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Proposals relating to Mount Street Infants School, Mount Street Junior School and Cradoc C.P. School

Objection Report

Powys

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Objection Report

Contents

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Consultation on proposals affecting Mount Street Infants School, Mount Street Junior School and Cradoc C.P. School

Objection Report

1. BACKGROUND

Powys County Council consulted on the following proposals affecting Mount Street Infants School, Mount Street Junior School and Cradoc C.P. School:

Phase 1

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

Phase 2

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

The consultation took place from the 25th February 2021 to the 12th May 2021. The Council published a consultation report outlining the findings of the consultation exercise.

On 14th December 2021, the Council's Cabinet agreed to proceed with the proposals, and a Statutory Notice was published from the 7th January 2022 to the 4th February 2022.

The proposals were as follows:

*'**Phase 1 of the Proposals***

From 31 August 2023:

i. The Council proposes to discontinue the following three schools which are maintained by Powys County Council:
   - *Mount Street C.P. Infants School, Rhosferig Road, Brecon, Powys, LD3 7NG ("Mount Street Infants School");*
   - *Mount Street C.P. Junior School, Brecon, Powys, LD3 7LU ("Mount Street Junior School");*
   - *Cradoc Community Primary School, Cradoc, Brecon, Powys, LD3 9LR ("Cradoc C.P. School").*

From 1 September 2023:

i. The Council proposes to establish a new English-medium community school maintained by Powys County Council for boys and girls aged 4-11

years old ("the New School"), that will operate on the current sites of Mount Street Infants School, Mount Street Junior School and Cradoc C.P. School.

Phase 2 of the Proposals

From 2025/2026:

i. The Council proposes to make a regulated alteration to transfer the New School to a new building on the former Brecon High School site, Penlan, Brecon, Powys, LD3 9SR.'

2. SUMMARY OF OBJECTIONS RECEIVED

113 objections were received during the statutory objection period.

As well as objections from parents and governors at the schools and members of the community, objections were received from the following organisations and individuals:

- Governing Body of Mount Street Infants School
- Governing Body of Cradoc C.P. School
- Brecon Town Council
- Cradoc Community Council
- Honddu Isaf Community Council
- Methyr Cynog Community Council
- James Evans MS
- Cllr Iain McIntosh
- Cllr Matthew Dorrance
- Cllr Liz Rijnenberg
- Chair of Governors, Mount Street Infants School
- Friends of Cradoc PTA
- Brecknock Play Association

The objections received included a petition objecting to the proposal which received 34 signatures.

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 the current schools

1. Mount Street Schools
2. Cradoc C.P. School

2. Comments about Phase 1 of the Proposals

1. Impact on quality of provision
2. Impact on pupils
3. Concern about loss of each school's individual identity / awards
4. Concern about changes to leadership arrangements
5. Concern about changes to staffing arrangements
6. Concern about governance arrangements
7. Comments about mixing rural and town schools
8. Concern that Phase 1 would last longer than expected
9. Comments about funding arrangements during phase 1
10. Comments about buildings
11. Other comments / questions about Phase 1

3. Comments about Phase 2 of the Proposals

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

4. Other comments

1. General comments about the impact on pupils
2. Concern about the impact on protected characteristic groups
3. General comments about the impact on staff
4. Comments about small and rural schools
5. Comments about other schools
6. Financial impact
7. Comments about Council / Welsh Government Strategies
8. Criticism of Powys County Council
9. Comments about the Welsh language
10. Alternative options
11. Comments about the process
12. Comments about Documentation

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 THE CURRENT SCHOOLS

1.1 Comments about the Mount Street Schools

1.1.1 Comments about Mount Street Infants School

1.1.1.1 General positive comments about the school

1.1.1.1.1	Mount Street infants is a very special place, only understood by those who have had the absolute honour of working there or being a pupil, parent or governor at the school. The unique ethos is not because of the building or resources but undoubtedly because of the relationships that exist there, staff to pupils, staff to staff, pupils to pupils, staff to parents and staff to governors. All are focused on mutual respect and a genuine care to do the best they can for each other at all times.	The Council notes these positive comments about Mount Street Infant School.
1.1.1.1.2	Mount Street Infant School is a fully inclusive, supportive and caring environment where the school ensures every pupil thrives and reaches their fullest potential.	As above.
1.1.1.1.3	Parents choose Mount St Infants because of factors including its status as an Eco School, the Forest School, the surroundings, the staff, the outdoor play facilities, it's small size and it's general identity and approach to education.	As above.

1.1.1.1.4	Mount Street Infants is a highly respected and valued school in the local community; it has provided children with a first-rate education and an overall positive experience that their caring and innovative education have further enhanced.	As above.
1.1.1.1.5	There is a thoughtful and supportive approach to learning at Mount Street Infants School. The children have fun, they take part in so many amazing projects and thoroughly enjoy the creative approach to learning at Mount Street.	As above.
1.1.1.1.6	The pupils are nurtured and thrive in the school system that currently exists. Mount Street Infants particularly gives a fantastic start to any child's education; it should be celebrated and used as an example for others to follow, not destroyed.	As above.
1.1.1.1.7	Powys should be celebrating and promoting the provision at Mount Street Infants and sharing the good practice that exists throughout Wales.	As above.

1.1.1.2 Comments about the quality of provision at the school

1.1.1.2.1	Mount Street Infants School gained a very favourable Excellent/Good Estyn report in 2020	The Council agrees that the standard of education at Mount Street Infant School is good, and notes the outcome of the school's Estyn inspection which took place in 2020 and the comments made in the inspection report.

1.1.1.2.2	As stated in the Estyn Report, Mount Street Infants School is an excellent school with children who are taught and cared for by an amazing staff team and Headteacher.	As above.
1.1.1.2.3	The school's Estyn report states that all children at Mount Street Infants School experience a high-quality, inspiring education.	As above.
1.1.1.2.4	The school's Estyn Report said "The excellent quality of the school's care, support and guidance for pupils results in outstanding levels of well-being"; "The school has an exceptionally happy family atmosphere where nearly all pupils thrive"; "Pupils regular work in the outdoors promotes very effectively their exceptional appreciation of the environment and the importance of safeguarding"; "The school's links with the community are exemplary and ensure that all pupils have the opportunity to engage with the wider world". How will the proposal improve on these aspects?	As above.
1.1.1.2.5	Reference to Mount Street Infants recent Estyn Report (January 2020) which summarises: "The excellent quality of the school's care, support and guidance for pupils results in outstanding levels of wellbeing. The school has an exceptionally happy family atmosphere where nearly all pupils thrive. It provides an extensive range of imaginative learning experiences, both in class and in the stimulating outdoor environment, which results in nearly all pupils having very positive attitudes to learning and achieving well; A united team of committed teachers and support staff share the headteacher's enthusiastic and inspiring vision for the school, which has best foundation phase practice at its heart. They work very effectively together for the good of	As above.

	their pupils. As a result, nearly all pupils, including those learning English as an additional language and those with SEN, make good progress and achieve expected or better outcomes by the end of the foundation phase.”	
1.1.1.2.6	Judgements from Mount Street Infants recent Estyn report (January 2020): Standards – Good; Wellbeing and attitudes to learning – Excellent; Teaching and learning experiences – Good; Care, support and guidance – Excellent; Leadership and management – Good.	As above.
1.1.1.2.7	Other comments from Mount Street Infants recent Estyn report: Excellent quality of the school’s care, support and guidance; Exceptionally happy family atmosphere; Stimulating outdoor environment; United team of committed teachers; Headteacher’s enthusiastic and inspiring vision; Expert use of the outdoor environment; Forest school has a powerful impact on their well-being and attitudes to learning; Pupils exceptional appreciation of the environment; Links with the community are exemplary; Exceptionally calm, nurturing family atmosphere; High quality natural environment strongly enhances pupils’ well-being; Excellent practice that results in outstanding levels of well-being and very positive attitudes to learning.	As above.
1.1.1.2.8	The school’s Estyn Report says that “Estyn will invite the school to prepare a case study on its excellent practice in key aspects of its provision that results in outstanding levels of well-being and very positive attitudes to learning for dissemination on Estyn’s website”	As above.

1.1.1.2.9	The Mount Street Infants Estyn Report from January 2020 states: “Many pupils’ use of Welsh is above expectations for their age. Nearly all pupils develop confident conversational skills, have a good range of vocabulary in formal and informal activities. Many pupils in the Specialist Centre respond appropriately to basic Welsh phrases when greeting others”; “The provision for Welsh language development is very strong. The environment is rich in Welsh vocabulary and pupils often conduct activities in Welsh.”	As above.
1.1.1.2.10	Whilst Powys Education Services had a poor Estyn report in the summer of 2019 Mount Street Infant School had an excellent Estyn report in January 2020.	The Council notes the outcome of the school’s Estyn inspection which took place in 2020 and the comments made in the inspection report. It is correct that Estyn’s inspection of education services in Powys which was carried out in 2019 concluded that these services were causing significant concern. In the Estyn report of July 2019, Estyn remarked, ‘Overall, the local authority knows its schools well.’ A monitoring visit took place in October which found that the Council ‘have made sufficient progress in relation to the recommendations following the most recent core inspection’. As a result, the Council was removed from the category of local authorities causing significant concern.
1.1.1.2.11	Given Estyn’s comments in the school’s Estyn report, does Powys County Council agree that Mount Street Infants School already achieves the Council’s Vision Statement?	The Council has stated throughout the process that there are no concerns about the quality of provision at Mount Street Infants School and the other schools

		affected by these proposals. The quality of provision at the three schools is not one of the reasons for the proposals.

1.1.1.3 Comments about the school being an infants school

1.1.1.3.1	At Mount Street Infants School pupils have the chance to take on responsibilities in Year Two and enjoy being the 'oldest' in the school – this can only be offered in an Infant-only school. All of the schools in Scandinavia have separate infants and juniors, and their students flourish.	The Council notes these positive comments about the provision at Mount Street Infants School, and the additional responsibilities which are taken on by Year Two people due to them attending an Infant School. School reorganisation in Powys has gradually moved to a model of 'all-through' provision in primary schools across the county. Mount Street Infant and Junior Schools are the last remaining separate infant and junior schools within the County. The advantages offered by single school provision for primary age pupils are well known. Due in part to an increased critical mass of learners, 'all-through' primary schools are usually able to offer both enhanced continuity of provision and a curriculum which is more broad and balanced in content, delivered in a continuous and coherent way from the Foundation Phase through to the end of Key Stage 2.
1.1.1.3.2	When the Year Two children are the oldest in the school it provides a unique opportunity to encourage great leadership skills, entrepreneurship, independence, accountability, mentoring skills and decision making.	As above.

1.1.1.3.3	Parents value the fact that by Year 2 pupils are capable of participating fully in meetings linked to the acquisition of the Eco School Platinum Award and the Healthy Schools National Award. They value that the Year 2 children take a lead in representing the school and are able to explain why Mount Street Infants is such an important school.	As above.
1.1.1.3.4	Both parents and pupils enjoy and benefit from the end of year 2 celebrations that are held before the children move on to the Junior School and the next phase of their education.	As above.
1.1.1.3.5	In Finland children attend pre-school before joining a primary school at the age of seven and it is well documented that the education system in Finland is among the best globally. Will Powys County Council agree that there are benefits of separate Infants and Junior Schools?	As above.
1.1.1.3.6	Families choose Mount Street Infants despite the fact that they have to reapply for a space at Mount Street Juniors during Year 2 ready for transition to Year 3. The single form is short and just a formality.	As above.
1.1.1.3.7	Instead of seeing a separate Infants School as a negative Powys County Council should be celebrating the “excellent quality of the school’s care, support and guidance” (Estyn Report) and protecting its uniqueness.	As above. The Council agrees that the standard of education at Mount Street Infant School is good, and notes the outcome of the school’s Estyn inspection which took place in 2020 and the comments made in the inspection report.

1.1.1.4 Comments about pupil numbers at the school

1.1.1.4.1	Mount Street Infants School does not have a high number of surplus places – the figures for surplus capacity in the Transforming Education document shows the capacity at Mount Street Infants School to be 116%.	The Council does not claim that there is a high number of surplus places at Mount Street Infants School. This is one of the challenges facing education in Powys as outlined in the Council's Strategy for Transforming Education in Powys, and was included in the Consultation Document as part of the section on 'Why change is needed in Powys.' Information provided in the Consultation Document stated that there were 113 pupils attending Mount Street Infants School and that at the time there were 16 surplus places (12.4%).
1.1.1.4.2	The projected pupil numbers for Mount Street Infants School are shown to be increasing and, therefore, is another one of the reasons for change that does not apply to Mount Street Infants School.	Whilst it is correct that the projected pupil numbers for Mount Street Infants School which were included in the Consultation Document suggest a small increase in pupil numbers at Mount Street Infants School, the increase is not significant. Pupil numbers at Mount Street Infants is not one of the reasons for the proposal.
1.1.1.4.3	The consultation document shows an increase in pupil numbers at Mount Street Infants School from 2021 to 2025. The Primary Schools, Transforming Education shows a 3.1% increase in the pupil numbers over the next 5 years at Mount Street Infants School. The same document shows a decrease of 9.3% in pupil numbers over the next 5 years at Sennybridge CP School. Will Powys County Council admit that Mount Street Infants School does not fall into the category of decreasing pupil numbers as evidenced by these Powys County Council documents?	As above.
1.1.1.4.4	Mount Street Infants is NOT a small school. Powys County Council's Admissions Information and Arrangements 2021-	As above.

	22 document and the Primary Schools, Transforming Education 2020 document state that Mount Street Infants School has 150 pupils on roll. The newly built primary schools in the last four years at Clyro, Llangorse, Hay on Wye, Talgarth and Llyswen are small schools. It states in the Admissions document that Clyro (combined Infants & Juniors) has only 86 pupils on roll, Llangors C in W School (combined Infants and Junior) has 161 pupils on roll, Hay on Wye CP School (combined Infants & Juniors) has 169 pupils on roll, Ysgol Y Mynydd Du, Talgarth (combined Infants & Juniors) has only 104 pupils on roll and Archdeacon Griffiths C in W School Llyswen (combined Infants & Juniors) has 148 pupils on role. Compared to these schools Mount Street Infants School cannot be classed as a small school.	The capital investment in schools in the Gwernyfed area was a result of an area school reorganisation which saw the number of schools reduce from 10 to 5.
1.1.1.4.5	As the school is attended by military children, pupil numbers fluctuate throughout the school year.	The Council is aware that the school is attended by military children, and notes that this leads to fluctuations in pupil numbers throughout the school year.

1.1.1.5 Comments about the school buildings

1.1.1.5.1	It is true that the Mount St Infants building is not wonderful, but the provision at the school makes up for this.	The Council recognises that there are issues with the Mount Street Infants building. The aim of this proposal is eventually to provide a new building, which would significantly improve the quality of accommodation for pupils attending the school.
1.1.1.5.2	Building Condition – The consultation document states that the current building condition of Mount Street Infants School is categorised as C. Of the 10 fabric elements graded 8 are	The condition survey was prepared by an external surveyor, and provides the Council with information about the condition of schools and recommendations

	graded B and only 2 are graded C. The two Condition C fabric elements are i) carpets and vinyl showing signs of age and ii) marks & scuffs in the decoration. The priority given to the C graded elements is priority 3. The document states that priority 3 is “essential work required within 2 years”. This work will therefore need to be undertaken by 2022. Will Powys County Council guarantee that the recommended works will be carried out by October 2022?	about the prioritisation of work required. It is then the decision of the Council to prioritise maintenance work within the funding available. The Major Improvements Programme is reviewed on a year by year basis. The Council has allocated just under £58,000 for works to Mount Street Infants School, and also an additional £21,000 in next year’s budget. This is nearly £80,000 which has been allocated for works at Mount Street Infants School, however this doesn’t include the elements identified in this comment.
1.1.1.5.3	The Mount Street Infants School building condition survey carried out in October 2020 indicates two elements which have been graded priority 3 – essential work required within 2 years. These are i) replacing vinyl and carpet and ii) redecoration. This will require Powys County Council to spend £55,272.12 on Mount Street Infants School by October 2022. This will leave only £59,814.83 in outstanding repairs.	The Council has allocated just under £58,000 for works to Mount Street Infants School, and also an additional £21,000 in next year’s budget.
1.1.1.5.4	Of the 11 M&E elements 9 are graded B and 2 graded C. The 2 Condition C M&E elements are i) low surface temperature radiators and ii) gas fired cabinets and distribution ductwork. As the heating system was replaced with electric heating in October 2020 the two condition C M&E elements are no longer applicable. Why has the building condition survey not been updated to reflect the new heating system when issue 1 of the report was written in December 2020 and issue 2 in February 2021?	The report was prepared by an external surveyor, and was based on a visit which took place on the 22nd October 2020.

1.1.1.5.5	The Education Minister has allocated £2.2m to Powys County Council from Welsh Government to undertake large scale repairs some of which could be used for large scale repairs at Mount Street Infants School. Why are Powys County Council not using this funding to repair Mount Street Infants School now?	The Welsh Government allocated £2.2m in 2020/21 from its Capital Maintenance Grant to support repairs and maintenance in schools. This was added to the Council's contribution to the Schools Major Improvements Programme. Projects are prioritised according to the scoring methodology outlined in the Council's Asset Management Plan.
1.1.1.5.6	Will Powys County Council to use the £2.2m already secured from Welsh Government to undertake the repairs amounting to £59,814.83 at the Mount Street Infants School?	As above.
1.1.1.5.7	How much of the £2.2m received from the Welsh Government has been allocated to Mount Street Infants School?	As above.
1.1.1.5.8	In a response to a question asked by County Councillor Rijnenberg regarding a breakdown of the backlog work required to repair Mount Street Infants School, the Head of Service stated: "The backlog maintenance figure is based on a calculation – square meterage of a school multiplied by ESTIMATED cost based on the condition of the building – this is not based on an itemised list of works." The figure of circa £712,314 in outstanding maintenance was therefore a guess and not evidence based.	This is correct - as indicated, the estimated backlog maintenance figure is based on a calculation.
1.1.1.5.9	The Mount Street Infants Building Condition Survey undertaken in October 2020 estimates the cost of maintenance required to actually be £208,935.95. The report recommends that the heating system is replaced at a	Comment noted.

	cost of £93,849.00. This work has already been undertaken so the revised cost of works required is £115,086.95.	
1.1.1.5.10	On page 47 of the consultation document the suitability of Mount Street Infants School building is described as Good/Poor	This is correct. On the same page, the Consultation Document describes the Condition of the Mount Street Infants School building as condition C – Poor.

1.1.1.6 Comments about the school grounds / Forest School

1.1.1.6.1	Mount street infants has fantastic outdoor learning opportunities, a new wildlife play equipment area, forest school area and large playing field.	The Council acknowledges that Mount Streets Infant School has extensive outdoor space, including a forest school area, and that the school uses this space extremely well to enhance teaching and learning opportunities, and to support the wellbeing of pupils. The Council recognises the importance of outdoor space and forest schools provision to the development and wellbeing of children. It is also recognised that the forest school transition at Mount Streets Infants School is located in an area of mature trees. Should the Council proceed with the proposals, pupils would eventually transfer to a new building in Brecon. The Council would ensure that there would be a forest school area and other outdoor areas at the new school. It is recognised however that this wouldn't be the same as the current forest school area at Mount Street Infant School for a number of years. However, the Council believes that forest school provision can be delivered in a variety of ways and does not solely rely on the availability of an area of mature trees.

1.1.1.6.2	The school grounds are fabulous and enables outdoor play safely and in a lovely setting.	As above.
1.1.1.6.3	There is a fantastic playing field at Mount Street Infants, which the children use daily at break time. Such a great natural outdoor space providing the freedom children need.	As above.
1.1.1.6.4	An excellent feature of the school's provision over many years is its expert use of the outdoor environment to inspire and motivate pupils, including those with special educational needs.	As above.
1.1.1.6.5	Pupils work in the outdoor areas, in the extensive grounds and forest school has a powerful impact on their well-being and attitudes to learning.	As above.
1.1.1.6.6	Mount Street Infants School has an excellent forest school and ethos of outdoor learning that won't necessarily be provided at the new site.	As above.
1.1.1.6.7	The forest school is such a beautiful spot of woodland for the children to learn and explore in. It is an important part of the school life at Mount Street Infants.	As above.
1.1.1.6.8	Mount Street Infants have Forest School areas that have been cultivated over time.	As above.
1.1.1.6.9	Mount Street Infants staff worked together to bring Forest School to fruition for the new millennium.	As above.
1.1.1.6.10	The forest school at the Infants, which has developed over a long period and is such a positive vital resource for pupils	As above.

	and the school community, is even more vital post-COVID. It is all about well-being, creative learning, being outside, connecting with nature, and developing a love of the great outdoors.	
1.1.1.6.11	The pupil's access to Forest School and outdoor education is second to none. The Forest School site and the expertise of the staff have been developed over a long time and cannot be recreated overnight in a new school.	As above.
1.1.1.6.12	One major selling point of Mount Street Infant School is the Forest School. It is so important for children to be able and learn outdoors, to connect with nature and the simple things, to go back to basics in a time where electronics dominate their lives. They flourish and experience things they might never experience otherwise. A playground with all the equipment possible can't replace that little patch of wilderness the school currently has.	As above.
1.1.1.6.13	The focus on Outdoor Learning using Forest School is a major asset of Mount Street Infants which has taken decades to establish and hone. The Mount Street Infants School Estyn report January 2020 states: "The use of the extensive grounds to enrich pupils' learning & well-being is a very strong & sustained feature of the school's provision. They include a coppiced wood, forest school, community gardens, trim trail & a large field which pupils use every break time whatever the weather. Regular time spent in this high quality natural environment strongly enhances pupil's well-being & attitudes to learning".	As above.

1.1.1.6.14	Children from military families that attend the school have reported the positive impact of learning outside in the school woodland.	As above.

1.1.1.7 Comments about the school's location

1.1.1.7.1	The school's location ensures that a large number of pupils/families walk to and from school everyday. Pupils enjoy walking to school.	The Council notes these comments stating that the school's current location encourages pupils to walk to school.
1.1.1.7.2	Parents can park at the Coop and walk up to the school, this means that children can walk to school and observe day to day activity in the community, which helps to reduce carbon, improve health and promote interest and knowledge in local surroundings.	As above.
1.1.1.7.3	Being very central, it is convenient for walking to school for many families spread out in all directions. Pupils walking to school can connect and explore on the way, and unwind and talk together at home time.	As above.
1.1.1.7.4	Mount Street Infants School is in the heart of Brecon and has close links with many organisations in the town.	The Council notes these comments stating that the school's current location means that it is well placed to establish links within the community.
1.1.1.7.5	The school is a community school, and its current location means that it is well placed to serve the community in Brecon.	As above.

1.1.1.8 Comments about school staff

1.1.1.8.1	The staff are brilliant and work extremely well as a team.	The Council notes these positive comments about the staff at Mount Street Infants School.
1.1.1.8.2	The school staff are early years specialists, and worked together to deliver the new Foundation Phase when Desirable Outcomes and Key Stage One were replaced.	As above.
1.1.1.8.3	Mount Street Infants staff worked together to deliver 'new' Blended Learning during Lockdown.	As above.
1.1.1.8.4	Mount Street Infants staff worked with schools across Wales to design the New Curriculum.	As above.
1.1.1.8.5	Mount Street Infants staff worked together with other schools to develop the Bilingualism pilot project.	As above.
1.1.1.8.6	Mount Street Infants staff have worked on the frontline throughout the pandemic, no furlough or 'working from home' in their cosy kitchens but together they provided a safe environment for the children.	As above.
1.1.1.8.7	The smaller team of teachers and staff at Mount Street Infants means that prospective parents can get to know most of the staff before even starting. Through the close knit, friendly approach, the teachers got to know pupils well when they start in reception. They get to understand all the children as individuals, which is largely due to having smaller numbers in the school.	Whilst noting these positive comments about the staff at Mount Street Infants school, all schools, regardless of their size or category, are required to support, challenge, understand and nurture all children to ensure that they achieve their full potential.
1.1.1.8.8	The Head is incredible, highly respected, and valued, and I would say the best Head that I have come across.	The Council notes these positive comments about the Headteacher at Mount Street Infants School.

