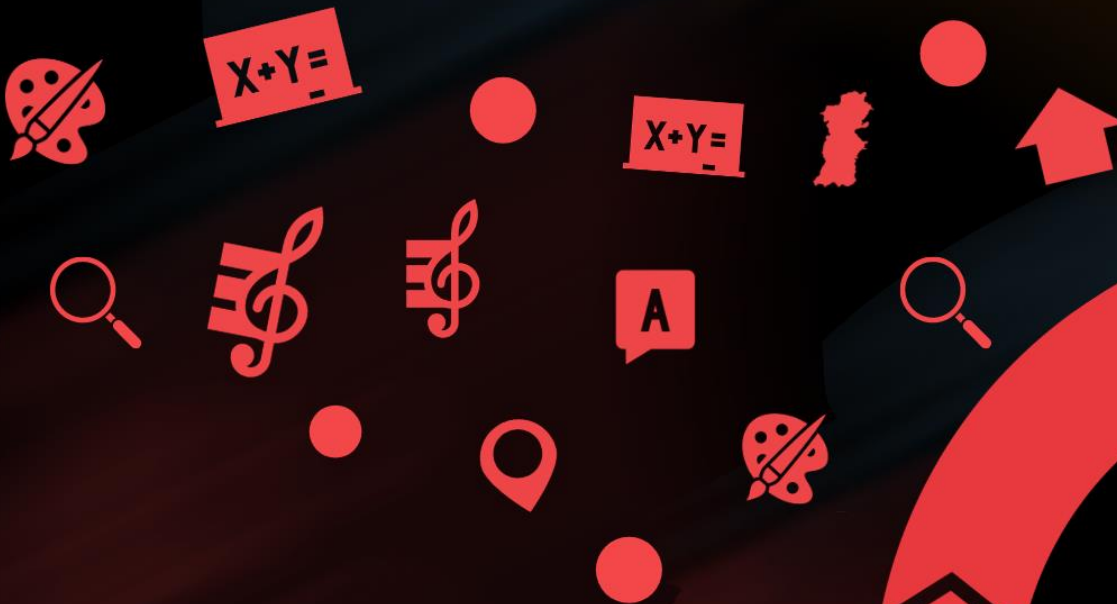




**Proposal to close Llanbedr C. in W.
School**
Objection Report



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Objection Report

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

Objection Report

1. BACKGROUND

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

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

The proposal was as follows:

