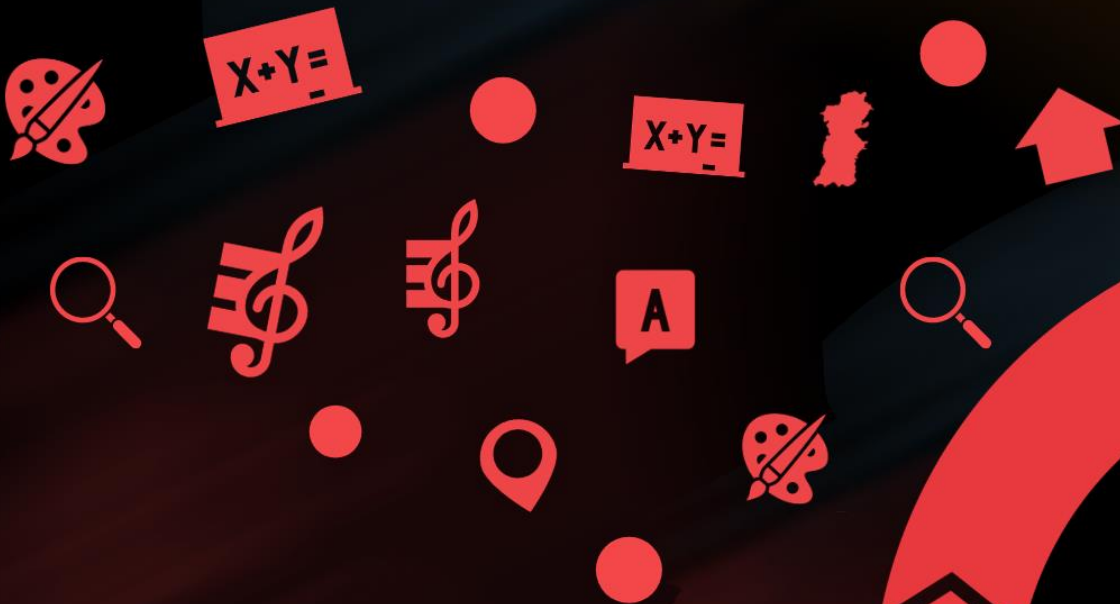




**Proposal to close Llanfihangel Rhydithon
C.P. School**
Objection Report



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Objection Report

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

Objection Report

1. BACKGROUND

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

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

The proposal was as follows:

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

2. SUMMARY OF OBJECTIONS RECEIVED

284 objections were received during the statutory objection period.

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

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

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

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

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

3. SUMMARY OF ISSUES RAISED IN THE OBJECTIONS RECEIVED

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

1. COMMENTS ABOUT LLANFIHANGEL RHYDITHON C.P. SCHOOL

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

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

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

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

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

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

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

1.3 Comments about the school's small size

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

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

1.4 Comments about the friendly nature of Llanfihangel Rhydithon CP School

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

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

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

1.5 Comments about extra-curricular provision at the school

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

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

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

1.6 Comments about pupils' transition to high school

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

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

1.7 Comments about the use of Welsh at the school

1.7.1	Dolau school has also instilled in their children a sense of belonging to Wales, providing positive Welsh language experiences and cultural activities that many a larger school in Powys has yet to provide.	<p>The Council notes these positive comments about the use of Welsh at Llanfihangel Rhydithon C.P. School. Should the Council proceed with the proposal to close Llanfihangel Rhydithon C.P. School, pupils would continue to learn Welsh at the alternative schools. All the alternative schools named in the Consultation Document have signed up to the Siarter Iaith, and are working towards the Bronze Award.</p> <p>One of the key characteristics of the four purposes in the Curriculum for Wales is to develop ambitious, capable learners who can communicate effectively in different forms and settings, using both Welsh and English. All learners should have appropriate pathways for learning Welsh and English to enable them to develop the confidence to use both languages in everyday life. All Powys schools are well supported with excellent resources from the Athrawon Bro Team to enable teachers to teach Welsh. Staff from nearby schools have attended the sabbatical Welsh language course with further staff attending the sabbatical course in Newtown in September 2021. Opportunities to use Welsh within</p>
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		and beyond the classroom (including on digital platforms) support learners to use Welsh confidently and appreciate its usefulness to communication in a bilingual Wales and again all Powys schools are effectively supported with rich resources from the Athrawon Bro Team. Schools, through effective pupil voice forums, known as the 'Criw Cymraeg' plan a range of activities to increase the use of Welsh outside the classroom. Facilitating the use of Welsh, through planned linguistic progression in every phase of education from ages 3 to16, and as part of a whole-school approach, offers opportunities for all learners to develop bilingually and this is a key priority for all schools in Wales.
1.7.2	The school has a Criw Cymraeg which promotes and encourages the children to use the Welsh Language. They do this by playing Welsh games during their break time, they also have "Welsh Phase of the Week". Members from Criw Cymraeg also pick a Welsh Speaker of the week.	As above.
1.7.3	I am confident that the teaching and non-teaching staff at Llanfihangel Rhydithon create an environment immersed in Welsh language and culture. A majority of teaching staff have very good Welsh language skills, some developed on the PCC educational sabbatical scheme, and actively encourage pupils to participate in Welsh language events.	As above.
1.7.4	The school has committed itself to the Welsh language, through the additional training of 3 teachers in a Welsh language training programme which the current Welsh in Education Strategy plan advocates for as a means of staff development in the Welsh language.	As above.
1.7.5	The only thing that Estyn said could be improved in 2019 was an increase in the use of the Welsh language...so teachers	As above.

