils from economically deprived backgrounds. This is 31% of children who attend the 3 schools. Although the report states that “It is anticipated that amalgamation of the 3 schools would have a positive impact on educational attainment” what else supports this statement other than the pupil deprivation grant would be larger? A far better way to improve educational attainment would be to remove social disadvantage.	The aim of the Proposals is to improve learner entitlement and experience for all learners, by providing the opportunity for all learners, including those from economically deprived backgrounds, to access a modern learning environment.
4.11.10.27	No mention of 3+ setting as usual they have been forgotten about.	This is untrue. The impact of the Proposals on nursery / early years provision is considered on pages 23-25 of the Consultation Document .
4.11.10.28	Impact on Early Years Provision. There appears to be little evaluation done on the impact to the early year's provision. With uncertainty parents may choose to move children to other schools if the future is uncertain. Early years provision is essential for primary schools in ensuring good links with future pupils, helping to reduce future falls in pupil numbers. Where is PCCs evaluation on the impact to users of the Early Years provision at Mount Street Infants school?	The impact of the Proposals on nursery / early years provision is considered on pages 23-25 of the Consultation Document .
4.11.10.29	ALN and SEN provision. Children with Additional Learning Needs who attend the Specialist Support Class at Mount Street Infants	The impact on vulnerable groups, including children with Special Educational Needs (SEN) is considered on pages

	are not included in the Consultation Document . Parents of these children have no information about the future educational provision of their children. From reading the Consultation Document s they cannot see if their children will be part of the future plans for education in Brecon or not. These children are hugely impacted by the disruption in their education due to Covid-19 and are in desperate need of stability. Why has PCC not included an evaluation of impact of ALN and SEN provision in this consultation?	32-33 of the Consultation Document . This is also considered in the draft impact assessment document which was published with the Consultation Document ation. The draft impact assessment document will be amended to reflect comments received during the consultation period, and an updated document will be considered by the Council's Cabinet when determining whether or not to proceed with these Proposals.
4.11.10.30	'The requirement for specialist provision as part of the new building will be a key consideration when reviewing the specialist provision for SEN/ALN in Brecon, in accordance with The Council's ALN Strategy. ' This is not a commitment to retaining the specialist provision. PCC could state that this will be protected: in not doing so, this looks like a subversive attempt to close the ALN units which currently support a number of children extremely effectively.	Comment noted.
4.11.10.31	English as an Additional Language (EAL). The Consultation Document does not take into account the provision of the need to engage with and communicate with parents of children with English as an Additional Language (EAL). Children from the Nepalese community may be living permanently in Brecon or be part of the Services/MoD community. The percentage of ethnic minority' pupils is included in the Brecon Catchment Business Plan but is not referred to in other documents. QUESTION. Why did PCC NOT engage with the Mount Street Infants School early on to obtain a clear understanding of the school community and its needs?	The proportion of EAL pupils at each school is included in the Consultation Document , and the impact on these pupils is considered in the draft impact assessments. The draft impact assessments will be updated after the consultation period to reflect comments received during the consultation, and updated versions will be considered by the Council's Cabinet when determining whether or not to proceed with the Proposals.
4.11.10.32	There is a lack of understanding of Mount Street Infant school and what we are to the families and community and what will be lost if this process goes ahead.	The Council does not agree with this comment. The consultation process provides an opportunity for the families and community to let The Council know their views on the Proposals, which will be taken into consideration before deciding whether or not to proceed.

4.11.10.33	The inaccuracies and inconsistencies within the Consultation Document ultimately leads to an extremely high-risk situation in which no aspect of the Mount Street Infant School community is valued.	The Council does not agree with this statement. The Consultation Document has been prepared in accordance with the requirements of the School Organisation Code.
4.11.10.34	Many points stating the benefit of the schools' merger specified in the Consultation Document tend to be vague. It is important that the community can familiarise itself with the specific examples of benefits and disadvantages in order to be able to better judge the proposal. For instance, what are the specific opportunities for the pupils and staff which are directly related to the merger of schools and do not exist while the schools operate individually? Similarly, since MSIS and MSJS have been collaborating for a while now, what facts are to suggest that a tension might occur between these schools in future? These are only few examples.	Comment noted. The Consultation Document has been prepared in accordance with the requirements of the School Organisation Code.
4.11.10.35	There is no assessment of the Penlan site in terms of how favourable or otherwise it might be to a primary setting. For example, this site would set the school apart from the wider primary school community within Brecon, creating an out-of-town provision that flies in the face of active travel, community-based schools, the Town Centre first strategy and any attempt to reconcile the current climate emergency by encouraging more parents to transport their children to school by car. Other potential developments (school, PRU and Swimming Pool) combined with traffic using The Leisure Centre, Ysgol Bannu, Brecon High School and Hogan Park will have a significant impact on traffic flow and pollution.	Comment noted.
4.11.10.36	The document states that as the proposed site for the new school was previously a school site, there are already good active travel links between the site and the town centre. Given that the previous school was a high school, and this is a primary school, I would suggest there will be drastically different requirements, or does Powys County Council consider that a four-year-old and a 16-year-old will have the same requirements? One access route is next to a main road and another includes stairs which is therefore not suitable for cycling. It is unrealistic for The Council to	A site has been identified which is the Penlan site. If the Proposals are implemented, further feasibility work would be required to confirm the site's suitability and planning permission would be required. Traffic assessments would be carried out as part of this work. Should the Council proceed with the Proposals, active travel / the provision of safe routes to school would be a key consideration.

	expect a four-year-old to walk 2.5 miles, including up the steep hill on Cerrigcochion Road, carrying their school bags in the pouring rain or frost, which could potentially be the case. Therefore, while this may not increase the transport cost for The Council, it is likely to lead to more congested roads, (of particular note as this could block ambulance and fire engine routes given the location), which are already under pressure in Brecon at peak times of day, as those who do not receive public transport to school are likely to drive.	
4.11.10.37	Powys County Council state that <i>“there are already good active travel links between the site and the town centre”</i> . However, the travel links are not good for parents/carers who have younger children in prams or pushchairs. The options are 1) to walk up a very steep, very busy road 2) to walk along a path that has several steps or 3) to walk up a muddy lane. Will Powys County Council concede that the active travel routes are not good for pupils aged between 3 years and 10 years?	Comment noted. Should the Council proceed with the Proposals, active travel / the provision of safe routes to school would be a key consideration.
4.11.10.38	The Consultation Document states that journey length would not be unreasonable and not exceed 45 minutes: that is a very long time for a child of four or five and adds 1 hour onto their school day.	The School Organisation Code requires local authorities to comment on <i>‘whether primary school pupils will have one-way journeys in excess of 45 minutes.’</i> This is why The Council has referred to journeys of 45 minutes. It is unlikely that implementation of Phase 2 of the Proposals would mean that pupils would have journey times as long as 45 minutes.
4.11.10.39	There is reference to a new swimming pool being on the site of the new school at Penlan and the benefit it would have to the health and wellbeing of the pupils. However, the redevelopment of the swimming pool is not part of this proposal and therefore any potential benefits must be removed from the impact assessment and cannot be considered as relevant. Similarly, any reference to the Pupil Referral Unit.	The PBC for the Brecon catchment which was considered by the Council’s Cabinet in September 2020 identified the following preferred way forward: <i>‘A new 360 place English-medium primary school in Brecon, to replace Mount Street Infants School, Mount Street Juniors School and Cradoc C.P. School, with a co-located Pupil Referral Unit and a community swimming pool – to be built on the site of the old Brecon High School.’</i>

		This is why the Consultation Document also refers to the development of a swimming pool and PRU alongside the proposed new school.
4.11.10.40	Your Consultation Document should remove all reference to the swimming pool as it already exists and is already due to be refurbished , you cannot throw it in just to try and make this proposal look like it is having a beneficial impact on the community.	As above.
4.11.10.41	Many details for Phase 2 within the Consultation Document are incomplete, incorrect or in reality unknown. The School Organisation Code (2018) states that from case law one of the four principles for consultation should: “include sufficient reasons and information for particular Proposals to enable intelligent consideration and response”. Based on this alone the information for Phase 2 in the current consultation is flawed. There are clearly many unknowns – future pupil numbers, no secured funding, no planning, no environmental impact assessment, no assessment to take into consideration other services being developed or co-located (e.g. Early Years Centre). Phase 2 is uncertain and high risk.	The information in the Consultation Document is in accordance with the requirements of the School Organisation Code.
4.11.10.42	The proposed new building is going to cost between £9-10 million and presently there is no guarantee of funding or detail on planning. The Consultation Document does not set out any detail on how the proposed site would meet the needs of the 3 schools. No detail about the other services and community facilities being proposed in Brecon, for example, early years centre, new community pool, pupil referral unit and how these might affect all the other schools in the Brecon Catchment or be better linked to or aligned with the overall education provision and accessibility to services within Brecon thus demonstrating an integrated approach to improving services and education.	Comment noted.
4.11.10.43	The Council has been extremely vague about the plans for the sites of Cradoc and Mount Street Schools should these Proposals go ahead. The document states, ' Any sites which are surplus following a move to a new building would be dis posed of in	Should the Council proceed with the Proposals in respect of Mount Street Infants, Mount Street Juniors and Cradoc C.P. School, the three school buildings would eventually be declared surplus following the move to a new building. All

	<p>accordance with The Council's asset management policy.' This sounds like a roundabout way of not saying (but meaning) we'll sell the sites to the highest bidder for housing development. This is a truly cynical approach and one which would irretrievably maim the already much-wounded reputation of The Council. It would also reveal the true reason for putting forward these Proposals to merge and move the schools; to fill The Council's depleted coffers. I only hope that in a post-Covid Wales that there will not be the money available or the will to push ahead with these ill-conceived and ill-judged Proposals.</p>	<p>surplus assets are subject to the process of disposal as outlined in The Council's Asset Management Policy. Whilst it is possible that this could lead to sale of the sites to third parties, some schools that have closed have been transferred to other service areas e.g. housing or to a community.</p>
4.11.10.44	<p>You have detailed the site of the old Brecon High School as the location for the new school build but have failed to mention what the sites of the three schools in question will be used for. This will have considerable impact on the surrounding communities and should therefore be a part of this consultation. For example, if they were used for housing then that would probably increase the number of primary school places required and therefore Powys County Council may require the surplus places you are trying to reduce and would put additional pressure on the community facilities in Brecon as you would be increasing the housing but reducing the facilities by removing three school buildings, particularly in Cradoc where the children use the grounds and the school holds a number of community events and there is no alternative facility. Once again highlighting how inappropriate it is to include Cradoc in this merger.</p>	<p>As above.</p>
4.11.10.45	<p>There is no evidence in the Consultation Document that can convince that a new building will provide a better education for future generations – the message it gives is that we are a throwaway society and move to new buildings when there is a perceived problem.</p>	<p>The Council does not agree with this statement. Options to improve / remodel the existing buildings were considered in the PBC for the Brecon catchment, however these were discounted.</p>
4.11.10.46	<p>You state repeatedly throughout the proposal that a new building will improve children's' education. However, it is not the building that affects the pupils' education it is the staff and teams who make the difference.</p>	<p>Comment noted. Should the Council proceed with implementation of the Proposals, the implementation date would be reviewed and an amended implementation date would be included in any Statutory Notice published.</p>

4.11.10.47	The consultation gives no certain future end date for a new school other than at the earliest 2024. The experience from the recent Welshpool amalgamation took 5-6 years.	As above.
4.11.10.48	The reasons for the proposal – ‘would reduce The Council's surplus places in primary schools; would lead to rationalisation of the primary school estate; financial saving to The Council; meets all the Critical Success Factor’ – are all just checkpoints and targets for Powys County Council and it is unfair to use the education and wellbeing of these children and the wider community of Cradoc as a trade off with The Council's accounts and targets. Powys County Council has a duty of care which I believe this proposal ignores.	Comment noted.
4.11.10.49	Apart from needing a new building, what are the reasons for the proposed closure of Cradoc school?	<p>The reasons why change is needed at Cradoc C.P. School are outlined in the Consultation Document . These are:</p> <ul style="list-style-type: none"> i) Decreasing pupil numbers ii) Building condition iii) Building configuration <p>It is acknowledged that the reasons for the proposed closure of Cradoc School primarily relate to the school's buildings.</p>
4.11.10.50	<p>This Consultation Document makes a number of statements that are not (and probably cannot be) backed up. I have highlighted some below.</p> <p>1. The offer of enhanced opportunities for pupils' is mentioned several times in the Consultation Document , but with no examples of what these may be what are these enhanced opportunities?</p> <p>2. Wellbeing and attitudes to learning are currently strong in all three schools. Amalgamating the schools would provide an opportunity to strengthen these further.' How?</p>	<p>The amalgamation of the schools would bring together the skills and expertise of staff from all of the schools. The combined skills and expertise will bring added opportunities for pupils through the sharing of staff expertise and good practice. The expertise of the staff would ensure that all learners receive an appropriate and differentiated curriculum, able to challenge pupils at the own ability.</p> <p>With a new school building, there would be a wider range of facilities available which would enhance learner experiences. This was also acknowledged in the response from Estyn.</p>

	<p>3. Implementation of the Proposals would provide improved opportunities for pupils in all key stages to benefit from staff specialisms throughout their time at the school, and to provide continuity in the support provided to vulnerable pupils throughout their time at the school. There would also be improved opportunities for more able and talented pupils.' How? What evidence do you have for this?</p> <p>4. It is also anticipated that amalgamating the three schools would have a positive impact on the skills of all pupils, including literacy, numeracy and ICT, through improved opportunities to share staff expertise and resources across, and through improved ability to monitor pupil progress in these aspects.' How does merging schools improve ability to monitor pupil progress? And how would this progress then be improved as a result of the merger?</p> <p>5. How would the curriculum provision and skills development be improved as a result of the merger?</p>	
4.11.10.51	Your document is not clear or easy to read, again putting many at a disadvantage (someone cynical would say The Council are doing it now to get it through quickly and quietly without any fuss). It is much harder for parents/ community to talk through the ideas you are suggesting and gain all the facts.	The document has been prepared in accordance with the requirements of the School Organisation Code. As well as the full document, two simpler versions were available – children’s version and young people’s version, and a verbal presentation was also available on the Council’s website which gave an overview of the Proposals.
4.11.10.52	The reports extracts shared verbally, have several factual errors, and as such, this means those council members are making the decisions are doing so on factually incorrect information. I would recommend that you see legal advice on this point.	The Council is not making decisions based on factually incorrect information.
4.11.10.53	In the set of plans, you are planning to issue to council members; I believe there are a grave number of errors, omissions and a general lack of detail concerning the alternative options, not to mention broad-brush figures that are poorly supported.	The Council does not agree with this statement.
4.11.10.54	The Council is devaluing each school’s status in assessing them under one consultation. Mount Street Infants is an excellent school as evidenced by the latest Estyn report. Is this consultation	The Council is consulting on one set of Proposals, therefore the Consultation Document ation considers the combined impact of the Proposals on the affected schools.

	evaluating three schools as if they were already one school? They are three schools and should be being assessed separately. Summarising the schools' data and community impact assessments into one summary is just diluting the value each school has and misleading to anyone who only reads part of the extremely long and complex document.	
4.11.10.55	We do not believe the consultation has been conducted as required by the Schools Organisation Code (2018) and in particular where the code states very clearly: "3.2 – Attention to Detail. It is essential that proposers seek and achieve high standards both in the information that underpins school consultations and in the Consultation Documents that are published. These will be examined by communities, school staff and parents and errors in detail can easily undermine confidence in a proposal. Failure to provide accurate, high quality Consultation Documents can result in consultations being abandoned, taking much longer than expected and to increased conflict with communities."	The Council's view is that the consultation has been carried out in accordance with the requirements of the School Organisation Code.
4.11.10.56	Powys CC has devalued the Smarties 3+ setting by listing the alternatives that currently exist elsewhere in Brecon. The provision within Mount Street Infants is thriving and provide for a large number of children, who deserve serious consideration.	The Council has not 'devalued the Smarties 3+ setting'. Information about other providers in Brecon was provided to illustrate that there were other options available in the catchment area, in addition to the current provision at Mount Street Infants School and Cradoc C.P. School.
4.11.10.57	Why is the accommodation at the 3+ setting described as good when Smarties occupy the same building as Mount Street Infants School & the school building is described as poor?	The description of the accommodation at the 3+ setting relates specifically to the area utilised by the setting, whilst the description of the school is based on an assessment of the whole building.