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

2. SUMMARY OF OBJECTIONS RECEIVED

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

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

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

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

1. Comments about Llanbedr C. in W. School
2. Impact on pupils

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

3. SUMMARY OF ISSUES RAISED IN THE OBJECTIONS RECEIVED

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

1. COMMENTS ABOUT LLANBEDR C. IN W. SCHOOL

1.1 Comments about the quality of provision

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

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

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

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

1.3 Comments about school staff

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

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

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

1.5 Comments about leadership at the school

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

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

1.6 Comments about the school's financial position

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

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

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

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

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

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

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

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

1.9 Comments about equipment at the school

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

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

1.10 Comments about pupil numbers at the school

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

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

1.11 Comments about the school's small size

1.11.1	The school's smaller class numbers offer greater attention and support to pupils.	The Council notes these comments about the class sizes at Llanbedr C. in W. School, and comparing the school with larger schools. Whilst acknowledging that some pupils / parents may
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		<p>prefer smaller schools / classes, the Council faces a challenge due to the high proportion of small schools in the county and the lack of equity amongst schools, as outlined in the Council's Strategy for Transforming Education 2020-30.</p> <p>Llanbedr C. in W. School teaches children in two classes of mixed-age groups, with a third class for pre-school nursery children. With such low pupil numbers the teacher-pupil ratio is notably different to many other schools in the area, and due to the Council's funding formula, the school's funding per pupil is higher than the Council's average. This does not provide equity across the education system – teachers in larger schools are required to provide the same education as smaller schools for less funding per pupil. Powys' Strategy is intended to improve equity across the education system and to ensure an improvement for every pupil's learning entitlement and experience.</p> <p>It is clear that the Council's expenditure on children in the smallest schools is very generous. Through the engagement with stakeholders which took place when developing the Strategy to Transform Education in Powys, it became apparent that there was a need for a vision for a stronger entitlement for all learners in Powys and equity for learners across the county. As the education profession moves towards the realisation of the new Curriculum for Wales, that vision requires the Council to pursue a transformational vision that</p>
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		<p>secures an attractive entitlement and equity for all learners, professional learning for all staff and secure leadership across all schools.</p> <p>The Council's primary specialists have been exploring how the authority can best support schools to deliver the new curriculum for 2022. These education professionals are of the view that this will be significantly more challenging, and will place significantly greater demands on teachers in very small schools. This does not mean that it would be impossible to deliver the new curriculum in these schools but it is clear that the skills required by teachers will need to be very wide ranging to support the full and effective fulfilment of the curriculum's high ambitions.</p> <p>The new Curriculum for Wales is locally influenced and often pupil-led. All schools will design the detail of their own curriculum to suit their learners based on the four purposes and the six Areas of Learning and Experience (AoLE). Learners' views about their experiences and about what, how and where they learn should be taken seriously when a curriculum is being designed. The school's curriculum needs to be co-constructed, encouraging learners, parents, carers and the local community to understand and contribute to its development. It should also draw on a wider range of experts and stakeholders who can contribute to learning.</p>
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		<p>The curriculum needs to be innovative and creative. Teachers, with pupils, will select the content, with no prescription on how areas should be taught, but with guidance provided nationally on a wide range of widely-recognised pedagogical principles. Additionally, planning and designing the curriculum in schools is a teacher responsibility, not one for support staff.</p> <p>Teachers in two class schools would need to plan for a mixed age range for all Areas of Learning and Experience. In some cases, this could involve preparing for and delivering for up to four different year groups for all six AoLEs. To ensure equity for learners, leaders and teachers across Wales, there needs to be a shared understanding of learner progression, including expectations around what progression may look like and the pace at which learners progress. This shared understanding is being developed through professional learning and dialogue, as an ongoing process both within and across schools. Practitioners can share and learn from each other's understanding of progression and adapt their teaching in the light of what is learned. This will be particularly challenging in a very small school with only two teachers, for example. If a member of staff is linking up with practitioners from other schools for all 6 AoLEs and across a wide age range they would need to be away from their class for a far greater amount of time than a teacher teaching a single year group or two year groups in a</p>
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		<p>class, and who also leads on behalf of the whole school on a single AoLE such as Humanities.</p> <p>High levels of flexibility and organisation are needed in lesson planning to ensure that teaching caters for both age groups and all abilities within the class. This additional workload is a risk that the education profession needs to manage together, given the limited numbers of teachers to carry the additional roles and responsibilities in a very small school. These schools not only have fewer qualified teachers in school to design the curriculum, but generally the limited numbers of staff will in all probability between them have a narrower range of disciplinary-specific expertise for the learners in that school than would probably be the case in a large school. In a larger school, each member of staff can lead on a specified area where they may have an appropriate background and in which they can continue to gain growing levels of expertise. Effective learning and teaching requires disciplinary-specific expertise which will become increasingly relevant in developing a curriculum as learners progress. Although the guidance promotes inter-disciplinary approaches, it also recognises the importance that disciplinary-specific expertise plays in such approaches.</p> <p>A significant responsibility for the Council, and others, over the coming years will be to ensure that every learner in Powys benefits from the step</p>
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		<p>change that is anticipated through the changing curriculum. The Council will work with all the schools in our care, of whatever size, and will provide significant support, whilst also encouraging collaboration. However, it would be inappropriate if officers of the authority did not stress the additional demands on staff in very small schools, whilst doing all we can to facilitate the lightening of the load.</p> <p>Additionally, it is only fair that professional primary experts within the Council comment on the balance of potential risks and benefits to a child when being taught by the same person over 3 or 4 years of their primary education.</p> <p>It is the view of primary experts within the Council that mixed age classes of more than 2 years provide a challenge to teachers where they must constantly adapt their approach. As a result, a high level of flexibility and organisation in lesson planning is required to ensure that teaching caters for both age groups and all abilities within the class. This is an additional workload on teachers and leaders who have a range of other roles and responsibilities in a small school.</p> <p>Teachers in very small schools need to plan, implement and assess for the needs of up to four year groups within one class, and within each of those year groups plan, implement and assess for up to several ability groups, some with complex needs, thereby ensuring that the planning is</p>
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		<p>differentiated for each child's needs. Larger schools have a greater level of staffing and single year group classes or a mixed year class of no more than usually 2 years.</p>
1.11.2	<p>We don't have large class sizes of over 30 children at Llanbedr, whilst many schools do.</p>	<p>As above.</p> <p>Current class sizes at the alternative schools in the Crickhowell catchment are as follows:</p> <p><u>Llangattock C. in W. Primary School</u></p> <ul style="list-style-type: none"> • Reception/Year 1 – 18 pupils • Year 1/2 – 27 pupils • Year 3/4 – 30 pupils • Year 5/6 – 28 pupils <p><u>Crickhowell C.P. School:</u></p> <ul style="list-style-type: none"> • Reception – 19 pupils • Yr 1 – 22 pupils • Yr 2 – 27 pupils • Yr 3 – 26 pupils • Yr 4 – 35 pupils • Yr 5 – 29 pupils • Yr 6 – 30 pupils <p><u>Llangynidr C.P. School:</u></p> <ul style="list-style-type: none"> • Reception/Year 1 12/19 = 31 • Year 2/Year 3 11/15 = 26

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

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

1.12 Comments about pupil engagement

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

1.13 Comments about nursery / early years provision at the school

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

1.14 Links between the school and the community

1.14.1	The school is committed to its local community.	<p>The Council fully acknowledges the links between Llanbedr C. in W. School and the community, the important role the school plays in the community, and in terms of community events.</p> <p>The potential impact of closure of the school on the community has been recognised in the Consultation Document, the draft Community Impact Assessment, the Consultation Report and the updated Impact Assessment document.</p> <p>The Impact Assessment document has been further updated to reflect comments raised in the Objections received, and the updated document will be considered again by the Council's Cabinet when determining whether or not to proceed with the proposal.</p>
1.14.2	Llanbedr school plays an important part of the local community, helping to act as a glue to bring the community together.	As above.
1.14.3	The school is very integrated with the local community.	As above.