1.1.1.8.9	Never have I met a more helpful and approachable headteacher. She gives her all for this wonderful school, she is very popular with both the parents and children. She is always around to chat to in the mornings and afternoons, and responds very quickly to any concerns.	As above.
1.1.1.8.10	The headteacher is fully involved in familiarising herself with the children as individuals, getting to know them personally beyond just knowing everyone by name.	As above.
1.1.1.8.11	Mount Street Infants already has a non-teaching Headteacher.	The Council is aware that Mount Street Infants already has a non-teaching Headteacher. Having a non-teaching Headteacher is not one of the reasons for these proposals.

1.1.1.9 Comments about specialist provision at the school

1.1.1.9.1	Staff and pupils at the Specialist Centre were highly praised in the latest Estyn report. The report states “The specialist centre provides a calm learning environment where the relationship between staff and pupils supports learning very well”.	The Council is pleased to note these comments about specialist provision at the school and the positive comments made in the Estyn inspection.
1.1.1.9.2	The SEN provision at Mount Street Infants is rated as excellent.	As above.
1.1.1.9.3	The school provides good support for pupils with additional learning needs, such as those that communicate using Makaton.	As above.

1.1.1.9.4	Children experiencing a high level of transience at our school include those who are from the Services/MoD or from Travellers communities. Many of these children experience high levels of stress when changing schools and really need the nurturing support that is offered at a small school such as Mount Street Infants with excellent outdoor provision.	The Council notes these comments relating to the support the school provides to pupils from military families and pupils from traveller communities.
1.1.1.9.5	Over many years Mount Street Infants has strived to make sure that language is never a barrier to the children's learning. Many languages are spoken or read by the parents of the children, including Nepalese or other dialects spoken in Nepal, and English. The best communication is achieved when talking face to face with the parents. During COVID one of the schools Teaching Assistants, with Nepalese as her first language, was able to explain verbally the safeguarding COVID regulations and she has also supported many families with home learning.	The Council notes these comments relating to the support the school provides to pupils for whom English is not their first language, in particular pupils from Brecon's Nepalese community.

1.1.1.10 Comments about early years provision at the school

1.1.1.10.1	The Smarties 3+ provision at the school provides an amazing opportunity to start their children's education in a setting that provides sector leading outdoor provision that has taken over 20 years to establish.	The Council notes these positive comments about the Smarties 3+ provision at the school.
1.1.1.10.2	Early years provision is the keystone of an infant or primary school and good links between Mount Street Infants and Smarties is essential for the children.	As above.

1.1.1.10.3	The 3+ setting at Mount Street Infants is thriving and provides for a large number of children, who deserve serious consideration.	As above. The potential impact of these proposals on early years provision has been considered throughout the process.
1.1.1.10.4	There is a risk that the uncertainty surrounding the provision at Mount Street Infants will impact on the security of the provision at Smarties 3+ setting.	The Council notes these concerns about the potential impact of the proposals on the Smarties 3+ setting. Should the Council proceed with the proposals, the early years provision at the school would remain during the Phase 1 of the proposal. Phase 2 of the Proposals – to build a new primary school – would include purpose-built facilities for early years provision.
1.1.1.10.5	The Council has devalued the Smarties 3+ setting by listing the alternatives that currently exist elsewhere in Brecon in the Consultation Document.	The Council does not agree that listing the alternatives that currently exist elsewhere in Brecon in the Consultation Document has devalued the Smarties 3+ setting.

1.1.2 Comments about Mount Street Juniors

1.1.2.1	Mount Street Juniors School also had a Good Estyn report on their last inspection. Many of the aspects that achieved these results will be lost in merging the schools and may cause lower Estyn report results in the future.	The Council notes these positive comments about Mount Street Junior School, and notes the outcome of the school's last Estyn inspection, which took place in 2016.
1.1.2.2	Mount Street Juniors was only built in 1987 – why has it been left to deteriorate? What message does this give to children in terms of care and conservation of assets?	The Council notes these concerns about the condition of the Mount Street Juniors building. As indicated in the Consultation Document, the building condition has been assessed as condition C.

		The Council's schools maintenance funding has steadily reduced over the last few years, and the Council has to prioritise its funding accordingly. Schools are prioritised using a scoring criteria which can be found in the Council's Schools Asset Management Plan. The Council's school maintenance budget for 2021/22 is approximately £5 million. £150,500 has been spent on Mount Street Junior School as part of the major improvement programme between 2012 and 2019, on safeguarding fences, a new boiler, roofing works and external fire doors.
1.1.2.3	In the case of Mount Street Junior School, the building condition is only rated as poor because Powys County Council has not maintained the buildings. This is a criminal waste of taxpayer's money as the school was only built 34 years ago, is a brick building and was built by a reputable firm of local builders.	Comment noted.
1.1.2.4	The suitability of the Mount Street Junior building is Excellent / Good.	This is correct. However, the Condition of the Mount Street Juniors School building is described as condition C – Poor.

1.1.3 Comments about the two Mount Street schools

1.1.3.1 Comments about transition arrangements

1.1.3.1.1	Transition of Year 2 children from Mount Street Infants to Mount Street Juniors is seen as a positive by many parents.	The Council notes these comments about the transition arrangements between Mount Street Infants

		and Mount Street Juniors, and that this is seen as positive by many parents. School reorganisation in Powys has gradually moved to a model of 'all-through' provision in primary schools across the county. Mount Street Infant and Junior Schools are the last remaining separate infant and junior schools within the County. The advantages offered by single school provision for primary age pupils are well known. Due in part to an increased critical mass of learners, 'all-through' primary schools are usually able to offer both enhanced continuity of provision and a curriculum which is more broad and balanced in content, delivered in a continuous and coherent way from the Foundation Phase through to the end of Key Stage 2. Transition between schools can affect pupils in different ways. There can be positive and negative aspects to transition. However, to keep the number of transitions a pupil's experiences throughout their education would have a more beneficial impact on pupil progress.
1.1.3.1.2	Parents and pupils see transition as a positive, so why do Powys County Council insist on portraying transition as a negative?	As above.
1.1.3.1.3	Pupils enjoy the transition from the Infants School to the Junior School. For the pupils at Mount Street Infants this is	As above.

	very positive. Will Powys County Council agree that transition can result in positive outcomes for pupils?	
1.1.3.1.4	From parental experience a separate infant school has provided an excellent setting for the Year 2 pupils to step up and be more than prepared for transition to a different school, and has improved their confidence later on in transition to the High School.	As above.
1.1.3.1.5	It is not difficult to apply for a place at the Junior School and parents do not find this arduous. Historically parents did not have to apply for a place at the Junior School; this was something that was introduced by Powys County Council. Does Powys County Council acknowledge that they caused parents to have to apply for admission to the Junior Phase?	The Council has not stated that the process of applying for a place at the Junior School is arduous. The Council states in the Consultation Document that a benefit of the proposals would be that 'Parents of pupils currently attending Mount Street Infants would not have to re-apply for admission to the junior phase'. This statement is correct. The Council is required to comply with the statutory regulations related to school admissions, to ensure there is a clear, transparent process.
1.1.3.1.6	The transition arrangements for pupils between Mount Street Infants School and Mount Street Infants School involves completing a form and this was introduced by Powys County Council. It would be very easy to revert to the previous arrangements where no form was completed.	Comment noted. See above.
1.1.3.1.7	It is not difficult to apply for a place at the Junior School and parents do not find this arduous. Historically parents did not have to apply for a place at the Junior School; this was something that was introduced by Powys County Council.	Comment noted. See above.

1.1.3.1.8	Where is the evidence that transition between Mount Street Infants and Juniors has a negative impact on pupil progress, pupil wellbeing and educational standards?	The Council has not stated that 'transition between Mount Street Infants and Juniors has a negative impact on pupil progress, pupil wellbeing and educational standards'. Transition between schools can affect pupils in different ways. There can be positive and negative aspects to transition. However, to keep the number of transitions a pupil's experiences throughout their education would have a more beneficial impact on pupil progress.

1.1.3.2 Other comments about the two schools

1.1.3.2.1	My children attended both Mount Street Infants and Mount Street Junior School, and I couldn't have wished for better schools for them.	The Council notes these positive comments about the two Mount Street Schools.
1.1.3.2.2	The headteachers and staff at both schools are outstanding. They work in small teams, they all know each other, and are good friends. The headteachers, all the teachers and all the teaching assistants know every single child by name, know about their background, what they like and dislike, know what stresses them and what calms them, hence each one of them can help when a child is upset and in distress and support it because they know what their needs are. They know who is friends with whom, who the bullies are and who is being bullied.	As above.

1.1.3.2.3	The two schools have had brilliant results and are doing extremely well. Why do you need to change and destroy something that is already brilliant?	As above. The reasons for the current proposals were included in the Statutory Notice which was published, and are as follows: • *To offer enhanced opportunities for pupils from attending one new, larger, school* • *To enable staff expertise and good practice to be shared across the entire primary age range* • *To ensure that all staff at the three current schools have the opportunity to secure positions in the new school* • *To provide more flexibility and personal development opportunities for staff* • *To provide improved transition arrangements for pupils currently attending Mount Street Infants School and Mount Street Junior School between the Foundation Phase and Key Stage 2* • *To provide access to 21st Century Schools Funding in order to provide a new building* • *To reduce the Council's surplus places in primary schools* • *To rationalise the primary school estate* • *To realise a financial saving* • *Meets all the Critical Success Factors*
1.1.3.2.4	If the Council were to combine the pupil numbers at Mount Street Infants and Mount Street Juniors, the combined numbers would be 302 pupils which would mean that the number of pupils attending Mount Street Infants School and Mount Street Junior School are the second highest in Powys. Will Powys County Council admit that these are not small schools?	The Council has not stated that Mount Street Infants School or Mount Street Junior School are 'small schools'.

1.1.3.2.5	The consultation document is presenting the MSI/MSJ as requiring change in terms of being the only school in Powys that is not a Primary. PCC could consider retaining this school in this form on the basis that both are performing to good and excellent standard until further options have been considered.	The Council notes the positive comments about the current provision at Mount Street Infants and Mount Street Juniors. However, as suggested in the comment, school reorganisation in Powys has gradually moved to a model of 'all-through' provision in primary schools across the county. The advantages offered by single school provision for primary age pupils are well known. Due in part to an increased critical mass of learners, 'all-through' primary schools are usually able to offer both enhanced continuity of provision and a curriculum which is more broad and balanced in content, delivered in a continuous and coherent way from the Foundation Phase through to the end of Key Stage 2. Transition between schools can affect pupils in different ways. There can be positive and negative aspects to transition. However, to keep the number of transitions a pupil's experiences throughout their education would have a more beneficial impact on pupil progress.

1.2 Comments about Cradoc C.P. School

1.2.1 General positive comments about the school

1.2.1.1	Cradoc is a thriving rural school with a good standard of education, a good budgetary position and feasible pupil	The Council notes these positive comments about Cradoc C.P. School.

	numbers. It is of vital importance to the local community in various ways.	
1.2.1.2	The school is a stable, safe, supportive environment for the children that go there.	As above.
1.2.1.3	The school has an excellent reputation for education and for children's well-being.	As above.
1.2.1.4	Cradoc is a thriving, ambitious and community-rooted school, which boasts a high level of achievement and good staff-pupil ratios.	As above.

1.2.2 Comments about the quality of education at the school

1.2.2.1	The school provides a good standard of education as noted in Estyn reports.	The Council notes these comments about the standard of education at Cradoc C.P. School, and would agree that all schools included in these proposals provide a good standard of education for their pupils.
1.2.2.2	The school provides an excellent education as proven by its inspection reports.	As above.
1.2.2.3	The education provided at Cradoc has been to a very good standard, with a number of children having been moved there because the educational offer was deemed superior to other schools in the area.	As above.
1.2.2.4	The school has earned many accolades and awards, such as becoming the first school in Wales to receive the School of	The Council notes these comments about the accolades and awards received by Cradoc C.P. School. Whilst implementation of the proposals may mean that

	Sanctuary award and many awards for the excellent use of Welsh, which would be lost if the school were to close.	the current schools would lose their awards, the high-quality provision which the school has developed to achieve this status would be maintained. The new school could reapply using the evidence that they have from the three schools.

1.2.3 Comments about pupil numbers at the school

1.2.3.1	The number of pupils attending the school – over 90 – does not justify closure of the school.	The Council notes these comments about current pupil numbers at the school. The school's size is not one of the reasons for the current proposals.
1.2.3.2	Cradoc school currently has 95 pupils, it should therefore not be classed as a small primary school.	As above.
1.2.3.3	It is a thriving school with over 90 pupils attending so certainly not a 'Small School' barely surviving against a background of rural depopulation as are so many others.	As above.
1.2.3.4	Cradoc is not a small or failing school. Its numbers have been consistently at 100 pupils or more.	Whilst the school's size is not one of the reasons for the current proposals, historical pupil numbers show that pupil numbers have, in the main, been falling year on year at Cradoc since 2014. Cradoc C.P. School pupil projections do not indicate a significant increase in numbers, with numbers remaining in the 90s.
1.2.3.5	Cradoc School is not a 'small rural school with falling register'. To the contrary there is consistent demand for school places.	As above.
1.2.3.6	Pupil numbers are on the increase and forecasts indicate numbers continuing to rise.	As above.

1.2.3.7	Recent applications for places mean that we anticipate the largest Reception intake for many years. The numbers are rising and not falling as suggested in the documentation.	The latest information held by the Council's admissions team regarding applications for September 2022 does not support this statement.
1.2.3.8	Application numbers for places at Cradoc school are rising.	As above.
1.2.3.9	The authority's education department claim the school is under subscribed with a suggest capacity of 150 pupils. This figure is inaccurate as the current capacity statistic is based upon square meterage within the building that is being used for non-educational needs such as storage etc. This needs re-evaluating based on the requirements of the new Donaldson's curriculum.	The capacity of Cradoc C.P. School is 175. The capacity of a school is calculated using the WG Guidance – Measuring Capacity of Schools in Wales'. For primary schools, the capacity is calculated on the size of rooms designated as 'classbases'. Specialist and support rooms such as libraries, IT rooms and staff rooms are not included in the calculation but must all be measured. The spaces in classrooms are then checked against the total usable space available to see if there is too much or too little space available to support the core teaching activities.

1.2.4 Comments about the buildings

1.2.4.1	Powys County Council have let Cradoc school's buildings deteriorate and the portacabins should only have been in place for a couple or few years at the most but have been there in excess of 10 years.	It is not true that the building has deliberately been allowed to deteriorate. £375,000 has been spent on works to the school, including the car park which cost £180,000. This included refurbishing mobile classroom, new boilers and controls, environmental health works to the kitchen and rewiring works. Whilst there has been investment in the buildings, the Council's view is that the Cradoc building is not suitable – the condition of the building is one of the challenges

		identified in the Consultation Document. Phase 2 of the proposals will provide a new building in Brecon, which will significantly improve the quality of accommodation for pupils currently attending the school.
1.2.4.2	If the Council had made the necessary refurbishments to Cradoc School as it should have over the years, the fabric of the school would have been maintained and upgraded as necessary.	As above.
1.2.4.3	You have neglected to invest in Cradoc school for years. It's time you dug deep and respected the rural children of our communities as you have already done in other areas of Powys.	As above.
1.2.4.4	The school structure which was built back in the late 60s was only meant to last for 20 to 25 years and it has been a total failure of Powys education department that the school has not been rebuilt before other schools. Why was Cradoc overlooked, this has let both children and the teaching staff down.	The Council notes these comments about current Cradoc school building. The Council's view is that the Cradoc building is not suitable – the condition of the building is one of the challenges identified in the Consultation Document. Phase 2 of the proposals will provide a new building in Brecon, which will provide the children of the three schools with the highest quality learning environment that would provide them with facilities, technology, and outdoor learning spaces to support their learning.
1.2.4.5	It does however need investment in buildings, an investment that any competent authority would have budgeted into its planning processes. We reject any assertion that the need to renew the buildings should ever be a reason to close a perfectly good school. This is especially true in the case of Cradoc, which has no community building (church or hall) and	As above. The Council notes these concerns about the possible impact on community facilities in Cradoc should the Council proceed with the implementation of Phase 2 of the Proposals. As stated in the draft community impact

	could therefore likely attract external funding (e.g. from the National Lottery) if a shared solution were sought and leadership exercised.	assessment: *'it is acknowledged that a move to a new school site in Brecon would mean that there would no longer be a school located in Cradoc, therefore potentially the community facilities provided by the school may no longer be available. It is currently unclear where the facilities and services currently provided by the school could be provided should there be no school located in Cradoc.'* The draft community impact assessment also states that: *'an initial search has identified some alternative locations in the area where community events could take place. Should the Council proceed with the Proposals, it would endeavour to work with the community in Cradoc to identify a suitable alternative, initially this could involve discussions with Community Councils in the area about future use of the school building.'* Should the Council proceed with these Proposals, the Cradoc C.P. School building would eventually be declared surplus following the move to a new building. All surplus assets are subject to the process of disposal as outlined in The Council's Asset Management Policy. Whilst it is possible that this could lead to sale of the sites to third parties, some schools that have closed have been transferred to other service areas e.g. housing or to a community - with the latter, this may allow for the space to be retained or developed for community use. This could enable the facilities to be retained for community activities.

1.2.4.6	Not long ago a new car park was provided – we felt this was a stepping stone to having a new building.	Comment noted.

1.2.5 Comments about the grounds

1.2.5.1	The school has very large play areas for games etc.	The Council notes these comments about the grounds at Cradoc C.P. School and acknowledges that the school has extensive outdoor space, including a forest school area. The Council recognises the importance of outdoor space and forest schools provision to the development and wellbeing of children. Should the Council proceed with the proposals, the Council would ensure that there would be a forest school area and other outdoor areas at the new school. It is recognised however that this wouldn't be the same as the current forest school area at Cradoc C.P. School for several years. However, forest school provision can be delivered in a variety of ways and does not solely rely on the availability of an area of mature trees.
1.2.5.2	Cradoc have Forest School areas that have been cultivated over time. These important learning opportunities will be lost if the schools close.	As above.
1.2.5.3	There are extensive grounds at Cradoc School, including a great variety of play areas and equipment, and an impressive Eco-classroom. This has been developed and designed by the children over the years and they get to enjoy it weekly in their Forest School sessions and some areas at play times.	As above.

1.2.5.4	The grounds are ideal for activities such as ‘forest schools’ which has been praised at other schools across Powys.	As above.
1.2.5.5	There are a variety of habitats at the school (rough meadow, a pond, marshy area, vegetable garden, woodland and wildlife areas). These cannot simply be built or recreated on a new school site and would take years, if not decades, to fully establish.	As above.
1.2.5.6	The local area (Crug) is used to enhance learning opportunities.	Comment noted.

1.2.6 Parents bring their children to the school although it isn’t their closest school

1.2.6.1	Many parents from out of catchment choose to make a twice-daily journey to bring their children to Cradoc school; they wouldn't be doing this if they didn't think that Cradoc is the best school for their children.	The Council acknowledges that a significant proportion of children attending Cradoc C.P. School live closer to other schools. The closest school for the 91 pupils attending Cradoc C.P. School, based on PLASC 2021 data is as follows: • Cradoc C.P. School – 50.5% of pupils • Priory C. in W. School – 24.2% of pupils • Llanfaes C.P. School – 8.8% of pupils • Sennybridge C.P. School – 5.5% of pupils • Mount Street Infants School – 4.4% of pupils • Archdeacon Griffiths C. in W. School – 3.3% of pupils • Builth Wells C.P. School – 3.3% of pupils

		This suggests that 50% of pupils attending Cradoc C.P. School are attending their closest school, with the remaining 50% living closer to other schools. Should the Council proceed with these proposals, parents would continue to be able to choose which school they wish their children to attend – if they did not want their child to attend the new school, they could apply for a place at a different school.
1.2.6.2	Many parents within Brecon prefer to send their children to Cradoc School, and this has been going on for 40 years plus. This is despite parents being acquainted with the condition of the School's building standard, which you have allowed to happen. This has not prevented them in sending their children to a school with excellent staff, high pupil attainment, good governance, management and the fantastic rural setting.	As above.
1.2.6.3	Pupils are currently travelling out of Brecon to attend our school for a reason, its high pupil attainment and amazing rural location.	As above.
1.2.6.4	Parents from Brecon choose to send their children to Cradoc School because it feels right for their children.	As above.
1.2.6.5	The fact that many parents choose to bring their children out of town to attend this rural school speaks for itself.	As above.
1.2.6.6	The school is popular with parents from Brecon who bring their children to the school because of the excellent education provided.	As above.

1.2.6.7	Many parents are choosing Cradoc School choosing it over their nearest schools, yet this seems to have gone against the school when you are deciding its fate.	As above. Parents choosing Cradoc over their nearest school is not one of the reasons for the current proposals.

1.2.7 Comments about the school's rural nature

1.2.7.1	The school's rural setting makes pupils' schooling experience even more enjoyable and memorable.	The Council recognises that Cradoc C.P. School is a rural school serving a large rural area, and the that the school is located in a rural setting.
1.2.7.2	Cradoc is a rural school surrounded by a strong community.	As above.
1.2.7.3	Cradoc is a rural school situated in a rural environment, it plays a significant part in our local community.	As above.
1.2.7.4	Cradoc is a rural school serving its wide rural community – it was built as close as possible to the base of the three valleys when smaller distant schools were amalgamated back in the 1960's. It has retained its rural ethos of "Providing roots to grow and wings to fly".	As above.
1.2.7.5	Cradoc school serves its surrounding rural communities. These largely agricultural and remote surrounding communities rely on having a safe community school which represents their social, cultural and familial demographic.	As above.
1.2.7.6	Cradoc is a rural school serving a wide rural area and its location was carefully chosen over 50 years ago to serve young children living in the Honddu, Yscir Fawr, Yscir Fechan	The Council recognises that Cradoc C.P. School serves a large rural area, and that the school was established

	and Bran valleys along the southern fringe of the Epynt Mountains. All the small schools in these valleys closed at that time.	in the 1960s following the closure of several village schools. The Council has to regularly review its schools infrastructure to ensure that it provides the best possible opportunities for learners. The fact that a school was established following a school reorganisation process does not mean that the school would not be affected by a school reorganisation process in the future.
1.2.7.7	There was a closure of 3 primary schools at the end of the 1960's (Upper Chapel, Merthyr Cynog and Battle) and a new primary school was built to serve the local community. It was my understanding that there were to be no further closures in the area. Conveniently no one seems to be able to find any paperwork from that time, despite requests to PCC.	As above.
1.2.7.8	When Battle School was closed and the children of Battle, Merthyr Cynog and Upper Chapel were brought together at Cradoc School, as a community we were led to believe that this would be the only change there would be in the education of our children. This has all been forgotten, and there doesn't seem as though there is guaranteed plan for our children in the future.	As above.
1.2.7.9	The education Cradoc School provides is broader than in an urban settings and encompasses farming and environment in lessons which are so relevant to children living in a rural ward.	The Council recognises that Cradoc C.P. School is located in a rural area and has a large proportion of farming families. All schools deliver education based on the same curriculum and are planning to introduce the new Curriculum, whether they are located in a rural or a town environment.

		Should the Council proceed with the proposals, the new school would be required to deliver the new Curriculum for Wales. Local context would be a factor in the delivery of the new Curriculum, and the new school would be able to develop the curriculum around both urban and rural communities that it serves.
	The school is part of the community and they use local interests to support the children's learning. Many children come from farming backgrounds and enjoy watching tractors and other farming machinery pass by the school – this would not be happening at a school based in a town area.	As above.

1.2.8 Comments about links between the school and the community

1.2.8.1	Cradoc CP School is the hub of the community.	The Council fully acknowledges the links between Cradoc C.P. School and the community, and the important role the school plays in the community. The potential impact of closure of the school on the community has been acknowledged throughout the process, including in the Consultation Document, the draft Community Impact Assessment, the Consultation Report and the updated Impact Assessment document. The impact assessment document will be 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.

1.2.8.2	Cradoc School is an integral part of the community.	As above.
1.2.8.3	Cradoc School provides a much-loved community hub and supports family integration, supports and enables friendship and connections within our rural community.	As above.
1.2.8.4	The Cradoc community and the surrounding area is reliant on the school as a mecca of community activity and engagement.	As above.
1.2.8.5	Cradoc School acts as the hub for the local surrounding rural communities which now have very few other facilities and amenities.	As above.
1.2.8.6	The school at Cradoc is an integral part of the Community and rural life in the Honddu Valley.	As above.
1.2.8.7	The school building in Cradoc is the focal point for many groups and clubs and has a thriving social calendar. It provides the local community with safe outdoor space and a play area for children, and others, to use outside of school hours.	As above.
1.2.8.8	Cradoc School is a community school in the true sense of the word and hosts many community gatherings, events and activities. It provides an after-hours venue for all manner of activity from training events to election counting to harvest socials. A valued play area and village car parking location too.	As above.