4.11.11 Comments about the impact assessments

4.11.11.1 Separate impact assessments should be carried out

4.11.11.1.1	I'm sure you are aware that there are specific obligations on any council seeking to close a rural school. Cradoc is a rural school and yet you have only completed one impact assessment,	The Council is carrying out one consultation on one set of Proposals which affect three schools. It is true that one overall draft impact assessment was carried out which
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	<p>combining town schools with a rural school. Can you please advise me why an impact assessment solely for Cradoc school has not been completed?</p>	<p>considered the impact of the Proposals. The draft impact assessment document which was published as part of the Consultation Document ation includes a draft community impact assessment. This includes a separate section for each of the three affected schools.</p> <p>During the consultation, a number of comments have been received suggesting that separate impact assessments should be carried out for the three schools to understand the impact on each school community separately.</p> <p>The updated impact assessments consider the impact of the Proposals on a number of different factors, and where the impact is deemed to be different for the different schools/communities, then this is outlined in the document. In particular, the community impact assessment shows the impact on the three school communities separately.</p>
4.11.11.1.2	<p>I wish to highlight the lack of a separate Impact Assessment for Cradoc School. One Impact Assessment covering the three schools does not reflect the differences between the rural and urban schools. In fact, a positive impact for Mount Street schools appears to mask the negative impact on Cradoc school. This does not suggest a fair and true assessment.</p>	<p>As above.</p>
4.11.11.1.3	<p>You have only compiled one impact assessment for the three schools when the impacts of each individual school are widely varied, they are each very different schools and the impacts cannot be classified as 'the same'.</p>	<p>As above.</p>
4.11.11.1.4	<p>I am very disappointed to see that the Impact Assessment has been done of all schools together. This should be three projects not one. Each school deserves to be consulted in its own merit and have three separate Impact Assessments, not thrown into one group. They are all excellent schools in their own rights with ample children numbers.</p>	<p>As above.</p>

4.11.11.1.5	They are completely different settings nurturing learners in a completely different manner and that is why we felt as a community that Cradoc deserved an individual impact assessment and not to be umbrellaed under that of an urban school.	As above.
4.11.11.1.6	How can one rural school be combined with two urban schools and have an equitable chance to be reviewed. When looking at scoring an Impact Assessment, a positive impact for Mount Street Schools appears to mask the very negative impact on Cradoc School. This cannot be considered to be a fair and true assessment.	As above.
4.11.11.1.7	You need to separate the schools in this proposal and determine their outcome individually on their own merit, by forcing us to all have one impact assessment you are deliberately hiding the fact that the Cradoc community would be decimated by this proposal, there are no benefits to the pupils, staff or wider community of Cradoc and its catchment area.	As above.
4.11.11.1.8	After school clubs & activities; as a three school project impact assessment has been created, instead of an individual one for Cradoc C.P. School, the impact on the school's after school clubs and other activities has not been accurately assessed or taken into account.	As above.
4.11.11.1.9	Each school is unique and by only undertaking an overarching impact assessment you are watering down the damage that will occur, e.g. by closing another rural school.	As above.
4.11.11.1.10	It is difficult to have confidence in the Impact Assessments pertaining to this as they have been combined for the 3 schools leading to generalised, rather than specific impact assessments which undermines their validity and reliability.	As above.
4.11.11.1.11	Each of the 3 schools included in this proposal are unique and have their own community and should have separate impact assessments so that decisions can be made about their future on their own merit rather than having an amalgamated impact assessment that is confusing and watered down.	As above.

4.11.11.1.12	The community impact assessments should be separate for each school as the impact on an urban community is vastly different to that on a rural community. Does Powys County Council agree that it is not a fair process to combine the 3 impact assessments?	<p>The draft community impact assessment document which was published as part of the Consultation Document ation does includes a separate section for each of the three affected schools.</p> <p>During the consultation, a number of comments have been received suggesting that separate impact assessments should be carried out for the three schools. The Council will be updating the draft impact assessments to reflect comments received during the consultation period, and will also review how the impact assessments are presented to ensure that the impact on all three school communities is fully considered.</p> <p>The updated impact assessments will be considered by the Council's Cabinet when determining how to proceed.</p>
4.11.11.1.13	We believe that the current impact assessment does not fully take into account the different issues that the merger has with each of the communities and that there should be three Community Assessments - one for each community as the dynamics in terms of age, gender, race, religion for each of the Communities is quite different, especially that of Cradoc as it is a rural community whereas the Mount St schools communities are more urban.	As above.

4.11.11.2 Other comments about the impact assessments

4.11.11.2.1	Has there been equalities impact assessment? I am concerned those with particular needs or in poverty will be disadvantaged by having to travel further.	A draft equalities impact assessment has been carried out and was published with the Consultation Document ation. In addition, impact on protected characteristic groups is considered in the integrated impact assessment, and consultees were asked to give their view on the Proposals' impact on people belonging to the protected characteristic groups. The draft impact assessments will be updated to reflect comments received during the
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		consultation period, and updated versions will be considered by the Council's Cabinet when determining whether or not to proceed with the Proposals.
4.11.11.2.2	In the Equality Impact Assessment, Powys County Council states that "the aim of the proposal is to improve the educational opportunities available to pupils in the Brecon area". A new building will not mean that our children's reading, mathematics, science, history or health and well-being will improve. It is teachers who improve educational opportunities not buildings. Kirsty Williams, Education Minister, recently said in the Senedd that "the (21st Century schools and colleges) programme is not just about new buildings; it is about providing environments that invest in the people that use them, valuing our excellent teachers and school staff and truly making a difference for our learners". As Mount Street Infants School's Estyn reports are consistently excellent what evidence does Powys County Council have that the proposal will improve the educational opportunities of our pupils?	<p>The Council fully acknowledges that buildings alone do not improve the quality of provision and educational opportunities available to pupils.</p> <p>All three schools provide good quality education. An amalgamation of the schools will bring together the strengths of each school, including the excellence identified by Estyn, enabling this to be shared across the schools / sites.</p>
4.11.11.2.3	In the Equality Impact Assessment it states that "The aim of the Proposals is to improve the educational opportunities available to pupils the Brecon area." The educational opportunities available to the pupils at Mount Street School are already excellent. A new building will not improve our children's reading skills, their mathematics or their wellbeing. This proposal is going to reduce the educational opportunities for some of the children. As stated in the draft impact assessment "there would be an impact on pupils' ability to access after school activities. Isn't this another example of the unfairness of this proposal?"	Comment noted.
4.11.11.2.4	Impact Assessment - Powys County Council (PCC) states but doesn't explain how in any detail, being part of a larger school is of benefit to the existing staff, particularly if they are not employed at the new school and are made redundant. I fail to see how this can be regarded as a neutral impact.	<p>Whilst it is possible that there could be a reduction in staffing requirements, particularly following a move to one new school in the future, the staffing requirements are initially likely to be similar to the current requirements.</p> <p>As explained in the Consultation Document , the expectation is that implementation of the Proposals would</p>

		<p>provide improved opportunities for staff. It is also expected that there would be a positive impact on staff morale in the future from working in a new building.</p> <p>The 'neutral' judgement is an overall judgement, which considers the potential negative impact on some staff and the potential positive impact on staff working in the school in the future.</p>
4.11.11.2.5	Impact Assessment - How is working in a new building when colleagues may have been made redundant going to improve staff morale?	As above.
4.11.11.2.6	Impact Assessment - The assessment states that closing the school in Cradoc would have a neutral effect on the local community - i believe it would be devastating for the local community. PCC's own vision states you will strengthen community development and resilience. How is closing the local school and removing the only community facilities in the area going to do this? Rebuilding a new school with a self contained community hall/hub attached would not only provide revenue, create employment but strengthen the local community and its development. Why hasn't this option been considered?	<p>The Impact Assessment does not state that closing the school in Cradoc would have a neutral effect on the local community.</p> <p>The Impact Assessment considers the overall impact of the Proposals. The assessment of the impact on 'Residents and Communities' on page 8 assess the impact of the Proposals as 'Poor', and clearly identifies that there would be an impact on the village of Cradoc. In addition, the impact on the Cradoc community is considered on page 19. Here again, the assessment identified the potential impact on the Cradoc community as 'major'.</p> <p>The impact assessment document also includes a draft Community Impact Assessment, which also considers the impact on the village of Cradoc and identified that closure of the school would impact on the village.</p> <p>All impact assessments will be updated to reflect comments received in the consultation responses, and updated versions will be considered by the Council's Cabinet when determining whether or not to proceed with the Proposals.</p>

4.11.11.2.7	Impact Assessment – it's interesting to read that when considering the impact of the proposal on the Powys Vision – all the actions that WILL affect the community are down as NEUTRAL but in fact these should be noted as NEGATIVE. This will have a huge impact on the community – the school is the only community building in the Yscir Ward. This impact assessment has been pulled together without real thought and understanding or involvement from the Community.	As above. Information from the affected schools was received when developing the draft impact assessments.
4.11.11.2.8	Impact Assessment - Supporting well being is one of PCC's visions- for many years the school has been widely used for a before and after school club as well as holiday club used by parents from other schools as well as Cradoc school. Your assessment makes no reference to this type of care being provided and yet you have rated the loss of this type of well being care as having no impact. As a working parent, I can tell you this type of care and service is of paramount importance and contributes massively towards my own, my children's and our entire families well being.	The draft community impact assessment published as part of the Consultation Document ation refer to the before and after school club and holiday club accommodated at Cradoc School. All draft impact assessments will be updated to reflect comments received in the consultation responses, and updated versions will be considered by the Council's Cabinet when determining whether or not to proceed with the Proposals.
4.11.11.2.9	Impact Assessment - PCC statement - We will support our residents and communities - you accept that the proposed new school would restrict and impact on pupils and children attending after school activities, so how can you support such a venture? It is not the case that a new school would overcome this impact and nor will it support PCC's vision.	The Council acknowledges that implementation of Phase 2 of the Proposals would mean that there would be no school in Cradoc, and could impact on pupils' ability to access after-school activities. All draft impact assessments will be updated to reflect comments received in the consultation responses, and updated versions will be considered by the Council's Cabinet when determining whether or not to proceed with the Proposals.
4.11.11.2.10	Impact Assessment - School Transport - the roads around the proposed site are already congested, increasing traffic in this area will add additional strain to the transport infrastructure within Brecon not to mention increased pollution and increasing risks around road safety. There is little to no likely hood of any parent allowing a Primary School pupil to walk or cycle to school given this.	The Council has identified in the draft Community Impact Assessment that it is possible that implementation of Phase 2 would mean that parents in Brecon would be <i>'more likely to drive their children to school rather than walk/cycle'</i> .

		All draft impact assessments will be updated to reflect comments received in the consultation responses, and updated versions will be considered by the Council's Cabinet when determining whether or not to proceed with the Proposals.
4.11.11.2.11	I reference your generic impact assessment for health being neutral. I disagree strongly. There has been no mention of the car use factor and importantly the impact of a much larger school on infection control.	All draft impact assessments will be updated to reflect comments received in the consultation responses, and updated versions will be considered by the Council's Cabinet when determining whether or not to proceed with the Proposals.
4.11.11.2.12	Many of the statements in the draft Impact Assessments are incorrect e.g. the impact on a Wales of cohesive communities states that merging the 3 schools and removing the primary school from Cradoc has a neutral impact. This must be a poor impact if 2 schools are removed from the centre of Brecon and Cradoc C.P. School is closed completely. How can a new building contribute to an attractive, viable, safe and well-connected community when it is proposed to build it on the outskirts of the community?	Comment noted. All draft impact assessments will be updated to reflect comments received in the consultation responses, and updated versions will be considered by the Council's Cabinet when determining whether or not to proceed with the Proposals.
4.11.11.2.13	The document states that many of the activities which currently take place in the schools could continue, but if they do not continue in Cradoc then they are less appealing for the elderly in the community and the local community is still lost. The document itself notes that it is currently unclear where the extensive community use of the Cradoc building could be replaced. Adding that that should phase two go ahead, it would endeavour to work with the community in Cradoc to identify a suitable alternative. I believe there should be alternative provisions proposed now, as how can an impact assessment be accurate if it has not been identified where such activities will take place, if they can at all without the school? Therefore, reinforcing the benefits of rebuilding Cradoc School in Cradoc, to ensure these community links are preserved.	As above.
4.11.11.2.14	It is also stated that an impact assessment will be updated and considered throughout the process. Powys County Council has a	These concerns are noted.