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

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

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

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

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

2. IMPACT ON PUPILS

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

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

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

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

2.2.1	There has been insufficient consideration of the mental health and well being of the pupils during Covid.	The Council recognises that the last couple of years have been difficult for all, including pupils and their families, due to the Covid pandemic. The Council also recognises that any school reorganisation proposal creates a period of uncertainty and concern for all involved, including children, and that this has been exacerbated due to the process taking place whilst the Covid pandemic has been ongoing.
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2.2.2	Closing the school will have a massive impact on the children’s mental health in an already challenging time.	As above.
2.2.3	I question why are you considering destroying the lives of these children further, at a time that humanity is witnessing the devastating impact of Covid 19 on the most vulnerable in our society.	As above.

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

2.3 Concern about pupils being separated from their friends

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

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

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

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

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

		Support would be provided by staff in all schools to support children to settle in to new environments.
2.4.3	At this point in their school life children need continuity and stability with familiar faces around them and the support of their teachers.	<p>The Council recognises that any school reorganisation process creates a period of uncertainty for all involved, including children. The Council is committed to supporting schools and learners, including through periods of change. An experienced member of staff from the Council is supporting school leaders effectively to help them manage possible changes for their learners.</p> <p>It is also expected that school governors, staff and parents support the children to ensure that there isn't a detrimental impact on their wellbeing.</p> <p>Schools receiving pupils as a result of a school closure are expected to work with the closing school, the pupils and their families to provide full support to pupils to ensure a smooth transition.</p>
2.4.4	Many children can't thrive in a large school. The children deserve better.	<p>Whilst acknowledging that some pupils / parents may prefer a smaller school, all schools, regardless of size, are required to support, challenge and nurture all pupils to achieve their full potential, and are able to provide for the needs of their pupils.</p> <p>Attending a smaller school does not necessarily mean that pupils receive a better or more individual education as there are a number of year groups and a wider age range of pupils in each class.</p>

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

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

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

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

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

3. TRAVEL IMPLICATIONS

3.1 Concern about additional travel time for pupils

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

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

3.2 Comments about additional transport costs

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

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

3.3 Environmental impact of additional travel

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

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

3.4 The additional travel would impact on parents / families

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

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

3.5 Impact on traffic congestion in the area

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

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

4. IMPACT ON THE COMMUNITY

4.1 General concern about impact on the community

4.1.1	Closure of the school would without a doubt change this local community.	<p>The Council acknowledges the school's central role in the community, and that there would be a negative impact on the community should Llanbedr C. in W. School close. This was recognised in the Consultation Document and the draft Community Impact Assessment.</p> <p>A number of comments were received during the consultation period which expressed concern about the proposal's impact on the community. These were listed in the Consultation Report. The impact assessments were also updated to reflect the comments received during the consultation period. The Consultation Report and updated impact</p>
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		<p>assessments were considered by the Council's Cabinet when determining whether or not to proceed with the proposal to close the school.</p> <p>Concern about the proposal's impact on the community has also been raised in the objections received, and these concerns are listed in this Objection Report. The Impact Assessment document has been further updated to reflect comments received in the Objections, and the Objection Report and updated impact assessment document will be considered by the Council's Cabinet when determining whether or not to proceed with the proposal to close the school.</p>
4.1.2	Closure of the school would be devastating for everyone in the area.	As above.
4.1.3	Removing the school from Llanbedr would have a dramatic and long term effect on the community in Llanbedr.	As above.
4.1.4	Closure of the school would irretrievably damage the already fragile rural community which would then impact on the wider local economy.	As above.
4.1.5	The school is a vital community asset which must be seen as a critical building block for a future development plan for the area.	As above.

4.2 The school is the heart of the community

4.2.1	This is a rural school that is at the heart of the community	The Council acknowledges the school's central role in the community, and that there would be a negative impact on the community should Llanbedr C. in W. School close. This was recognised in the
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		<p>Consultation Document and the draft Community Impact Assessment.</p> <p>A number of comments were received during the consultation period which expressed concern about the proposal's impact on the community. These were listed in the Consultation Report. The impact assessments were also updated to reflect the comments received during the consultation period. The Consultation Report and updated impact assessments were considered by the Council's Cabinet when determining whether or not to proceed with the proposal to close the school.</p> <p>Concern about the proposal's impact on the community has also been raised in the objections received, and these concerns are listed in this Objection Report. The Impact Assessment document has been further updated to reflect comments received in the Objections, and the Objection Report and updated impact assessment document will be considered by the Council's Cabinet when determining whether or not to proceed with the proposal to close the school.</p>
4.2.2	The school forms the centre of a growing and thriving community.	As above.
4.2.3	The school is the heart of this community and our parish.	As above.
4.2.4	If the school closes the heart of Llanbedr will be gone.	As above.

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

4.3 Concern about the impact on community activities

4.3.1	<p>Many events take place at the school with which the wider community are involved or attend. These are likely be lost if the school closes, and the community will become a poorer place as a result.</p>	<p>The Council acknowledges the school's central role in the community, and that there would be a negative impact on the community should Llanbedr C. in W. School close. This was recognised in the Consultation Document and the draft Community Impact Assessment.</p> <p>A number of comments were received during the consultation period which expressed concern about the proposal's impact on the community. These were listed in the Consultation Report. The impact assessments were also updated to reflect the comments received during the consultation period. The Consultation Report and updated impact assessments were considered by the Council's Cabinet when determining whether or not to proceed with the proposal to close the school.</p> <p>Concern about the proposal's impact on the community has also been raised in the objections received, and these concerns are listed in this</p>
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		Objection Report. The Impact Assessment document has been further updated to reflect comments received in the Objections, and the Objection Report and updated impact assessment document will be considered by the Council's Cabinet when determining whether or not to proceed with the proposal to close the school.
4.3.2	Closure of the school would see the devastating loss of the many local events that are held there with its strong connection with the church and our community will lose a valuable social structure and link.	As above.
4.3.3	The Community Impact Assessment shows a lack of understanding on the impact it would have on the community by suggesting that the village hall would be an alternative location for gatherings when it is the school and its children which are at the core and driving force of community events and once scattered will be irretrievable.	As above. The Community Impact Assessment states that there is a village hall in the village which is located separately to the school, and which would continue to be available to the community to hold community events should the school close. Whilst acknowledging the important role the school plays in respect of community events, it remains the case that a community building would continue to be available in the village in which community events could take place, should there be no school in the village.