1.2.8.9	Cradoc has a large community around the school, a very friendly community that would visit the Eisteddfods and help out in fun events like the PTA fair to raise money for the school (pre-covid).	As above.
1.2.8.10	The Friends of Cradoc School (PTA) have organised many community events, for example discos, Christmas celebrations, bingo, supporting 50 year celebrations.	As above.
1.2.8.11	In Cradoc we have an active and well supported PTA who have organised many events which involve not only the school pupils, parents and teachers but the wider community.	As above.
1.2.8.12	The school operates as an open school, whereby children can use the grounds out of school hours; learning to ride their bikes, play rugby or have picnics.	As above.
1.2.8.13	The Council has not accurately measured how the Cradoc School site is used by the local community.	Information about community use of the school site has been included in the Community Impact Assessment, which was initially developed based on input from the school. This has been updated throughout the process to reflect feedback received.
1.2.8.14	Cynefin – Cradoc School provides a place of belonging, it is a place that is familiar to our children (and our children's, children). It is a place that offers historical, cultural and social relevance and shapes and continues to shape our community.	Comment noted.

1.2.9 Comments about school staff

1.2.9.1	The headteacher and staff are outstanding – they know every single child by name.	The Council notes these positive comments about the staff at Cradoc C.P. School.
1.2.9.2	The school has a lovely team of staff who communicate together well, to the advantage of the children.	As above.
1.2.9.3	The teaching staff are brilliant.	As above.
1.2.9.4	The teachers know the children well and get to know the families and extended families well.	As above.

1.2.10 Comments about provision for pupils with additional needs

1.2.10.1	Children with special educational needs can thrive where there are strong familial links to the school, and where the other pupils may develop a better understanding of children who learn 'differently'.	The Council is pleased to note these comments about the support provided for pupils with additional needs at the school.
1.2.10.2	Cradoc School has a very good reputation of inclusivity and provision of specialist teaching and intervention for pupils who need extra support, something which may be spread more thinly in a much larger school.	As above.
1.2.10.3	Pupils with ALN get more time and support than they would in a larger class.	As above.
1.2.10.4	Pupils with anxiety receive very good support at the school.	As above.
1.2.10.5	The school is a safe place for children who are unsafe at home.	Comment noted. The Council would expect all schools to be a safe place for children who are unsafe at home.

1.2.11 Comments about wraparound provision at the school

1.2.11.1	Cradoc offers a breakfast and after school club which is essential for many children and their full-time working parents.	The Council recognises that wraparound provision is available at the school, which is provided by Cool Kids @ Cradoc. Should the Council proceed with the proposals, provision would continue to be available in Cradoc during Phase 1. Phase 2 of the proposals includes building a new school which would have integrated early years facilities, and the intention is that this would provide early years education and wraparound provision, ensuring that provision would continue to be available.
1.2.11.2	Cradoc School has very good wrap around care that has an excellent reputation, and many families choose the school for this facility.	As above.
1.2.11.3	Wrap around care is a strong feature of the school's provision for the community and has been rated as "Excellent" by inspectors.	As above.
1.2.11.4	Cradoc School provides its pupils with an excellent before and after school facility, this has served many families so well over the years and is a vital part of the school's provision.	As above.
1.2.11.5	The wrap around care that's provided from the school is a major help for parents.	As above.

1.2.11.6	The after school club is well attended and enables local parents to work a full day.	As above.
1.2.11.7	There is excellent Holiday / Breakfast and After School Club provision at Cradoc, coolkids@cradoc – working parents are very reliant on these services.	As above.
1.2.11.8	There is a holiday club at the school which accommodates not just Cradoc students but those from across the Brecon cluster and beyond.	As above.

2. COMMENTS ABOUT PHASE 1 OF THE PROPOSALS

2.1 Impact on quality of provision

2.1.1	Amalgamating Cradoc with the two town schools would jeopardise the excellent performance of MSI and good performance of MSJ (as assessed by Estyn).	The Council notes these concerns about the possible impact of the proposal on the performance of the existing schools. The Council is committed to providing the children and staff of the three schools with a high-quality learning environment, which will include modern, purpose-built facilities and technology fit for the 21st Century, further enhancing the school's ability to implement the new Curriculum for Wales, for the benefit of all pupils. Phase 1 of the proposals, establishing a new school initially on the current three sites, is a fundamental step in realising the outcome of Phase 2, which is the construction of a new school building.

		The intention of these proposals is to merge the three schools to establish one school, with the schools staying on their current sites temporarily until they transfer to the new building. When merging schools into a new building, the Council's approach has been to merge the schools before the new building is ready. This enables the establishment of a new governing body, the appointment of a headteacher and the development of a vision for the new school. It also allows the governors and headteacher of the new school to have direct input into the design of the new building and to ensure that the staffing of the new school is appropriate. However, there would also be benefits to Phase 1 in terms of supporting teaching, learning and leadership across the three sites. There would be the opportunity to share good practice across all sites, meaning that provision would benefit from shared expertise from all teachers. With the introduction of the new Curriculum, this approach will have a positive impact on improving outcomes for pupils. It is anticipated there would be a positive impact on quality and standards through the establishment of one new larger primary school. In respect of pupils currently attending the Mount Street Schools, this would mean that pupil progression would be monitored throughout pupils' time in primary school, from age 4 to 11, ensuring continuity in delivery and approach. As a larger school, the headteacher would be able to spend more time on leadership, enabling a greater focus on

		improving the quality of provision. In addition, there would be a larger team of staff, enabling expertise to be shared across the school and enabling more distributed leadership and professional development opportunities. Each school brings its own individuality, however, there are also many areas where, by amalgamating, staff would benefit from working together, sharing good practice, sharing knowledge and experiences in preparation for the implementation of the new Curriculum, ensuring consistency in approaches to literacy and numeracy, for example. All three schools currently provide good quality education and are self-improving schools – this is the view of the Council's School Improvement Team. It is recognised that they have different strengths, however, this will be a benefit to a new school as the school will be able to meet the needs of all pupils. With an amalgamation of the three schools, the strength in leadership and excellence identified by Estyn and the Council would be shared within the new school, impacting positively on standards and leadership. Should the proposals be implemented, then a temporary governing body would be established. The first task would be to recruit a headteacher for the new school and to establish a strong senior leadership team. The headteacher would be able to oversee the strategic development of the school as whole, supported by the senior leadership team.

2.1.2	The decision creates a large school on three separate sites with a single head teacher. This would involve disruption and is likely to impact on the standards of education at a point when stability and consolidation are needed to enable the impact of COVID to be fully assessed. Many children will have missed out and had setbacks in progress during this period and the cost benefits of this drive to amalgamate need careful consideration.	As above.
2.1.3	Phase 1 and the merger of three schools places the school community at risk and threatens the following at Mount Street Infants: Excellent Estyn Report 2020, high standards, categorisation, school grounds, school woodland, planted over 20 years ago and named the Millennium Wood, Platinum Eco school, Healthy School National Award, ICT infra structure, links with town including Dementia Matters, The Hours art exhibition, visits to bakery, fire station. Parents of children at the school and within the 3+setting, services families, Nepalese families. PTA Smarties Little Gems.	As above.
2.1.4	Mount Street Infants School has an Improvement Capacity of A and a Support Capacity of Green. Will Powys County Council agree that amalgamation of the schools will result in Mount Street Infants School losing these categorisations that they have worked so hard to achieve.	As above.
2.1.5	Mount Street Infants School gained a very favourable Excellent/Good Estyn report in 2020, and Mount Street Juniors School also had a Good Estyn report on their last inspection. Many of the aspects that achieved these results	As above.

	will be lost in merging the schools and may cause lower Estyn report results in the future.	
2.1.6	Can PCC explain why it is willing to sacrifice an excellent school like Mount Street Infants, with an ideal setting for the Foundation Phase and the New Curriculum, for no short term benefit and no guarantee of a new school?	As above.
2.1.7	The latest Estyn inspection report rates Mount Street Infants School as EXCELLENT across 2 inspection areas and GOOD across 3 inspection areas. Mount Street Junior School is rated as GOOD across all 10 inspection areas and Cradoc C.P. School is rated as ADEQUATE across all 10 inspection areas. Will Powys County Council agree that standards of education and progress in the 3 schools are not all currently good?	It is acknowledged that there are differences in the findings of the latest Estyn inspections of the three schools. Information about each school's latest Estyn inspection was included in the consultation document published in respect of these proposals. Whilst there are differences in the findings, it must also be noted that the three inspections did not take place at the same time – Mount Street Infants' last inspection took place in 2020, Mount Street Juniors last inspection took place in 2016, and Cradoc C.P. School's last inspection took place in 2017, with a review in 2018. All three schools currently provide good quality education and are self-improving schools – this is the view of the Council's School Improvement Team. It is recognised that they have different strengths, however, this will be a benefit to a new school as the school will be able to meet the needs of all pupils. Each school brings its own individuality, and there are also many areas where, by amalgamating, staff would benefit from working together, sharing good practice, sharing knowledge and experiences in preparation for

		the implementation of the new Curriculum, ensuring consistency in approaches to literacy and numeracy, for example. With an amalgamation of the three schools, the strengths identified by Estyn and the Council in respect of each of the three schools would be shared within the new school, impacting positively on standards and leadership.
2.1.8	It has been acknowledged that Mount Street Infant School is well placed to deliver the requirements of the new curriculum. What evidence is there that a new school would be better placed to do this? It will depend on the new staffing structure and the new governing body & especially the new Headteacher, none of which are yet in place.	There would also be benefits to Phase 1 in terms of supporting teaching, learning and leadership across the three sites. There would be the opportunity to share good practice across all sites, meaning that provision would benefit from shared expertise from all teachers. With the introduction of the new Curriculum, this approach will have a positive impact on improving outcomes for pupils. It is anticipated there would be a positive impact on quality and standards through the establishment of one new larger primary school. In respect of pupils currently attending the Mount Street Schools, this would mean that pupil progression would be monitored throughout pupils' time in primary school, from age 4 to 11, ensuring continuity in delivery and approach. As a larger school, the headteacher would be able to spend more time on leadership, enabling a greater focus on improving the quality of provision. In addition, there would be a larger team of staff, enabling expertise to be shared across the school and enabling more distributed leadership and professional development opportunities.

2.2 Impact on pupils

2.2.1	One school, one Headteacher, operating over three sites for up to five years is a ridiculous way to manage transition to a possible new school. I do not believe this arrangement will be best for our children's education, especially when so much is being asked of teachers, with COVID and a new curriculum to embed.	The Council recognises that any school reorganisation process creates a period of uncertainty for all involved, including children, and that the last couple of years have been particularly difficult due to the Covid pandemic. The Council is committed to supporting schools and learners, including through periods of change. An experienced member of staff from the Council is supporting school leaders to help them manage possible changes for their learners. It is also expected that school governors, staff and parents support the children to ensure that there isn't a detrimental impact on their wellbeing. The Council is committed to providing the children and staff of the three schools with a high-quality learning environment, which will include modern, purpose-built facilities and technology fit for the 21st Century, further enhancing the school's ability to implement the new Curriculum for Wales, for the benefit of all pupils. Phase 1 of the proposals, establishing a new school initially on the current three sites, is a fundamental step in realising the outcome of phase 2, which is the construction of a new school building as this will enable the school's governors, staff, pupils and parents to have an input into the design of their new school. The intention of these proposals is to merge three schools to become one school, with the schools staying

		on their current sites temporarily until they transfer to the new building. Disruption for pupils would be minimal during the first phase of the proposals, as it is expected that most staff would remain on their current sites, although it is recognised that senior leadership may change. Pupils would be able to participate in discussions such as the name and logo of the new school. It would be a decision for the temporary governing body whether a new uniform would be needed, but usually, pupils are able to participate in this discussion as well. It is recognised that there would be more disruption for pupils when they move into the new school building, but they would also have the opportunity to be part of the development of the new building. The Council usually organises sessions with pupils (and governors, staff and parents) during the development of new school designs, and site visits would be arranged as the construction unfolds. In Powys there are examples of headteachers successfully managing schools across more than one site, including a three-school federation across three school sites. This has been successfully implemented with standards being maintained across each of the schools.
2.2.2	Concern about three sites being run by one Headteacher for up to five years – this will place massive demands on teachers, with COVID and a new curriculum to embed, and if	As above.

	it goes wrong, it will impact on our children's education long term. Estyn did not see evidence that the plan will improve outcomes.	
2.2.3	Phase one presents no benefit for the children of Mount Street Infants School.	As above.
2.2.4	Concern that pupils would have years of uncertainty with a fragmented school over three sites and little chance of an amalgamation on-site in a new school.	As above.
2.2.5	The proposed changes during Phase 1 will not make any positive changes that will contribute to improving the education and well-being of the children at Mount Street Infant School.	As above.
2.2.6	The impact of Covid-19, the uncertainty of the consultation process and potentially more disruption during Phase 1 will bring a time of insecurity to the children when they actually need the school to be a constant and calm sanctuary during these turbulent times.	As above.
2.2.7	The Covid-19 pandemic has had a devastating impact on the school community and changed forever the formative experiences of the children. The focus of the school staff, families and children needs to be on the establishment of routines to rebuild progress in skills across the whole curriculum. This proposal potentially will cause years and years of continued disruption for these children.	As above.

2.2.8	How will Powys CC protect well-being and education of the children during Phase 1?	Should the Council proceed with the proposals, the new school would be responsible for ensuring that the needs of all pupils are met.
2.2.9	During Phase 1 how will Powys CC protect our children from the services community?	Should the Council proceed with the proposals, the new school would be responsible for ensuring that the needs of all pupils are met, including children from the services community.
2.2.10	The school provides an exceptionally calm, nurturing family atmosphere so that nearly all pupils want to come to school and feel happy and safe there. How will Powys County Council provide better than our children have now? The emotional and behavioural support provided for pupils is outstanding and reflects staff knowledge of the needs of individual learners. How will Powys County Council improve on the outstanding emotional and behavioural support that the pupils of Mount Street Infants School currently have?	Should the Council proceed with the proposals, the new school would be responsible for ensuring that the needs of all pupils are met. The Council recognises the outstanding practice which currently exists at Mount Street Infants School. The practices and strategies employed by all staff at the school would be retained within the new school, and learning experiences would be enhanced following the planned move to a new building in the future.

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

2.3.1 Concern about loss of school identity

2.3.1.1	There will be a loss of individual school identity with amalgamation.	The Council notes these concerns that implementation of the proposals would lead to a loss of individual school identity. Should the Council proceed with the proposals, the three schools would become part of one new school. There would be an opportunity to develop a new sense

		of identity and ethos within the new school, building on the strengths of the current schools and there would be an opportunity for pupils and the wider school communities to contribute to developing the identity of the new school.
2.3.1.2	Amalgamation will lead to the loss of each individual schools identity.	As above.
2.3.1.3	Not happy to change school name and uniforms when nothing else is changing immediately as this seems to lose the schools' identities for no reason.	As above.
2.3.1.4	The proposal for phase one is to close Mount Street Infants School which will impact hugely on the pupils as they will no longer go to Mount Street Infants School but to a currently unnamed school. Does Powys County Council agree that the school's identity will be lost?	As above.
2.3.1.5	How will an identity as a 'school' be possible when the children are not able to mix with the other children on a regular basis and can't even see the other 'school' buildings from their own playground?	The Council notes these comments about school identity. Should the Council proceed with implementation of the Proposals, a new school would be established which would initially operate across the three existing sites. There would be an opportunity to develop a new sense of identity and ethos within the new school, building on the strengths of the current schools, and there would be an opportunity for pupils and the wider school communities to contribute to developing the identity of the new school. All schools operate within their own school communities, and there would be an opportunity to

		develop a new school community. A creative, innovative headteacher would be able to put arrangements in place to enable whole school activities. There would be a single School Council, which would work together to ensure pupil voice was heard.

2.3.2 Concern about loss of school awards

2.3.2.1	The schools may lose a lot of the certifications they have worked so hard to get.	The Council notes these concerns that should the proposals be implemented, the schools would lose the certifications and awards they currently have. Although the certifications may be lost, the high quality provision which the schools have developed to achieve these certifications would be maintained. The new school could reapply using the evidence they have from the three schools. The work the schools do to achieve certifications is for the benefit of the pupils. This will be maintained as strong processes are in place within the school and these would not be lost if the proposals were to be implemented. Schools do not carry out these projects solely to get the recognition of the badges or flags, but for the impact these have on the pupils.
2.3.2.2	Mount Street Infants will lose their hard earner awards and accolades, such as Eco-School and Healthy School.	As above.

2.3.2.3	Cradoc School currently holds a Platinum Eco Schools award. What will happen to such awards if the school is merged with others?	As above.
2.3.2.4	Telling the Eco Committee children during their interview that it is okay to lose their Healthy Schools award and Platinum Eco Flag status because as a new 'school' they can just start again, shows a poor understanding on the Transformation Team's behalf, of the hard work that it takes to achieve this level of commitment.	Comment noted.

2.4 Concern about changes to leadership arrangements

2.4.1	Concern that the current headteachers would lose their jobs.	The Council fully acknowledges that any school reorganisation period causes a period of uncertainty for those affected by the proposals, and that in this case, implementation of the proposals would impact on the current headteachers. Ensuring that staff are treated fairly throughout any process is a fundamental and important principle. Should the Council decide to go ahead with the Proposals, the Council would work with the temporary governing body, which would be responsible for agreeing the staffing structure. Its first task would be to appoint a headteacher for the new school, followed by the senior leadership team. There would be opportunity for the current headteachers to be considered for any posts within the new school. A temporary governing body can, under

		certain circumstances, ringfence the positions of headteacher and deputy headteacher to those currently in these positions, rather than go to a national advert (as would normally be the case for a headteacher position). This would therefore be a decision for any temporary governing body. However, there would need to be a formal consultation process to ensure that the process was carried out fairly and legally and to try and avoid any compulsory redundancies. An experienced headteacher is working for the Council to support school leaders. In addition, staff wellbeing will be supported throughout the process by the HR team and unions, and staff can access the Employee Assistance Programme which is currently delivered through Care First.
2.4.2	Concern that at least 2 headteachers would lose their jobs.	As above.
2.4.3	Concern about one headteacher taking on the work that 3 headteachers are currently needing to do.	The Council notes this concern about an increase in workload for the headteacher. When developing a staffing structure for the new school, the temporary governing body would need to consider the school's leadership structure, and would need to ensure sufficient leadership positions across the three sites to support the headteacher. In Powys there are examples of headteachers successfully managing schools across more than one site, including a three-school federation across three school sites. This has been successfully implemented

		with standards being maintained across each of the schools.
2.4.4	To share 1 Headteacher over 2 sites is difficult but to share 1 Headteacher over 3 sites is impossible.	As above.
2.4.5	It is my view that merging the jobs of three people into one will have a detrimental effect on the running of each school.	As above.
2.4.6	One person in charge of three sites does not offer a comparable level of leadership as it is physically impossible for them to be in three places at once or to be able to give as much time and energy to each individual school as they do currently.	As above. The headteacher would manage their time between the sites, and an appropriate leadership structure would be put in place to ensure appropriate arrangements when the headteacher is not on a particular site. Each site would have a deputy headteacher or teacher in charge to oversee the school while the headteacher was not on site. They will have designated roles and responsibilities which would include what to do when the headteacher was not on site.
2.4.7	It is going to be a very difficult task for one Head teacher to manage 3 schools. What will happen if there is a problem in one of the town schools if the Head teacher is at the country school? The Head teacher could spend their time travelling between the schools several times a day when their time would be better spent doing their job not travelling.	As above.
2.4.8	The new Headteacher may have to travel between the 3 schools several times per day.	As above.

2.4.9	The new Headteacher will be going back and fore between the 3 schools. This will impact on the deputy Heads which will then impact on their availability to teach if they are dealing with incidents.	As above.
2.4.10	Amalgamation of the 3 schools would lead to additional travel costs for the Headteacher, for staff and for governors.	It is not expected that staff would move between sites, although there would be occasions when the whole group of staff would come together for professional learning, team building etc. However it is not expected that there would be significant additional travel for staff, as two of the three sites are located next to each other, and the other is only a few miles away. As indicated in the consultation report, any staff affected by this may be eligible for payments under the disturbance policy and/or claim mileage for travel between sites.
2.4.11	The 3 current headteachers are very involved in school life. If this proposal goes ahead, at least 2 will lose their jobs and there is no way that they can know all the pupils and parents as well as they do now.	The headteacher would be present at each school site throughout the week and should still be able to build strong relationships with pupils and their parents and know them as individuals. In addition, each site would have a deputy headteacher or teacher in charge to oversee the school while the headteacher was not on site, who would be available on site throughout the week.
2.4.12	The headteachers of the current schools are always visible at drop-off and pick-up, they respond quickly to parent concerns and know all the children by name, often along with siblings and parents names too. If this proposal goes ahead with only 1 headteacher running 3 sites, there is no way that they can	As above.

	be on every campus every day, and therefore will not be able to maintain the same close student/parent relationships they have now.	
2.4.13	What impact will the absence of a familiar Headteacher within the same building, five days a week, who knows all of their names, have on the atmosphere of the 'school' and the children's recognition of authority, support and esteem?	As above.
2.4.14	The school operating over three sites with one headteacher will be detrimental to pupils' education and well-being. This may lead to pupils not knowing who their headteacher is.	As above.
2.4.15	One head teacher and one Governing Body cannot have the same close relationship with each individual school site and community of parents and carers.	As above. Whilst the make up of the Governing Body would be dependent on who wants to be part of the Governing Body, the Council's expectation would be that the Governing Body would include some members who are associated with each site.
2.4.16	PCC has not understood that one head teacher cannot effectively cover three school sites to complete the responsibilities listed below: Manage the changes due to the amalgamation of three schools, including changes to staffing structures and Governing Bodies; Respond to the continued demand of COVID; Ensure that three School Development Plans are developed; Maintain ALN provision and the SSC class at Mount Street Infants and Junior Schools; Embed the New Curriculum for Wales; Ensure the 3+ setting at the infants thrives and numbers attending are stable or increasing; Support the children and families from the military	The Council notes this concern regarding the demands that would be potentially placed on one headteacher covering three sites during Phase 1. When developing a staffing structure for the new school, the temporary governing body would need to consider the school's leadership structure, and would need to ensure sufficient leadership positions across the three sites to support the headteacher. There would also be a need to clearly define the roles and responsibilities of each member of the school's

	services. Ensure that grants from the MoD that have been awarded to individual schools are spent as stated in the grant applications made by individual schools.	leadership team. Whilst there are some roles that only headteachers can attend, there are other responsibilities which could be undertaken by other members of the school's leadership team. In Powys there are examples of headteachers successfully managing schools across more than one site, including a three-school federation across three school sites. This has been successfully implemented with standards being maintained across each of the schools.
2.4.17	The expectation of a new Head, leadership team and governors would be immense and very pressured. How do you expect them to cope and manage just some of the following? - School on three different sites; New ALN code; New school curriculum; Staffing; Inevitable budget cuts; Differing parents' expectations on the three sites; ALN Unit; Three-year-old setting; Pupil numbers; Differing ethos; Estyn inspections; Service pupils; EAL pupils; Building maintenance; Utilities and maintenance contracts; Service pupils arriving anytime throughout the year from all over the UK and world. Given the experience, I do not believe they will get the support and resources to manage all of this from the County, which will inevitably negatively impact pupils, families, and staff.	As above.
2.4.18	One headteacher across three schools in the interim seems inappropriate. The stress that would put on one person particularly during current COVID regulations, new curriculum visions and new ALN transformations! It is not practical to have one head manage all of these administrative duties as	As above.

	well as get to know all pupils in all of the schools and support staff. It is staff knowing their children which makes schools the positive learning experiences that they are.	
2.4.19	How can one headteacher covering three sites possibly work, especially in the current climate? Standards will definitely fall, so will the morale of teaching staff. This will drag on for several years – how much damage will that do to the children's education?	In Powys there are examples of headteachers successfully managing schools across more than one site, including a three-school federation across three school sites. This has been successfully implemented with standards being maintained across each of the schools.
2.4.20	In Phase 1 there will be even more responsibility placed on leadership teams in each school with a head teacher stretched over three sites.	When developing a staffing structure for the new school, the temporary governing body would need to consider the school's leadership structure, and would need to ensure sufficient leadership positions across the three sites to support the headteacher. There would also be a need to clearly define the roles and responsibilities of each member of the school's leadership team. Whilst there are some roles that only headteachers can attend, there are other responsibilities which could be undertaken by other members of the school's leadership team.
2.4.21	There would be enormous pressure on the school leadership team to manage the day-to-day running and maintenance of the three sites and be actively involved in organising and planning a new build.	As above.
2.4.22	One head teacher covering three school sites will not have adequate time to support staff. The deputies at each school will become the leader of each separate school site and will	As above.

	have to pick up the day to day running of the schools with an overall loss in teaching resource.	
2.4.23	Operating across 3 sites would cause increased stress for the Headteacher, less support for staff and pupils and increased workload for the Headteacher.	As above.
2.4.24	The timescale that a Headteacher would be responsible for three schools is not clear.	The Statutory Notice published in respect of these proposals proposes to open a new school on the existing sites from the 1st September 2023, with a move to a new building planned to take place during 2025/26.
2.4.25	The proposal states “operating across 3 sites could cause challenges for the school’s leaders during this phase”. What it fails to say is that these challenges could continue for many years if 21st century funding for a new build is not secured. How is it in the best interest of the pupils, parents, Headteachers, teachers, support staff, cooks, cleaners or governors for this proposal to proceed?	The Council has included the development of new schools in the Brecon catchment in its revised Strategic Outline Programme for the 21st C Schools Programme. Should the Proposals be approved by Cabinet, then the Council would commission the first stages of the design process, and develop a Strategic Outline Case for the approval of Cabinet and the Welsh Government. It would then further work up the plans through the RIBA stages, and develop an Outline Business Case, again for Cabinet and Welsh Government approval. Following this, a Full Business Case would be prepared, and once approved by Cabinet and the Welsh Government, construction would commence. Welsh Government do not release funding until the Full Business Case is approved – up to this point, any approvals given by the Welsh Government are approvals ‘in principle’. If the Welsh Government ’s contribution to the project was not available, the Council would fund the project

		directly from its own capital programme, through a combination of asset sale and borrowing.
2.4.26	Operating across 3 sites would not enable increased focus on leadership compared with the current situation at Mount Street Infants.	When developing a staffing structure for the new school, the temporary governing body would need to consider the school's leadership structure, and would need to ensure sufficient leadership positions across the three sites to support the headteacher. There would also be a need to clearly define the roles and responsibilities of each member of the school's leadership team. Whilst there are some roles that only headteachers can carry out, there are other responsibilities which could be undertaken by other members of the school's leadership team.
2.4.27	Phase one could impact on the standards at Mount Street School as the new Headteacher will be concentrating on raising standards at the other 2 schools.	Should the Council proceed with implementation of these proposals, the three current schools would close, therefore there would not be 2 'other' schools. The new Headteacher would be required to maintain high standards across all three sites.
2.4.28	If schools were to go back into lockdown or outside visitors need to be restricted, how would this work with one Headteacher covering three sites?	As well as a headteacher, each site would have a designated teacher in charge or deputy headteacher. They would be responsible for the school when the headteacher was off site. In terms of any return to lockdown, the decision would be made by the headteacher and the governing body. This would be the same as current regulations.