	<p>duty of care to these people and the community. Rural schools have already been lost e.g., Battle school, and if you remove the school from Cradoc then the pressure on Brecon roads and services will increase, resulting in negative impact on Brecon town, and you lose the community in Cradoc, which is a further negative impact. Therefore, Powys County Councils' local objective that "people in Powys will be connected by strong communities" cannot be met by this proposal as you are destroying the community, leaving young children traveling further to school, no facilities in their community and less interaction for the elderly.</p>	<p>All draft impact assessments will be updated to reflect comments received in the consultation responses, and updated versions will be considered by the Council's Cabinet when determining whether or not to proceed with the Proposals.</p>
4.11.11.2.15	<p>In our view it is not correct that 'impact on the community will be minimal' or that 'the impact in the community in Brecon would be positive by having a new Primary school with enhanced facilities'. At this stage there is nothing available about facilities and much to lose in terms of existing benefits of the MS schools. NB – see attached letter which questions the ease with which PCC would be able to achieve a Capital Receipt from MS sites.</p>	<p>All draft impact assessments will be updated to reflect comments received in the consultation responses, and updated versions will be considered by the Council's Cabinet when determining whether or not to proceed with the Proposals.</p>
4.11.11.2.16	<p>Transient pupil population. There appears to be no consideration given to children experiencing a high level of transience at Mount Street Infants School, including those who are from the Services/MoD or from Travellers communities. Many of these children experience high levels of stress when changing schools and really need the nurturing support that is offered at a small school with excellent outdoor provision. These children and their families have reported the positive impact of learning outside in the school woodland as part of parental questionnaires. QUESTION. Why has PCC not included an evaluation of impact on transient pupils in this consultation?</p>	<p>Comment noted. The impact assessments were published in draft form with the Consultation Document, and will be updated to reflect comments received in the consultation responses. Updated versions will be considered by the Council's Cabinet when determining whether or not to proceed with the Proposals.</p>
4.11.11.2.17	<p>Age discrimination. Disability discrimination. Pregnancy and maternity discrimination. There appears to be no assessment of impact on older people who currently walk to the school and back home with their grandchildren or great grandchildren. There appears to be no consideration of the impact on families with children or adult carers with a disability. There appears to be no</p>	<p>As above.</p>

	consideration for young families and expectant mothers which needs to be taken into proper consideration for future Proposals. The lack of evaluation of all the above issues further supports the need to carry out a separate consultation for Phase 2.	
4.11.11.2.18	The Consultation Document (in particular the IAI) brings into question whether the proposal represents an appropriate response to the strategic spatial and environmental policy context; is The Council able to demonstrate it has met its s62 (2) Environment Act 1995 duty to have regard to the purposes of the Brecon Beacons National Park? Do the Proposals consider the recently published development plan Future Wales and the Brecon Regional Growth Zone it identifies? Have the long-term carbon & other implications baked into any decision necessitating pupils' transport from Cradoc been quantified and evidenced? What are the costs of providing an off road and accessible active travel / cycle path from Cradoc to Brecon should phase 2 materialise? And how will this be met? These are all first order environmental issues which need to be considered alongside the identified educational and community impacts.	Should a new school be developed, the Council would comply with all of these duties when developing the new building.
4.11.11.2.19	Has an Environmental Impact statement been undertaken to consider the impact of increased journeys from rural schools?	The environmental impact of the Proposals is considered in the draft impact assessments. These will be updated to reflect comments received during the consultation period, and updated versions will be considered by the Council's Cabinet when determining how to proceed in respect of this proposal.
4.11.11.2.20	Has there been assessment of change in ecological footprint if total commuting travel for pupils increases? What is the comparison of CO2 impact of refurbishing the old school at Cradoc vs building a new one.	As above.
4.11.11.2.21	The following assessment must be undertaken before The Council (as a competent authority) makes any decision in relation to its plan/project: 'The Conservation of Habitats and Species Regulations 2017' https://www.legislation.gov.uk/ukxi/2017/1012/contents/made (Habitats Regulations Assessment incl. Appropriate Assessment,	These assessments would be carried out as part of developing the proposed new building.

	having regard to NRW Evidence Report 489 (Jan 2021) on the critical threshold exceedances of Phosphates including within the River Usk Special Area of Conservation).	
4.11.11.2.22	The following statutory assessment must be made available for consultation. It is particularly relevant to the phase 2 intentions for redeveloping the site of the former Brecon High School: 'The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004' https://www.legislation.gov.uk/wsi/2004/1656/contents/made:Screening report / Environmental Report if screened in (within the context of the screening report / environmental report prepared for The Council's 21st Century Strategic Outline Programme – Please can you provide me with a copy of this?). Further reading is available here: https://www.landmarkchambers.co.uk/wp-content/uploads/2018/07/StrEnvironAssessment.pdf	These assessments would be carried out as part of developing the proposed new building.

4.11.12 Comments about the consultation response form

4.11.12.1	Why does Question 5 state that the new school site will be at Penlan, Brecon, when the Consultation Document explains that the use of this site is only an intention? Question 5 is not valid and is dangerously misleading.	The Consultation Document clearly states on page 17 that <i>'the intention is that the school would move to a new building located on the site of the old Brecon High School, Penlan, Brecon, LD3 9SR...'</i> No other possible locations are suggested for the new school.
4.11.12.2	(Impact on Welsh question 2) Is this a different question to the previous one? Maybe if we'd had a meeting with the Transformation team you could have explained but it didn't happen so I'm not sure what you're asking me.	The comments relating to the Proposals' impact on Welsh are questions which the Council is required to include in such consultations in order to meet the requirements of the Welsh Language Standards.

4.11.13 Other comments about documentation

4.11.13.1	Cradoc school should have a new eco school with attached community hall venue (as Yscir Ward are the only ward not to have a community hall) built on the site of its current playing fields whilst the	Options involving rebuilding Cradoc School were considered and assessed in the PBC for the Brecon catchment which was considered and approved by
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	<p>school continues to normally function in situ. This has even been indicated as a viable option by Powys County Council when assessing the site previously, yet now in your Consultation Document you are suddenly insinuating that this would be too disruptive. How is this any different to your most recent new school building of Llangorse village school? In Llangorse the children had no playgrounds throughout construction but remained on site. Or Clyro school? Clyro school children were moved to portacabins at great disruption so.</p>	<p>Cabinet in September 2020. As well as various remodelling options, this includes the following new build options:</p> <ul style="list-style-type: none"> • <i>Option 4B – New build Cradoc, new build Brecon primary school, close Sennybridge</i> • <i>Option 4C – New build Sennybridge, new build Brecon primary school, new build Cradoc</i> • <i>Option 4D – Close both Sennybridge and Cradoc, build new school on alternative site, new build Brecon primary school</i> • <i>Option 5B – New build Cradoc, establish new all-through school in Brecon with new build, primary, close Sennybridge</i> • <i>Option 5C – New build Sennybridge, establish new all-through school in Brecon with new build primary, new build Cradoc</i> <p>An appraisal of all options was carried out, and options 4B, 4C, 4D, 5B and 5C were discounted at this stage. This assessment included a SWOT assessment of the various options, which identified 'potential disruption during construction' as a weakness for many of the options and for all of the affected schools. Whilst this is identified as a weakness, this is not the reason why any of the options to provide a new building at Cradoc was discounted.</p> <p>The consultation included an opportunity for consultees to suggest alternative options. All alternative options suggested are outlined in this consultation report, and a further assessment will be carried out in accordance with the requirements of the School Organisation Code.</p>
4.11.13.2	<p>Disruption to pupils; When I joined the Cradoc C.P. School governing body in 2019 one of the first tasks I took on was to try and have a new school built in Cradoc. I arranged meetings between</p>	<p>As above.</p>

	<p>myself, the school and Powys County Council. During one of the meetings, the then portfolio holder for education, Cllr Myfanwy Alexander and education officers agreed that a new school could be built next to the current building, on the playing field. This would result in minimal disruption, an easy transfer of pupils from the old building to the new building, followed by the removal of the current building to place a new playing field in its footprint. However, within the current Proposals the education department claim building a new school would not be feasible due to excessive disruption? This claim is in no way accurate at all and should be removed from the Proposals.</p>	
4.11.13.3	<p>Why are you suggesting that our school could not remain onsite for the duration? Cradoc school could remain in the buildings they are currently in and still have access to the playgrounds surrounding the school throughout the duration of the building work with no detrimental impact at all.</p>	<p>Comment noted. As above.</p>
4.11.13.4	<p>Your projects fail to consider that the school can operate in its current buildings while work takes place elsewhere on the site for a new building.</p>	<p>As above.</p>

4.12 ALTERNATIVE OPTIONS

4.12.1 Status Quo

4.12.1.1	<p>All 3 schools should be kept as they are. I don't see the point of merging the schools mentioned above if Priory and Llanfaes are staying as they are.</p>	<p>Status Quo was considered as an option in the PBC for the Brecon catchment and also in the Options Appraisal for Mount Street Infants, Mount Street Juniors and Cradoc which was included in the Consultation Document , however this option was discounted in both exercises.</p>
4.12.1.2	<p>Why amalgamate? Leave the schools to operate as they are. Instead of "Financial saving to The Council" surely what is best for the schools is the priority.</p>	<p>As above.</p>
4.12.1.3	<p>Definitively stay as they are.</p>	<p>As above.</p>

4.12.1.4	Keep them separate.	As above.
4.12.1.5	Please don't change anything. There is nothing wrong with the settings and how they are in place now.	As above.
4.12.1.6	Leave them as they are! If it isn't broken, DO NOT FIX IT!! Is there an issue with how the schools work at the moment? NO! Leave well alone!	As above.
4.12.1.7	I think The Council need to keep things the way they are they schools are fine as they are.	As above.
4.12.1.8	Maintain the present setup – develop and continue to finance as they are.	As above.
4.12.1.9	The existing schools need to remain in place and with their individual heads who understand their specific community.	As above.
4.12.1.10	From my view the status quo is working. Sustainable renewing and repaired buildings is a better way forward.	As above.
4.12.1.11	Whilst population demographics change over time, the three schools which are the subject of the consultation were at some point built where they currently stand and a public institution like a school would not have been built without reason or planning. Brecon is a historic town and while there are new houses being built, the original buildings are still standing where they were built many years ago. Mount Street being the largest town school would probably be in the best place for Mount Street and Cradoc school in the best place to educate pupils from the many surrounding villages.	As above.

4.12.2 Repair and improve the current school buildings

4.12.2.1	Funding for each site to make their own developments/improvements	'Do minimum – backlog maintenance only' and 'Remodel all primary schools in current locations' were considered in the Brecon catchment PBC, however these options were discounted.
4.12.2.2	I feel that remodelling/updating our existing building would be a far better option and will give our pupils more, which should be the whole point of change.	As above.

4.12.2.3	Please consider remodelling/updating our school and do not let us lose everything that has been built up over the years to achieve a great school.	As above.
4.12.2.4	I propose that you invest in the current buildings, to update and maintain which would allow these established school communities to thrive.	As above.
4.12.2.5	Refurbishing the current buildings and supporting the current schools.	As above.
4.12.2.6	Update the current facilities of the current schools which I imagine would cost significantly less than building a new school and would not cause the disruption to the pupils, parents, and teachers that the proposed plan will cause.	As above.
4.12.2.7	Use the funding for the new build to instead fund the community schools themselves to improve the sites that already exist.	As above.
4.12.2.8	Bigger is not necessarily better, the money would be better spent on modernising the current schools, leaving the children in familiar surroundings, with teachers they know and trust and where they can continue to flourish and thrive.	As above.
4.12.2.9	Why has PCC not included an option to draw down 21st Century Schools funding to repair and improve the three schools as they currently stand?	As above.
4.12.2.10	Far more sensible to remain on current sites and secure 21st Century funding to upgrade the existing building and facilities. This would surely be a far cheaper and environmentally friendly option.	As above.
4.12.2.11	The economics of building brand new schools does not make sense when a fraction of the money can be used for improvements to existing buildings, to save us all money especially after covid.	As above.
4.12.2.12	It's an absurd amount of money and time to waste on fixing what isn't broken. The existing schools instead should be focused on and enhanced rather than starting afresh.	As above.
4.12.2.13	Repair and maintain has to be the mantra in a time of over consumption. Powys could provide an example of how this could be done, and save itself money at the same time. Please make a detailed and realistic assessment of what it would take to do this and set an environmentally friendly example.	As above.

4.12.2.14	Mount Street Infants could be refurbished in situ using techniques that can minimise cost, use sustainable materials (timber) to create a building that is self sufficient in energy for heat and light (using solar and ground source heat pumps) reducing future operational costs.	As above.
4.12.2.15	We would like to see the existing sites of Mount Street schools considered for repair and refurbishment. 21st Century funding is available to undertake refurbishment as well as new builds. This could provide a long-term solution which does not compromise the needs of future generations. There is also 2.2. million funding available to Powys from Welsh Government to improve the condition of schools and in the first instance we would support utilising these funds to bring the existing buildings up to standard given that there is no urgency in terms of the nine drivers for change which have been set out in the Consultation Document .	As above.
4.12.2.16	Ironically, new builds do not last as long as current school buildings and seem to have numerous maintenance issues, resulting in The Council not saving as much money, as if it just used the Welsh Government 21st funding to improve and maintain the current school buildings. The Council is probably more likely to receive this as it has less impact on all. It is more environmentally friendly as it utilises what we already have with less disruption. The maintenance funding could also be used to add green energy such as solar panels to the refurbished schools. I cannot see how the new school will provide over what the pupils have already, in fact, I firmly believe that it will result in them having a lot less – a new build does not solve all the issues you perceive the schools to have.	As above.

4.12.3 3 new buildings

4.12.3.1	Simple. Build 3 new schools. One for Cradoc – on the current site. One for Mount St Infants and One for Mount St Juniors.	Whilst ‘remodel all primary schools in current locations’ was considered and discounted in the PBC for the Brecon catchment, rebuilding all three schools was not considered. Given the constraints surrounding the existing sites of Mount Street Infants School and Mount Street Junior School, rebuilding these schools in their
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		current location would not be a realistic option, and rebuilding 3 new schools would not provide value for money.
4.12.3.2	Rebuilding the current school sites, keeping the schools and their identities and the current 3+ settings.	As above.
4.12.3.3	It is clear that the best solution in terms of quality of education (which is the overriding factor) would be to have the current governance structure (3 separate schools) in 3 new buildings.	As above.

4.12.4 2 new buildings – 1 in Cradoc, 1 in Brecon

4.12.4.1	Build new school for Mount Street at old BHS site. Rebuild new school for Cradoc on existing site.	<p>The following options which would provide a new building in Brecon and Cradoc were considered in the PBC:</p> <ul style="list-style-type: none"> • <i>Option 4A – New build Sennybridge, new build Brecon primary school, close Cradoc</i> • <i>Option 4B – New build Cradoc, new build Brecon primary school, close Sennybridge</i> • <i>Option 4C – New build Sennybridge, new build Brecon primary school, new build Cradoc</i> • <i>Option 4D – Close both Sennybridge and Cradoc, build new school on alternative site, new build Brecon primary school</i> • <i>Option 5B – New build Cradoc, establish new all-through school in Brecon with new build, primary, close Sennybridge</i> • <i>Option 5C – New build Sennybridge, establish new all-through school in Brecon with new build primary, new build Cradoc</i> <p>An appraisal of all options was carried out, and options 4B, 4C, 4D, 5B and 5C were discounted at this stage.</p>
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4.12.4.2	Rebuild Cradoc school in Cradoc and build a new school in Brecon for Mount Street pupils	As above.
	Instead of wasting another million pounds in tax payers money in yet another consultation (like the high schools merger flop) I think it would be money better invested in rebuilding Cradoc school in Cradoc and re build Mount Street a new school for the infants and juniors as I appreciate they need a bigger school to meet the demands of increasing pupils attending. Dragging Cradoc into the equation should not be an option.	As above.
4.12.4.3	A new school in Cradoc – as has been promised in Sennybridge – and amalgamation of Mount Street Junior/ Infants is by far the most sensible outcome.	As above.
4.12.4.4	The only option I think Powys should consider with respect to Cradoc School is to rebuild the school on the current site as they should for Mount Street Infants also.	As above.
4.12.4.5	Amalgamate Mount Street infant and junior schools on one site and rebuild a new school for the rural village school in Cradoc, this school serves a wide catchment area and deserves to keep the school where it is to serve the rural communities.	As above.
4.12.4.6	I think Cradoc school should stay where it is, and if it needs a new building give it a new building. It might make sense to merge mount street infants and juniors in a new building together, but Cradoc is its own local school and should be left out of it!	As above.
4.12.4.7	Yes I think they should rebuild Cradoc school and merge mount street infants and juniors!! It makes more sense. Closing all the rural schools is having a negative impact on communities, and would be much more beneficial in merging mount street into one primary school!!	As above.
4.12.4.8	New build school for Cradoc on the current school grounds. Having previously worked at Mount Street Infants I also appreciate that they need a new building but the community it sits in is within close proximity to town and not at the top of a very steep hill.	As above.
4.12.4.9	Amalgamate the Mount Street schools and build a new school at Cradoc, on the playing field. If the new school had an 'external' room and facilities available to but not part of the school, this would be a	As above.

	real boost to the community. A new playing field would then be created on the old school site.	
4.12.4.10	Combine the 2 Mount Street Schools and then invest in Cradoc School. This is a rural school to serve the rural community in Cradoc, Battle, Merthyr Cynog and Upper Chapel areas.	As above.
4.12.4.11	Cradoc primary should be kept and rebuilt in Cradoc. As outlined in the Proposals I agree mount street are in need of a larger school and think they should have a new primary school built at the old high school site.	As above.