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

4.4.1	There is a very real threat that closing the school would mean young and future families would no longer find the area suitable and would look to settle elsewhere.	The Council acknowledges the school's central role in the community, and that there would be a
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		<p>negative impact on the community should Llanbedr C. in W. School close.</p> <p>Comments were received during the consultation period which expressed concern that closure of the school would mean that people would not want to live in Llanbedr. These were listed in the Consultation Report. The impact assessments were also updated to reflect comments received during the consultation period. The Consultation Report and updated impact assessments were considered by the Council's Cabinet when determining whether or not to proceed with the proposal to close the school.</p> <p>Concern that the proposal would mean that people would not want to live in Llanbedr in the future has also been raised in the objections received, and these concerns are listed in this Objection Report. The Impact Assessment document has been further updated to reflect comments received in the Objections, and the Objection Report and updated impact assessment document will be considered by the Council's Cabinet when determining whether or not to proceed with the proposal to close the school.</p>
4.4.2	If the school closed, Llanbedr will become the exclusive preserve of holiday lets and retirees.	As above.

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

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

4.5.1	The school provides a place where many living in the potentially isolated, rural pockets of the community can meet.	<p>The Council acknowledges the school's central role in the community, and in particular these comments which express concern about the impact of closure of the school on community well-being, suggesting that it would result in increased isolation.</p> <p>A number of comments were received during the consultation period which expressed concern about the proposal's impact on the community. These were listed in the Consultation Report. The impact assessments were also updated to reflect the comments received during the consultation period. The Consultation Report and updated impact</p>
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		<p>assessments were considered by the Council's Cabinet when determining whether or not to proceed with the proposal to close the school.</p> <p>Concern about the proposal's impact on the community has also been raised in the objections received, and these concerns are listed in this Objection Report. The Impact Assessment document has been further updated to reflect comments received in the Objections, and the Objection Report and updated impact assessment document will be considered by the Council's Cabinet when determining whether or not to proceed with the proposal to close the school.</p>
4.5.2	Closure of the school would sever important community links for parents moving to the area. Where else would they meet people in a similar situation and integrate into the community?	As above.
4.5.3	Closure of the school would severely disadvantages new parents and will promote loneliness and isolation and presents a real risk of mental harm to new mothers in particular.	As above.
4.5.4	The dispersal of children to up to six different schools will have serious consequences for the well-being and social cohesion of the area.	As above.
4.5.5	The mental health effect of closing the school on children, parents and others in the community will be nothing but negative.	As above.

4.6 Comments about the impact of previous school closures on communities

4.6.1	<p>The closure of Cwmdu Church in Wales school some time ago has completely changed the village. People no longer move there because of the school and long time residents do not feel a bond with the schools their children now have to go to.</p>	<p>The Council acknowledges these concerns about the impact previous school closures have had on the communities in which they are located. However, the Council, like all other local authorities, has a duty to plan effective school organisation and to manage its schools infrastructure effectively, and, as a result, schools have been closed over the years.</p> <p>The Council fully acknowledges the potential negative impact of the proposal to close Llanbedr C. in W. School on the community. This has been acknowledged in the documentation considered by Cabinet as part of the process, and will also be included in the Objection Report and updated impact assessment which are considered by Cabinet when making a final decision on whether or not to proceed with implementation of the proposal.</p>
4.6.2	<p>Closure of our own village school had a negative impact not only on the children but the local community, with children from one year group not only attending a variety of schools but also attending schools across different boroughs – Powys, Monmouthshire, Torfaen and Blaenau Gwent.</p>	<p>As above.</p>
4.6.3	<p>Please reconsider and reflect on the effect other school closures have had on our rural communities.</p>	<p>As above.</p>

5. COMMENTS ABOUT HOUSING DEVELOPMENTS IN THE AREA

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

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

6. COMMENTS ABOUT OTHER SCHOOLS PUPILS MIGHT TRANSFER TO

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

6.1.1	There is a lack of available spaces to absorb pupils in any single alternative school.	<p>The current capacities and pupil numbers¹ of the three other primary schools in the Crickhowell catchment are as follows:</p> <p>Crickhowell C.P. School Capacity – 230 Current pupil numbers – 186</p> <p>Llangattock C. in W. School Capacity – 121 (exc. Nursery) Current pupil numbers – 117 pupils (N – Yr 6); 104 pupils (R – Yr 6)</p> <p>Llangynidr C.P. School Capacity – 147 Current pupil numbers – 108</p>
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¹ Teachers Centre 20th January 2022