2.4.29	It is likely that disruption from COVID will continue for several years. A headteacher covering three sites would be severely challenged to visit all three sites safely.	The Covid local management of schools is in place to support schools with the risk assessment around the transferring of staff between sites. Currently, Powys has several schools with shared headteachers and they are able to move between schools safely, ensuring they follow all Covid guidance.
2.4.30	The complexity of one Headteacher visiting the schools with Covid-19 restrictions in place and improving standards at all three schools is unrealistic.	In Powys there are examples of headteachers successfully managing schools across more than one site, including a three-school federation across three school sites. This has been successfully implemented with standards being maintained across each of the schools during the Covid period.

2.5 Concern about changes to staffing arrangements

2.5.1	We believe that disruption from COVID is likely to continue for several years. Staff will not be able to liaise with other teachers to further develop transition plans from Foundation Phase to Key Stage 2 within a larger school on three sites.	The Council notes that any school reorganisation proposal leads to a period of uncertainty for those affected by the proposal, including staff, and notes these concerns about the possible impact on staffing arrangements should the Council proceed with implementation of the proposals. Any staffing changes required through Phase 1 and beyond would need to be duly consulted on and support will be given to staff throughout this process by HR and the relevant trade unions. Should the Council proceed with implementation of the proposals, the headteacher would be the lead in

		bringing together the senior leadership team to ensure they are a consistent and coherent team. There are other schools in Powys that are multi-sited and Powys would be happy to link these to the new headteacher to share their experiences in establishing and maintaining consistency across their schools. There would be opportunities for all staff to liaise with other staff. In the first phase, whilst it is expected that staff would remain on their current sites, there would be enhanced opportunities to share expertise and knowledge within a wider group of staff. Over the pandemic period, staff have become used to using technology and applications to work virtually with other schools and to take part in training opportunities.
2.5.2	Concern that implementation of Phase 1 would not lead to staff unity across the new school, and that there would be low morale.	As above.
2.5.3	Concern that there would be a fragmented SLT team which would negatively impact pupils.	As above.
2.5.4	There is high potential for negative impacts on staff during Phase 1.	As above.
2.5.5	Amalgamation could lead to taxis having to be provided to transport staff between schools, again an additional cost as happened when contact centre staff travelled between new County Hall and Neuadd Brycheiniog.	It is not expected that staff move between sites, although there would be occasions when the whole group of staff would need to come together for professional learning, team building etc.

2.5.6	How will Powys CC protect staff during Phase 1?	The Council notes that any school reorganisation proposal leads to a period of uncertainty for those affected by the proposal, including staff, and notes these concerns about the possible impact on staffing arrangements should the Council proceed with implementation of the proposals. Any staffing changes required through Phase 1 and beyond would need to be duly consulted on and support will be given to staff throughout this process by HR and the relevant trade unions. Staff wellbeing would be supported throughout the process and beyond by the HR team and unions, and staff can access the Employee Assistance Programme which is currently delivered through Care First.

2.6 Concern about governance arrangements

2.6.1	An interim Governing Body will be given the responsibility to carry out a plan that does not have the support of two of the three schools' current Governing Bodies. This interim Governing Body will not have adequate representation from the three schools and will carry a heavy burden to deliver what has been entirely the Local Authorities decision.	The Council notes this concern about the make up of the temporary Governing Body. Should the Council proceed with implementation, the Council would work with the current Governing Bodies to support transition to the new operating model, for the benefit of the pupils, staff and wider school communities. The temporary governing body would be made of existing governors at each of the three schools, who would be asked to express interest in being part of the temporary governing body. Every effort would be made to ensure a fair balance between the three schools as

		far as possible and the Council would work with the schools to ensure that balance.
2.6.2	The proposed number of teacher governors (1 or 2) will not be a fair representation of all 3 schools during phase 1 of the proposal. The proposed number of teacher governors (1 or 2) and staff governors (1) will not be a fair representation of all 3 schools during phase one of the proposal. As the temporary governing body would be responsible for appointing a Headteacher and for developing a new staffing structure this imbalance could have an impact on the decisions made by the temporary governing body. Does Powys County Council agree that the structure of the temporary governing body presents an imbalance which could impact on the decisions made?	The make up of the new school's governing body would be determined by the Government of Maintained Schools (Wales) Regulations 2005. Every effort would be made to ensure a fair balance between the three schools as far as possible, and the Council would work with the schools to ensure that balance.

2.7 Comments about mixing rural and town schools

2.7.1	The town and rural schools present different issues and require different solutions.	Whilst noting these concerns that the Council is proposing to amalgamate two schools which are located in Brecon with a third school which is located in a more rural setting, all schools in the Brecon catchment have a strong collaborative ethos and work very well together as a cluster of schools – these include schools that are located in the town of Brecon and in rural settings, plus a mixture of English-medium, Welsh-medium and dual stream schools, some with a Church in Wales ethos. The schools already have strong links, whatever their status.

		Analysis of the pupils attending Cradoc C.P. School suggests that a significant proportion come from the town of Brecon itself. All schools deliver education based on the same curriculum and are planning to introduce the new Curriculum, whether they are located in a rural or a town environment.
2.7.2	It does not appear to be well thought out to propose to amalgamate two urban schools with a rural school.	As above.
2.7.3	Whilst it makes sense that the Junior and Infants' urban schools in Mount Street should be merged, as Cradoc is a completely separate Rural school it should never have been included in this reorganisation.	As above.
2.7.4	A merger with Cradoc School is not in the best interest of the children of Mount Street Infants School. Cradoc School is a rural school and should not be amalgamated with an urban school.	As above.
2.7.5	Cradoc is a rural school serving a rural community, unlike the two Mount Street schools who are town schools serving a town community.	As above.
2.7.6	It does not make sense to amalgamate a rural school (Cradoc) with two town schools (Mount Street Infants and Mount Street Juniors) where there have been no previous links.	As above.
2.7.7	Whilst I can see it might make sense to have closer links between Mount Street Juniors and Mount Street Infants, it makes no sense to include Cradoc in this proposal.	As above.

2.7.8	There seems no sense to add Cradoc into the mix; there is no history of links between Mount Street and Cradoc, the former are in Brecon, and Cradoc is a rural school with very different communities. It seems that it has all just been lumped together with no thought on the outcome and impact.	As above.
2.7.9	The proposal considers the merge of two urban schools and one rural school. These schools currently cater for a wide range of backgrounds and walks of life suited to their specific location and the pupils who attend them.	As above.
2.7.10	It is difficult to see the logic in merging 2 town schools with a rural school when they have no previous connections. The needs of Cradoc School and their community cannot be met by joining with Mount Street schools and Powys County Council should consider addressing the issues raised in the 'case for change' for Cradoc school separately.	As above.
2.7.11	I can see the logic in merging the two Mount Street Schools and cannot understand why PCC has not done this years ago. Cradoc however has no connection whatsoever with either if these two schools. PCC are comparing apples and pears, yes they are both fruit but there it ends.	As above.
2.7.12	What benefits are there for the children of Mount Street Infants School of a merger with Cradoc CP School? Mount Street Infants School has no history with this rural school. How will merging these schools "improve learner entitlement and experience" for the children of Mount Street Infants School?	As stated in previous answers, the advantages offered by single school provision for primary age pupils are well known. Due in part to an increased critical mass of learners, 'all-through' primary schools are usually able to offer both enhanced continuity of provision and a curriculum which is more broad and balanced in content, delivered in a continuous and coherent way

		from the Foundation Phase through to the end of Key Stage 2. There are skilled teachers across all three schools that would be able to share expertise and experiences to enhance the learning for all pupils.
2.7.13	How is a merger with Cradoc in the best interests of the children of Mount Street?	As above.

2.8 Concern that Phase 1 would last longer than expected

2.8.1	Can PPC state realistically how long Phase 1 is likely to exist?	The proposal outlined in the Statutory Notice is to establish the new school on the three existing sites from September 2023, with a move to the planned new building during 2025/26.
2.8.2	I do not believe PPC does know how long Phase 1 under Option 4 is likely to continue as there is no firm plans for a new school and won't be for many years.	As above.
2.8.3	The proposed time frames are unrealistic. The consultation gives no certain future end date for a new school other than at the earliest 2024.	The timeframes outlined in the consultation document have been amended in the Statutory Notice to reflect the change in the timelines for Cabinet consideration of the Consultation Report. The proposal outlined in the Statutory Notice is to establish the new school on the three existing sites from September 2023, with a move to the planned new building during 2025/26.

2.8.4	Delays by Powys CC have already caused the original dates for closure of the three schools to change from 31st August 2022 to 31st August 2023 and the original expectation of moving into a new school building to change from September 2024 to 2025/2026.	It is correct that the proposed dates included in the Statutory Notice are different to those that were included in the Consultation Document. This was because Cabinet considered the Consultation Report in respect of these proposals later than originally expected, therefore it would no longer be possible to implement from September 2022.
2.8.5	The proposal is likely to mean an amalgamated school (Cradoc, MSJ, MSI) operating across three sites for at least 4-5 years. If no funding is secured for a new school this position would be permanent and would be an awful outcome for all three schools. An amalgamated school across three sites for a period of 4-5 years or longer in our view is unacceptable.	The Council notes this concern that the amalgamated school would be required to operate across three sites for longer than expected. The Council has included the development of new schools in the Brecon catchment in its revised Strategic Outline Programme for the 21st C Schools Programme. Should the Proposals be approved by Cabinet, then the Council would commission the first stages of the design process, and develop a Strategic Outline Case for the approval of Cabinet and the Welsh Government. It would then further work up the plans through the RIBA stages, and develop an Outline Business Case, again for Cabinet and Welsh Government approval. Following this, a Full Business Case would be prepared, and once approved by Cabinet and the Welsh Government, construction would commence. Welsh Government do not release funding until the Full Business Case is approved – up to this point, any approvals given by the Welsh Government are approvals 'in principle'. If the Welsh Government 's contribution to the project was not available, the Council would fund the project

		directly from its own capital programme, through a combination of asset sale and borrowing.
2.8.6	If the planning for Phase 2 is refused due to issues with, for example, a future feasibility study, the 'new' school running from three sites could continue indefinitely which will be unsettling for parents, carers, pupils and staff.	As above.
2.8.7	It is too high a risk to amalgamate 3 schools without the guarantee that phase 2 will proceed.	As above.
2.8.8	In Phase 1 the amalgamation will cause disruption and uncertainty and there is no guarantee of Phase 2 going ahead leaving the unacceptable prospect of a school spread across three sites for an uncertain period of time.	As above.
2.8.9	Does PCC have the resources to provide adequate support for staff and the schools for a transition of 4-5 years or longer?	Additional funding would be provided to the school to enable it to operate successfully across three sites. Should the school be required to operate in this way for longer than expected, funding and support arrangements would be further reviewed, to ensure that the school could continue to operate effectively for as long as required.

2.9 Comments about funding arrangements during phase 1

2.9.1	It does not appear to be value for money to amalgamate the 3 schools at an estimated cost of £50k.	The Council is committed to providing the children and staff of the three schools with a high-quality learning environment, which will include modern, purpose-built facilities and technology fit for the 21st Century, further enhancing the school's ability to implement the new

		Curriculum for Wales, for the benefit of all pupils. Phase 1 of the Proposals, establishing a new school initially on the current three sites, is a fundamental step in realising the outcome of Phase 2, which is the construction of a new school building as this will enable the school's governors, staff, pupils and parents to have an input into the design of their new school. When merging schools into a new building, the Council's approach has been to merge the schools before the new building is ready. This enables the establishment of a new governing body, the appointment of a headteacher and the development of a vision for the new school. It also allows the governors and headteacher of the new school to have direct input into the design of the new building and to ensure that the staffing of the new school is appropriate. As indicated in the Consultation Document, estimated annual revenue savings were £16,181 as part of Phase 1, and £220,066 for Phase 2. Following the revision of the school funding formula for primary phase schools, the estimated saving is now approximately £6,400 for Phase 1 and then £137,410 for Phase 2 and recurrently each year afterwards. It is acknowledged that there would be some additional set up costs associated with establishing the new school – as indicated in the Consultation Document published in respect of this proposal, 'there would be some additional set-up costs. Based on previous primary school mergers, this is estimated to be in the

		region of £50k.' Whilst acknowledging that this is an additional cost, these are one off costs, some of which would need to be incurred anyway when establishing a new school. These set up costs would be recouped within the first year of the schools moving into one new build location in phase 2.
2.9.2	I understand that the set up cost for this proposal will be around £50000, which is far too high when the council will only be saving £16000 per year. Surely if the council has £50000 it could invest in updating the current sites instead?!	As above.
2.9.3	Set up cost of £50000 too high when only saving £16000 per year.	As above.
2.9.4	The document indicates that Phase 1 will result in an annual revenue saving of £16,181 per annum but the set-up cost will be in the region of £50k. Therefore, if the new school opens in 2024, phase one will have cost Powys County Council at least £16,000.	As above.
2.9.5	Amalgamation will not result in any initial finance savings as the setup costs are estimated as being approximately £50k whilst the savings are only £9,438.92 in 2022/23 and £6,742.08 in 2023/24.	In the impact assessment document, the annual savings have been split across two financial years. Of the estimated annual savings of £16,181 during phase one, £9,438.92 of this would be realised during the September – March of one financial year, and the remaining £6,743.08 would be realised during April – August of the next financial year.

		It should be noted that following the revision of the school funding formula for primary phase schools, the estimated saving is now approximately £6,400 for Phase 1 and then £137,410 for Phase 2 and recurrently each year afterwards. As stated above, these set up costs would be recouped within the first year of the schools moving into one new build location in phase 2.
2.9.6	Can PCC clarify if the £50,000 stated is a per annum or a one off cost?	The estimated £50,000 would be one off costs.
2.9.7	Can the Council define what the actual expected overall costs are for Phase 1?	The expected additional costs during Phase 1 would include the following: • Data and email merger/migrations • School website • School signage • Telephony systems merger/migration • Staffing costs
2.9.8	How will Powys CC protect public spending during Phase 1?	Powys County Council always strives to provide value for money in the delivery of its services, constantly seeking out cost savings and efficiencies, including service transformation across all service areas. Powys schools also strive to run as efficiently as possible.

		The new governing body and the new headteacher would be supported in their planning, budget setting and monitoring.
2.9.9	Although the proposals state that amalgamation should result in some efficiencies it then goes on the say that it could lead to inefficient use of resources. When school budgets are so stretched why are Powys County Council proposing an inefficient use of resources?	In the Consultation Document published in respect of these proposals, the Council states that 'there would be a need to maintain all three buildings in the short term, which would result in duplication of resources and could lead to inefficient use of resources in the short term.' However should the Council proceed with implementation of the proposal, the expectation is that the new school would use its resources as efficiently as possible.
2.9.10	Why has PCC not factored school maintenance costs over the transition period into the consultation proposal?	The maintenance costs are likely to remain the same as they are currently and are already factored into the costs through the funding formula, which allocates funding based on a property condition survey.
2.9.11	The MoD Education Support Fund, a UK wide grant, has been applied for successfully for many years. This funding has enabled Mount Street infants to employ teaching assistants to support very young services children who are having to cope with multiple changes of school. By Year 2 some services children are starting their third or fourth school. The school has been able to ensure that one of the teaching assistants is first language Nepali, to allow verbal translation for children and parents when needed. In Wales, the Supporting Services Children in Education, is able to pass on funding to Mount Street Infants. Over the past ten years £150,000 has been applied for, granted and audited successfully. The impact of this funding is threatened if Phase 1 becomes a reality.	As part of Phase 1, the pupils would remain on the current sites but as part of the new school. Should the grant continue to be available from the MoD, the new school would be able to apply for it. The application process would require the school to set out how the grant will support military children and the school would need to apply the grant in line with the grant's criteria. Given the success of the existing schools in accessing this funding, the Council does not foresee difficulties in future applications.

	Currently 3 schools can apply but it is unlikely that the level of support would be maintained. Phase 1 will have a very negative impact on the provision for the military children.	
2.9.12	During Phase 1 how will Powys CC protect the MOD Grant funding that provides supports the UK and Nepalese children?	As above.

2.10 Comments about buildings

2.10.1	It is likely to take 4-5 years to realise and implement phase two. In the interim the existing schools will still need to be adequately maintained.	The Council fully agrees that there is a need to maintain schools and to address any issues that arise, regardless of whether schools are reviewed or not. All schools are funded to maintain their schools through the funding formula, and this is based on current building condition and size of the building. This provides funding so that schools can meet their responsibility for day-to-day maintenance of school buildings, and the Council also has a Schools Major Improvements Programme to support on-going maintenance in schools.
2.10.2	Reassurance is needed that the existing school buildings will be maintained during Phase 1.	As above.
2.10.3	How will Powys CC protect the Mount Street Infant School building during Phase 1?	As above.
2.10.4	Concern that no improvements will be made to the existing buildings for the next 3 – 4 years while the Council tries to raise funds for a new site, meaning that the buildings will	As above.

	become even more dilapidated through lack of investment, which will harm pupils' primary school experience.	
2.10.5	The proposal to open a new building is yet to obtain planning permission or secure any funding, so may never happen. What will happen to the three buildings in the interim – the Cradoc building is in need of maintenance and repair.	As above.
2.10.6	Concern that the Council will not invest in the three existing site whilst waiting for a new building, meaning that they will deteriorate and pupils and staff will be expected to carry on attending them.	As above.

2.11 Other comments / questions about Phase 1

2.11.1	It is very likely that pupils will move to other schools in the Brecon Catchment during Phase 1.	The intention is to establish the new school on 3 sites initially before eventually moving to a new building. This would mean that provision would continue to be available on the 3 current sites in the short term, which would help with establishing the new school's identity and with transition to the new model. The Council would expect that pupils currently attending the 3 schools would continue to attend these sites following establishment of the new school, however ultimately parents/pupils can apply for a place in any school they choose, and they are entitled to move to other schools if that is their preference.

2.11.2	Concern about additional costs to families such as a new school uniform etc.	If the proposals are agreed, the new school would open at the start of the academic year, which would minimise the potential cost implications for parents. Whether or not to introduce a new school uniform would be a decision for the temporary governing body of the new school. It is also possible that the temporary governing body could decide to introduce any new uniform on a phased basis, minimising the additional costs for families. Funding is currently available to support low-income families with support for uniform costs.
2.11.3	Concern that it would be difficult to build relationships between the sites when pupils don't know each other and don't even recognise them from outside school because they don't live near each other.	The Council notes these concerns. A creative, innovative headteacher would be able to put arrangements in place to enable whole school activities, which would help to build relationships between pupils. This could include online activities. In addition, there would be a single School Council, which would work together to ensure pupil voice was heard, and could also make suggestions regarding how to build relationships across the three sites.
2.11.4	Concern about inequality that would be created by children at different sites not being able to access the same activities.	Whilst noting these concerns, arrangements relating to access to activities for pupils would be made by the new school, who would aim to ensure that the needs of all pupils are met.
2.11.5	How will Powys CC protect uniqueness of Mount Street Infant School during Phase 1?	Should the Council proceed with implementation of the Proposals, Mount Street Infant School would no longer exist – a new school would be established which would initially operate across the three existing sites. This

		would enable good practice and the expertise of teachers across all three existing schools to be shared across all three sites. Should the schools close, then there would be an opportunity to develop a new sense of identify and ethos within the new school, building on the strengths of the current schools. All schools operate within their own school communities, and there would be an opportunity to develop a new school community.
2.11.6	Pupil Places Capacity – The current capacity at Mount Street Infants School is 129, Mount Street Junior School has a current capacity of 172 and Cradoc CP School has a capacity of 175; a total of 476 pupils. Will Powys County Council provide an explanation as to why they propose that the capacity of the new school operating over 3 sites should be 56 less than the number currently attending the 3 schools?	The Council recognised in the Consultation Report that there was an error in the Consultation Document in respect of the capacity of the new school operating on three sites. As well as being addressed in the Consultation Report, this was corrected in the Statutory Notice, which states that 'the New School's capacity will initially by 476 for pupils aged 4 – 11'.

3. COMMENTS ABOUT PHASE 2 OF THE PROPOSALS

3.1 Concern that funding has not yet been secured for Phase 2

3.1.1	Concern that Phase 1 will go ahead without funding having been secured for Phase 2.	The Council notes these concerns regarding the funding arrangements for Phase 2 of the proposals. The Council has included the development of new schools in the Brecon catchment in its revised Strategic Outline Programme for the 21st C Schools Programme. Should the proposals be approved by Cabinet, then the Council would commission the first stages of the design process, and develop a Strategic Outline Case for the

		approval of Cabinet and the Welsh Government. It would then further work up the plans through the RIBA stages, and develop an Outline Business Case, again for Cabinet and Welsh Government approval. Following this, a Full Business Case would be prepared, and once approved by Cabinet and the Welsh Government, construction would commence. Welsh Government do not release funding until the Full Business Case is approved – up to this point, any approvals given by the Welsh Government are approvals 'in principle'. If the Welsh Government 's contribution to the project was not available, the Council would fund the project directly from its own capital programme, through a combination of asset sale and borrowing.
3.1.2	Currently there is no capital funding to build a new school.	As above.
3.1.3	The funding for Phase Two is currently not available and is in no way guaranteed.	As above.
3.1.4	Powys County Council has no guarantee of securing funding for phase 2.	As above.
3.1.5	What is the Council's plan is funding is not secured for a new school?	As above.
3.1.6	PCC has not clarified what will happen if the authority is NOT successful in securing funding for a new school.	As above.
3.1.7	What happens if Powys aren't granted funding to build the new school? No plan B for phase 2 has been outlined.	As above.