4.12.5 1 new building in Brecon, close Cradoc school

4.12.5.1	Close Cradoc school build a new school Infants and Juniors on the current Infants site with parking on the junior site.	<p>'Merge Mount Street Infants School and Mount Street Junior School to create a new primary school. Close Cradoc C.P. School, with pupils to attend alternative schools' was one of the options considered in the options appraisal exercise in respect of the current Proposals. Whilst this was not the preferred option identified following this exercise, the option did not fail to meet any of the critical success factors and was therefore identified as a 'possible' option.</p> <p>As required by the School Organisation Code, options will be reviewed following the consultation period in order to determine how to proceed in respect of these Proposals.</p>
4.12.5.2	Amalgamate the infant and juniors and close Cradoc. Build new schools for the infants and juniors. Appoint one head for the infants and juniors. Give the children from Cradoc the option of going to Sennybridge or provide portacabins to accommodate the extra children from Cradoc on the site of the infants and juniors until they have new schools built.	As above.
4.12.5.3	If necessary, close Cradoc C.P. School and merge the pupils with Mount Street Infants and Junior Schools, but only merge these two schools when funding has been secured and when (or just before) they can be merged physically. Two years under a single	As above.

	headteacher, which could increase to more, since funding has not yet been agreed for this merger, will not be in the best interests of any of the schools.	
4.12.5.4	If necessary, Cradoc C P School could be closed and merged before the other two, as I understand that many of the pupils are from the town of Brecon, rather than the village of Cradoc, anyway. But leave the amalgamation of Mount Street Infants and Junior Schools until funding has been secured and they can be merged physically	As above.
4.12.5.5	I think Cradoc school should close those pupils maybe distributed around the other schools and the monies earnt and saved should be spent on the existing schools to be repaired or improved etc	As above.

4.12.6 MSI and MSJ to collaborate rather than merge

4.12.6.1	It would be more sensible to have closer links between Mount Street Juniors and Infants. There would be no loss of the vital Forest School; there would remain a school in the centre of Brecon that is easily accessible for families with small children, and there would be a school in the centre of the local community.	Comment noted.
4.12.6.2	Resource sharing can be achieved effectively and efficiently as has been demonstrated by many other local authorities without them having to physically be in the same building. Teachers with expertise and skills in certain areas, with good management and leadership can be shared out. Thus improving links between different schools, areas and communities. Equipment, can be timetabled and managed in the same way.	Comment noted.

4.12.7 Merge Mount Street Schools and leave Cradoc as a separate school

4.12.7.1	Combine the two Mount Street Schools and leave Cradoc as the rural country school that it is	'Merge Mount Street Infants School and Mount Street Junior School to create a new primary school. Cradoc C.P. School to continue to operate as a separate school' was one of the options considered in the options appraisal exercise in respect of the current Proposals.
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		Whilst this was not the preferred option identified following this exercise, the option did not fail to meet any of the critical success factors. As required by the School Organisation Code, options will be reviewed following the consultation period in order to determine how to proceed in respect of these Proposals.
4.12.7.2	Amalgamation of Mount Street Infants and Mount Street Juniors is a very sensible idea. None of the other primary schools in the area have separate Infant and Junior Schools. I do not support amalgamating with Cradoc School, as closing village schools harms the local community. I think the amalgamation of the two Mount Street schools should only take place when they have a new site, so that they are amalgamated as a single school on a single site.	As above.
4.12.7.3	I think Cradoc school should stay where it is, I'm not sure of the conditions of that school so maybe rebuild it on the same site if you can. As for Mount Street Infants and Mount Street Juniors I think they should be put together to form one school.	As above.
4.12.7.4	Mount st infants and juniors should be merged and provided with a new school. Cradoc should be a stand alone primary school that serves the farming and rural community.	As above.
4.12.7.5	MSI/MSJ is Forest School and has good/excellent Estyn status. Why not consider a joining of the MS schools where there is a reasonable chance of maintaining standards rather than a 3 way merger which in many ways will be a phantom merger because families are likely to choose alternatives such as Sennybridge and Priory.	As above.
4.12.7.6	Cradoc should be allowed to continue as a separate school, with its own identity and charm. Generations of children from the local areas have attended Cradoc School and will continue to do so in its present location.	As above.
4.12.7.7	No reservations with regards to the merger of the two Mount St schools onto one site, however, we would want to see a new school built in Cradoc which will continue to be the hub of the community and service the community of Cradoc's needs.	As above.
4.12.7.8	If you want to give Mount street a new building then give them one together seeing as they are the same school. Leave Cradoc out of it!	As above.

	It makes sense to move both the Mount Street schools, but not Cradoc. Cradoc has had a good past and deserves a better future.	As above.
4.12.7.9	I don't believe Cradoc should form part of this amalgamation as it would destroy their community school long term. I believe that an amalgamation of the 2 Mount St schools would be beneficial to streamline parent communications, logistics and aid pupil transition. I believe that an amalgamation should however, be led by the Infants school staff and Head teacher as they currently have been graded excellent in their recent inspection. The outdoor learning aspect should also be led by MSI and replicated in the Junior school. I don't believe the amalgamation should take place until funding for a new site has been secured to reassure staff, parents and pupils about the future aims and objectives prior to this.	As above.
4.12.7.10	Amalgamate Mount Street Infants and Junior School while retaining Cradoc on its existing site - room to build on the existing playing field, move school over and create new playing field on old school site.	As above.
4.12.7.11	The amalgamation of the three schools will not work. Why not rebuild the infant and junior buildings and appoint one head and SLT across the two sites. This could work as the sites are so close. The staff would feasibly be able to work together. The idea to involve Cradoc school seems ridiculous.	As above.
4.12.7.12	Just combine Mount Street Infants and Juniors on the existing Mount Street Infants site. Cradoc should be left as independent school as caters for rural community.	As above.
4.12.7.13	Combine the two schools in Brecon as they are both town schools and leave Cradoc School as a rural school to serve the rural community.	As above.
4.12.7.14	If a merge has to happen then why not a merge between the two mount street schools? I don't know why Cradoc has been brought into this process as that is a rural school, it offers completely different things for its community than Mount Street. By merging the two schools then they could stay in town which is a huge reason a lot of people choose it.	As above.

4.12.7.15	Merge Mount Street Infants and Junior school - invest in the buildings and keep the current green site and grounds. This would allow for easier key stage transition but would keep the local ethos and excellence of the schools.	As above.
4.12.7.16	Instead of merging the three schools, combine Mount Street Infants and Juniors and leave Cradoc out. The Mount Street schools have a good working relationship with children moving up in a controlled and warm environment. Both buildings need improving, but parents and children do not want to lose their schools.	As above.
4.12.7.17	Probably a good idea for Mount Street Infants & Juniors to be located somewhere easier accessible. But don't bring extra traffic and pollution into town with adding Cradoc into the mix.	As above.
4.12.7.18	Cradoc School is a separate issue for Powys County Council and should have its own process, not pulled into an amalgamation with Mount Street Infants and Junior School.	As above.
4.12.7.19	Merge the 2 Mount Street schools and leave Cradoc as it is.	As above.

4.12.8 Retain / rebuild Cradoc School

4.12.8.1	Rebuild Cradoc - don't go looking for radical solutions it puts people off supporting education in Powys, improve what is established and it will create community support	<p>The following options which would provide a new building in Brecon and Cradoc were considered in the PBC:</p> <ul style="list-style-type: none"> • <i>Option 4A – New build Sennybridge, new build Brecon primary school, close Cradoc</i> • <i>Option 4B – New build Cradoc, new build Brecon primary school, close Sennybridge</i> • <i>Option 4C – New build Sennybridge, new build Brecon primary school, new build Cradoc</i> • <i>Option 4D – Close both Sennybridge and Cradoc, build new school on alternative site, new build Brecon primary school</i> • <i>Option 5B – New build Cradoc, establish new all-through school in Brecon with new build, primary, close Sennybridge</i>
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		<ul style="list-style-type: none"> • <i>Option 5C – New build Sennybridge, establish new all-through school in Brecon with new build primary, new build Cradoc</i> <p>An appraisal of all options was carried out, and options 4B, 4C, 4D, 5B and 5C were discounted at this stage.</p>
4.12.8.2	Cradoc school NEEDS rebuilding on the site but to be honest if they could keep the school I believe they would put up with the building they have there. The other two schools don't need changing perhaps Mount Street infants in the future.	As above.
4.12.8.3	Cradoc is a thriving school which should remain and be rebuilt if necessary.	As above.
4.12.8.4	If anything a new build just for Cradoc will make the numbers go up.	As above.
4.12.8.5	Powys County Council need to build Cradoc its new school, on its current site, to go along with ground works they began by upgrading the car parking in 2019!	As above.
4.12.8.6	Please keep Cradoc open and help it to thrive with a new building.	As above.
4.12.8.7	The Council should consider rebuilding Cradoc C.P. School on the same site in order to improve the condition of the building, whilst retaining its independence and location.	As above.
4.12.8.8	I propose you rebuild Cradoc School on the current site.	As above.
4.12.8.9	Cradoc School could easily be rebuilt on the site of the existing playing field whilst keeping the old school open and running as normal for the duration of the build. This could very easily be accomplished without causing any of the proposed upheaval. The site is more than large enough to accommodate this.	As above.
4.12.8.10	With regards to Cradoc School there is a very obvious solution. The Cradoc School site is a large site. A new School should be built on the site before the existing one is demolished. This would I believe the best option in the interest of Cradoc C.P. School pupils is to build a new school on the current site. There should be no alternative to this! The Welsh Assembly has money for education and this is where that money should be going: to improve school buildings and do	As above.

	anything possible to improve/maintain the mental wellbeing of children and teaching staff in these challenging times!	
4.12.8.11	A carpark has recently been incorporated into Cradoc school site which has really proved to be successful. To add to this Cradoc school should be re-built to aid the community and for it to last for many more years to come to support the existing rural and new families in the wide area. The school has fantastic views overlooking the Brecon Beacons. The school could also be rebuilt to include facilities to make this into the main community hub for the rural area. This could include library facilities for the children and the elderly in the area, leisure facilities and a community area where meetings, parties and social activities could take place. It is so important that Powys listen to the voice of the people living in these rural areas so that we can ensure this becomes the right decision for the people.	As above.
4.12.8.12	Save and rebuild Cradoc School so that it continues to serve the rural communities to the north-west of Brecon. Penlan is well served by roads to the east. It will make much more sense.	As above.
4.12.8.13	Cradoc has to have a new building the present one is not fit for purpose but please do not rip the heart out of this rural community.	As above.
4.12.8.14	I am extremely disappointed that the Council have not considered rebuilding a new school in Cradoc. This is what the children, parents, grandparents etc and community members want. Cradoc School is the heart and foundation of the community. The current school is situated on a substantial site and significant development could take place whilst the existing school continues to operate. If a new school was built on the playing field this would cause very minimal disruption. Once the new school is built the old school building could be demolished and this area then used as a playing field.	As above.
4.12.8.15	The site at Cradoc lends itself perfectly for a new school to be built on site with very little disruption to the children, the environment or to traffic. I feel very little thought has gone into an alternative to the current proposal by Powys County Council.	As above.
4.12.8.16	We have the perfect ground for a new school and Cradoc should have a new school within our rural community.	As above.

4.12.8.17	Remodelling/updating our existing building and keeping our location would be a preferred option and would have benefits for our pupils.	As above.
4.12.8.18	The Cradoc School site has plenty of space to build a new school, which should be done before the existing building is closed and would cause minimum disruption. A new school should be built in Cradoc, not Brecon.	As above.
4.12.8.19	Cradoc school is nothing to do with Mount Street school and this needs to be protected as one of a small number of rural schools and rebuilt on the existing site	As above.
4.12.8.20	The proposal of a new school on the site of Cradoc must potentially be an idea? The moving of 124 children and staff into Brecon is going to increase the journey time, traffic and CO2 emissions. Additional mini-buses, larger buses on the roads in our rural community would contribute to the considerable congestions on the roads during peak times of the day commuting to and from Brecon. Potentially leading to traffic congestion and the volume of traffic during times of increased numbers of pupils walking along dangerous trunk roads into the town.	As above.
4.12.8.21	I propose you reassess your options and consider Option One, but to put finances/funding towards a new school building on the Cradoc school site; it would bring minimal disruption to the school and be the best option for our children, staff and community.	As above.
4.12.8.22	Either re-build Cradoc or update parts of the old building. I was a past pupil at Cradoc 20 years ago and nothing has been done since then. Shame on The Council for not updating this building 20 years ago when it was promised these changes!	As above.
4.12.8.23	The school is in very bad repair and we believe that our school should be re-built and retained within our community, and not transferred to a new site in Brecon. The spacious grounds could be easily used to rebuild our school without disrupting the education of our pupils.	As above.
4.12.8.24	I would ask that you to strongly consider rebuilding Cradoc School in its current location. Thereby maintaining the long standing foundations of community and belonging that exists today for our rural families. In doing so this would also support the Welsh	As above.

	Government 's 2018 National Mission to maintain the delivery of education in small and rural schools in Wales. '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. ' (Welsh Government , 2008, page 8)	
4.12.8.25	All parties involved in this decision should surely be working towards the ultimate long-term benefit of current and future children of our community (not a short term saving of money). This can only be achieved by creating a new build that will facilitate and enhance the existing successful educational provision which is currently being supplied by Cradoc C P School.	As above.
4.12.8.26	What makes sense is to support our community and rebuild Cradoc School on a different part of the site before the existing school is demolished. This would cause very little disruption.	As above.
4.12.8.27	A new building in Cradoc incorporating a communal room that could be used for community use, could create an income for Powys	As above.
4.12.8.28	Why not rebuild Cradoc school to improve an already good school rather than merge with other schools and risk disrupting and damaging this?	As above.
4.12.8.29	Instead of taking away the only remaining public building in our community, why not consider rebuilding a better school/community hub? The school building is already used for a number of community activities (as detailed in the Community Impact Assessment document) If the new building had a separate hall, toilets and kitchen facilities, the opportunities are endless. From concerts and parties to fitness classes and fundraisers, providing a well needed meeting place for the community and additional income for the school.	As above.
4.12.8.30	If a new school was built in Cradoc, with higher pupil capacity, there is a high probability that demand would be high enough to justify the cost. No consideration or evaluation has been given to this possibility, this should be undertaken straight away to	As above.