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

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

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

		<p>School leaders manage their class structure according to pupil numbers and the needs of pupils. Should the Council proceed with the current proposal to close Llanbedr C. in W. School, and should this lead to an increase in pupil numbers at Crickhowell C.P. School, it is possible that the school would need to review its class structure to ensure that suitable provision was provided for all learners, and that the provision was in-line with Welsh Government guidance.</p>
6.2.4	<p>The increased class sizes at Crickhowell School are clearly to the detriment to children, particularly those who are especially young or fall behind for other reason.</p>	<p>As above.</p>
6.2.5	<p>Concern about bullying at Crickhowell C.P. School.</p>	<p>The Council acknowledges this concern about bullying at Crickhowell C.P. School.</p> <p>Llanbedr C. in W. School is a small school, and therefore it is possible that there are fewer incidents of bullying at this school than at larger school, such as Crickhowell C.P. School. However, bullying can occur in all schools, and the important issue is how the school responds to bullying when it occurs, addressing the needs of both the young person who has experienced the bullying and the young person who has carried out the bullying.</p> <p>All schools have anti-bullying policies in place, which are regularly reviewed, and these are part of the Safeguarding arrangements within those schools.</p>

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6.3 Comments about Llangattock School

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

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

6.4 Comments about Llangynidr School

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

6.5.1	Llangorse and Priory Schools are also full	<p>The current capacities and pupil numbers² of Llangorse C. in W. School and Priory C. in W. School are as follows:</p> <p>Llangorse C. in W. School Capacity – 178 Current pupil numbers – 165 (N – Yr 6); 148 (R – Yr 6)</p> <p>Priory C. in W. School Capacity – 165 Current pupil numbers – 158 (R – Yr 6)</p>
6.5.2	Llangorse and Priory Schools are not realistic options as they are not in the Crickhowell area – pupils would wish to remain with their friends.	Should the Council proceed with the proposal to close Llanbedr C. in W. School, the expectation is that pupils would transfer to alternative schools in the Crickhowell catchment area, or in other local authorities for pupils living outside Powys.

² Teachers Centre 20th January 2022

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

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

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

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

6.7 Other comments

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

7. COMMENTS ABOUT CHURCH IN WALES PROVISION

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

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

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

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

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

7.2 Reference to the School Organisation Code

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

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

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

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

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

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

8.1 Llanbedr School is already delivering the Curriculum for Wales

8.1.1	<p>The school is delivering on the new Welsh curriculum and will continue to develop its expertise in this, as are other schools.</p>	<p>The Council recognises that Llanbedr C. in W. School is preparing well for the implementation of the new Curriculum for Wales.</p> <p>The Council's primary specialists have been exploring how the authority can best support schools to deliver the new curriculum for 2022. These education professionals are of the view that this will be significantly more challenging and will place significantly greater demands on teachers in very small schools. This does not mean that it would be impossible to deliver the new curriculum in these schools but it is clear that the skills required by teachers will need to be very wide ranging to support the full and effective fulfilment of the curriculum's high ambitions.</p> <p>The new Curriculum for Wales is locally influenced and often pupil-led. All schools will design the detail of their own curriculum to suit their learners based on the four purposes and the six Areas of Learning and Experience (AoLE). Learners' views about their experiences and about what, how and where they learn should be taken seriously when a curriculum is being designed. The school's curriculum needs to be co-constructed, encouraging learners, parents, carers and the local community to understand and contribute to its development. It should also draw on a wider range of experts and stakeholders who can contribute to learning.</p>
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		<p>The curriculum needs to be innovative and creative. Teachers, with pupils, will select the content, with no prescription on how areas should be taught, but with guidance provided nationally on a wide range of widely-recognised pedagogical principles. Additionally, planning and designing the curriculum in schools is a teacher responsibility, not one for support staff.</p> <p>Teachers in very small schools would need to plan for a mixed age range for all Areas of Learning and Experience. In some cases, this could involve preparing for and delivering for up to four different year groups for all six AoLEs. To ensure equity for learners, leaders and teachers across Wales, there needs to be a shared understanding of learner progression, including expectations around what progression may look like and the pace at which learners progress. This shared understanding is being developed through professional learning and dialogue, as an ongoing process both within and across schools. Practitioners can share and learn from each other's understanding of progression and adapt their teaching in the light of what is learned. This will be particularly challenging in a very small school with only two teachers, for example. If a member of staff is linking up with practitioners from other schools for all 6 AoLEs and across a wide age range they would need to be away from their class for a far greater amount of time than a teacher teaching a single year group or two year groups in a</p>
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		<p>class, and who also leads on behalf of the whole school on a single AoLE such as Humanities.</p> <p>Good learning and teaching challenges all learners by encouraging them to recognise the importance of sustained effort in meeting expectations that are high but achievable for them. This is one of the 12 pedagogical principles in the new curriculum and all teachers need to engage effectively with research and professional development to enable them to have high expectations of all learners and develop as 'high expectation' teachers who have more positive attitudes towards learners and more effective teaching practices. This is a priority for the Council to ensure equity for all learners.</p>
8.1.2	Llanbedr leads the cluster in the development and introduction of the new curriculum.	As above.
8.1.3	The staff at Llanbedr are leading the way in teaching the new curriculum.	As above.
8.1.4	The new curriculum is already being successfully introduced.	As above.
8.1.5	Llanbedr School has been at the forefront of the development and implementation of the new curriculum in Powys and has been seen by Powys CC as an exemplar of good practice	As above.
8.1.6	The school have been working tirelessly on implementing the new curriculum for some time to the point that the headteacher leads the cluster in meetings as to how the new curriculum should be implemented! This alone suggests that your argument is deeply flawed.	As above.
8.1.7	Llanbedr school, within the Crickhowell Cluster, had been leading on elements of the new curriculum and has been a	As above.