3.1.8	I think it's doubtful Powys will receive funding for phase two, which will mean years down the line there is one school over three sites, which is not beneficial for anyone and harmful for all.	As above.
3.1.9	It seems to be very risky to amalgamate these 3 schools without funding being in place for the new building. Have the Welsh Government got any money left with the amount that COVID-19 has cost?	As above.
3.1.10	Your proposal states "the Council would need to go through an extensive business case process in order to draw down funding. Should 21st Century Schools funding not be available, the Council could consider utilising alternative funding sources". The Powys County Council website states "A huge 70% of our money comes from Welsh Government, so since they are cutting that funding year on year the task of balancing our budgets gets harder." "There are tough challenges ahead". Will Powys County Council agree that it is impossible to guarantee that alternative funding sources would be available?	As above.
3.1.11	On Page 20 of the Consultation Document, the Council states that the likelihood of no capital funding is a medium risk, and the impact of this risk is high. A very high risk for all three schools.	As above.
3.1.12	It is of concern that PCC state there is a medium likelihood of no capital funding to finance the phase 2 project. In the absence of any secure ringfenced funds, we can only go on	As above.

	the vague assumption that, after reorganisation of the three schools, a new school may or may not occur.	
3.1.13	If no funding is secured for a new school, this would mean the amalgamated school operating across three sites would be permanent and would be an awful outcome for all three schools.	As above.
3.1.14	If funding for a new building doesn't materialise this will result in Cradoc School children receiving a sub-standard learning experience, due to the current state of the school building, for many years ahead.	As above. Should the schools remain in their current buildings for longer than anticipated, there would continue to be a need to maintain schools and to address any issues that arise.

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

3.2.1	This is not enough information about Phase 2 for consultees to have formulated an informed decision on the plans.	The information provided during the consultation was in line with the requirements of the School Organisation Code. A new school building in itself does not require consultation, however there is a requirement to consult where the new building is located more than one mile from the current location. The Council is of the view that consulting on the proposals is the first step that needs to be undertaken to ensure that the views of stakeholders are known before the Council commits to a significant capital investment.

		Should the Council proceed with the proposals, there would be further engagement opportunities when developing the new building, and further consultation processes would be undertaken as part of this work, including planning processes.
3.2.2	It was not possible for consultees to comment properly on Phase Two plans when no detail has been provided, as required by the School Organisation Code.	As above.
3.2.3	Because there is a wholesale lack of information about Phase 2 it is impossible make any intelligent decision or comment on this part of the proposal. There are clearly many unknowns: No secured funding; Uncertainty over future pupil numbers including no consideration of the impact of nearby new housing developments in Brecon which could see a future demand for school places; No pre-app planning advice including environmental impact assessment and transport; No assessment of how this proposal fits with other services being developed or co-located (eg Early Years Centre). There is insufficient information about Phase 2 therefore a separate consultation should take place.	As above.
3.2.4	There is insufficient information about Phase 2 to make any intelligent decision or comment. The School Organisation Code (2018) states that from case law one of the four principles for consultation should: “include sufficient reasons and information for particular proposals to enable intelligent consideration and response”. Based on this alone the information for Phase 2 in the current consultation is wholly lacking and poorly thought through. There are clearly many unknowns – future pupil numbers, no secured funding, no	As above.

	planning, no environmental impact assessment, no assessment to take into consideration other services being developed or co-located (e.g. Early Years Centre). Phase 2 is uncertain and high risk.	
3.2.5	Given the complexity of the current proposal in terms of scope and the lack of detail for Phase 2 it would have been far better going out in two stages so that people could focus firstly on the specific issues relating to a merger and later the location of a new build if necessary.	As above.
3.2.6	Phase 2 deserves an honest, genuine and inclusive conversation to investigate the possible future options for Mount Street Infants. This would be best served with a proper and fair consultation when Powys CC have considered all the options that really are affordable and achievable.	As above.
3.2.7	The Consultation Process has asked stakeholders to make a decision based on very vague possibilities for Phase Two which does still not have any written planning consent, no guaranteed funding, no published consultation with the National Parks, no published consultation with the Highways dept, no clarity of a chosen site, no published feasibility studies, no published traffic feasibility, no published water feasibility, no new impact assessment, no published designs, no published clarity regarding the Specialist Support Units, no published clarity regarding the 3 yr old settings and no published clarity on which pupils will be legible for school transport. I do not believe it is possible for me to make an informed decision without this key information?	As above.

3.2.8	Will Powys County Council delay consultation on phase 2 until such time as it is known that phase 2 can become a reality?	The Council will not delay consultation on phase 2. The information provided as part of the consultation was in line with the requirements of the School Organisation Code. A new school building in itself does not require consultation, however there is a requirement to consult where the new building is located more than one mile from the current location.
3.2.9	There is no assessment of planning, environment, transport issues – for the proposed location of the new school let alone the assessment of risk of managing a site with multiple developments potentially taking place. This supports the need to carry out a separate consultation on Phase 2.	The information provided during the consultation was in line with the requirements of the School Organisation Code. A new school building in itself does not require consultation, however there is a requirement to consult where the new building is located more than one mile from the current location.
3.2.10	When will Powys CC hold a second consultation that includes accurate information and also, affordable and achievable options for Phase Two?	The Council has no plans to hold a second consultation in respect of Phase Two.

3.3 Comments about the impact on pupils

3.3.1	Concern about the impact of moving pupils to a larger site in Brecon.	The Council recognises that any school reorganisation process creates a period of uncertainty for all involved, including children, and that in the case of the current proposals, implementation of Phase 2 of the proposals would result in a significant change for pupils. The Council is committed to supporting schools and learners through period of change. In respect of the current proposals, whilst pupils would move to a new site during Phase 2, the staff at their existing sites

		would also be transferring to the new site, and would be able to continue to support the children to ensure that there isn't a detrimental impact on their wellbeing. In addition, there would be opportunities for pupils to visit the new site during the construction process, which would help them to become familiar with the new site / building before moving there.
3.3.2	Concern that because the school would be larger, not all the children would know each other.	The Council notes this concern. However, pupils would move to the new site with the other pupils from their previous site, therefore they would have friends at the new site, as well as the opportunity to make new friends. Implementation of the proposals on a phased basis would also provide opportunities for pupils to get to know pupils on the other sites before moving to the new building, which would help to ease their transition to the new building.
3.3.3	Concern that there would be more bullying in the school because it is a larger school.	The Council notes this concern regarding potential building at the new school. It is possible that there are fewer incidents of bullying at smaller school than larger schools because of the smaller number of pupils at the schools. 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. All schools have anti-bullying policies in place, which are regularly reviewed, and these are part of the safeguarding arrangements within those schools.

3.3.4	How will Powys County Council ensure that all staff have knowledge of the individual needs of 360 pupils?	All schools, regardless of size, are able to provide for the needs of their pupils, and are required to support, challenge and nurture all pupils to achieve their full potential. Smaller schools do not necessarily mean that pupils receive a more individual education as there is often a number of year groups and a wider age range of pupils in the class. The intention is to introduce the proposals on a phased basis, meaning that pupils would initially continue to attend school in the same location. Pupils would transfer to the new building with their existing staff, meaning that these staff would continue to be available to support them with this move.
3.3.5	The instability this situation will create is already anticipated to take 5yrs. To a 5-year-old child, this will seem like a lifetime.	The Council recognises that any school reorganisation process creates a period of uncertainty for all involved, including children, and that a 5 year implementation period would seem like a very long time to a 5 year old child. Should the Council proceed with the proposals, current pupils would continue to receive good quality education on their existing site throughout the implementation period.
3.3.6	The impact Covid has already had on our children's mental well being and now the threat of their school closing and maybe having to move to a much larger urban school at primary age will definitely have a detrimental effect.	The Council recognises that any school reorganisation process creates a period of uncertainty for all involved, including children, and that the last couple of years have been difficult for all, including pupils and their families, due to the Covid pandemic. The intention is to introduce the proposals on a phased basis, meaning that pupils would initially continue to

		attend school in the same location. Whilst eventually the pupils would transfer to a new building, this would not happen immediately, and pupils would transfer to the new building with their friends, and with the staff from their previous site, meaning that these staff would continue to be available to support them with this move.
3.3.7	Phase 2 has the potential to negatively impact pupils from economically deprived backgrounds as it is sufficiently distant from housing estates in St Johns Ward to lead to attendance issues, particularly as low income families have lower likelihood of car use.	The Council notes this concern about the potential negative impact of Phase 2 on pupils from economically deprived backgrounds.

3.4 Comments about the new building

3.4.1 Concern that the new school will be too big

3.4.1.1	Primary school children and especially infant age children need surroundings that feel safe to grow in confidence. The nurture and care given in a smaller setting cannot be emulated in a larger setting and the new school could have up to 420 children.	All schools, regardless of size, are able to provide for the needs of their pupils, and are required to support, challenge and nurture all pupils to achieve their full potential. Smaller schools do not necessarily mean that pupils receive a more individual education as there is often a number of year groups and a wider age range of pupils in the class. The intention is to introduce the proposals on a phased basis, meaning that pupils would initially continue to attend school in the same location. Should the Council proceed with the plans to provide a new building, pupils would transfer to the new building with their friends, and with the staff from their previous site, meaning that

		these staff would continue to be available to support them with this move.
3.4.1.2	Concern about the potential impact of such a large school on children. Where is the evidence to suggest that this makes a good learning nurturing environment for children? Quite the opposite.	As above.
3.4.1.3	How will the outstanding levels of well-being and very positive attitudes to learning at Mount Street Infants be enhanced by our pupils attending a new larger school?	As above.
3.4.1.4	Very young children need to feel safe and secure, to know staff and other children and not be in the overwhelming and daunting environment that a bigger, bustling building would be.	As above.
3.4.1.5	Concern that children's needs would be missed because the school is too big.	As above.
3.4.1.6	The school will be too large to ensure that children get adequate input and standards are likely to deteriorate.	As above.
3.4.1.7	Being in a large school brings its own set of problems. Where there are more people, there's more trouble. Each child will no longer be known or recognised by all members of staff.	As above.
3.4.1.8	Children would attend a new school with a much larger capacity. What close contact support would they receive and what relationships would they form with the staff? How would this affect the child mentally?	As above.

3.4.1.9	Large schools are not always happy places for many children, children that have specific needs are often failed in crowded and noisy places thus leading their ability to learn at a great disadvantage.	As above.
3.4.1.10	With the sheer scale of children, break times and areas would have to be segregated, and fences would once again be built between young children and their close friends and relatives.	It would be possible that the school would need to make arrangements to organize breaktimes and lunchtimes around the larger number of pupils, as happens in the larger primary schools in Powys, however this would not necessarily mean that pupils wouldn't be able to see their friends and relatives in other year groups.
3.4.1.11	The proposal would lead to a three way merger which would involve 360-420 pupils on roll – this is too large compared to the other town schools in Brecon.	The Council notes this concern about the size of the proposed new school.
3.4.1.12	I can also only assume that class sizes in the new school will be larger than the current sizes in Cradoc, given that the new school will be built to accommodate 360 pupils?	The new school would be funded based on the total number of pupils and would be required to ensure an appropriate number of classes / teaching staff. New build primary schools are designed and built to accommodate a maximum of 30 pupils per class. This is in line with Building Bulletin 1999 Briefing Framework for Primary School Projects and Welsh Government requirements. Therefore, it is unlikely that class sizes would exceed 30.
3.4.1.13	The classes will be too big for the children to be able to have the attention in class they need.	As above.

3.4.1.14	I object to the size of the proposed new school. Clearly it would mean that class sizes will be bigger and teaching and learning quality will be jeopardised.	As above.
3.4.1.15	Pupils thrive in smaller schools and classes. Pupils in large classes are unable to explain that they are struggling, and teachers don't have the time to make sure that all pupils reach their potential.	As above.

3.4.2 Concern that the new building would be too small

3.4.2.1	Insufficient capacity - current capacity of the 3 schools is 476. The new building will support approximately 360 pupils. This clearly isn't sufficient and the other schools in the area cannot support the additional 116 pupils. The population of Brecon is expanding and so more capacity is needed not less.	The capacity figure provided for the proposed new building is indicative at this stage. As outlined on page 17 of the Consultation Document: 'Based on the PBC approved in September 2020, the intention is that the new school would move to a new building which would accommodate approximately 360 pupils – the capacity of the new school would need to be further assessed during the design stage.' This is also outlined in the Statutory Notice, which states: 'Following transfer of the New School to the new school building, it is anticipated that the New School's capacity would be 360, however this would be confirmed during the design stage.'

3.4.2.2	The proposed new school capacity does not cover the amount of students currently attending the 3 schools – where are the other children supposed to go to school?	As above.
3.4.2.3	The proposed new school does not provide enough school places. Current predicted numbers do not include the amount of new houses that are likely to be built within the area, increasing the amount of children requiring school places.	As above.
3.4.2.4	The school is likely to be too small the day it opens. There are several new housing estates, all of which could impact, increasing school numbers and putting more demand on school places.	As above.
3.4.2.5	The new school building only has capacity based on current and immediate future need. With one large housing development currently being built, and more in the pipeline, the demand for school places in Brecon is likely to increase. These plans do not appear to include any extra capacity.	As above.
3.4.2.6	The proposals do not provide enough school places. I'm aware that most cabinet members do not live close to Brecon, but they need to be aware that there are a lot of new housing developments being built locally which will increase pressure and demand for school places.	As above.
3.4.2.7	Has the predicted pupil number taken into consideration the new housing developments currently being erected in the Brecon area?	As above.
3.4.2.8	Have the figures taken into account the amount of new houses that are likely to be built within the area? Concern that	As above.

	the proposals do not provide enough school places for new families moving to the area.	
3.4.2.9	The building needs to be larger with a capacity of 500 plus pupils, or Cradoc needs to remain separate and have a new building there as well as the new building in Brecon.	As above.

3.4.3 Comments about the outdoor space at the new school

3.4.3.1	I cannot see how a Forest School will be created at the new site as I cannot see where feasibly it would be located; it will take years to develop, meaning years of school pupils will miss out on this vital resource.	The Council develops all primary school buildings in line with Building Bulleting 1999 Briefing Framework for Primary School Projects. This clearly identifies requirements in terms of sporting facilities, and outside areas to include hard and soft play areas, and habitat areas. All the Council's new school builds are designed to include outdoor spaces for learning and play, sports facilities including multi use games areas and playing fields, and the Council also sets aside areas that can be developed for forest school provision. It is recognised that the current forest school provision at the three schools have developed over time, but there are ways of providing forest school experiences without the need for a mature woodland area. Should the proposals be implemented, the governors, staff and pupils of the new school would be able to influence the design of such a space.
3.4.3.2	The superb Forest School area could not be replicated in the short term, if at all, at a new build. This would deprive them of	As above.

	a safe place to learn new skills in a special environment and would take away opportunities to learn outside in all weathers.	
3.4.3.3	Concern that pupils will lose their sector-leading outdoor learning facilities in exchange for a bare outdoor space.	As above.
3.4.3.4	The benefits of a rural school with wildlife that has been growing there for many many years will not be replicated in a new build town school.	As above.
3.4.3.5	Concern about loss of the outdoor and forest school environment at Mount Street Infants.	As above.
3.4.3.6	Loss of the woodland area at Mount Street Infants would be devastating for pupils.	As above.

3.4.4 Other concerns / queries about the new building

3.4.4.1	At Mount Street Infants School we already have classrooms, group rooms, early years facilities, staff room, hall, dining facilities, community facilities and sports facilities. What additional facilities will this proposal give Mount Street Infants School?	All new build primary schools are designed and developed in line with Building Bulleting 1999 Briefing Framework for Primary School Projects. Should the Proposals be implemented, the new school would provide similar facilities as currently in Mount Street Infants School and the other schools, and in accordance with the Building Bulletin requirements, but to a modern design specification.
3.4.4.2	As ‘no designs for the new building have been developed yet’, we are concerned that the children will get less under this proposal than they have now.	As above.

3.4.4.3	It's not very likely that Brecon Beacons National Park will give you planning permission. Have you even notified them or/and completed a site feasibility study? Surely this needs to be part of a new consultation as it is a separate issue.	Should the Proposals be implemented, the design process would begin, following the RIBA stages, the first of which is strategic definition. This includes feasibilities, including ecology studies. Planning consent is normally sought once RIBA 4 (technical design) has been completed. However, the consultancy team liaise early on with the planning department at Brecon Beacons National Park Planning Authority to get an understanding of potential issues that need to be considered prior to issuing the pre-application planning consultation. Only once this has been completed is a full planning application submitted.
3.4.4.4	There is no evidence given that a new building will provide a better education for future generations – the message it gives it that we are a throwaway society and move to new buildings when there is a perceived problem.	The Council does not agree with this statement. Options to improve / remodel the existing buildings were considered in the PBC for the Brecon catchment, however these were discounted.
3.4.4.5	Spending £10m on a new building whilst only expecting it to last for 60 years is poor use of tax payers' money. Many houses in Brecon are over 200 years old and have been modernised and are fit for the 21st century. Powys must learn from the example of its residents.	As above.
3.4.4.6	Ironically, new builds do not last as long as current school buildings and seem to have numerous maintenance issues, resulting in the council not saving as much money, as if it just used the Welsh Government 21st funding to improve and maintain the current school buildings. The council is probably more likely to receive this as it has less impact on all. It is more environmentally friendly as it utilises what we already	As above.

	have with less disruption. The maintenance funding could also be used to add green energy such as solar panels to the refurbished schools.	
3.4.4.7	There is no definitive evidence that new buildings / infrastructure provide better education as suggest by this report: https://educationendowmentfoundation.org.uk/education-evidence/early-years-toolkit/built-environment.	The Council fully agrees that new buildings alone do not provide better education.
3.4.4.8	Sian Gwenllian MS said in the Senedd recently “a school is not a building; a school is a group of children and young people learning together, led by skilled teachers who can inspire future generations.” Does Powys County Council agree that a school is more than a building?	The Council fully agrees that a school is more than a building.
3.4.4.9	It would seem that PCC are trying to offer a shiny new school to tempt everyone into thinking that the performance of the schoolchildren will improve with a new building. This is not the case, in my view performance and the excellence of a good education comes with the quality of teachers and the environment in which the children are taught.	As above.
3.4.4.10	Does the Council agree that it is teachers who will ensure provision of the new curriculum is developed, not buildings?	The Council fully agrees that new buildings alone do not provide a better education, and will not ensure that the new curriculum is successfully delivered.
3.4.4.11	Will the new build last for 60 years? None of the 3 schools in this proposal is 60 years old and Powys County Council wants to replace them. In fact, Mount Street Junior School is a new build and opened in November 1987, only 34 years ago. Given Powys County Council’s history of not maintaining	With appropriate maintenance, the expected lifespan of a new school building is 65 years.

	their buildings what guarantees can be given that a new building will be maintained and in 34 years time there won't be a proposal to replace it?	
3.4.4.12	Mount Street Infants School and Mount Street Junior School occupied one building until approximately 50 years ago when the Local Authority decided to build a new school for Mount Street Infants. What guarantees are there that, in 50 years time, the advice won't be that the school is too large, the building hasn't been maintained and therefore Powys County Council are proposing to separate the schools and build new schools?	There are never any guarantees that schools that have been through a reorganisation process will not be reviewed again in future.
3.4.4.13	There is no feasibility report. The Llansantffraid CiW School project has had to be put on hold because of the findings of the feasibility study.	It is correct that the Llansantffraid CiW School project has been put on hold because of the findings of the feasibility study, however this was a project to provide a 3 class extension to an existing school on a very constrained site. The Council's intention is to provide a new building on the former Brecon High School site, this is a large site, which was previously a school site, therefore whilst a feasibility study would need to be undertaken, the Council's expectation is that a new school building on this site will be feasible.

3.5 Comments about the proposed site

3.5.1 Comments about suitability of the site

3.5.1.1	We know that the site is big enough, but we don't know whether it is suitable for small children.	Should the proposals be implemented, the design process would begin, following the RIBA stages, the first of which is strategic definition, which would include assessing the site's suitability for the proposed development.
3.5.1.2	The site is far too windy as evidenced by the broken trees at Brecon High School.	Should the proposals be implemented, the location and situational aspects would be considered in order to design the school in accordance with its environment.
3.5.1.3	Penlan is a very windy area. The new High School has had to replace trees which have snapped in the wind. This is not the correct location for a new primary school.	As above.
3.5.1.4	The site is not suitable for youngsters as it is very steep with lots of hidden areas.	Should the Proposals be implemented, the location and situational aspects would be considered in order to design the school in accordance with its environment. Generally, the Council's approach to new school builds is to ensure that the site is level and the topography can be adjusted by levelling out the site.
3.5.1.5	The site has several different levels which may not provide a safe play area for the children.	As above.
3.5.1.6	There is no forest area on the site which Mount Street Infants has, so immediately you would lose this.	The Council recognises the importance of outdoor space and forest schools provision to the development and wellbeing of children. The Council would ensure that there would be a forest school area and other outdoor areas at the new school. Whilst it is recognised that this wouldn't be the same as

		the current forest school area at Mount Street Infant School for a number of years, the Council believes that forest school provision can be delivered in a variety of ways and does not solely rely on the availability of an area of mature trees.
3.5.1.7	There are currently no Forest School facilities – it would take years to develop an new outdoor learning areas.	As above.
3.5.1.8	If you wanted to create a new forest school on the site, it would take years for it to be properly established and wild.	As above.
3.5.1.9	Will a mature Forest School be planted at the Penlan site and what will happen to the existing Forest School at Mount Street Infants School?	As above.
3.5.1.10	Forest School takes many years to establish. How will you ensure that the grounds at the new school will have a powerful impact on our pupils' well-being and attitudes to learning form the day of opening?	As above.
3.5.1.11	Currently the children have a large level field in which to play and a well established forest school – neither of these are being proposed for the new site.	As above.
3.5.1.12	Where is PCC's evidence that it will be possible to construct a new school on the site of the Old High School? Of feasibility / suitability / planning / road safety / transport / sustainability / environmental impact?	Should the proposals be implemented, the design process would begin, following the RIBA stages, the first of which is strategic definition. This includes feasibilities, including ecology studies. Planning consent is normally sought once RIBA 4 (technical design) has been completed. However, the consultancy team liaise early on with the planning

		department at Brecon Beacons National Park Planning Authority to get an understanding of potential issues that need to be considered prior to issuing the pre-application planning consultation. Only once this has been completed is a full planning application submitted.
3.5.1.13	It is not clear if the location of the new school is suitable as regards impacts on the environment, transport, traffic; combined impacts of co-locating with other proposed (but not confirmed) facilities at the sites (Pupil Referral Unit and Community Pool); unconfirmed Active Travel and School Transport arrangements; and no consideration of the outdoor learning environment crucial to young children's education health and wellbeing.	As above.

3.5.2 Concern about the location

3.5.2.1	Penlan is not an ideal location in terms of its distance from town.	The Council fully recognises that the proposed site is slightly further away from the town centre and up a hill. There is already a primary school and early years setting located even further away from the town centre. The Council's view is that the walking route to school is not excessive. Should the Council proceed with the Proposals, ensuring appropriate Active Travel routes to the school would be an important consideration.
3.5.2.2	The site would set the school apart from the wider primary school community within Brecon as it would be located out of town.	As above.