4.12.8.31	I attach a .pdf copy of the 1161 signatures obtained via the online petition I created here; https://bit.ly/RebuildCradoc , and 7 scanned pages consisting of 114 signatures obtained by hand within the community. This gives a total of 1275 people who have signed the petition to express their objections against the proposal to close Cradoc C.P. School, and instead, build a new one on the current school site.	As above.
4.12.8.32	The community's position is that we would like PCC to consider the rebuilding of Cradoc Community Primary School on its existing site, further strengthening the sense of inclusion and diversity in the community. As The Council considers its position and plans, Cradoc Community Working Group, will seek our own independent plans, to demonstrate the viability of the site, school and vitality of the rural community.	As above.

4.12.9 Alternative rebuild options for the Mount Street schools

4.12.9.1	Investment in school stock can be done on the current sites, even if Mount Street Junior and Infant schools were rebuilt together on the infant site, over a two-storey building. The current Mount Street Junior site could then be rebuilt and repurposed to house the PRU if needed.	These alternative rebuild options for the Mount Street schools are noted.
4.12.9.2	Purchase the land that is currently on the market which adjoins forest school and incorporate it into the Mount Street Infant School grounds. Build a new school in the grounds of Mount Street Infants School.	As above.
4.12.9.3	The Mount Street schools could merge on the site of the Infants' school, thus retaining the forest school, field and play equipment (if the new school was built up rather than out). A new purpose-built PRU could be housed on the site of Mount Street Juniors, keeping the locations separate, the PRU could be enclosed with a large outdoor area and PCC would no longer need to rent the old St Joseph's site.	As above.
4.12.9.4	Mount Street Infants site has considerable developed outdoor space. Could consideration not be given to join Mount Street Junior/Infants on the infants site in a new purpose built two storey building? The	As above.

	current Mount Street Junior site could then be repurposed or rebuilt for PRU making it more sustainable in long term than renting St Josephs?	
4.12.9.5	Surely building on the Infants school playing field a two-story building having the entrance to the school at the top end, then use the current juniors school for parking? This would help with the parking and congestion around mount street area. Then have a playing field where the infant school is now. They already have lovely outdoor equipment, and the woods are already there.	As above.
4.12.9.6	I believe that if The Council are insistent on the amalgamation then it needs to be on the current Mount Street Infant site – being a two storey minimum build with the juniors being used for staff, visitor & parental/guardian car parking. Including the 3+ and specialist support units.	As above.
4.12.9.7	A joint Mount Street Infant and Junior School could be built on the field the Infant School currently stands on. Parking of course will still be tricky there, but so far the parking arrangements with free parking next to the Co-op have been working fine. If the new school was built on the very end of the plot, with three floors, then there would still be enough room for outdoor space. Where the current infant school stands could be turned into part field, part parking for parents. A new build MUST include a forest school! If the new school was built on the Infant school site, then the forest school could be kept where it is and be used by all the children.	As above.
4.12.9.8	Create a MS Primary School on the current sites – they are yards away from each other – consider building on these sites in the future – do some scoping and planning to achieve the art of the possible.	As above.
4.12.9.9	Maybe build a new infants school on the existing land/playing field. Then use the existing school site as a play area / sports area and keep the forest school.	As above.
4.12.9.10	I feel if the Junior school was repaired and kept running the way it is, then the infant school could have a new building on the field, as outlined above. If that is not a viable option, then the two schools should be amalgamated on the Infant School site as outlined above.	As above.

4.12.10 Merge Cradoc with Sennybridge or Priory

4.12.10.1	It seems more logical to merge Cradoc School with Sennybridge School as they are both rural schools and the new build Sennybridge School will have surplus spaces.	Comment noted.
4.12.10.2	Amalgamate Cradoc with Sennybridge. Utilise Cradoc school as PRU unit.	Comment noted.
4.12.10.3	As Powys County Council are building a large new school in Sennybridge it would seem to be more sensible to amalgamate Cradoc School with Sennybridge School.	Comment noted.
4.12.10.4	Amalgamate Cradoc School with Sennybridge School.	Comment noted.
4.12.10.5	Why has a prospective merge between another rural school has not been considered i.e. Sennybridge C P School and Cradoc? Both schools are located in rural areas and would have pupils who attend that are of similar backgrounds.	Comment noted.
4.12.10.6	Merge Cradoc with Sennybridge, these schools are closer in nature of their catchment areas.	Comment noted.
4.12.10.7	Amalgamate Sennybridge C.P. School with Cradoc C.P. School as they are both rural schools.	Comment noted.
4.12.10.8	Merging Cradoc and Sennybridge is a more realistic option but instead you favour a Welsh stream rural school over an English stream rural school!	Comment noted. It is not true that the Council is 'favouring a Welsh stream rural school over an English stream rural school.'
4.12.10.9	If it really must be done, it would be best to combine Cradoc and Sennybridge, as they are both rural schools. Why are Sennybridge the only one that you are not proposing an amalgamation and they will get a new school on their current site?	Amalgamation with Sennybridge was not considered as an option within the further options appraisal carried out in respect of Mount Street Infants School, Mount Street Juniors School and Cradoc C.P. School or in the Consultation Document published in respect of the current Proposals, as options involving Sennybridge had been discounted in the Programme Business Case – these papers were focussed on options for the three schools.
4.12.10.10	Ysgol Y Bannau, Brecon has 45 surplus spaces. Sennybridge C.P. School has 45 pupils learning through the medium of Welsh. Transfer 45 pupils from Sennybridge to Brecon which solves the problem of surplus spaces at Ysgol Y Bannau. The 95 pupils at	This suggestion would mean that Sennybridge C.P. School would become an English-medium school. The Council has no intention to change the language category

	<p>Cradoc School could transfer to the new Sennybridge C.P. School and join the 81 remaining Sennybridge pupils. This would give a pupil number of 176 resulting in 4 surplus spaces as opposed to 54 surplus spaces at the new Sennybridge school. Repair or rebuild Mount Street Infants School and repair Mount Street Junior School. Of the 95 pupils at Cradoc C.P. School transfer 57 to the new build Sennybridge C.P. School, transfer 3 pupils to Builth Wells C.P. School, transfer 7 to Llanfaes CP School, transfer 10 to Mount Street Infants/Juniors, transfer 16 to Priory & transfer 2 to Ysgol Bro Tawe. Apart from the pupils whose closest school is Cradoc, all other pupils would be attending their closest schools. Also, as the other schools have surplus spaces, according to the Powys Admissions Policy, this would reduce the number of surplus spaces in these schools. Repair or rebuild Mount Street Infants School and repair Mount Street Junior School.</p>	<p>of Sennybridge C.P. School to become an English-medium school.</p>
4.12.10.11	<p>It would be better for Cradoc pupils to merge with Priory as Priory is their closest school if PCC want to merge Cradoc with an urban school.</p>	<p>Merging Mount Street Infants, Mount Street Juniors and Cradoc schools is the intended as Phase 1 before a move to a new build in the future. There would be no reason to merge Cradoc with Priory School.</p>

4.12.11 Other suggestions

4.12.11.1	<p>Why is the plan if this is intended to be transformational only considering MSI/MSJ/Cradoc – there are 2 other Primary Schools in Brecon – why are they not included in the new build assuming that the long-term plan is 4-18 education for all Brecon children. This feels very piecemeal and focused on a short-term building acquisition rather than reflection on what will give the children the best possible education in the context of having had 15months COVID disruption.</p>	<p>The Programme Business Case for the Brecon catchment considered the whole Brecon catchment. However, as indicated in the PBC, <i>‘Of the schools within this catchment, several operate within buildings that are assessed as being of a condition A standard, with no outstanding backlog maintenance issues...For the purposes of this PBC, all Condition A primary schools within the catchment have been considered out of scope, as they present only limited drivers for capital investment.’</i></p>
4.12.11.2	<p>When will Powys CC begin to transform education in the Brecon Catchment in a holistic way with contributions for the wider community?</p>	<p>As above.</p>

4.12.11.3	When will Powys CC consider realistic ways to transform education in the Brecon Cluster?	As above.
4.12.11.4	Why is the Penlan site considered suitable for pupils from Yscir? If there is no option but to save money through merging schools, the Llanfaes site, which is on the same side of Brecon would be a better choice because it's closer and does not involve driving through town.	Comment noted.
4.12.11.5	I think The Council needs to engage the Mount Street schools and their communities in a much more open process to develop a plan for how the two schools might work together. This should not be rushed.	Comment noted.
4.12.11.6	Why not just employ someone to oversee all of the schools without removing the current heads? Surely this would be better than leaving the schools out on a limb with no stability.	Comment noted.
4.12.11.7	I think your time would be better used looking at schools that have issues rather than wasting everyone's time on saying you want to fix a school that doesn't need fixing.	The reasons why change is needed at Mount Street Infants, Mount Street Juniors and Cradoc C.P. School are outlined in the Brecon catchment PBC and in the Consultation Document published in respect of this proposal. It is not the case that the Proposals are trying to 'fix a school that doesn't need fixing.'
4.12.11.8	Don't do it and stop with these constant Proposals to improve education when you don't have a clue what people want - ask people then look at what they want before telling them what you propose. You always try to force these things without first asking	The consultation period carried out on these Proposals provided an opportunity for all stakeholders to let the Council know their views on the Proposals. All comments received will be taken into consideration when determining whether or not to proceed with the Proposals.
4.12.11.9	PCC should use this opportunity to be at the forefront of updating their schools with Eco-Technology that will move us into an era of Climate-Safe buildings. A genuine move to protect and influence our future learners. Some of our pupils may one day have your job and be in your position. Let's hope that the decisions made now will have a positive impact on these future citizens who's job will be made easier knowing that the first steps towards sustainability were made when they were in MSIS.	Should the Council proceed with the Proposals, achieving the highest possible environmental standards would be a key consideration when developing the proposed new building.
4.12.11.10	Sell the old High School site at Penlan to a hotel/tourist accommodation developer – with everything the site has to offer,	Comment noted. The Council's current intention is to develop the Penlan site as outlined in the PBC for the

	views, recreational activities, the town is ripe for visitors – with the revenue improve each of the existing school sites.	Brecon catchment and the Consultation Document in respect of these Proposals. Should the Council not proceed with this plan, the Council would dispose of the site in accordance with its Asset Management Policy.
4.12.11.11	Would the playing fields near the Theatre and Ysgol Penmaes be a better consideration where there would be level access to land and the surrounding town for enrichment activities.	Comment noted.
4.12.11.12	Cradoc has the potential to be a top-class rural school connecting communities together. A small run voluntary community shop/food bank/. Open playground offering children to meet in a safe way play space. Providing a community hall to run rural courses/mental health/farming/diversification. Community groups/young farmers etc the potential to provide an income for Powys outside of school hours and also a service to the community can be achieved. Invest in Cradoc put the right management in place and watch a thriving school grow and potentially double its pupil numbers!	The current projected pupil numbers for Cradoc C.P. School does not suggest that there is potential to double the school's pupil numbers.
4.12.11.13	Invest in a Welsh stream in a Brecon primary school not everyone who wants Welsh education wants to send their children to a fully Welsh school and have them shipped away for high school.	Comment noted. The number of pupils currently accessing Ysgol y Bannau in Brecon do not suggest that there is a need for additional Welsh-medium provision in the town / catchment.
4.12.11.14	If you want to do something for the Welsh language, consider making it a dual stream school.	As above.
4.12.11.15	Create a Welsh stream in Cradoc school – stop discriminating against people who want to speak Welsh. New school at Cradoc with a new Welsh stream – watch them come flocking	As above.
4.12.11.16	Increase the parking spaces	The Council notes this comment about the need to improve parking spaces. The provision of sufficient parking spaces would be a consideration as part of the planned new building.
4.12.11.17	More funding to support the fantastic schools we already have	All schools are funded in accordance with the Council's Funding Formula for schools.
4.12.11.18	I'm afraid the only option would be for a rise in council tax. Of course, this would be unpopular with residents, but children's education is more important.	Comment noted.

4.12.11.19	School meals need to be improved, the menu is boring for children. You would make more profit by adjusting the menu and restructuring pricing to reduce costs. Just has a detrimental effect on the kids education	Comment noted.
4.12.11.20	Merge Brecon Town Primary schools, despite money been spent on them, some being rebuilt. Sell off the sites for more housing developments.	As indicated in the PBC in respect of the Brecon catchment, <i>'Of the schools within this catchment, several operate within buildings that are assessed as being of a condition A standard, with no outstanding backlog maintenance issues...For the purposes of this PBC, all Condition A primary schools within the catchment have been considered out of scope, as they present only limited drivers for capital investment.'</i>
4.12.11.21	When will Powys CC investigate alternative options for Mount Street infants that could be both affordable, achievable and build on current good practice?	The Council has considered a number of options, both in the PBC for the Brecon catchment and in the options appraisal document / Consultation Document .
4.12.11.22	Mount Street Infants School and Mount Street Junior School occupied one building until approximately 50 years ago when the Local Authority decided to build a new school for Mount Street Infants. What guarantees are there that, in 50 years time, the advice won't be that the school is too large, the building hasn't been maintained and therefore Powys County Council are proposing to separate the schools and build new schools?	Comment noted. The Council has a duty to continually review its schools to ensure that schools. There are never any guarantees that schools that have been through a reorganisation process will not be reviewed again in future. With appropriate maintenance, the expected lifespan of a new school building is 65 years.

4.13 COMMENTS ABOUT THE IMPACT ON WELSH

4.13.1 Comments about the use of Welsh at the existing schools

4.13.1.1 Comments about the use of Welsh at Cradoc

4.13.1.1.1	Cradoc School uses Welsh to familiarise pupils with the language and culture of the country in which they live.	The Council notes these positive comments about the use of Welsh at Cradoc C.P. School. Should the Council proceed with these Proposals, pupils would continue to
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		learn Welsh and have opportunities to experience Welsh culture at the new school.
4.13.1.1.2	Cradoc pupils attended Yr Urdd when my children were there. They held Eisteddfodau and both went to Nationals and won.	As above.
4.13.1.1.3	Cradoc School has always done well in integrating the Welsh language to its children. For example, the whole community is invited to its Eisteddfod every year.	As above.
4.13.1.1.4	Our children are doing an excellent job learning Welsh at Cradoc school, and are currently at a much higher level than expected for their age. The teachers are excellent at encouraging the use of Welsh during general activities and the children continue to use these phrases at home too. The school has awards for their excellent use of Welsh, something we are very proud of and do not wish to lose, which would happen if Phase 1 went ahead.	As above.
4.13.1.1.5	In Cradoc the Welsh language is thriving throughout the whole school ethos.	As above.
4.13.1.1.6	Cradoc School works hard to promote the Welsh language and as a rural community, has very close links with the older generation in the area. This means that the local Welsh heritage, history and culture is readily available to the school and is supported by the community.	As above.