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

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

8.2.1	<p>A recent question in the Senedd to the minister of education and Estyn confirmed that a small school does not prohibit the implementation of the new curricula or indicate any issues with the implementation. Powys has alleged it does, but have provided no evidence in support of this claim.</p>	<p>The Welsh Government's definition of a small school is a school with 91 pupils or less.</p> <p>Teachers in very small schools would need to plan for a mixed age range for all Areas of Learning and Experience. In some cases, this could involve preparing for and delivering for up to four different year groups for all six AoLEs. To ensure equity for learners, leaders and teachers across Wales, there needs to be a shared understanding of learner progression, including expectations around what progression may look like and the pace at which learners progress. This shared understanding is being developed through professional learning and dialogue, as an ongoing process both within and across schools. Practitioners can share and learn from each other's understanding of progression and adapt their teaching in the light of what is learned. This will be particularly challenging in a very small school with only two teachers, for example. If a member of staff is linking up with practitioners from other schools for all 6 AoLEs and across a wide age range they would need to be away from their class for a far greater amount of time than a teacher teaching a single year group or two year groups in a</p>
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		class, and who also leads on behalf of the whole school on a single AoLE such as Humanities.
8.2.2	The closure proposal by the LA has frequently claimed that small schools will struggle to deliver the new curriculum in Wales. This is an assumption which is not backed up by evidence and is counter to the views of the Education Minister in the Welsh Government and the position taken by Estyn.	As above
8.2.3	Neither Estyn nor the Welsh Education Minister have indicated that small schools are unable to deliver the New Curriculum	Very small primary schools can deliver the new curriculum, however, it will be significantly more challenging and will place significantly greater demands on teachers in very small schools. This does not mean that it would be impossible to deliver the new curriculum in these schools but it is clear that the skills required by teachers will need to be very wide ranging to support the full and effective fulfilment of the curriculum's high ambitions. Teachers in very small schools would need to plan for a mixed age range for all Areas of Learning and Experience. In some cases, this could involve preparing for and delivering for up to four different year groups for all six AoLEs. To ensure equity for learners, leaders and teachers across Wales, there needs to be a shared understanding of learner progression, including expectations around what progression may look like and the pace at which learners progress. This shared understanding is being developed through professional learning and dialogue, as an ongoing process both within and across schools. Practitioners can share and learn from each other's understanding of progression and adapt their teaching in the light of what is learned.

		This will be particularly challenging in a very small school with only two teachers, for example. If a member of staff is linking up with practitioners from other schools for all 6 AoLEs and across a wide age range they would need to be away from their class for a far greater amount of time than a teacher teaching a single year group or two year groups in a class, and who also leads on behalf of the whole school on a single AoLE such as Humanities.
8.2.4	Powys claims that small schools are not suited to delivering the new curriculum. But, as I understand, no evidence has been produced that that Llanbedr is failing in this, and have admitted that it is an excellent school.	As above
8.2.5	Powys County Council claims that small schools are not suited to delivering the new curriculum and yet Llanbedr is already teaching the new curriculum, and staff there are mentoring other (larger) schools as they introduce it.	All Powys schools are working towards the implementation of the new curriculum. Schools are working in collaboration across their clusters and supporting each other. The schools in the Crickhowell cluster are sharing approaches and plans with each other rather than any one school taking the lead.
8.2.6	You have provided zero evidence to support your view that small schools cannot implement the new curriculum, yet you use this as an argument to close the school. I see no evidence from Estyn or the Welsh Government to support your view. With respect, I fail to see how Lynette Lovell's opinion could possibly outweigh the opinion of the Welsh Govt or Estyn.	Please see comment 8.1.1
8.2.7	My understanding is the new curriculum is based on models used in New Zealand and Scandinavia and very successfully adapted to small rural school environments. Where is the independent expert evidence this will not work?	Please see comment 8.1.1

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

8.3 Other comments

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

9. COMMENTS ABOUT SMALL AND RURAL SCHOOLS

9.1 Positive comments about small schools

9.1.1	A smaller school is much more suitable for some children.	The Council notes these comments about small schools. Whilst the Council recognises that some parents prefer smaller schools, all schools, regardless of size, are required to support, challenge and nurture all pupils to achieve their full
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		<p>potential, and are able to provide for the needs of their pupils. Attending a smaller school with smaller class sizes would not necessarily mean that pupils receive a more individual education as there are a number of year groups and a wider age range of pupils in the class.</p> <p>As stated in the Council's Strategy for Transforming Education 2020-2030, the Council faces a challenge due to the high proportion of small schools in the county and the lack of equity amongst schools. Powys' Strategy is intended to improve equity across the education system and to ensure an improvement for every pupil's learning entitlement and experience.</p> <p>It also remains the case that the Council is concerned about the challenge facing very small schools in delivering education at a time of significant change.</p>
9.1.2	There is nothing inherently wrong with a small school.	As above.
9.1.3	I also feel it is a great advantage to have small, mixed age classes where older pupils learn to take responsibility for younger pupils both in class and at play.	As above.
9.1.4	Smaller schools better enable pupils to develop social skills and the ability to care for others, which will ensure that they grow up to be socially responsible adults, which will benefit the communities in which they live. These skills must be learned in a school community which is small enough for all the pupils to	As above.