3.5.2.3	The Penlan site is too far out of town for people to walk to.	As above.
3.5.2.4	If a new primary school is built at Penlan, hardly anyone will walk to school anymore.	As above.
3.5.2.5	Active travel would be discouraged – no parent of a young child would actively encourage them to cycle up a steep hill with a relatively narrow road at rush hour.	As above.
3.5.2.6	Children in Years 5 and 6 often walk to Mount Street Junior School on their own. They will probably no longer be allowed to walk on their own to the new school as it's further away and there will be much more traffic.	As above.
3.5.2.7	The pavement leading up the hill is narrow and unsafe, so the walk to school will be much more dangerous.	As above.
3.5.2.8	The proposed site is unsuitable and wholly inaccessible for many people unless travelling by car. It is on a slope and small children cannot be expected to walk up to school.	As above.
3.5.2.9	The location up the hill would mean that more people would drive to school.	As above.
3.5.2.10	What plans do the Council have for improving the walking routes to the site?	Should the Council proceed with the Proposals, ensuring appropriate Active Travel routes to the school would be an important consideration.
3.5.2.11	The location at the top of a very steep hill will make it less likely that pupils will be able to participate in activities in the town e.g. dementia group, cathedral, theatre.	The Council notes this concern that the proposed location of the new school would affect the school's ability to participate in activities in the town. There is already a primary school and early years setting

		located even further away from the town centre than the proposed site, therefore the Council's view is that the distance is not excessive. However this concern will be reflected in the updated Community Impact Assessment which will be considered by Cabinet when determining whether or not to proceed with implementation of the proposal.
3.5.2.12	It would be more difficult for parents, perhaps with buggies, to walk to the new site.	The Council notes this concern that it would be more difficult for parents, particularly those with buggies, to walk to the new site.
3.5.2.13	There has been no assessment of the impact on families with pushchairs walking to the site.	Concern that it would be more difficult for pregnant women / young mums to access the proposed site was noted in the updated equality impact assessment. This will be further updated to reflect the objections received, and an updated version will be considered by Cabinet when determining whether or not to proceed with implementation of the proposal.
3.5.2.14	There has been no assessment on the impact on older people walking to the site.	Concern that it would be more difficult for older people to access the proposed site was noted in the updated equality impact assessment. This will be further updated to reflect the objections received, and an updated version will be considered by Cabinet when determining whether or not to proceed with implementation of the proposal.
3.5.2.15	Concern about the impact on disabled people due to the location up a hill.	Concern that it would be more difficult for pupils / parents with disabilities to access the proposed site was noted in the updated equality impact assessment. This will be further updated to reflect the objections

		received, and an updated version will be considered by Cabinet when determining whether or not to proceed with implementation of the proposal.
3.5.2.16	There is no suitable public transport for parents/carers from Brecon town to the Penlan site.	Should Phase 2 of the Proposals be implemented, the Council would consider public bus arrangements and timetables in order to ensure that they provide convenient access to the Penlan site.
3.5.2.17	Locating the school so far from the centre of town will reduce footfall on Brecon High Street.	These concerns regarding the impact on the Brecon economy are noted. The proposals' impact on the economy is considered in the integrated impact assessment, which was updated following the consultation period to reflect this concern, and will be further updated to reflect the objections received.
3.5.2.18	There is no 'Cynefin' at Penlan. 'Cynefin' is found in the town of Brecon not on the outskirts.	The Brecon area is rich and diverse and well suited to the Cynefin aspect of the new Curriculum for Wales. A school would explore the community it serves rather than where it is located. Therefore the pupils would not lose the links with the Brecon community and the whole area served by the school as part of their curriculum experience.
3.5.2.19	According to the new curriculum, Cynefin is defined as "the place where we feel we belong, where the people and the landscape around us are familiar, and the sights and sounds are reassuringly recognisable." There is no "Cynefin" at Penlan for young children.	As above.

3.6 Comments about other facilities on the proposed site

3.6.1	It is unclear who will manage the swimming pool.	It is the intention that the development of a new swimming pool would be part of the redevelopment of Brecon Leisure Centre, replacing the current swimming pool, and would be managed by Freedom Leisure – its usage during school hours by the community would be subject to discussion and agreement with Freedom Leisure.
3.6.2	Who will be managing the community swimming pool; the school or the leisure centre?	As above.
3.6.3	Will the community be able to use the swimming pool during school hours?	As above.
3.6.4	It would be better to co-locate a swimming pool with the leisure centre. It doesn't seem to make much sense to co-locate a swimming pool with a school when there is a leisure centre on the other end of the site.	As above.
3.6.5	What investigations regarding safeguarding issues has Powys County Council undertaken with regards co-locating a community swimming pool with a primary school?	It is the intention that the development of a new swimming pool would be part of the redevelopment of Brecon Leisure Centre, replacing the current swimming pool, and would be managed by Freedom Leisure – its usage during school hours by the community would be subject to discussion and agreement with Freedom Leisure. Should the Council proceed with the proposals, safeguarding would be an important consideration when developing designs.
3.6.6	It is unclear who will manage the Pupil Referral Unit.	The PRU would be managed by the PRU Management Committee and led by the Headteacher of the PRU.

3.6.7	The Pupil Referral Unit should be co-located with Brecon High School and not with a primary school.	As above.
3.6.8	The PRU has only been entered into the mix as it will attract an extra 10% of funding from Welsh Government.	This is untrue. The PRU has been included as there is a need to provide alternative accommodation for the PRU which is currently located in Brecon.
3.6.9	Should a Pupil Referral Unit be co-located with a primary school? Wouldn't it be better to co-locate a PRU with the High School as the pupils are of the same age group?	The PRU in Brecon provides education for pupils aged 7-18.
3.6.10	There has been no clear thinking about the other services and community facilities being proposed in Brecon – for example early years centre, new community pool, pupil referral unit and how these might affect all the other schools in the Brecon catchment or be better linked to / aligned with the overall education provision and accessibility to services within Brecon.	Comment noted.

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

3.7.1	What will happen to the current school sites should they close?	Should the Council proceed with the proposals in respect of Mount Street Infants, Mount Street Juniors and Cradoc C.P. School, the three school buildings would eventually be declared surplus following the move to a new building. All surplus assets are subject to the process of disposal as outlined in the Council's Asset Management Policy. Whilst it is possible that this could lead to sale of the sites to third parties, some schools that have closed have been transferred to other

		service areas e.g. housing or to a community - with the latter, this may allow for the space to be retained or developed for community use.
3.7.2	Should the proposed development at Penlan go ahead, the existing site of Cradoc School would be developed for housing.	As above.
3.7.3	If Powys County Council were to sell the Mount Street Infant School site there would be a loss of a green space in the heart of Brecon.	The Council notes this concern about potential loss of green space in Brecon.
3.7.4	Concern about potential loss of green space in Brecon. The future of the school playing field and woodland area at Mount Street Infants will be of great interest to the surrounding community. This is an important Green Space that should not just be sold at any cost for development.	The Council notes this concern about potential loss of green space in Brecon.
3.7.5	The proposal states that any surplus sites would be disposed of in accordance with the Council's asset management policy. Selling the land & building at Mount Street Infants School would entail selling a green space in the town. The future generations commissioner wants to see changes to towns to make sure no-one in Wales lives more than 300m from a public green space. This could mean that Powys County Council will not be able to sell the land.	The Council notes this concern.
3.7.6	Was the land at Mount Street Infants School acquired for the purpose of education and if so, can this purpose be changed?	The Council is not aware of any restrictions relating to the ownership of the land on which the school is located.

3.7.7	Can Powys County Council sell the Mount Street School land? Was the land gifted to the Council for the purposes of education by the Cobb estate?	The Council is not aware of any restrictions relating to the ownership of the land on which the school is located.

3.8 Comments about the impact on the community

3.8.1 Impact on the Cradoc Community

3.8.1.1 General concern about there not being a school in Cradoc

3.8.1.1.1	The school is very important to the community and must remain in Cradoc.	The Council has recognised within the Consultation Document and the draft Community Impact Assessment that full implementation of the proposals would eventually mean that there would be no school in Cradoc, which would have a negative impact on the community. The Community Impact Assessment was updated to reflect information about the impact on the community which has been received during the consultation, and an updated version was considered by the council's Cabinet when determining how to proceed with the proposals. This will be updated again to reflect comments received during the objection period, and the updated version will be considered by the Cabinet when determining whether or not to proceed with implementation of the proposals.
3.8.1.1.2	Closure of the school would be detrimental to residents of Cradoc who have a good relationship with the school.	As above.

3.8.1.1.3	The proposal would destroy the sense of community in Cradoc.	As above.
3.8.1.1.4	The walk to save Cradoc showed that the proposed closure doesn't just affect the children of Cradoc School but also the community.	As above.
3.8.1.1.5	The closure of Cradoc school can only be detrimental to the community, to this and to future generations.	As above.

3.8.1.2 Concern about the impact on community facilities / events

3.8.1.2.1	Concern about the loss of school based facilities which are used by the local community.	The Council acknowledges that the Cradoc C.P. School building is used for community activities, and notes the concerns about the possible impact on community facilities in Cradoc should the Council proceed with implementation of Phase 2 of the proposals. As stated in the draft Community Impact Assessment: 'it is acknowledged that a move to a new school site in Brecon would mean that there would no longer be a school located in Cradoc, therefore potentially the community facilities provided by the school may no longer be available. It is currently unclear where the facilities and services currently provided by the school could be provided should there be no school located in Cradoc.'

		The draft Community Impact Assessment also stated that: ‘an initial search has identified some alternative locations in the area where community events could take place. Should the Council proceed with the Proposals, it would endeavour to work with the community in Cradoc to identify a suitable alternative, initially this could involve discussions with Community Councils in the area about future use of the school building.’ Should the Council proceed with these Proposals, the Cradoc C.P. School building would eventually be declared surplus following the move to a new building. All surplus assets are subject to the process of disposal as outlined in The Council’s Asset Management Policy. Whilst it is possible that this could lead to sale of the sites to third parties, some schools that have closed have been transferred to other service areas e.g. housing or to a community - with the latter, this may allow for the space to be retained or developed for community use. This could enable the facilities to be retained for community activities. The draft impact assessments were updated to reflect feedback received during the consultation period, and the updated assessments were considered by the Council’s Cabinet when determining whether to proceed with the proposals. They will be updated again to reflect comments received during the objection period, and the updated version will be considered by the Cabinet when determining whether or not to proceed with implementation of the proposals.

3.8.1.2.2	The closure would not only result in a loss of local educational provision but a meeting venue. In its absence the nearest meeting place for our area would be in Upper Chapel, Merthyr Cynog Community Hall, 8.5 miles from Brecon. Not only that, it is the only local facility available between the towns of Brecon and Builth Wells as a children's play area. The playground and fields are regularly used by local children for bike riding, skating and many outdoor sports.	As above.
3.8.1.2.3	Living in Aberyscir we do not have a community hall, playing field or other such amenities. Cradoc school is the heart and central point of this rural community, and the closure of the school will have a detrimental impact on local children and people living in this area.	As above.
3.8.1.2.4	Closure of the school would mean that events which currently take place in Cradoc would no longer take place. This would have a negative impact on the community.	As above.
3.8.1.2.5	Over the years I have seen many services lost in the countryside, everything that we need we have to travel to get, we have lost post offices, petrol stations, bus services, the gritter already only comes to Cradoc School. Losing the school would mean that another provision would go, and many more besides.	The Council notes these concerns that implementation of the proposals would result in a further loss of facilities in the area. The Community Impact Assessment was updated to reflect information about the impact on the community which has been received during the consultation, and an updated version was considered by the council's Cabinet when determining how to proceed with the proposals. This will be updated again to reflect comments received during the objection period, and

		the updated version will be considered by the Cabinet when determining whether or not to proceed with implementation of the proposals.
3.8.1.2.6	It would be such a shame to so many to close the school and the hub of the community, especially given the services Cradoc has already lost including bus services and the post office as well as surrounding schools. I truly believe you would be doing a disservice to the people of Powys should you close Cradoc School.	As above.
3.8.1.2.7	The community would be irretrievably damaged by school closure. With no community hall, shop, post office or pub the closure of the school would reduce Cradoc to a satellite hamlet of Brecon and with the passage of time more locals would most likely choose not to live there. The second home and absentee owner scenario would probably come to pass.	As above.
3.8.1.2.8	If we see the closure go ahead we will see even more disappear from the community – will Pontfaen YFC still have a prominent place within the movement if the children of the area are split between Brecon, Sennybridge and Builth schools? Probably not.	The Council notes this concern about the potential impact on Pontfaen YFC, however there is no reason why the YFC could not continue to run even if there was no school in Cradoc.

3.8.1.3 Comments about 'Cynefin'

3.8.1.3.1	The word "Cynefin" meaning "The place where we feel we belong, where the people and landscape around us are familiar and the sights and sounds are reassuringly recognisably. Though often translated as "habitat", Cynefin is not just a place in a physical or geographical sense; it is the	The Brecon area is rich and diverse and well suited to the Cynefin aspect of the new Curriculum for Wales. A school would explore the community it serves rather than just its local community. Therefore the pupils would not lose the Cradoc community as part of their

	historic, cultural and social place which has shaped and continues to shape the community and inhabits it" If the children from Cradoc school are forced to move to a different school, then not only would this meaning be lost, it will have a detrimental impact on local children, this is a breach of the new curriculum.	curriculum experience. They would use this alongside the locality of the whole Brecon area.
3.8.1.3.2	The New Curriculum has a focus on Cynefin and Wellbeing. If the council moves the pupils of Cradoc Community School to a school out of their community their Cynefin will have less meaning to them; all their current Cynefin that they feel and experience will be lost. Welsh Government announced on 21 July 2020 that: "The (new) curriculum does, however, place great emphasis on the local area, or what it calls Cynefin. According to the new curriculum, Cynefin is defined as: "the place where we feel we belong, where the people and landscape around us are familiar, and the sights and sounds are reassuringly recognisable. Though often translated as 'habitat', Cynefin is not just a place in a physical or geographical sense: it is the historic, cultural and social place which has shaped and continues to shape the community which inhabits it."	As above.
3.8.1.3.3	How poignant it is that PCC are proposing to close a rural school and the origins of the word Cynefin lie in a farming term used to describe the habitual tracks and trails worn by animals in hillsides.	As above.

3.8.1.4 Other

3.8.1.5	The area will become less inviting to both new families moving in and will retaining young families if there are no rural schools for their children to attend. These young families come to rural Powys and choose to send their children to rural school and have jobs that keep money within the communities in which they live.	The Council notes this concern that families would not want to move to the area should there be no rural school for their children to attend. There are other schools in the Brecon catchment, and in neighbouring catchments, which include rural schools. Should the Council proceed with these proposals, parents could apply for a place for their child in any school, and could apply for a place for their child in a rural school should that be their preference.

3.8.2 Impact on the Brecon community

3.8.2.1	The building of a new school at Penlan, Brecon would have a negative impact on our community. Mount Street School is, and always has been a community school embedded in the heart and history of Brecon Town.	These comments about the close links between the Mount Street schools and the community in Brecon are noted. The Council prepared a draft community impact assessment which considered the proposals' impact on the community. This was published with the Consultation Documentation. The impact assessment was updated to reflect comments received during the consultation, and the updated assessment was considered by the Council's Cabinet when determining whether or not to proceed with the proposals. This will be updated again to reflect comments received during the objection period, and the updated version will be considered by the Cabinet when determining whether or not to proceed with implementation of the proposals. The proposals aim to establish a new school which would continue to be located in Brecon, therefore it

		would still be possible for the new school to establish close links within the town.
3.8.2.2	Mount Street Infant School is currently in the heart of Brecon and has close links with many organisations within the town. There is a very strong case for maintaining schools in their communities and is central part of Welsh Government policy.	As above.
3.8.2.3	How does PCC justify wiping away the years of community links and support that Mount Street Infants school has built up its local area?	As above.
3.8.2.4	Being out of town will result in less connection with community.	As above.
3.8.2.5	PCC has not properly assessed the impact of wiping away years of community links and support that Mount Street Infants School has built up its local area	As above.
3.8.2.6	With their current locations the two Mount Street schools play an integral part in their community. A new school on Penlan will be removed from everything and won't feel like it is part of anything anymore.	As above.
3.8.2.7	Relocating a school to the proposed Penlan site will take away a big chunk of social interaction and activity within the community.	As above.
3.8.2.8	The latest Estyn report for Mount Street Infants School states "The school's links with the community are exemplary". The effect of this proposal would be to destroy those exemplary links.	As above.

3.9 Comments about travel implications

3.9.1 Concern about additional travel for pupils

3.9.1.1	Concern that additional travel would be required for current pupils of Cradoc School.	It is acknowledged that implementation of Phase 2 of the proposals would mean that there would be an increase in travel for pupils currently attending Cradoc C.P. School for whom this is currently the closest school. However, a significant proportion of pupils that attend Cradoc C.P. School live closer to other schools, therefore implementation of the proposals would reduce the travel required for these pupils. Due to the geographic nature of Powys, many pupils of primary age are transported to school by bus with no detrimental impact.
3.9.1.2	Additional transport costs could be occurred where the nearest suitable school e.g. Llanfaes or Priory is full and unable to admit a learner. If the next nearest suitable school that has room to take the child is the proposed new school and is 2 miles away from the home address, then free transport will have to be provided. Will Powys County Council confirm that additional transport costs could be incurred?	Following the planned move to a new building in Phase 2 of the proposals, the Council would review the catchment area of the new school and transport would be provided for all pupils living within its newly defined catchment. It is possible that this would also require the Council to review the catchment areas of other schools in Brecon, which could impact on transport entitlement to those schools, and could impact on transport costs.

3.9.2 Concern about the impact on traffic in Brecon

3.9.2.1	There will be a significant increase in traffic on the already pot hole riddled rural roads along with further congestion in Brecon at school drop off and pick up times. The traffic down Priory Hill and Cerrigochian Road in Brecon at these times is already very congested and busy and the proposed plan to build a new 300+ pupil primary school on the Penlan site will only add to the traffic problems.	These concerns about the impact on traffic in Brecon are noted. Should the Council proceed with the Proposals, further consideration would be given to this aspect when developing plans for the building. This would include an assessment of the impact on traffic in Brecon.
3.9.2.2	Cerrigcochion Road is extremely busy and is a dangerous steep hill. Siting a 360 pupil school at Penlan would increase traffic and pollution.	As above.
3.9.2.3	The following are also based along the hill to the proposed site or in close proximity to the proposed site: Ysgol-Y-Bannau Welsh Medium Primary School, Brecon High School, Brecon Leisure Centre, Neath Port Talbot College, the ambulance station and the hospital plus 120 new houses. A 360 pupil school on the proposed site will increase congestion in this area, make it more difficult for ambulances to negotiate along the road in emergencies and create rat runs in the Belle Vue & Cerrigcochion Lane areas of Brecon & increase journey times for pupils. Have Powys County Council taken into consideration the extra traffic that will be on Cerrigcochion Hill and the impact this will have on the ambulance station?	As above.
3.9.2.4	Traffic is already bad enough going up Cerrigcochion Road. Adding another 300 to 400 cars every morning and afternoon will create the perfect traffic jam.	As above.
3.9.2.5	The traffic around the proposed Penlan site is already heavy at peak hours with parents dropping off children at the high	As above.

	school, college & Ysgol Y Bannau, along with leisure centre users. This will only be increased by the large new primary school being added to the area, making it unsafe for children to walk to school and environmentally detrimental due to increased car fumes.	
3.9.2.6	Increased traffic in Brecon will cause chaos in a town which is already seeing long tailbacks.	As above.
3.9.2.7	It states in the proposal that “parents would be more likely to drive their children to school rather that walk/cycle”. This will have a huge impact on Brecon which is already suffering from traffic tail backs.	As above.
3.9.2.8	Traffic will also be increased in the Priory area of Brecon which will impact on parents/carers taking their children to Priory School.	As above.
3.9.2.9	More vehicles will create more congestion.	As above.

3.9.3 Concern about the environmental impact of additional travel

3.9.3.1	These proposed plans seem to contradict the Council’s own declaration of a ‘climate emergency’ and plans to achieve net zero by 2030.	The potential environmental impact of additional transport is recognised in the draft impact assessment: *‘Implementation of Phase 2 of the Proposals would require additional travel for pupils currently attending Cradoc School. This would have a negative environmental impact as more home to school transport would need to be provided to transport pupils to their nearest school.’*

		However, 50% of the children currently attending Cradoc C.P. School live closer to other schools and therefore are not eligible for free home-to-school transport. This suggests that there is already a significant amount of pupils being transported to the school in cars already. Concerns have also been raised that the proposed site would mean that more people would drive to school rather than walk. It is recognised that this would also have an environmental impact. This is also reflected in the updated impact assessments which were considered by Cabinet after the consultation period. The Council fully acknowledges the need to provide opportunities for walking and/or cycling to school. Should the Council proceed with the proposals, ensuring appropriate Active Travel routes to the school would be an important consideration.
3.9.3.2	More vehicles will create more pollution.	As above.

3.9.4 Other comments about travel implications

3.9.4.1	The first bus from Woodlands Crescent leaves at 0954, nearly an hour after school starts and only goes as far as Brecon Interchange 1. There is no connecting bus to the High School site. There is also no bus back to the High School site in time for parents to collect their children at 1530.	The Council notes this concern regarding the public transport which is currently available in Brecon.

3.9.4.2	Most of the Cradoc children living in the parish of Merthyr Cynog would not get free transport as it will not be the closest school to their homes with children going to other schools in Brecon, Sennybridge and Builth.	As indicated in the Statutory Notice published in respect of this proposal: 'Following transfer of the New School to the new school building in Brecon, free home to school transport will be provided to the new building for eligible pupils who are registered at the school at the time. For parents applying for a place at the school for their child for the first time, the Council will redefine the new school's catchment, and transport will be provided to the school for all pupils living within its newly defined catchment.'
3.9.4.3	If numbers are up to their limit over time in the new school we could easily be in a position that siblings would be only given school transport to the nearest school, which would mean that families could be split between Priory School and the new school, which in my view is totally unacceptable.	As above.