4.13.1.2 Comments about Welsh at MSI

4.13.1.2.1	Many pupils' use of Welsh in MSIS is above expectations for their age.	The Council notes these positive comments about the use of Welsh at Mount Street Infants School. Should the Council proceed with these Proposals, pupils would continue to learn Welsh and have opportunities to experience Welsh culture at the new school. It is an expectation of the new Curriculum that all schools provide opportunities for pupils to use Welsh within and beyond the classroom (including on digital platforms) and support learners to use Welsh confidently and appreciate its usefulness to communication in a bilingual Wales.
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4.13.1.2.2	Lots of Welsh is taught at the Infants.	As above.
4.13.1.2.3	The staff at Mount Street Infants are committed to providing a learning environment that is rich in the Welsh language, culture and heritage and they will continue to develop provision in this area, beyond the requirements of the Curriculum for Wales. The MSI Estyn Report from January 2020 states: Many pupils' use of Welsh is above expectations for their age. Nearly all pupils develop confident conversational skills, have a good range of vocabulary in formal and informal activities. Many pupils in the Specialist Centre respond appropriately to basic Welsh phrases when greeting others. The provision for Welsh language development is very strong. The environment is rich in Welsh vocabulary and pupils often conduct activities in Welsh.'	As above.
4.13.1.2.4	Currently Mount Street Infants using a good mixture of English and Welsh.	As above.

4.13.2 Comments about the proposal's impact on Welsh

4.13.2.1 The proposal will have a negative impact on the Welsh language

4.13.2.1.1	Pupils of Cradoc have more to lose than gain.	<p>Should the Council proceed with these Proposals, pupils would continue to learn Welsh and have opportunities to experience Welsh culture at the new school.</p> <p>One of the key characteristics of the four purposes in the Curriculum for Wales is to develop ambitious, capable learners who can communicate effectively in different forms and settings, using both Welsh and English. All learners should have appropriate pathways for learning Welsh and English to enable them to develop the confidence to use both languages in everyday life. All Powys schools are well supported with excellent resources from the Athrawon Bro Team to enable</p>
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		teachers to teach Welsh. Schools, through effective pupil voice forums, known as the 'Criw Cymraeg' plan a range of activities to increase the use of Welsh outside the classroom. Facilitating the use of Welsh, through planned linguistic progression in every phase of education from ages 3 to 16, and as part of a whole-school approach, offers opportunities for all learners to develop bilingually and this is a key priority for all schools in Wales.
4.13.2.1.2	There will be a greater mix of/and ethnicities of children and less chance of Welsh language being used by the children. Sadly the Welsh language is not of importance to non-Welsh people and it does not have any value to them. The proposed school will by nature be more English speaking than anything.	As above.
4.13.2.1.3	The focus of a school move / amalgamation would detract from the Welsh language due to other targets. Obviously the breakdown of the community would result in the loss of language.	As above.
4.13.2.1.4	Adverse effect on the Welsh language if all schools are combined.	As above.
4.13.2.1.5	Using Welsh is generally more predominant in villages – by “blending” a rural and town primary school a crucial part of our identity will be lost.	As above.
4.13.2.1.6	Welsh and Welsh traditions are a big part of each school. Inclusion in activities is much easier in a small school as everyone takes part. This is logistically much more difficult in a larger school. Thus, increasing the size of the schools by amalgamation could have a negative impact	As above.

4.13.2.2 The proposal will not improve the Welsh language provision

4.13.2.2.1	Nothing to be gained by joining the schools.	Should the Council proceed with these Proposals, pupils would continue to learn Welsh and have opportunities to experience Welsh culture at the new school.
4.13.2.2.2	There are no positive effects on the Welsh language as this is a proposal for an English medium school.	As above.

4.13.2.2.3	How can an English Medium School give children a positive effect on opportunities to use the Welsh language?	As above.
4.13.2.2.4	How are you going to support the learning of Welsh in the schools across three sites? The solution to all of this is to not go ahead with very ill thought out proposal, that is not going to improve our children's wellbeing and education.	As above.
4.13.2.2.5	This Proposals offer nothing to enhance the provision of bilingualism as it relates to MSI school.	As above.

4.13.2.3 The proposal will not have an impact on the Welsh language

4.13.2.3.1	The Welsh language will be no different regardless	Comment noted.
4.13.2.3.2	I believe there will be no difference to the provisions for the use of the Welsh language, all 3 schools are currently English medium.	Comment noted.
4.13.2.3.3	Little impact on Welsh.	Comment noted.
4.13.2.3.4	In my opinion it will have no impact as the new school will not be a Welsh language school - they will be taught Welsh in the same way as they are in their respective schools now.	Comment noted.
4.13.2.3.5	I do not think this amalgamation will have any positive or negative effect on the Welsh language opportunities other than possibly an overall decrease in pupil achievement as case studies have shown to be the case in larger pupil number schools.	Comment noted.
4.13.2.3.5	Wouldn't make a difference moving to a new build	Comment noted.
4.13.2.3.6	I think the same opportunities apply.	Comment noted.
4.13.2.3.7	It should have no impact	Comment noted.
4.13.2.3.8	I don't believe that the merger of the three schools will have any adverse impact on the Welsh Language	Comment noted.
4.13.2.3.9	The Welsh language is being used successfully already in these schools! It would make no difference.	Comment noted.
4.13.2.3.10	As long as Welsh is being taught then everything should be fine	Comment noted.
4.13.2.3.11	I believe Welsh language is taught in all schools so this would not impact	Comment noted.
4.13.2.3.12	Honestly it would make little difference	Comment noted.
4.13.2.3.13	No difference from what schools can currently offer now.	Comment noted.

4.13.2.3.14	This has no relevance whatsoever to the Proposals as the proposed new school is to be English-medium.	Comment noted.
4.13.2.3.15	I don't think the Proposals will impact the teaching and learning of Welsh.	Comment noted.
4.13.2.3.16	No affects in terms of my family since Welsh Language is probably 5th Language in my family. However, it might have an adverse effect on those who want to learn Welsh as well.	Comment noted.
4.13.2.3.17	There will be no impact on the Welsh language. Powys do not support Welsh language education anyway - look at the standard of Welsh education in both Ysgol Y Bannau and the High school - this is proof.	It is not true that Powys 'do not support Welsh language education'. The Council's Strategy for Transforming Education in Powys includes a clear commitment to developing Welsh-medium provision in Powys, and the Council is currently consulting on a new Welsh in Education Strategic Plan (WESP) for 2022-2032, which outlines the Council's plans to develop Welsh-medium education in the county over the next 10 years.

4.13.3 Other comments

4.13.3.1 It's easier to teach Welsh in rural/small settings

4.13.3.1.1	As with all aspects of education many children thrive in a small supportive community school and learning Welsh is likely to be easier to promote in a smaller setting – this is English Medium but there is still a requirement to learn / use Welsh.	There is an expectation that all schools in Wales, whatever their size, promote effective teaching and learning of Welsh -it is a mandatory element that must be included and taught in a curriculum from the ages of three to sixteen.
4.13.3.1.2	Rural schools are better at encouraging the use of the Welsh Language – even if not formal Welsh Schools.	The Siarter Iaith (Welsh Language Charter) is a national framework for all settings and schools to provide a holistic basis for planning experiences across the curriculum in order to increase learners' use of Welsh and develop their confidence in the language. It supports increased opportunities for learners to speak Welsh in a variety of contexts and embed their use of Welsh language patterns from an early age. The principles set out in the Siarter

		laith are in keeping with the Curriculum for Wales 2022 guidance.
4.13.3.1.3	Although not, of course, exclusively, Welsh has always prospered better in rural communities. This proposal will have the effect of diluting the 'Welsh-ness' of the area (and we'll see the effect on the children use of the language).	As Welsh is taught in all schools in Powys, and the Siarter laith initiatives are also promoted, with excellent support by the Welsh Officers, the children will have opportunities to develop bilingually so that they are ambitious, capable learners who can communicate effectively in different settings and forms.

4.13.3.2 References to Powys WESP and other Welsh language strategies

4.13.3.2.1	It is disappointing that the proposal would not expand the availability of the Welsh language provision. It states in WESP " <i>It will also be necessary to increase the number of learners in English-medium schools who learn Welsh successfully by developing Welsh-medium provision in the statutory education period, and this will form an integral part of the new Curriculum</i> ". Does Powys County Council agree that this proposal does nothing to promote the Welsh language?	<p>The Council does not claim that the Proposals would expand the availability of Welsh language provision – as stated on page 38 of the Consultation Document issued in respect of this proposal, 'The intention is to amalgamate three English-medium schools in order to establish one new English-medium primary school. The proposal is not linked to the targets in the Council's Welsh in Education Strategic Plan. The Proposals would not expand or reduce the availability of Welsh language provision.'</p> <p>There is already access to designated Welsh-medium provision in Brecon ac Ysgol y Bannau.</p>
4.13.3.2.2	It states in The Council's WESP 'It will also be necessary to increase the number of learners in English-medium schools who learn Welsh successfully by developing Welsh-medium provision in the statutory education period, and this will form an integral part of the new Curriculum.' Can PCC explain how it is acceptable that this proposal does nothing to promote the Welsh language?	As above.
4.13.3.2.3	Not sure how this is going to have a positive impact on Welsh medium education bar a few more numbers at Sennybridge, no thought on the other three schools. You have already said that the proposal is not linked to targets in The Council's Welsh in Education Strategic Plan.	As above.

4.13.3.2.4	The document does not unfortunately make any Proposals as to how this can be improved and consider the Welsh Government 's aspiration to have commitment to work towards one million people speaking the Welsh language by 2050 and to continue to invest in encouraging more people to use and speak Welsh in their daily lives.	As above.
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4.13.3.3 The proposal offers no ambition in relation to the Welsh language

4.13.3.3.1	The Proposals as they stand appear to have NO aspirations as regards encouraging the use of Welsh Language which is hugely disappointing. There is no evidence anywhere that the proposed new school will be perceived to be anything other than English-medium. It is disappointing that the proposal would not expand the availability of the Welsh language provision.	<p>The Council does not claim that the Proposals would expand the availability of Welsh language provision – as stated on page 38 of the Consultation Document issued in respect of this proposal, ‘The intention is to amalgamate three English-medium schools in order to establish one new English-medium primary school. The Proposals are not linked to the targets in the Council’s Welsh in Education Strategic Plan. The Proposals would not expand or reduce the availability of Welsh language provision.’</p> <p>There is already access to designated Welsh-medium provision in Brecon ac Ysgol y Bannau.</p> <p>Should the Council proceed with implementation of the Proposals, it would welcome the opportunity to work with the new school to develop the Welsh language provision, should that be the school’s wish.</p>
4.13.3.3.2	The Proposals within the Consultation Document are lacking ambition and forward thinking in relation to the Welsh Language. This is very disappointing as I thought the ambition of all Welsh schools was to be bilingual.	As above.
4.13.3.3.3	There is no information about how this proposal will increase the number of Welsh Learners – it is proposed to be English medium but Welsh learners should be increased and supported.	As above.

4.13.3.3.4	Why has PCC not included any aspirations for bilingualism in its Proposals?	As above.
4.13.3.3.5	This consultation misses the opportunity to have an open and inclusive discussion about the future development of the Welsh Language during Phase 1 or Phase 2. Including Ysgol y Bannau in the Proposals for a new large Brecon school could have been really exciting.	Ysgol y Bannau was included in the Programme Business Case for the Brecon catchment which was considered by the Council's Cabinet in September 2020. However, as explained in the Programme Business Case: <i>'Of the schools within this catchment, several operate within buildings that are assessed as being of a condition A standard, with no outstanding backlog maintenance issues. These schools are Llanfaes C.P. School, Priory Church in Wales School, Ysgol y Bannau and Brecon High School...for the purposes of this PBC, all Condition A primary schools within the catchment have been considered out of scope, as they present only limited drivers for capital investment.'</i>

4.13.4 Other

4.13.4.1	I didn't notice any mention of Welsh in your document so you don't seem that bothered.	<p>The Consultation Document considers the links to The Council's Welsh in Education Strategic Plan (WESP), however as indicated in the document, <i>'The Proposals are to amalgamate three English-medium schools in order to establish one new English-medium primary school. The Proposals are not linked to the targets in the Council's Welsh in Education Strategic Plan. The Proposals would not expand or reduce the availability of Welsh language provision.'</i> The impact on Welsh is also considered in the Draft Impact Assessment document.</p> <p>All Consultation Document ation was available in Welsh throughout the consultation period.</p>
4.13.4.2	More Welsh language training could be provided to staff.	Comment noted.
4.13.4.3	There should be more support i.e. more teachers and teaching assistants to help. The Nepalese community already speak their	Comment noted.

	own language and leave MSI and MSJ speaking about 3-4 languages well.	
4.13.4.4	How will Powys CC protect and promote the development of the Welsh language in Brecon, with ambition and enthusiasm?	The Council is currently consulting on a new Welsh in Education Strategic Plan (WESP) for 2022-2032, which sets out how the Council aims to develop Welsh-medium provision in Powys.
4.13.4.5	With a new school where it is proposed, that means that up there, there will be an English-medium primary, a Welsh-medium primary and (I hope) a bilingual secondary school.	This statement is correct – Should the Proposals be implemented, there would be an English-medium primary school, a Welsh-medium primary school and a dual stream secondary school located in the Penlan area of Brecon.
4.13.4.6	Some of the staff in both schools are fluent Welsh speakers, the schools should be incorporating Welsh into the everyday curriculum regardless of where they are situated.	Comment noted
4.13.4.7	The Welsh speaking pupils who may be 2nd language Welsh need to know how magic it is to speak 2 languages and build on their knowledge. More Eisteddfodau, more music, arts, dance, sport and culture needed.	The Council fully agrees that there is a need that opportunities are provided to enable pupils that learn Welsh as a 2 nd language to develop their language skills outside the classroom. Opportunities are provided through the Cymraeg Campus language charter. Mount Street Juniors, Mount Street Infants and Cradoc have achieved the bronze award for the Cymraeg Campus.
4.13.4.8	A bigger school would provide more options surely for Welsh language. However, there is already a Welsh medium primary school at that location. Teaching in the new school should not change in terms of language medium.	Comment noted.
4.13.4.9	The provision of the learning of the Welsh language its history, culture us hugely important in all Welsh English medium schools.	Comment noted.
4.13.4.10	The question I have is why are schools that teach the English language first treated less favourably than Welsh language schools? Both Ysgol y Bannau and Sennybridge Schools have been left out of these Proposals entirely. I would have to ask the question that if Cradoc School or any of the other schools were Welsh language schools would they be in these Proposals? I would argue that the three schools are being unfairly discriminated against because they	There are currently 7 primary schools in the Brecon catchment area. There are 2 other English-medium primary schools located in Brecon that are not affected by these Proposals. As explained in the Programme Business Case for the Brecon catchment which was considered by the Council's Cabinet in September 2020, <i>'Of the schools within this</i>