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

9.2 Concerns about larger schools

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

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

9.3 Comments about rural schools

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

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

9.4 There is a need for choice

9.4.1	We need a mix of small and large schools.	<p>The Council recognises that parents are able to choose any school for their child(ren) to attend but there is no requirement to provide a range of schools according to size.</p> <p>In terms of the choice of a small school, the Welsh Government's definition of a small school is a</p>
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		<p>school that has fewer than 91 pupils. In Powys, there are 33 schools with fewer than 91 pupils. However, the Council has a duty to maintain an equitable schools infrastructure across a large and sparsely populated county.</p> <p>The Council's Strategy for Transforming Education in Powys 2020-30 was developed following an extensive engagement exercise with schools and other stakeholders. One of the challenges facing Powys, as identified in that engagement exercise, was the fact that the county has too many small schools.</p> <p>Should the Council proceed with the proposal to close the school, parents could apply for a place for their child(ren) at any alternative school they choose, and could apply for a place in a smaller school in the catchment should that be their preference.</p>
9.4.2	Whatever the curriculum, there must be choice for parents too.	As above.
9.4.3	Currently parents have choice.	As above.
9.4.4	Whilst some children excel wherever they are educated, some do not. Some benefit from the competitive element and facilities a large school offers, some prefer the close knit, nurturing environment a small school affords. There is a need for both.	Whilst acknowledging that some pupils / parents may prefer smaller schools, the Council faces a challenge due to the high proportion of small schools in the county and the lack of equity amongst schools, as outlined in the Council's Strategy for Transforming Education in Powys 2020-30.

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

10. COMMENTS ABOUT FINANCE

10.1 Cost per pupil

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

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

10.2.1	<p>This seems to be purely a money making exercise by Powys County Council and appears extremely poorly thought out and researched.</p>	<p>As stated in the Council's Strategy for Transforming Education in Powys 2020-30, the Council faces a challenge due to the high proportion of small schools in the county and the lack of equity amongst schools. Llanbedr C. in W. Primary School teaches children in three classes of mixed aged groups. With such low pupil numbers the teacher-pupil ratio is notably different to many other schools in the area, and due to the Council's funding formula, the school's funding per pupil is higher than the Council's average. This does not provide equity across the education system - teachers in larger schools are required to provide the same education as smaller schools for less funding per pupil. Powys' Strategy is intended to improve equity across the education system and to ensure an improvement for every pupil's learning entitlement and experience.</p> <p>It is clear that the Council's expenditure on children in the smallest schools is very generous, but through all of the engagements with stakeholders and the subsequent development of the Strategy to Transform Education in Powys, it is very apparent that there needs to be a vision for a stronger entitlement for all learners in Powys and equity for</p>
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		learners across the county. That vision, as the education profession moves towards the realisation of the new Curriculum for Wales does require the Council to pursue a transformational vision that secures an attractive entitlement and equity for all learners, professional learning for all staff and secure leadership across all schools.
10.2.2	I believe that the closure of this thriving school is entirely a cost cutting exercise with zero consideration given to the impact on the children and community.	As above.
10.2.3	Closing the school for financial gain is morally wrong the school is achieving and delivering education above other schools.	As above.
10.2.4	The only reason for closure is money – this is not a valid reason to lose an amazing educational setting like Llanbedr.	As above.
10.2.5	Learners’ interests should always be at the forefront of any decisions, not cost.	As above.
10.2.6	The proposals are to save money which is against the interest and well-being of the children.	As above.

10.3 Queries about where the savings would go

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

		the elected representatives of the taxpayers of the county.
10.3.6	The amount purported to be saved will be swallowed in a jiffy on expenses, perks for the great and the good, subsidising the canteen for Powys whilst staff whilst OAPs at the Day Centres pay twice or four times as much for their lunch.	As above, Powys County Council always strives to provide value for money in the delivery of its services, constantly seeking out cost savings and efficiencies, including service transformation across all service areas.

10.4 Other comments

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

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

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

11.1 Criticism of county councillors

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

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

11.2 Criticism of Council officers

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

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

12. COMMENTS ABOUT THE PROCESS

12.1 Comments about the process taking place during the Covid pandemic

12.1.1	We believe PCC used the mask of a COVID pandemic to force this decision.	<p>The Council recognises that the last couple of years have been difficult for all due to the Covid pandemic. The Council also recognises that any school reorganisation proposal creates a period of uncertainty and concern for all involved, including children, and that this has been exacerbated due to the process taking place whilst the Covid pandemic has been ongoing.</p> <p>Following Estyn's inspection of Powys Education Services in 2019, the Council started to develop a</p>
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		<p>new Strategy for Transforming Education in Powys, which was approved in April 2020. In order to address the issues raised by Estyn regarding the organisation of its schools, it was necessary for the Council to continue with the development and consultation on proposals during the pandemic.</p> <p>The process has been carried out in accordance with the School Organisation Code, and the level and detail of responses received to all recent consultations outlines that stakeholders have engaged fully in these processes, even though there have been restrictions in place.</p>
12.1.2	In an unprecedented time when community and mental wellbeing have been championed, Powys County Council have proposed a cruel and divisive proposal to its residents, voters and tax payers.	As above.