3.10 Pupils would transfer to alternative schools

3.10.1	This proposal will cause parents to choose alternative schools for their children. With such uncertainty surrounding the schools parents will take flight and send their children to other schools in Brecon instead of Mount Street Infants School or Mount Street Junior School.	The Council notes this concern that the current proposals will mean that parents will choose for their children to attend alternative schools. Parents can apply for a place at whichever school they choose, and should the Council proceed with the proposals, parents could apply for places at other schools should that be their preference. Places will be

		allocated in accordance with the relevant Admissions Policy.
3.10.2	Uncertainty surrounding the current process has already led to children moving to other schools in the Brecon cluster (outside of the three schools involved in Phase One).	As above.
3.10.3	Parents of the children from Cradoc School will be passing either Priory or Llanfaes schools on their way into Brecon. It follows therefore that they will send their children to those schools. What will happen if Priory and Llanfaes schools become over-subscribed and the new school is empty?	As above.
3.10.4	It is a significant risk that rural children will go to Sennybridge school and the new school at Penlan will have surplus spaces.	As above.
3.10.5	A large proportion of parents from the Cradoc catchment area will seek to send their children to a different rural school even further afield rather than into a setting in Brecon town.	As above.
3.10.6	Ultimately if the school were to close the next nearest primary school for the majority of pupils would be Priory Church in Wales School in Brecon (not the proposed new school on the Penlan site). With this in mind does Priory have space for these prospective new pupils?	As above. There are currently 155 pupils at Priory School, and the school has a capacity of 165. Priory C. in W. School is a Voluntary Aided school therefore is responsible for its own admissions arrangements. Any applications for places at the school would need to be made to the school.
3.10.7	Parents won't walk past Priory or Llanfaes Schools to then walk further up a steep hill to the Penlan site.	Comment noted. Parents can apply for a place at whichever school they choose, and any parents

		wishing to apply for a place their children at either Priory School or Llanfaes are able to do so. Any applications for places at Llanfaes CP School would be considered in accordance with the Council's Admissions Process. Priory C. in W. School is a Voluntary Aided school therefore is responsible for its own admissions arrangements. Any applications for places at the school would need to be made to the school.
3.10.8	Parents will want their children to go to Priory or Llanfaes which will be closer for lots of children.	As above.
3.10.9	Parents are highly likely to send their children to schools closer to their homes when there is so much uncertainty regarding the future of Mount Street Infants School. 40% of children currently attending Mount Street Infants School live closer to Priory Church in Wales School in Brecon but choose to send their children to our school. Does Powys County Council agree that these proposals could impact on pupils attending other schools in the Brecon catchment?	Should the Council proceed with implementation of these proposals, the Council's intention is that all pupils currently attending Mount Street Infants, Mount Street Juniors and Cradoc CP School would attend the new school, initially on their existing site, and that eventually they would transfer to the new building. However, parents can apply for a place at whichever school they choose, and should the Council proceed with the Proposals, parents could apply for places at other schools should that be their preference. Places will be allocated in accordance with the relevant Admissions Policy.
3.10.10	Parents could choose to send their children to other schools when there is so much uncertainty regarding the future of Mount Street Infants. 3.5% of the children currently attending Mount Street Infants School live closer to Ysgol y Mynydd Du in Talgarth. Will Powys County Council agree that these	As above.

	proposals could impact on pupils attending other schools not in the Brecon catchment?	
3.10.11	What if parents, as we know many already do, feel so strongly that they want their children educated in a rural school that they instead send their children to schools in neighbouring clusters, for example Archdeacon Griffiths CIW Primary school in Llyswen? This will leave Brecon with a new building without the pupils to fill it and place significant pressure on other rural schools, failing to meet the council's ambition to reduce surplus school places.	As above.
3.10.12	45.1% of pupils live closer to other schools and may attend these schools rather than the Penlan site.	As above.
3.10.13	Powys County Council state that the risk of parents not wanting their children to attend the new school, so move them to alternative schools is low likelihood and low impact. However, it is highly likely that, as the closest schools for many of the children will be Priory School or Llanfaes School, parents will choose alternative schools. This will result in spare capacity at the proposed new school and cuts in budget. Decisions will have to be made by the Governing Body regarding staff redundancies and how the heating and the rates of the new 360 school are to be paid for. Does Powys County Council agree that this risk should be high likelihood and high impact? If not, why not?	The Council's view is that the assessment of the risk which was included in the Consultation Document is appropriate.
3.10.14	If a new school is built in Sennybridge it is very likely pupils from Cradoc will transfer there as opposed to coming to a new school in Brecon which won't be as accessible. This appears to be born out in the figures proposed; ie PCC is	The Council is currently developing plans for a new build school in Sennybridge C.P. School with a capacity of 150. Whilst the Council currently intends that the proposed new school in Brecon would be a 360 place

	building a 180 place school in Sennybridge which currently only has 126 pupils on roll; the proposed new school (Phase 2) in Brecon is indicated to have only 360 places when the total of all pupils currently attending the three schools (Cradoc, MSJ, MSI) is 420.	school, this figure is indicative at this stage, and would be confirmed during the design stage.
3.10.15	Most pupils from rural areas attending Cradoc School are likely to disperse to other rural schools, either Sennybridge or Builth. Those coming from Brecon may well disperse to closer schools in Llanfaes or Priory. This could leave the school with a very difficult budget scenario if all staff are kept on as proposed with fewer pupils than expected.	Should the Council proceed with implementation of these proposals, the Council's intention is that all pupils currently attending Mount Street Infants, Mount Street Juniors and Cradoc CP School would attend the new school, initially on their existing site, and that eventually they would transfer to the new building. However, parents can apply for a place at whichever school they choose, and should the Council proceed with the Proposals, parents could apply for places at other schools should that be their preference. Places will be allocated in accordance with the relevant Admissions Policy. The new school would be required to manage the budget allocated to it and ensure that staffing levels are affordable.

3.11 Comments about impact on childcare / wraparound provision

3.11.1	Closure of Cradoc School poses a serious risk to the early years setting which operates breakfast, after school and holiday childcare provision, and parents may not be able to travel to similar provision in Brecon town.	The Council notes these concerns about the impact on the childcare / wraparound provision which is currently available at Cradoc.

		Should the Council proceed with the proposals, provision would continue to be available in Cradoc during Phase 1. Phase 2 of the proposals includes building a new school which would have integrated early years facilities, and the intention is that this would provide early years education and wraparound provision, ensuring that provision would continue to be available. However, it is acknowledged that this provision would be located in Brecon, not in Cradoc, therefore it would be more difficult for parents living in the Cradoc area to access.
3.11.2	At the present time, children can attend the three-year-old setting at Cradoc full time. If you decide to have full time places available in the proposed development, would there be adequate spaces for them. In Cradoc, children can also attend the before and after school club, so children can be cared for in the same building from 7:45 AM to 6:00 PM. I understand that there is a shortage of childcare places in Brecon as a whole and Cradoc already has wrap around care well established and parents choose to send their children to the school because of this facility.	As above.
3.11.3	There is a shortage of wrap around childcare at other schools and Cradoc along with only 1 other school in Brecon currently offer a holiday club which is invaluable for working parents like ourselves and many other parents in Brecon. This provision would be lost if Cradoc School closes.	As above.
3.11.4	If the merger goes ahead what happens to the families who rely on the wraparound services at Cradoc?	As above.

3.12 Queries about admissions arrangements

3.12.1	Although pupils currently attending the 3 schools would be allocated places at the new school, can Powys County Council guarantee that their siblings will be able to attend the new school?	If the school is oversubscribed, the Council's Admissions Team would consider applications based on the over-subscription criteria outlined in the School Admissions Policy, which includes siblings already in the school.
3.12.2	There isn't any published documentation regarding admissions for younger siblings who have yet to secure a place at any of the current schools, nor any guarantees that the military families yet to arrive will be able to access the 'site' of their choosing for all of their children.	As above.
3.12.3	Many of the town schools have limited places for children and often families have to appeal to get children into their closest school.	The Council notes this concern about the availability of places in Brecon schools. All applications for places are considered in accordance with the relevant Admissions Policy. If there is no place is available, there is an opportunity for parents to appeal.

3.13 Other comments

3.13.1	Cradoc is a rural school, a feature that will be lost if it moves into Brecon.	The Council acknowledges that Cradoc is a rural school, and that the proposal is to eventually move the school to a new site in Brecon. The Council recognises that parents can choose to apply for a place for their child(ren) in any school they wish, however there is no requirement for the Council to provide a choice of schools of certain types or of certain

		sizes. There are currently 7 schools which provide primary education in the Brecon catchment. The current proposal is proposing to merge 3 of these schools, however there would still be 5 schools in the catchment which would continue to provide choice. This includes community primary schools, Church in Wales provision, a Welsh-medium primary school and a school located in a rural area.

4. OTHER COMMENTS

4.1 General comments about the impact on pupils

4.1.1 General concern about the impact on pupil well-being

4.1.1.1	I don't believe this has been taken into account when considering the impact of children being forced to leave their current rural education setting and move to a much larger urban school.	The Council fully acknowledges that all school reorganisation proposals cause a period of uncertainty for those affected by the Proposals, including pupils. The Council is committed to supporting schools and learners, including through periods of change. An experienced member of staff from the Council is supporting school leaders effectively, to help them manage possible changes for their learners. It is also expected that school governors, staff and parents support the children to ensure that there isn't a detrimental impact on their wellbeing. The intention is to introduce the proposals on a phased basis, meaning that pupils would initially continue to attend school in the same location, which would

		minimise the impact on pupils initially. Should the Council proceed with the proposals, pupils would eventually transfer to the new building with their friends and staff from their existing site, meaning that these staff would be available to support the transition to the new building.
4.1.1.2	It would seem that maybe the best interests of children is not really being considered in the decisions made which will affect their everyday lives.	As above.
4.1.1.3	The well-being of pupils at Mount Street Infants School must be paramount.	As above.
4.1.1.4	Whilst saving money is essential, particularly with the cost of the pandemic, it should not be to the detriment of our children's well-being.	As above.
4.1.1.5	I genuinely am shocked that the children's education and welfare are being let down and there will be a lot of upset children who will most likely end up losing friends because parent will end up with a difficult decision as to whether or not they will be applying for a place/s at the other schools.	As above. Parents can apply for a place at whichever school they choose, and should the Council proceed with the proposals, parents could apply for places at other schools should that be their preference. Places will be allocated in accordance with the relevant Admissions Policy.

4.1.2 Concern about the proposals being taken forward during the Covid pandemic

4.1.2.1	Children have already lost out on so much over the last two years, educationally and socially. Was this really the time to start these proceedings?	The Council fully acknowledges that all school reorganisation proposals cause a period of uncertainty for those affected by the proposals, including pupils, and that the Covid-19 pandemic has caused further challenges over the last 18 months or so. Whilst acknowledging that it would have been preferable had the consultation taken place at a time when there wasn't an ongoing pandemic, it has been necessary for the Council to continue with the development and consultation on proposals during the current pandemic in order to address the issues raised by Estyn regarding the organisation of its schools. The Council is committed to supporting schools and learners, including through periods of change. An experienced member of staff from the Council is supporting school leaders effectively, to help them manage possible changes for their learners. It is also expected that school governors, staff and parents support the children to ensure that there isn't a detrimental impact on their wellbeing. The intention is to introduce the proposals on a phased basis, meaning that pupils would initially continue to attend school in the same location, which would minimise the impact on pupils initially. Should the Council proceed with the proposals, pupils would eventually transfer to the new building with their friends and staff from their existing site, meaning that these staff would be available to support the transition to the new building.

4.1.2.2	With the pandemic in mind our children's mental health and well being has been in the fore-front of our Community. The stress of missing their friends has impacted on them greatly, together with missing out on great chunks of their education.	As above.
4.1.2.3	Having experienced the effects of a global pandemic children are now prospectively facing the closure of their school, creating a sense of worry and concern for them. Was the well-being of our children seriously considered when the timing of these proposals were announced?	As above.
4.1.2.4	Anxiety levels amongst pupils and parents continue to be high due to the pandemic and these proposals are adding to those anxiety levels. Does Powys County Council agree that during a global pandemic is not the correct time to cause further anxiety for our pupils?	As above.
4.1.2.5	Merging 3 schools at this point is a concern given that the impact of COVID on educational achievement is still unknown but very likely to have increased the educational divide. This is not a time to merge 3 schools.	As above.

4.1.3 Concern about further disruption for pupils

4.1.3.1	Covid-19 has caused huge disruption for our children and to cause another 2 periods of disruption is totally unacceptable. We will be reaping the educational repercussions of the pandemic for decades.	The Council fully acknowledges that all school reorganisation proposals cause a period of uncertainty for those affected by the proposals, including pupils, and that the Covid-19 pandemic has caused further challenges over the last 18 months or so. Whilst acknowledging that it would have been preferable had the consultation taken place at a time when there

		wasn't an ongoing pandemic, it has been necessary for the Council to continue with the development and consultation on proposals during the current pandemic in order to address the issues raised by Estyn regarding the organisation of its schools. The Council is committed to supporting schools and learners, including through periods of change. An experienced member of staff from the Council is supporting school leaders effectively, to help them manage possible changes for their learners. It is also expected that school governors, staff and parents support the children to ensure that there isn't a detrimental impact on their wellbeing. The intention is to introduce the proposals on a phased basis, meaning that pupils would initially continue to attend school in the same location. Should the Council proceed with the proposals, pupils would transfer to the new building with their existing staff, meaning that these staff would be available to support the transition to the new building. Whilst noting the concern that the phased implementation will lead to further disruption for pupils over a number of years, the Council's view is that introducing the proposals on a phased basis will provide an opportunity to ease transition to the new arrangements as pupils will initially continue to attend school in their current location.
4.1.3.2	The disruption of the last 2 years will have a long term impact on children attending these schools. The impact of the COVID pandemic is far from over and the impact on the	As above.

	children's education will be ongoing. The children will be attempting to catch up, build on educational progress and foster emotional development and wellbeing, against a background of uncertainty.	
4.1.3.3	Staff should be focussed on supporting children's learning through the ongoing disruption caused by COVID. The disruption of the last 12 months will have a long term impact on children attending these schools. The Covid pandemic is far from over and the impact on the children's education will be ongoing. The children will be attempting to catch up, build on educational progress and foster emotional development and wellbeing, against a background of uncertainty.	As above.
4.1.3.4	This process creates two periods of disruption on top of the disruption already caused by COVID.	As above.
4.1.3.5	There will be ongoing impact of the disruption from both COVID and this proposal for PCC as well as the children in terms of outcomes and educational reputation.	As above.
4.1.3.6	Surely PCC's priority must be on settling the children back into education as opposed to further disruption?	As above.
4.1.3.7	How can the Council, with all the disruption and uncertainty experienced, add more tension, instability, and turmoil when things are just starting to look at improving. Pupils have just got back into school and had some form of normality, structure, and stability. We need to be providing stability and wellbeing, not unsettling everything again. The treatment of pupils appals me, where is the duty of care?	As above.

4.1.3.8	The uncertainty and disruption will significantly and negatively impact the most vulnerable pupils, especially after what they have experienced in the pandemic this year.	As above.

4.1.4 Concern about the impact on pupils of attending the new school

4.1.4.1	The closure of Cradoc School and this “idea” of them being forced to leave their current rural education setting and move to a much “larger urban school” is going to impact on these children for many, many years to come.	The Council recognises that any school reorganisation process creates a period of uncertainty for all involved, including children, and that in the case of the current proposals, implementation of Phase 2 would result in a significant change for pupils. The Council is committed to supporting schools and learners, including through periods of change. An experienced member of staff from the Council is supporting school leaders effectively to help them manage possible changes for their learners. It is also expected that school governors, staff and parents support the children to ensure that there isn’t a detrimental impact on their wellbeing. In respect of the current proposals, whilst pupils would move to a new site during Phase 2, the staff at their existing sites would also be transferring to the new site, and would be able to continue to support the children to ensure that there isn’t a detrimental impact on their wellbeing. In addition, there would be opportunities for pupils to visit the new site during the construction process, which would help them to become familiar with the new site / building before moving there.

4.1.4.2	Moving rural children to an urban school could seriously disrupt the time they are provided to learn.	As above.
4.1.4.3	Each child has their specific needs. Whilst some of these needs could be best met in a larger school, others are far more suited to a smaller, rural school.	As above.
4.1.4.4	Young children thrive on familiarity, and this is going to be a huge upheaval for the year groups involved during this time of change.	As above.
4.1.4.5	Much larger numbers, a much more impersonal experience for the children attending. At complete odds with the reasons people choose Mount Street, or the lovely village school of Cradoc.	As above.
4.1.4.6	The real needs of the pupils have been missed from the proposal in favour of a myth that pupils' outcomes are better in a shiny, modern school.	The Council doesn't agree with this statement. The proposal is being taken forward in order to implement the Council's Strategy for Transforming Education, which aims to improve Learner Entitlement and Experience for pupils.
4.1.4.7	One school, one Headteacher, operating over three sites for up to five years is a ridiculous way to manage transition to a possible new school. I do not believe this arrangement will be best for children's education, especially when so much is being asked of teachers, with COVID and a new curriculum to embed.	The Council notes these concerns about the possible impact of the proposal on the performance of the existing schools. The Council is committed to providing the children and staff of the three schools with a high-quality learning environment, which will include modern, purpose-built facilities and technology fit for the 21st Century, further enhancing the school's ability to implement the new Curriculum for Wales, for the benefit of all pupils. Phase

		1 of the proposals, establishing a new school initially on the current three sites, is a fundamental step in realising the outcome of Phase 2, which is the construction of a new school building. The intention of these proposals is to merge the three schools to establish one school, with the schools staying on their current sites temporarily until they transfer to the new building. When merging schools into a new building, the Council's approach has been to merge the schools before the new building is ready. This enables the establishment of a new governing body, the appointment of a headteacher and the development of a vision for the new school. It also allows the governors and headteacher of the new school to have direct input into the design of the new building and to ensure that the staffing of the new school is appropriate. However, there would also be benefits to Phase 1 in terms of supporting teaching, learning and leadership across the three sites. There would be the opportunity to share good practice across all sites, meaning that provision would benefit from shared expertise from all teachers. With the introduction of the new Curriculum, this approach will have a positive impact on improving outcomes for pupils. It is anticipated there would be a positive impact on quality and standards through the establishment of one new larger primary school. In respect of pupils currently attending the Mount Street Schools, this would mean

		that pupil progression would be monitored throughout pupils' time in primary school, from age 4 to 11, ensuring continuity in delivery and approach. As a larger school, the headteacher would be able to spend more time on leadership, enabling a greater focus on improving the quality of provision. In addition, there would be a larger team of staff, enabling expertise to be shared across the school and enabling more distributed leadership and professional development opportunities. Each school brings its own individuality, however, there are also many areas where, by amalgamating, staff would benefit from working together, sharing good practice, sharing knowledge and experiences in preparation for the implementation of the new Curriculum, ensuring consistency in approaches to literacy and numeracy, for example. All three schools currently provide good quality education and are self-improving schools – this is the view of the Council's School Improvement Team. It is recognised that they have different strengths, however, this will be a benefit to a new school as the school will be able to meet the needs of all pupils. With an amalgamation of the three schools, the strength in leadership and excellence identified by Estyn and the Council would be shared within the new school, impacting positively on standards and leadership. Should the proposals be implemented, then a temporary governing body would be established. The

		first task would be to recruit a headteacher for the new school and to establish a strong senior leadership team. The headteacher would be able to oversee the strategic development of the school as whole, supported by the senior leadership team.
4.1.4.8	Powys County Council states that "the aim of the proposal is to improve the educational opportunities available to pupils in the Brecon area". A new building will not mean that our children's reading, mathematics, science, history or health and well-being will improve. It is teachers who improve educational opportunities not buildings. Kirsty Williams, Education Minister, recently said in the Senedd that "the (21st Century schools and colleges) programme is not just about new buildings; it is about providing environments that invest in the people that use them, valuing our excellent teachers and school staff and truly making a difference for our learners". As Mount Street Infants School's Estyn reports are consistently excellent what evidence does Powys County Council have that the proposal will improve the educational opportunities of our pupils?	As above.

4.1.5 Pupils should be able to attend school in the community they live in

4.1.5.1	All our pupils deserve to be taught in the environment and community they live in. You have not taken this into account under your current proposals.	The Council acknowledges that should these proposals be implemented, eventually, pupils living in Cradoc would be unable to go to school in Cradoc. However, this is similar to the situation in many villages across Powys. Due to the geographic nature of Powys, many pupils of primary age are transported to school by bus with no detrimental impact. The Council does not consider that

		the distance or travel times for pupils currently attending Cradoc C.P. School would be excessive. A significant proportion of pupils currently attending Cradoc C.P. School live in Brecon, therefore implementation of the proposals would mean that they were attending a school nearer to the community where they live.
4.1.5.2	Children deserve to be taught in the environment and community in which they live. We do not believe that Pupil Entitlement has been taken into account by Powys County Council with these plans.	As above.
4.1.5.3	Whose interests are best served closing a rural school which is functioning well and relocating the pupils away from their community?	As above.
4.1.5.4	Why deprive future generations of pupils from enjoying the rurality of their school, the community's generational ties and support, in a school environment that promotes learning, well-being and social development?	As above.
4.1.5.5	Reference to 'Cynefin' – defined as "The place where we feel we belong, where the people and landscape around us are familiar, and the sights and sounds are reassuringly recognisable. Though often translated as 'habitat', Cynefin is not just a place in a physical or geographical sense: it is the historic, cultural and social place which has shaped and continues to shape the community which inhabits it." If Cradoc CP School children are forced to move to a different school then not only will this meaning be lost, it will have a	The Brecon area is rich and diverse and well suited to the Cynefin aspect of the new Curriculum for Wales. A school would explore the community it serves rather than just its local community. Therefore the pupils would not lose the Cradoc community as part of their curriculum experience. They would use this alongside the locality of the whole Brecon area.

	detrimental impact on local children, this is in breach of the new curriculum.	

4.1.6 Other concerns about the impact on pupils

4.1.6.1	The staff are the experts here and know what is best for our children's education. I do not believe that this proposal shows a true understanding of the needs of the children in these Brecon Schools. What will it take for you to listen to their expertise and the voice of the families rather than ignore them as you pursue your own agenda?	All stakeholders have had the opportunity to give their views as part of this process. Meetings were held with staff, governors and pupils at the three affected schools during the consultation period, which provided a further opportunity for these stakeholder groups to let the Council know their views on the proposals. The feedback received during the consultation period was incorporated into a consultation report, which was considered by Cabinet when determining whether or not to proceed with the proposals. There has been a further opportunity during the objection period for stakeholders to let the Council know if they don't agree with the proposals. The comments made in the objections are summarised in this objection report, which will be considered by the Cabinet when determining whether or not to proceed with implementation of the proposals.
4.1.6.2	We want what's best for young children's education, and this proposal does not have young children's education at the heart of it.	The Council does not agree with this statement. The proposals are being taken forward in order to implement the Council's Strategy for Transforming Education, which aims to improve learner entitlement and experience for all pupils in Powys.

4.1.6.3	I am extremely concerned about the Cabinet's decision as I know that the closure of the school would impact every pupil significantly.	The Council recognises that any school reorganisation process creates a period of uncertainty for all involved, including children, and that in the case of the current proposals, implementation of Phase 2 would result in a significant change for pupils. The Council is committed to supporting schools and learners, including through periods of change. An experienced member of staff from the Council is supporting school leaders effectively to help them manage possible changes for their learners. It is also expected that school governors, staff and parents support the children to ensure that there isn't a detrimental impact on their wellbeing. In respect of the current proposals, whilst pupils would move to a new site during Phase 2, the staff at their existing sites would also be transferring to the new site, and would be able to continue to support the children to ensure that there isn't a detrimental impact on their wellbeing. In addition, there would be opportunities for pupils to visit the new site during the construction process, which would help them to become familiar with the new site / building before moving there.
4.1.6.4	Throughout the consultation document there is a significant emphasis placed on the term 'Improve Learner Entitlement' but there is not an explanation of what more a child will gain in this regard. However, they would be losing the benefits of an average sized town school, with Good/Excellent Estyn Status, Forest and Eco School status and an environment which has nurtured and developed children from a diverse cross section	The Council is committed to providing the children and staff of the three schools with a high-quality learning environment, which will include modern, purpose-built facilities and technology fit for the 21st Century, further enhancing the school's ability to implement the new Curriculum for Wales, for the benefit of all pupils. Phase 1 of the proposals, establishing a new school initially on

	of the community for decades. Any change must provide more and not less in terms of education. The recent Estyn Inspection described MSI as having an ‘exceptionally calm, nurturing atmosphere and inclusive environment’.	the current three sites, is a fundamental step in realising the outcome of Phase 2, which is the construction of a new school building. The intention of these proposals is to merge the three schools to establish one school, with the schools staying on their current sites temporarily until they transfer to the new building. When merging schools into a new building, the Council’s approach has been to merge the schools before the new building is ready. This enables the establishment of a new governing body, the appointment of a headteacher and the development of a vision for the new school. It also allows the governors and headteacher of the new school to have direct input into the design of the new building and to ensure that the staffing of the new school is appropriate. However, there would also be benefits to Phase 1 in terms of supporting teaching, learning and leadership across the three sites. There would be the opportunity to share good practice across all sites, meaning that provision would benefit from shared expertise from all teachers. With the introduction of the new Curriculum, this approach will have a positive impact on improving outcomes for pupils. It is anticipated there would be a positive impact on quality and standards through the establishment of one new larger primary school. In respect of pupils currently attending the Mount Street Schools, this would mean that pupil progression would be monitored throughout

		pupils' time in primary school, from age 4 to 11, ensuring continuity in delivery and approach. As a larger school, the headteacher would be able to spend more time on leadership, enabling a greater focus on improving the quality of provision. In addition, there would be a larger team of staff, enabling expertise to be shared across the school and enabling more distributed leadership and professional development opportunities. Each school brings its own individuality, however, there are also many areas where, by amalgamating, staff would benefit from working together, sharing good practice, sharing knowledge and experiences in preparation for the implementation of the new Curriculum, ensuring consistency in approaches to literacy and numeracy, for example. All three schools currently provide good quality education and are self-improving schools – this is the view of the Council's School Improvement Team. It is recognised that they have different strengths, however, this will be a benefit to a new school as the school will be able to meet the needs of all pupils. With an amalgamation of the three schools, the strengths identified by Estyn and the Council would be shared within the new school, impacting positively on standards and leadership. Should the proposals be implemented, then a temporary governing body would be established. The first task would be to recruit a headteacher for the new

		school and to establish a strong senior leadership team. The headteacher would be able to oversee the strategic development of the school as whole, supported by the senior leadership team.
4.1.6.5	What enhanced opportunities would the children have just because the school is larger?	As above.