	<p>are not Welsh language schools and it is English language schools that are treated less favourably.</p>	<p><i>catchment, several operate within buildings that are assessed as being of a condition A standard, with no outstanding backlog maintenance issues. These schools are Llanfaes C.P. School, Priory Church in Wales School, Ysgol y Bannau and Brecon High School...for the purposes of this PBC, all Condition A primary schools within the catchment have been considered out of scope, as they present only limited drivers for capital investment.'</i></p> <p>The Programme Business Case goes on to consider a range of options for the 4 remaining schools, which include new buildings in Sennybridge and / or Cradoc and / or Brecon. Following an appraisal of all options, three options were shortlisted which were as follows:</p> <ul style="list-style-type: none"> • <i>Option 1 – Do minimum – Backlog maintenance only</i> • <i>Option 4A – New build Sennybridge, New build Brecon primary school, close Cradoc</i> • <i>Option 5A – New build Sennybridge, establish new all-through school in Brecon with new build primary, close Cradoc.</i> <p>It is not the case that English language schools are being treated less favourably than those providing Welsh-medium education.</p>
4.13.4.11	<p>There has been much local chagrin about the fact that no mention has been made of Sennybridge School or the consistently underperforming Ysgol-y-Bannau. It is thought that these schools are 'safe' due to the provision of Welsh-medium education. This would seem to privilege schools offering Welsh-medium over English-medium schools which is both discriminatory and short-sighted.</p>	<p>As above.</p>

4.14 COMMENTS IN FAVOUR OF THE PROPOSALS

4.14.1	It's a good idea to amalgamate three schools.	Comment noted.
4.14.2	I agree with this proposal.	Comment noted.
4.14.3	I think the combination of all 3 school is great. Cradoc school is too small to offer the pupils the full experience of a school i.e. not one class per year group, not enough pupils to play sport against other schools, very hard to move up to high school when pupils are from a very small school. Mount street infants needs a new school as their building is well past its best before date.	Comment noted.
4.14.4	Both Mt. Street and Cradoc are excellent schools and their amalgamation can only strengthen their teaching and financial options.	Comment noted.
4.14.5	I think it is a good idea, reducing overall costs of running 3 schools. Mt Street Infants is very old I went there and I am 52. I believe Cradoc is also in need of updating. Suitable public transport must be provided to aid smaller children to get up to the high school campus from Llanfaes and the housing estates North of the town centre.	Comment noted.
4.14.6	The Mount Street schools should be as one moving them up to the old high school shouldn't be too much of a problem as they are nearly there anyway and I think it would be better that the children were away from houses a bit more.	Comment noted.
4.14.7	I think this is a great idea. My children attend Mount Street Junior and Infant school. It would be much easier to have one school rather than 2	Comment noted.
4.14.8	Brecon children deserve a good education, something that is lacking from every school. Make this a super school, and allow the children to flourish. Save money on multiple buildings and put that money into giving the children the best education possible. They are the future, and Powys currently is failing them.	Comment noted.
4.14.9	This is an excellent idea. The site needs using, and the present sites of the two Mount Street schools are inappropriate now that so many people drop off and pick up their children by car. The small one-way roads in this area are clogged up with cars, and particularly the Junior School, where cars come up the dead-end lane and then have to turn around. (I live further along that lane). The Infant School is in old	Comment noted.

	'temporary' buildings which have long passed their 'use-by' date. The Junior School is in a purpose-built building but I believe it is the oldest of the primary school buildings in the area. A new primary school where the old High School was is an excellent idea, and there is increasing housing nearby. The sites of the present Infant School and Junior School could then be sold for new housing, which would be a much more appropriate use of those spaces.	
4.14.10	Great - use the old site for something other than housing - tag it with the leisure centre and give improvements to that too, which the children will be able to have access to.	Comment noted.
4.14.11	Great use for the old high school land	Comment noted.
4.14.12	This amalgamation or the move to new building on old Brecon High School would help in long terms specially with multiples children from the same household to drop off and pick up.	Comment noted.
4.14.13	Having a big new primary school will be great for all the pupils and it's near the local high school so can share transport and leisure facilities. Having the pupil referral unit on site will be great for the pupils of Both facilities. Lots of access to sport facilities and plenty of space to play and run about. Plenty of parking and easy and safe drop off and pick up.	Comment noted.
4.14.14	I think the merging of the two Mount Street schools could be a good thing for continuity of the pupils education, however the parents and teachers at Mount Street would be best placed to provide an opinion on that. I can see the advantages of a new building at Penlan, however I am concerned with the huge increase of traffic it would cause on Cerrigochion Road! Especially with the new housing development.	Comment noted.
4.14.15	It's my belief that for many Phase 1 is the best option. As a parent with a children in Mount Infants and one soon to attend and being a former pupil of Mount Street Juniors it is troublesome to consider the prospects of moving these schools from their current sites. Although I do agree these schools must be merged to improve the experience for the children and reduce the stress of having to move from Mount Street Infants to Juniors. The school is in the community at present and feels very accessible to many. It others a sense of pride for the	Comment noted.

	children and merging and moving seems like an added stress for these children who have already had a turbulent time with the unprecedented pandemic. The staff, the history are all equally important and must be considered.	
4.14.16	Do not invest money in rebuilding each school. Powys and Brecon have an aging population. We cannot continue to keep all these sites open and have all the running costs when there are other options. We as a county must move forward and start looking to the future. Our children deserve better-quality, purpose-built buildings.	Comment noted.

DRAFT

7. FURTHER ASESMENT AND CONCLUSION

The School Organisation Code includes some additional steps to be undertaken in respect of the consultation report for Proposals relating to the closure of rural schools. As Cradoc C.P. School is identified in the Code as a rural school, this section addresses these requirements.

7.1 Further assessment of the Proposals and alternatives

Following consultation, the Council has carried out a further assessment of the Proposals and the alternatives identified in the proposal paper on the likely impact on quality and standards in education, the likely impact on the community and the likely effect of different travelling arrangements.

The revised assessments, which take account of further information that has come forward through the consultation or otherwise, are provided in the table below:

Option	Likely impact on quality and standards	Likely impact on the community	Likely impact of different travelling arrangements
Option 1: Status Quo – Mount Street Infants School, Mount Street Junior School and Cradoc C.P. School continue to operate as separate schools	There would be no impact on quality and standards – pupils would continue to attend either Mount Street Infants School, Mount Street Junior School or Cradoc C.P. School.	There would be no negative impact on the community – provision would continue to be available in the current Mount Street locations and Cradoc.	There would be no impact on travel arrangements – pupils would continue to attend either Mount Street Infants School, Mount Street Junior School or Cradoc C.P. School.
Option 2a: Federation – Mount Street Infants School and Mount Street Junior School federate to create a federated primary school. Cradoc C.P. School	The impact on quality and standards would be minimal – pupils would continue to attend their existing schools, however a federated governing body would be established to oversee the Mount Street Schools. This could provide additional opportunities for	The impact on the community would be minimal – provision would continue to be available in the current Mount Street locations and Cradoc. One joint governing body would be responsible for Mount Street Infants	There would be no impact on travel arrangements – pupils would continue to attend either Mount Street Infants School, Mount Street Junior School or Cradoc C.P. School.

<p>continues to operate as a separate school</p>	<p>collaboration across the three schools, and an opportunity to appoint one headteacher for the federation in the longer term. There would also be additional opportunities to share staff expertise across the federation.</p>	<p>School and Mount Street Junior School, however a separate governing body would continue to operate for Cradoc C.P. School.</p>	
<p>Option 2b: Federation – Mount Street Infants School, Mount Street Junior School and Cradoc C.P. School federate to create a federated primary school</p>	<p>The impact on quality and standards would be minimal – pupils would continue to attend their existing schools, however a federated governing body would be established to oversee the three schools. This could provide additional opportunities for collaboration across the three schools, and an opportunity to appoint one headteacher for the federation in the longer term. There would also be additional opportunities to share staff expertise across the federation.</p>	<p>The impact on the community would be minimal – provision would continue to be available in the current Mount Street locations and Cradoc.</p> <p>However, one joint governing body would be responsible for the three schools, therefore there could be a perceived reduction in community involvement in management of the school, depending on the make up of the federated governing body.</p>	<p>There would be no impact on travel arrangements – pupils would continue to attend either Mount Street Infants School, Mount Street Junior School or Cradoc C.P. School.</p>
<p>Option 3a: Merge Mount Street Infants School and Mount Street Junior School to create a new primary school. Cradoc C.P. School to continue to operate as a separate school</p>	<p>It is anticipated that this option would have a positive impact on quality and standards at the Mount Street schools through the establishment of one new primary school. This would mean that pupil progression would be monitored throughout pupils' time in primary school, from age 4 to 11, ensuring continuity in delivery and approach.</p>	<p>The impact on the community would be minimal – provision would continue to be available to the communities currently served by Mount Street Infants School and Mount Street Junior School at a new primary school located in Brecon. Cradoc C.P. School would continue to operate as a separate school in Cradoc, therefore there would be no impact on the Cradoc community.</p>	<p>One new school would be established in Brecon to replace the current Mount Street Infants School and Mount Street Junior School. This may result in an additional distance to school for some pupils, however provision would continue to be available within Brecon, therefore it is not anticipated that the impact on travel would be significant.</p>

	<p>Cradoc C.P. School would continue to operate as a standalone school, therefore there would be no impact on quality and standards at Cradoc.</p>		<p>Cradoc C.P. School would continue to operate as a standalone school in Cradoc, therefore no additional travel would be required for pupils currently attending Cradoc C.P. School.</p>
<p>Option 3b: Merge Mount Street Infants School and Mount Street Junior School to create a new primary school. Close Cradoc C.P. School, with pupils to attend alternative schools.</p>	<p>It is anticipated that this option would have a positive impact on quality and standards at the Mount Street schools through the establishment of one new primary school. This would mean that pupil progression would be monitored throughout pupils' time in primary school, from age 4 to 11, ensuring continuity in delivery and approach.</p> <p>This option would result in the closure of Cradoc C.P. School. The impact on quality and standards would depend on which school(s) pupils transferred to, however in general there are no concerns about the quality of provision at any of the schools in the Brecon catchment therefore it is not anticipated that the impact on quality and standards would be negative.</p>	<p>Provision would continue to be available in Brecon, therefore the impact on the Brecon community would be minimal. Ultimately, there would be a positive impact on the community in Brecon through the provision of one new primary school with enhanced community facilities.</p> <p>Implementation of this option would mean that there would no longer be provision in Cradoc. This would have a negative impact on the Cradoc community, and would result in the loss of primary provision in Cradoc, and a possible loss of any community facilities associated with the school from the village of Cradoc.</p> <p>Respondents suggested that the loss of the school in Cradoc would mean the loss of a community facility, and that a number of extra-curricular and community activities would disappear, impacting on social cohesion and the wellbeing of residents in the area.</p>	<p>One new school would be established in Brecon to replace the current Mount Street Infants School and Mount Street Junior School. This may result in an additional distance to school for some pupils, however provision would continue to be available within Brecon, therefore it is not anticipated that the impact on travel would be significant.</p> <p>Implementation of this option would mean that there would be no longer be provision in Cradoc. This would result in additional travel for pupils for whom Cradoc C.P. School is currently the closest school. Whilst home to school travel would be provided for eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirement for parents in order to access school activities / events.</p> <p>However, a number of pupils that currently attend Cradoc C.P. School live closer to schools located in</p>

		<p>Responses received during the consultation expressed a strong view that the loss of the school would have a detrimental impact on the community, and this is identified in the Community Impact Assessment. Many respondents noted that Cradoc C.P. School was the heart of the community.</p>	<p>Brecon. If these pupils transferred to schools in Brecon, this option would lead to a reduction in travel for these pupils.</p>
<p>Option 4: Merge Mount Street Infants School, Mount Street Junior School and Cradoc C.P. School to create a new primary school</p>	<p>It is anticipated that this option would have a positive impact on quality and standards through the establishment of one new larger primary school. In respect of pupils currently attending the Mount Street Schools, this would mean that pupil progression would be monitored throughout pupils' time in primary school, from age 4 to 11, ensuring continuity in delivery and approach. As a larger school, the headteacher would be able to spend more time on leadership, enabling a greater focus on improving the quality of provision. In addition, there would be a larger team of staff, enabling expertise to be shared across the school and enabling more distributed leadership and professional development opportunities.</p>	<p>Provision would continue to be available in Brecon, therefore the impact on the Brecon community would be minimal. Ultimately, there would be a positive impact on the community in Brecon through the provision of one new primary school with enhanced community facilities.</p> <p>Implementation of this option would eventually mean that there would no longer be provision in Cradoc. This would have a negative impact on the Cradoc community, and would result in the loss of primary provision in Cradoc, and a possible loss of any community facilities associated with the school from the village of Cradoc.</p> <p>Respondents suggested that the loss of the school in Cradoc would mean the loss of a community facility, and that a number of extra-</p>	<p>One new school would be established in Brecon to replace the current Mount Street Infants School and Mount Street Junior School. This may result in an additional distance to school for some pupils, however provision would continue to be available within Brecon, therefore it is not anticipated that the impact on travel would be significant.</p> <p>Implementation of this option would mean that there would be no longer be provision in Cradoc. This would result in additional travel for pupils for whom Cradoc C.P. School is currently the closest school. Whilst home to school travel would be provided for eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirement for parents in order to access school activities / events.</p>

	<p>Initially the proposal is to establish the new school on the sites of the three existing schools, before eventually moving to a new building. Concern has been expressed about the impact of operating across three sites will have a negative impact on the quality of provision. However, establishing a new school provides an opportunity to bring together the strengths of each existing school.</p> <p>Eventually, the intention is to move to a new building. This would mean that pupils would benefit from school buildings of a much higher quality than the current buildings, which would have a positive impact on their learning experience.</p>	<p>curricular and community activities would disappear, impacting on social cohesion and the wellbeing of residents in the area.</p> <p>Responses received during the consultation expressed a strong view that the loss of the school would have a detrimental impact on the community, and this is identified in the Community Impact Assessment. Many respondents noted that Cradoc C.P. School was the heart of the community.</p>	<p>However, a number of pupils that currently attend Cradoc C.P. School live closer to schools located in Brecon. Attending a school in Brecon would lead to a reduction in travel for these pupils.</p>
<p>Option 5: Close Mount Street Infants School and Mount Street Junior School, pupils to attend alternative schools. Retain Cradoc C.P. School.</p>	<p>This option would result in the closure of Mount Street Infants School and Mount Street Junior School. The impact on quality and standards would depend on which school(s) pupils transferred to, however in general there are no concerns about the quality of provision at any of the schools in the Brecon catchment therefore it is not anticipated that the impact on quality and standards would be negative.</p> <p>Cradoc C.P. School would continue to operate as a standalone school,</p>	<p>Whilst implementation of this option would mean that Mount Street Infants School and Mount Street Junior School would no longer exist, it is likely that pupils would transfer to alternative provision in Brecon, although additional capacity may be required in Brecon in order to facilitate this.</p> <p>Whilst provision would continue to be available in the town of Brecon, there would be a loss of facilities in the locations where the two Mount Street Schools are currently located,</p>	<p>Implementation of this option would mean that Mount Street Infants School and Mount Street Junior School would no longer exist. It is likely that pupils would transfer to alternative provision in Brecon, however additional capacity may be required in Brecon in order to facilitate this. It is therefore anticipated that there would be no significant impact on travel arrangements.</p> <p>Cradoc C.P. School would continue to operate as a standalone school in</p>