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

12.2.1	Powys County Council have not taken the wishes of the parents, pupils or local community into account - any worries or concerns have just been dismissed.	The Council produced a 287 page consultation report which outlines the comments received during the consultation period. This report, and the issues outlined in the report, were considered by the Council's Cabinet when determining whether or not to proceed with the proposal to close the school, as well as updated versions of the impact assessments which reflected feedback received during the consultation period.
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12.2.2	The points raised during the consultation process appear to have been ignored.	As above.
12.2.3	I wrote to the councillors with my concerns before the decision was made and was given a generic, unhelpful response saying that my concerns would be addressed in the Consultation Report. My concerns have not been addressed, and I still feel closure is an immoral decision.	As above.

12.3 The decision is pre-determined

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

12.4 Suggestions that the process has not been carried out correctly

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

12.5 Comments about meetings with the Portfolio Holder

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

12.6 Comments about the presumption against closing rural schools

12.6.1	The proposal contradicts the presumption against closing rural schools.	<p>Section 1.8 of the Welsh Government's School Organisation Code outlines the steps that proposers need to take when bringing forward proposals for rural schools.</p> <p>It also states that this:</p> <p><i>'does not mean that a rural school will never close but the case for closure must be strong and all viable alternatives to closure must have been conscientiously considered by the proposer, including federation'.</i></p> <p>The Council has carried out these steps during the formation of the Proposal Paper that was considered by Cabinet in February, and carried out the additional steps required in the preparation of the Consultation Report which was considered by the Council's Cabinet in November 2021.</p>
12.6.2	I object to the closure of Llanbedr School as the Rural Schools Policy has in no way been followed.	As above.

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

12.7 Comments about potential Judicial Review

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

12.8 General criticism of the proposal

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

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

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

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

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

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

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

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

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

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

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

14.1 Comments about consultation documentation

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

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

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

14.2.3	Pupils from military families [1.18.1 – 1.18.3 all with ‘comment noted’] and 5.2.3	<p>The Council notes this comment that the response provided to all comments relating to pupils from military families was ‘comment noted’. Where a comment is noted, the comment does not require a response, however this does not mean that the comments have not been taken into consideration by the Cabinet when deciding whether or not to proceed with the proposal.</p> <p>As well as the comments included in Consultation Report, reference was also made to the potential impact on pupils from military families in the updated impact assessments which were also considered by Cabinet when determining whether or not to proceed with the proposal.</p> <p>Comments about the potential impact on military families were also received in some of the Objections received, therefore concern about the impact on military families is also noted in this Objection Report, which will be considered by the Council’s Cabinet when determining whether or not to proceed with implementation of the proposal.</p>			
14.2.4	<p>I am very disappointed in this report: slight, far too many similar copy-and-paste responses, and far too many ‘comments noted’. Additionally there is some very poor editing, such as:</p> <table border="1" data-bbox="360 1305 1249 1366"> <tr> <td data-bbox="360 1305 427 1366">1.21.3</td> <td data-bbox="427 1305 875 1366">Llanbedr School has very strong non-educational advantages. This is helped by the third-party funding it receives from past and present parents, and pupils in one form or another.</td> <td data-bbox="875 1305 1249 1366">As 1.21.3</td> </tr> </table>	1.21.3	Llanbedr School has very strong non-educational advantages. This is helped by the third-party funding it receives from past and present parents, and pupils in one form or another.	As 1.21.3	<p>A number of similar comments were made, for which the local authority’s response was the same / similar.</p> <p>Where a comment is noted, the comment does not require a response.</p>
1.21.3	Llanbedr School has very strong non-educational advantages. This is helped by the third-party funding it receives from past and present parents, and pupils in one form or another.	As 1.21.3			

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

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

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

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14.3 Comments about Estyn’s consultation response

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

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

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

14.4 Comments about data

14.4.1	Your numbers for pupils attending Llanbedr and capacity in the receiving schools are incorrect and have been throughout the process. Powys CC have literally no idea what schools have capacity to take Llanbedr pupils.	<p>Data used throughout the process has reflected the latest information available at the time. Data sources have been referenced throughout.</p> <p>Current pupil numbers³ and capacity at Llanbedr C. in W. School and the other schools in the Crickhowell catchment are as follows:</p> <p>Llanbedr C. in W. School Capacity – 57 Current pupil numbers: 53 pupils (N – Yr 6); 44 pupils (R – Yr 6, funded via delegated budget)</p> <p>Crickhowell C.P. School Capacity – 230 Current pupil numbers – 186</p> <p>Llangattock C. in W. School Capacity – 121 (exc. Nursery) Current pupil numbers – 117 pupils (N – Yr 6); 104 pupils (R – Yr 6)</p> <p>Llangynidr C.P. School Capacity – 147 Current pupil numbers – 108</p>
14.4.2	During the consultation period highly paid officers time and again used outdated fact and figures regarding Llanbedr School, they were offered many opportunities to correct them but refused. In particular numbers on roll were repeatedly incorrect, especially	Data used throughout the process has reflected the latest information available at the time. Data sources have been referenced throughout.

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

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

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

14.6 Comments about the Council’s response to objections received

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

15. COMMENTS ABOUT THE COUNCIL'S TRANSFORMING EDUCATION STRATEGY

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

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

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

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

16. COMMENTS ABOUT WELSH GOVERNMENT STRATEGIES

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

17. ALTERNATIVE OPTIONS

17.1 Retain the school

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

17.2 Federation

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

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

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

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

17.4 Area Review

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

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