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

1.8 Comments about the school buildings / grounds / facilities

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

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

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

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

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

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

1.10 Comments about leadership at the school

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

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

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

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

1.11 Comments about school staff

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

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

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

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

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

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

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

1.14 Reference to Friends of Dolau School (FODS)

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

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

2. IMPACT ON PUPILS

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

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

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

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

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

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

2.2 Concern about consultation taking place during the Covid pandemic

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

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

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

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

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

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

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

2.5 Concern about the impact on the quality of education

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

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

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

3.1 The Council would need to provide transport for more pupils

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

3.2 Concern about additional travel time for pupils

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

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

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

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

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

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

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

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

3.5 Concern about the environmental impact of additional travel

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

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

3.6 Comments about additional transport costs

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

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

3.7 Other comments about travel arrangements

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

4. IMPACT ON STAFF

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

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

5. IMPACT ON THE COMMUNITY

5.1 General concerns about the impact on the Dolau community

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

5.2 The school is the heart of the village/community

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

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

5.3 Comments about the community hall

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

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

5.4 Comments about impact on community activities

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

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

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

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

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

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

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

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

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

5.8 Comments about the impact of previous school closures on communities

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

7.3 Other comments

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

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

8.1 Comments about the early years provision at Dolau

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

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

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

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

8.3 Comments about alternative early years provision

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

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

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

9.1 Positive comments about small schools

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

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

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

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

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

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

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

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

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

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

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

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

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

9.7 Reference to the presumption against closure of rural schools

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

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

10.1 Concern about the quality of education in the alternative schools

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

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

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

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

10.3 Comments about Crossgates C.P. School

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

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

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

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

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

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

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

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

10.4 Comments about other schools

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

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

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

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

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

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

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

12. FINANCIAL IMPACT

12.1 Comments about the estimated savings

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

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

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

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

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

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

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

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

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

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

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

12.5 Comments about funding for small and rural schools

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

12.6 Comments about the financial impact on other schools

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

12.7 Other ways in which the Council could save money

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

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

13.1 Comments about the process taking place during the Covid pandemic

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

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

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

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

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

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

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

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

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

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

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

13.5 Comments about the presumption against closing rural schools

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

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

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

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

13.7 Comments about timescales

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

13.8 Comments about potential legal challenge

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

13.9 Other queries relating to the process

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

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

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

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

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

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

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

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

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

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

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

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

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

15. COMMENTS ABOUT DOCUMENTATION

15.1 Comments about the consultation documentation

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

15.2 Comments about the consultation report

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

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

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

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

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

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

15.3 Comments about Estyn's consultation response

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

15.4 Comments about the Statutory Notice

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

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

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

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

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

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

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

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

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

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

17.1 Comments about the Council's Transforming Education Strategy

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

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

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

17.2 Vision 2025

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

17.3 Towards 2040 – the Powys Wellbeing Plan

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

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

17.4 Welsh in Education Strategic Plan (WESP)

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

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

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

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

18. CRITICISM OF THE COUNCIL

18.1 Criticism of county councillors

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

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

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

18.2 Criticism of Council officers

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

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

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

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

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

18.5 Other criticisms

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

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

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

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

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

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

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

19.3 Federation with another school

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

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

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

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

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

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

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