	<p>therefore there would be no impact on quality and standards at Cradoc.</p>	<p>which could impact on the community in this area of Brecon.</p> <p>Cradoc C.P. School would continue to operate as a separate school in Cradoc, therefore there would be no impact on the Cradoc community.</p>	<p>Cradoc, therefore no additional travel would be required for pupils currently attending Cradoc C.P. School.</p>
<p>Option 6: Close Mount Street Infants School, Mount Street Junior School and Cradoc C.P. School. Pupils to attend alternative schools.</p>	<p>This option would result in the closure of Mount Street Infants School, Mount Street Junior School and Cradoc C.P. School. The impact on quality and standards would depend on which school(s) pupils transferred to, however in general there are no concerns about the quality of provision at any of the schools in the Brecon catchment therefore it is not anticipated that the impact on quality and standards would be negative.</p>	<p>Whilst implementation of this option would mean that Mount Street Infants School and Mount Street Junior School would no longer exist, it is likely that pupils would transfer to alternative provision in Brecon, although additional capacity may be required in Brecon in order to facilitate this.</p> <p>Whilst provision would continue to be available in the town of Brecon, there would be a loss of facilities in the locations where the two Mount Street Schools are currently located, which could impact on the community in this area of Brecon.</p> <p>Implementation of this option would mean that there would no longer be provision in Cradoc. This would have a negative impact on the Cradoc community, and would result in the loss of primary provision in Cradoc, and a possible loss of any community facilities associated with</p>	<p>Implementation of this option would mean that Mount Street Infants School and Mount Street Junior School would no longer exist. It is likely that pupils would transfer to alternative provision in Brecon, however additional capacity may be required in Brecon in order to facilitate this. It is therefore anticipated that there would be no significant impact on travel arrangements.</p> <p>Implementation of this option would mean that there would be no longer be provision in Cradoc. This would result in additional travel for pupils for whom Cradoc C.P. School is currently the closest school. Whilst home to school travel would be provided for eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirement for parents in order to access school activities / events.</p>

		<p>the school from the village of Cradoc.</p> <p>Respondents suggested that the loss of the school in Cradoc would mean the loss of a community facility, and that a number of extra-curricular and community activities would disappear, impacting on social cohesion and the wellbeing of residents in the area.</p> <p>Responses received during the consultation expressed a strong view that the loss of the school would have a detrimental impact on the community, and this is identified in the Community Impact Assessment. Many respondents noted that Cradoc C.P. School was the heart of the community.</p>	<p>However, a number of pupils that currently attend Cradoc C.P. School live closer to schools located in Brecon. Attending a school in Brecon would lead to a reduction in travel for these pupils.</p>
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7.2 Further reasonable alternatives

The other alternatives which were suggested in the consultation responses received are outlined in section 18 of the 'issues raised in the consultation period' section of this report, including the Council's response to these alternatives. These are as follows:

4.12.1 Status Quo

The assessment of 4.12.1 is as per the assessment of 'Option 1 – Status Quo' in the table in section 7.1 above.

4.12.2 Repair and improve the current school buildings

The assessment of this alternative option is as per the assessment of 'Option 1 – Status Quo' in the table in section 7.1 above. Should the Council continue with the three schools, there would be a need to repair and improve the current buildings, therefore this is not considered to be a reasonable alternative option.

4.12.3 3 new buildings

This option was considered and discounted in the Programme Business Case for the Brecon catchment which was considered by the Council's Cabinet in September 2020.

Rebuilding 3 new schools would not provide value for money. In addition, the constraints surrounding the existing sites of Mount Street Infants School and Mount Street Junior School mean that rebuilding these schools in their current location would be challenging. This is not considered to be a reasonable alternative option.

4.12.4 2 new buildings – 1 in Cradoc, 1 in Brecon

This option was considered and discounted in the Programme Business Case for the Brecon catchment which was considered by the Council's Cabinet in September 2020 as it would not provide value for money. However, it is acknowledged that this could be a reasonable alternative, which would see the retention of provision in Cradoc. The option to provide 2 new buildings, 1 in Cradoc and 1 in Brecon will be assessed as a reasonable alternative option.

4.12.5 1 new building in Brecon, close Cradoc school

This option is similar to Option 3b which is outlined in section 7.1 above, however it is acknowledged that Option 3b does not specify the provision of a new building in Brecon. The option to provide one new building in Brecon and to close Cradoc School will be assessed as a reasonable alternative option.

4.12.6 MSI and MSJ to collaborate rather than merge

Mount Street Infants and Mount Street Junior schools already work together to minimise disruption for pupils who transition between the two schools. Therefore, on this basis, this alternative option won't be evaluated further.

4.12.7 Merge Mount Street Schools and leave Cradoc as a separate school

See 'Option 3a' in the table in section 7.1 above.

4.12.8 Retain / rebuild Cradoc School

Building a new school in Cradoc was considered and discounted in the Programme Business Case for the Brecon catchment which was considered by the Council's Cabinet in September 2020. Building a new school in Cradoc alone would not address the issues raised in respect of the three schools, therefore alone would not be a viable alternative option. Building a new school in Cradoc is part of 4.2.14 above, therefore the alternative option to retain / rebuild Cradoc school will be considered in the assessment of this option.

4.12.9 Alternative rebuild options for the Mount Street schools

The constraints surrounding the existing sites of Mount Street Infants School and Mount Street Junior School mean that rebuilding these schools in their current location would be challenging. The Council has no other suitable land in Brecon where a new building could be located.

4.12.10 Merge Cradoc with Sennybridge or Priory

Whilst options involving Sennybridge were considered in the Business Case for the Brecon catchment, no options involving Sennybridge were considered in the Consultation Document . The option to merge Cradoc with Sennybridge will be assessed as a reasonable alternative option.

Priory C. in W. School was considered outside the scope of the Business Case for the Brecon catchment, therefore options involving Priory C. in W. School were not considered. The option to merge Cradoc with Priory C. in W. School will be assessed as a reasonable alternative option.

4.12.11 Other suggestions

The suggestions provided within this heading are not considered to be reasonable alternative as the comments provided don't address the challenges faced by Mount Street Infants School, Mount Street Junior School and Cradoc C.P. School.

Therefore the reasonable alternatives that will be assessed are:

- 2 new buildings – 1 in Cradoc, 1 in Brecon
- 1 new building in Brecon, close Cradoc School
- Merge Cradoc with Sennybridge C.P. School
- Merge Cradoc with Priory C. in W. School

Option	Likely impact on quality and standards	Likely impact on the community	Likely impact of different travelling arrangements
<p>2 new buildings – 1 in Cradoc, 1 in Brecon</p>	<p>It is anticipated that this option would have a positive impact on quality and standards at the Mount Street schools through the establishment of one new primary school. This would mean that pupil progression would be monitored throughout pupils' time in primary school, from age 4 to 11, ensuring continuity in delivery and approach. Pupils would also benefit from a new building.</p> <p>Cradoc C.P. School would continue to operate as a standalone school, therefore there would be no impact on quality and standards at Cradoc. Pupils would also benefit from a new building.</p>	<p>The impact on the community would be minimal – provision would continue to be available to the communities currently served by Mount Street Infants School and Mount Street Junior School at a new primary school located in Brecon. Enhanced community facilities could also be provided as part of the new building, which would have a positive impact on the facilities available to the community.</p> <p>Cradoc C.P. School would continue to operate as a separate school in Cradoc, therefore there would be no impact on the Cradoc community. Enhanced community facilities could also be provided as part of the new building, which would have a positive impact on the facilities available to the community.</p>	<p>One new school would be established in Brecon to replace the current Mount Street Infants School and Mount Street Junior School. This may result in an additional distance to school for some pupils, however provision would continue to be available within Brecon, therefore it is not anticipated that the impact on travel would be significant.</p> <p>Cradoc C.P. School would continue to operate as a standalone school in Cradoc, therefore no additional travel would be required for pupils currently attending Cradoc C.P. School.</p>
<p>1 new building in Brecon, close Cradoc C.P. School</p>	<p>It is anticipated that this option would have a positive impact on quality and standards at the Mount Street</p>	<p>Provision would continue to be available in Brecon, therefore the impact on the Brecon community</p>	<p>One new school would be established in Brecon to replace the current Mount Street Infants School</p>

	<p>schools as they would be merged and would move into 1 new building in Brecon. This would mean that pupil progression would be monitored throughout pupils' time in primary school, from age 4 to 11, ensuring continuity in delivery and approach.</p> <p>This option would result in the closure of Cradoc C.P. School. The impact on quality and standards would depend on which school(s) pupils transferred to, however in general there are no concerns about the quality of provision at any of the schools in the Brecon catchment therefore it is not anticipated that the impact on quality and standards would be negative.</p>	<p>would be minimal. Ultimately, there would be a positive impact on the community in Brecon through the provision of one new primary school with enhanced community facilities.</p> <p>Implementation of this option would mean that there would no longer be provision in Cradoc. This would have a negative impact on the Cradoc community, and would result in the loss of primary provision in Cradoc, and a possible loss of any community facilities associated with the school from the village of Cradoc.</p> <p>Respondents suggested that the loss of the school in Cradoc would mean the loss of a community facility, and that a number of extra-curricular and community activities would disappear, impacting on social cohesion and the wellbeing of residents in the area.</p> <p>Responses received during the consultation expressed a strong view that the loss of the school would have a detrimental impact on the community, and this is identified in the Community Impact Assessment. Many respondents noted that Cradoc C.P. School was the heart of the community.</p>	<p>and Mount Street Junior School. This may result in an additional distance to school for some pupils, however provision would continue to be available within Brecon, therefore it is not anticipated that the impact on travel would be significant.</p> <p>Implementation of this option would mean that there would be no longer be provision in Cradoc. This would result in additional travel for pupils for whom Cradoc C.P. School is currently the closest school. Whilst home to school travel would be provided for eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirement for parents in order to access school activities / events.</p> <p>However, a number of pupils that currently attend Cradoc C.P. School live closer to schools located in Brecon. If these pupils transferred to schools in Brecon, this option would lead to a reduction in travel for these pupils.</p>
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<p>Merge Cradoc C.P. School with Sennybridge C.P. School</p>	<p>This option would not impact on Mount Street Infants School and Mount Street Junior School, therefore there would be no impact on quality and standards – pupils would continue to attend either Mount Street Infants School or Mount Street Junior School.</p> <p>Cradoc C.P. School would merge with Sennybridge C.P. School, and one new, larger primary school would be established. There are no concerns in respect of the provision at either Cradoc C.P. School or Sennybridge C.P. School, so it is not anticipated that this option would have a negative impact on quality and standards, and there would be opportunities to improve quality and standards. As a larger school, the headteacher would be able to spend more time on leadership, enabling a greater focus on improving the quality of provision. In addition, there would be a larger team of staff, enabling expertise to be shared across the school and enabling more distributed leadership and professional development opportunities.</p>	<p>This option would not impact on Mount Street Infants School and Mount Street Junior School, therefore there would be no impact on the community in Brecon.</p> <p>There would be no impact on the community in either Cradoc or Sennybridge as provision would remain in both villages.</p>	<p>This option would not impact on Mount Street Infants School or Mount Street Junior School, therefore there would be no impact on travel arrangements for pupils attending these schools.</p>
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<p>Merge Cradoc C.P. School with Priory C. in W. School</p> <p>(for definition purposes, this would mean a 2 sited school as there is no room to expand Priory C.i.W Primary School currently)</p>	<p>This option would not impact on Mount Street Infants School and Mount Street Junior School, therefore there would be no impact on quality and standards – pupils would continue to attend either Mount Street Infants School or Mount Street Junior School.</p> <p>Cradoc C.P. School would merge with Priory C. in W. School, and one new, larger primary school would be established. There are no concerns in respect of the provision at either Cradoc C.P. School or Priory C. in W. School, so it is not anticipated that this option would have a negative impact on quality and standards, and there would be opportunities to improve quality and standards. As a larger school, the headteacher would be able to spend more time on leadership, enabling a greater focus on improving the quality of provision. In addition, there would be a larger team of staff, enabling expertise to be shared across the school and enabling more distributed leadership and professional development opportunities. It must be noted that Cradoc is a community primary school whilst Priory is a Church in Wales primary school, therefore discussion would be needed in</p>	<p>This option would not impact on Mount Street Infants School and Mount Street Junior School, therefore there would be no impact on the community in respect of these two schools.</p> <p>Provision would be retained in Cradoc to accommodate all pupils, therefore there would be no impact on the Cradoc community.</p>	<p>This option would not impact on Mount Street Infants School or Mount Street Junior School, therefore there would be no impact on travel arrangements for pupils attending these schools.</p> <p>Provision would be retained in Cradoc to accommodate all pupils, therefore there would be no impact on travel arrangements for pupils attending Cradoc C.P. School.</p>
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	respect of the denominational status of the new school.		
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7.3 Conclusion

The Consultation Document published in respect of the Proposals for Mount Street Infants School, Mount Street Junior School and Cradoc C.P. School outlined the reasons why change is needed in Powys, as outlined in the Council's Strategy for Transforming Education, which are as follows:

- High proportion of small schools
- Decreasing pupil numbers
- High number of surplus places
- Building condition
- Financial pressures
- Inequality in access to Welsh-medium education
- Limited post-14 and post-16 offer
- Inequality in access to SEN provision
- Historical lack of political decision making

The Consultation Document also outlines the reasons why change is needed in Mount Street Infants School, Mount Street Junior School and Cradoc C.P. School, which are as follows:

Mount Street Infants and Mount Street Junior Schools

- Building condition
- Last remaining infant and junior schools in Powys
- Transition arrangements
- Staff development opportunities

Cradoc C.P. School

- Decreasing pupil numbers

- Building condition
- Building configuration

Having considered the issues raised during the consultation period and having carried out a further assessment of the Proposals and alternative options on the likely impact on quality and standards in education, the likely impact on the community and the likely effect of different travelling arrangements, and having considered any further reasonable alternatives suggested during the consultation period, the Council's view is that the current proposal continues to be the most appropriate response to these reasons outlined for the Proposals, to ensure improved management of the Powys schools estate, and to ensure that the best possible educational opportunities can be provided to the pupils currently attending Mount Street Infants, Mount Street Juniors and Cradoc C.P. School and across Powys in the future. The reasons for the Proposals outlined in the Consultation Document were as follows:

- To offer enhanced opportunities for pupils from attending one new, larger, school
- To enable staff expertise and good practice to be shared across the entire primary age range
- To ensure that all staff at the three current schools have the opportunity to secure positions in the new school
- To provide more flexibility and personal development opportunities for staff
- To provide improved transition arrangements for pupils currently attending Mount Street Infants School and Mount Street Juniors School between the Foundation Phase and Key Stage 2
- To provide access to 21st Century Schools Funding in order to provide a new building
- To reduce the Council's surplus places in primary schools
- To rationalise the primary school estate
- To realise a financial saving

However, as it has taken longer than anticipated to conclude this consultation report, it will no longer be possible to implement the Proposals in accordance with the timescales which were outlined in the Consultation Document, therefore there will be a need to review the implementation timescales. The recommendation is to proceed with the Proposals as outlined in the Consultation Document, however to amend the proposed implementation for Phase 1 to September 2023, and to amend the proposed implementation date for Phase 2 to 2025/26.