4.2 Concern about the impact on protected characteristic groups

4.2.1 Impact on pupils with ALN

4.2.1.1	Concern about loss of / disruption to the current specialist units – ALN at MSI is rated as excellent.	The Council notes this concern about any changes to the ALN provision at the Mount Street schools. The Council recognises the value of the support provided by specialist provisions across the local authority, including those located in the Mount Street schools. It has established a clear vision and strategy for SEN/ALN which aims to provide appropriate specialist education for pupils with ALN as close to their home as possible. The provision for pupils with the most complex needs has recently undergone a review and the Council has already begun a programme of improved provision. The Council has also been further reviewing the provision provided by its specialist centres and will produce a report of its findings in this area. This report will include the evaluation of specialist provision in the Brecon cluster. Any recommendations will be based on

		the needs of children and young people in the area. Having listened to the views of schools, the Council is currently reviewing the funding of specialist centres. Should the Council proceed with implementation of these proposals, ensuring that the provision meets the needs of pupils with ALN would be a consideration.
4.2.1.2	The specialist centres have hardly been considered and yet they play a huge role for parents of these children. The uncertainty, the transitions to new environments will cause extreme behaviours affecting their learning progress.	As above.
4.2.1.3	Mount street infants has special needs unit which from the current proposed plans there is no mention of whether this will remain as part of the merger or new school.	As above.
4.2.1.4	There are no firm proposals regarding the specialist unit. Why are facilities for vulnerable groups, including children with special educational needs only anticipated? Has Powys County Council forgotten about our vulnerable groups?	As above.
4.2.1.5	The commitment to the specialist centres currently at Mount Street Infant and Junior schools seemed quite vague in the consultation report. Will they definitely be retained in a new build?	As above.
4.2.1.6	ALN and SEN provision. Children with Additional Learning Needs who attend the Specialist Support Class at Mount Street Infants are not included in the consultation document. Parents of these children have no information about the future educational provision of their children. From reading the	As above.

	consultation documents they cannot see if their children will be part of the future plans for education in Brecon or not. These children are hugely impacted by the disruption in their education due to Covid-19 and are in desperate need of stability. Why has PCC not included an evaluation of impact of ALN and SEN provision in this consultation?	
4.2.1.7	Children with Special Educational Needs have already been hugely impacted by the disruption in their education due to COVID-19 and are in desperate need of stability. These proposals will mean another 2 periods of disruption which will negatively impact on vulnerable groups. Why are Powys County Council not preserving every little bit of stability for our children whose education has been disturbed as never before?	The Council fully acknowledges that all school reorganisation proposals cause a period of uncertainty for those affected by the proposals, including pupils, and that the Covid-19 pandemic has caused further challenges over the last 18 months or so. Whilst acknowledging that it would have been preferable had the consultation taken place at a time when there wasn't an ongoing pandemic, it has been necessary for the Council to continue with the development and consultation on proposals during the current pandemic in order to address the issues raised by Estyn regarding the organisation of its schools. The Council is committed to supporting schools and learners, including through periods of change. An experienced member of staff from the Council is supporting school leaders effectively, to help them manage possible changes for their learners. It is also expected that school governors, staff and parents support the children to ensure that there isn't a detrimental impact on their wellbeing. The intention is to introduce the proposals on a phased basis, meaning that pupils would initially continue to attend school in the same location. Should the Council

		proceed with the proposals, pupils would transfer to the new building with their existing staff, meaning that these staff would be available to support the transition to the new building. Whilst noting the concern that the phased implementation will lead to further disruption for pupils over a number of years, the Council's view is that introducing the proposals on a phased basis will provide an opportunity to ease transition to the new arrangements as pupils will initially continue to attend school in their current location. In addition, there would be opportunities for pupils to visit the new site during the construction process, which would help them to become familiar with the new site / building before moving there.
4.2.1.8	I am very concerned about the proposal to close all 3 schools as I don't think that the children's welfare and how their education might be affected (especially children who have learning difficulties, autism etc) moving to a new school.	As above.

4.2.2 Comments about the Nepalese pupils / EAL and BAME pupils

4.2.2.1	There is a large Nepalese community at Mount Street Infants and Juniors and these schools have built a great relationship with this community which could easily be lost with current proposals.	The Council notes this concern. Should the proposals be implemented, the expectation is that staff currently employed at Mount Street Infants, Mount Street Juniors and Cradoc C.P. School would transfer to the new school, therefore they would be able to continue to support the Gurkhas. This support would need to be a key part of the new school.

4.2.2.2	Children from our Nepali and BAME communities needing language and learning support will find it harder in large 360-420 school.	As above. Teachers would still be able to spend time with all pupils, including Nepalese pupils, to ensure that they understand what is asked of them.
4.2.2.3	Children who use English as a second language will not have the current level of support which they currently have in schools with a roll of 110/170.	As above.
4.2.2.4	Concern that children who need support, such as children who do not use English as a first language, will get lost in a bigger school.	As above.
4.2.2.5	The percentage of 'ethnic minority' pupils is included in the Brecon Catchment Business Plan but is not referred to in other documents.	Information about the ethnic background of pupils currently attending the three schools was included in the Consultation Document, and was also considered in the equality impact assessment carried out in respect of these proposals.

4.2.3 Comments about pupils from military families

4.2.3.1	There appears to be no consideration given to children experiencing a high level of transience at Mount Street Infants School, including those who are from the Services/MoD. Many of these children experience high levels of stress when changing schools and really need the nurturing support that is offered at a small school with excellent outdoor provision.	The Council notes this concern about the potential impact of the proposals on pupils from military families currently attending the school. The expectation is that many of the staff currently employed at the schools would transfer to the new school, therefore they would be able to continue to support the children from an army background.

4.2.3.2	Concern that children who need support, such as children from military families who are new to Brecon, will get lost in a bigger school.	As above.

4.2.4 Other concerns

4.2.4.1	There appears to be no consideration given to children experiencing a high level of transience at Mount Street Infants School, including those who are from Traveller communities. Many of these children experience high levels of stress when changing schools and really need the nurturing support that is offered at a small school with excellent outdoor provision.	The Council notes this concern about the potential impact of the proposals on pupils from Traveller communities currently attending the school. The expectation is that many of the staff currently employed at the schools would transfer to the new school, therefore they would be able to continue to support these children at the new school. Children belonging to protected characteristics groups are supported, challenged and nurtured to achieve their full potential in all schools.
4.2.4.2	Impact on educational attainment among children from economically deprived backgrounds. The proposal states that “the preferred option would impact on any pupils from economically deprived backgrounds. This is 31% of children who attend the 3 schools. Although the report states that “It is anticipated that amalgamation of the 3 schools would have a positive impact on educational attainment” what else supports this statement other than the pupil deprivation grant would be larger? A far better way to improve educational attainment would be to remove social disadvantage.	The greatest impact on learning is through good teaching. The amalgamation of three schools brings together the qualities and skills of three groups of teachers, all with different strengths. Through shared good practice, this will have the greatest impact on supporting all learners, including those from socially disadvantaged backgrounds.

4.2.4.3	Concern that children who are struggling because of the impact of child poverty will get lost in a bigger school.	The draft impact assessments published as part of the Consultation Documentation consider the socio-economic duty, and the impact of the proposals on pupils from lower income families. The impact assessments were updated to reflect the comments received during the consultation period, and an updated version was considered by Cabinet when determining whether or not to proceed with the proposals. They will be further updated to reflect comments received during the objection period.
4.2.4.4	Age discrimination. There appears to be no assessment of impact on older people who currently walk to the school and back home with their grandchildren or great grandchildren.	Concern that it would be more difficult for older people to access the proposed site was noted in the updated equality impact assessment. This will be further updated to reflect the objections received, and an updated version will be considered by Cabinet when determining whether or not to proceed with implementation of the proposal.
4.2.4.5	This will discriminate against elderly people who may not be able to walk the further distance up a steep hill to take their grandchildren to school.	As above.
4.2.4.6	It will be more difficult for disabled people to access the new site due to its location up a hill.	Concern that it would be more difficult for pupils / parents with disabilities to access the proposed site was noted in the updated equality impact assessment. This will be further updated to reflect the objections received, and an updated version will be considered by Cabinet when determining whether or not to proceed with implementation of the proposal.

4.2.4.7	There has been no consideration of the impact on families with children or adult carers with a disability.	As above.
4.2.4.8	This will discriminate against parents with a disability as the site is too far out of town.	As above.
4.2.4.9	It will be more difficult for pregnant women to access the site due to its location up a hill.	Concern that it would be more difficult for pregnant women / young mums to access the proposed site was noted in the updated equality impact assessment. This will be further updated to reflect the objections received, and an updated version will be considered by Cabinet when determining whether or not to proceed with implementation of the proposal.
4.2.4.10	There has been no consideration for young families and expectant mothers which needs to be taken into consideration for future proposals.	As above.
4.2.4.11	Penlan is a poor site for disabled people, pregnant women and the infirm to access without a car.	As above.
4.2.4.12	Housing the PRU on the same site as a mainstream primary school next to a mainstream high school does not seem like the best option for pupils who have struggled to cope in mainstream education.	Should the Proposals be approved, the layout of the site at Penlan would be developed to ensure that the provision meets the needs of the pupils attending. It is the intention that the primary school would be located in a standalone building, and that the PRU would be in a separate standalone building as well.
4.2.4.13	Women are 3 times more likely to take a child to school (http://content.tfl.gov). Increasing evidence and attention points to the impact of urban design decisions on female disadvantage. This has not been addressed in the proposals.	The Council notes this concern about the impact of the proposed new site on women. Concern about the impact of the proposed new site on women is already reflected in the impact assessment document, this will

	The ‘out of town’/’peripheral school zone’ approach, in respect of its non-proximity to other services such as nurseries, shops, health services and office settings has been shown to significantly increase female travel times with subsequent impact on employability and income. Females who are engaged in greater travel times have less ‘around school’ availability for part time work. This impacts low income individuals without cars most, thus accentuating the cycle of disadvantage. For example, a mother from north St Johns Ward could expect to walk 30mins one way to the proposed new school site with a pram and 2 small children in tow. One hour total for a school aged child. Add in another trip to pick up a pre-schooler from a morning session, that is 1.5 hours daily. A total of 10.5 hours every week transiting a child to school. These are real issues in people’s lives. A parent from Cradoc’s 10 minute journey, with traffic, parking and school handover could also be at least 30 mins. Progressive urban design decisions in other countries have focussed on ‘gender mainstreaming’ policies. My question is whether PCC is willing to address equality issues by explicit inclusion of the needs and lived experiences of women in their actions with regards to these proposals. Schools need to be IN communities, not on the periphery.	be further updated to reflect comments made in the objections received, and the updated version will be considered by Cabinet when determining whether or not to proceed with implementation of the proposals.

4.3 General comments about the impact on staff

4.3.1 Concern that staff would lose their jobs

4.3.1.1	Concern about the impact on staff that might not have a job.	The Council notes that any school reorganisation proposal leads to a period of uncertainty for those affected by the proposal, including staff, and notes

		these concerns about the possible impact on staffing arrangements should the Council proceed with implementation of the proposals. Ensuring that staff are treated fairly throughout any process is a fundamental and important principle. Should the decision be to go ahead with the proposals, then the Council would work with the temporary governing body, which would be responsible for agreeing the staffing structure. Once a staffing structure has been developed, all staff would enter into a formal period of consultation outlining all the positions available in the new school and the process by which staff move into those roles. The Council has produced a Management of Change Principles document, that all temporary governing bodies are requested to adopt, so that staff can be transferred to positions where this is possible. This work is carried out in conjunction with all the recognised unions for both teaching and non-teaching staff. HR work alongside staff through the formal process, and also informally to offer support, recognising that any period of change can be unsettling. Through the current Management of Change Principles, it is advised that posts are ringfenced to those already employed across the current schools and it is within the Council's policies to avoid compulsory redundancies if at all possible.

		Until any new staffing structure is prepared for consultation, it is not possible to know the impact on current staffing levels, however, it is expected that there would be minimal impact for current staff during Phase 1 of the proposals, although it is recognised that there would be an impact on the current headteachers from the start of Phase 1. There may be opportunities for roles not available in smaller schools e.g. TLR positions; middle management roles. Once any school reorganisation proposal is approved by Cabinet, HR officers work with schools to ensure that there is flexibility in staffing - for instance recruiting to existing vacancies on a fixed term basis to provide greater security for permanent members of staff.
4.3.1.2	Concern about staff losing their jobs.	As above.
4.3.1.3	Loss of jobs for excellent teachers in the area.	As above.
4.3.1.4	All 3 schools have excellent teaching & support staff, not all of whom are guaranteed a position in the new school.	As above.
4.3.1.5	Staff will be able to apply for positions at the new school but can Powys County Council guarantee that all current staff who desire a position will be able secure a position?	As above.
4.3.1.6	Will Powys County Council agree that there is a RISK that not all staff will secure positions in the new school?	As above.
4.3.1.7	Whilst the documentation states that there would be an opportunity for all staff to secure positions in the new school,	As above.

	there will be fewer jobs, and redundancies would be inevitable.	
4.3.1.8	The plans are to reduce staff numbers – this will result in insufficient staffing levels and substandard provision, which is completely unacceptable.	As above.
4.3.1.9	Existing staff will have to apply for their own jobs in the new building and the decrease in planned pupil numbers will mean a decrease in staff needed.	As above.
4.3.1.10	For Phase 2 there is no clear plan other than creating a new school to accommodate a smaller number of pupils overall (420 down to 360). There would need to be further job losses at that stage given the expected fall in pupil numbers.	As above. The capacity figure provided for the proposed new building is indicative at this stage. As outlined in the Statutory Notice: 'Following transfer of the New School to the new school building, it is anticipated that the New School's capacity would be 360, however this would be confirmed during the design stage.' The school would continually be reviewing its level of staffing as schools do now each year and plan for the appropriate level of permanent and temporary staffing based on predicted numbers, grant allocation and budget allocation. All schools review and plan in a 3 year block with support from their finance officer and HR officer so levels of staffing would be regularly reviewed.

4.3.2 Concern about the impact on staff morale and well-being

4.3.2.1	It is not acceptable to be putting additional pressure on staff at this point in time. This is impacting on morale, health and wellbeing.	The Council recognises that all school reorganisation proposals create a period of uncertainty for all involved, including staff. Should the Proposals be implemented, then HR officers would work alongside school staff through the formal process, and also informally, to offer support whilst recognising that any period of change can be unsettling. Staff would also be able to receive support from their unions and they will also have access to the Employee Assistance Programme for Powys currently delivered through Carefirst.
4.3.2.2	The merger of all 3 schools is already causing all staff to feel undervalued with a loss of job security.	As above.
4.3.2.3	Staff morale has no doubt been affected by concerns regarding their future roles.	As above.
4.3.2.4	Staff morale will be affected by all the uncertainty and loss of support, identity and job security, and this would impact on pupils.	As above.
4.3.2.5	Anxiety over job security is not conducive to staff wellbeing.	As above.
4.3.2.6	Happy staff make a happy school environment. An atmosphere of uncertainty is not conducive to staff wellbeing.	As above.
4.3.2.7	Conducting a controversial consultation process in the midst of a global pandemic is not conducive to staff wellbeing.	As above.

		The Council acknowledges that the Covid pandemic has caused disruption for staff, and acknowledges the role school staff have played in responding to the pandemic. An experienced headteacher is working for the Council to support school leaders to help them manage possible changes for their staff and learners.
4.3.2.8	This last term has been one of the worst for staff during the whole pandemic and yet the Local Authority has continued to undermine staff confidence by taking forward unsupported proposals.	As above.
4.3.2.9	The proposals infer a transition period extending over at least five years, with no certain future end date other than 2026 at the earliest, and possible further job losses during the transition period. This is unacceptable and will be hugely damaging to staff morale, health and wellbeing.	The Council notes this concern.
4.3.2.10	The proposals suggest a transition period of at least five years. This is a long time for staff to be uncertain about the future of their jobs.	The Council notes this concern.
4.3.2.11	Strong leaders are created by individuals being a part of the process. The staff's opinions being ignored by the Transformation Team is not conducive to staff wellbeing.	The staff's opinions are not 'being ignored by the Transformation Team'. Following the consultation period, an extensive 425 page Consultation Report was produced outlining the issues raised during the consultation period, including issues raised by staff. A meeting was also held with staff during the consultation

		period. The points raised were also included in the Consultation Report. The Consultation Report was considered by Cabinet when determining whether or not to proceed with implementation of the proposals.

4.3.3 Other comments

4.3.3.1	Staff have worked tirelessly to cope with the demands of the pandemic. This transformation plan will undermine all their hard work and commitment.	The Council acknowledges that the Covid pandemic has caused disruption for staff, and acknowledges the role school staff have played in responding to the pandemic. The Council also acknowledges that any school reorganisation period causes a period of uncertainty for those affected by the Proposals, An experienced headteacher is working for the Council to support school leaders to help them manage possible changes for their staff and learners. In addition, staff wellbeing will be supported through the process by the HR team, their unions and they will have access to the Employee Assistance Programme for Powys currently delivered through Carefirst.
4.3.3.2	Mount Street Infants School's most recent Estyn report states that "Professional learning opportunities for staff are excellent". How will this proposal improve on excellent professional learning opportunities for our staff?	As excellent practitioners there would be an expectation that teachers shared their expertise. Working across a larger group of staff would be excellent professional learning for all staff.
4.3.3.3	Currently some staff walk to school but they would probably drive to the new site again increasing carbon emissions. Does	Staff that currently walk to school at Mount Street Infants and Mount Street Juniors would be able to

	Powys County Council agree that this proposal will have a negative impact on those members of staff who do not drive?	continue to walk to the new location. It is acknowledged that staff currently working in Cradoc School who do not drive would no longer be able to walk to school.
4.3.3.4	How will best foundation phase practice be provided when teachers will no longer be foundation phase specialists?	There would need to be foundation phase teachers in the new school, therefore the specialism would be maintained in these schools. The sharing of good practice between foundation phase staff would enhance teaching in the foundation phase.
4.3.3.5	The latest Estyn report states that “Teachers and support staff have a deep understanding of the principles and practice of the foundation stage.” “A very strong, sustained feature of the school is the in-depth knowledge that staff have of each pupil’s strengths and needs”. How will Powys Council ensure that staff’s deep understanding of the foundation phase would be not be weakened under this proposal?	As above.

4.4 Comments about small and rural schools

4.4.1 Comments about small schools

4.4.1.1	There is a lot of evidence to show that small schools if run and managed properly can provide an equal if not better all round education for children.	The Council notes these comments about the benefits of small schools. However, as stated in the Council’s Strategy for Transforming Education in Powys 2020-2030, the Council faces a challenge due to the high proportion of small schools in the county and the lack of equity amongst schools. The Council’s Strategy is intended to improve equity across the education system and to ensure an improvement for every pupil’s learning entitlement and experience.

		However, none of the three schools affected by these proposals meet the Welsh Government definition of a small school. The size of the three schools is not one of the reasons for these proposals.
4.4.1.2	Small schools are known to reduce the negative effects of social deprivation, reduce violence, and increase positive parent involvement and student accountability. The reduction of anonymity and isolation for students in small schools in turn reduces bad behaviour and aggression.	As above.
4.4.1.3	Smaller, rural community schools are important as not all children feel they get seen or heard in a larger school.	As above.
4.4.1.4	Evidence shows that children thrive in smaller educational settings, which represent their own cultural background. Estyn identified this in its most recent report of Cradoc School, stating that the majority of pupils 'have a strong understanding of their place in their own and the wider community and they realise the importance of helping others' and that partnerships with the local community have a 'positive effect on pupils' learning and wellbeing'.	As above.
4.4.1.5	Small schools work for introverted children and children with SEN. Bigger and newer are not what a child values. A child values connectedness, intimacy and being known. Feeling comfortable in their world.	Whilst noting these concerns about pupils with SEN/ALN attending a larger school, the Council's opinion is that pupils with ALN and those with disabilities would be equally well supported by larger schools. Where schools have larger classes with a high number of pupils with additional needs, there are processes and mechanisms within the Council to provide additional support and guidance as appropriate.

4.4.2 Comments about rural schools

4.4.2.1	A rural school is such an important element of the community.	The Council recognised the importance of Cradoc School to the local community in the draft community impact assessment. This was updated to reflect feedback received during the consultation period, and an updated version was considered by the Council's Cabinet when determining whether or not to proceed with the proposals. All schools are important to their community, regardless of their size or whether they are rural or urban. The Council acknowledges that Cradoc School is identified in the School Organisation Code as a 'rural school'. The School Organisation Code includes additional steps to be undertaken in respect of rural schools. The Council has complied with these requirements when developing these proposals and will continue to comply with the requirements should the proposals proceed.
4.4.2.2	Rural schools are the heart of community life.	As above.
4.4.2.3	The countryside can be an isolating place to live and we should never underestimate the friendly conversations made at the school gate when new mums can get together and feel part of a community, it can be for many the starting blocks of integrating in an area and friendships are formed that will last throughout the generations.	As above.

4.4.2.4	Rural schools provide lifelong connections for the children at the school, and are also a gateway for much of the social and community life of the village, strengthening bonds between people who otherwise are in danger of becoming increasingly isolated.	As above.
4.4.2.5	Cradoc is a rural school and for the cabinet to consider Brecon town to also be a rural school have no understanding and have taken no opportunity to go to these schools and see for themselves the interests, friendships, rural essence of these children.	As above.
4.4.2.6	When a school leaves a rural area, the heart of a community also leaves.	As above.
4.4.2.7	In 2019 ERW produced a report that illustrated that rural school pupils scored higher in wellbeing and the desire to learn that that of urban school pupils.	The Council notes the content of the ERW report.

4.4.3 Criticism of the Council's treatment of rural schools / communities

4.4.3.1	I believe that PCC is making a dreadful mistake by reducing the options of rural schools.	The Council fully acknowledges the rural nature of Powys, which brings with it a number of challenges – as explained in The Council's Strategy for Transforming Education in Powys, which was developed following extensive engagement with schools and other stakeholders: *'Delivering services across such a large, sparsely populated area is challenging and expensive. This is particularly true for education.'*

		The Council fully recognises the need to develop an education provision which fully meets the needs of all learners, including those living in towns and in more rural areas. The Council's aspirations are outlined in the Vision and Guiding Principles which are included in the Strategy for Transforming Education in Powys, and the first of the guiding principles is 'A world class rural education system that has learner entitlement at its core.' The Council has been taking forward a number of proposals to implement its Strategy. Whilst some of these have affected schools in small villages, others have affected schools in larger villages or in towns. For any proposals affecting the closure of schools identified as 'rural schools' in the School Organisation Code, The Council has complied with additional requirements outlined in the Code. In addition, the Council carries out Community Impact Assessments in respect of any proposals undertaken, with input from the affected schools. These are updated throughout the process to reflect any feedback received, and the latest versions are considered by the Council's Cabinet when determining whether or not to proceed with each proposal.
4.4.3.2	Rural communities of medium sized (Cradoc school) as well as small schools are being unfairly targeted.	As above.
4.4.3.3	I urge the Council to reconsider and to support rural schools.	As above.

4.4.3.4	Why would PCC, a Conservative majority council, decide to close a successful, thriving, well attended rural school?	As above.
4.4.3.5	If rural schools such as Cradoc are closed, then I fear that just a few years we'll all be looking back and thinking bad decisions were made by our current politicians.	As above.
4.4.3.6	The Cabinet Members should be assisting and encouraging rural areas to thrive. Closing a protected rural School does the opposite.	As above.

4.4.4 Comments about the 'Presumption against closure of Rural Schools'

4.4.4.1	Welsh Government guidance states that rural schools have protected status.	The Council fully acknowledges the role of rural schools in their communities. The Council has complied the requirements of the School Organisation Code's 'presumption against closure of rural schools' in respect of the Proposals.
4.4.4.2	The Welsh Government guidance states that everything possible should be done to retain rural schools with closure being the last option; this has not even been entered into the equation.	As above.
4.4.4.3	The Council has blatantly rejected Welsh Government guidance which states that rural schools should be treated differently. Welsh Government guidance also states that Rural schools have a protected status; this has also been ignored.	As above.

4.4.4.4	The proposal to close Cradoc Primary School is in complete contravention of the Welsh Government guidelines regarding the protected status of rural schools.	As above.
4.4.4.5	The Schools Organisational Code states that you have to make special arrangements for rural schools and they must be strong and all viable alternatives to closure must have been conscientiously considered by the proposer, including federation. This has not been offered.	As above.
4.4.4.6	Cradoc School is designated a 'rural' school and it should be treated differently to non rural schools. Powys County Council has not done this.	As above.
4.4.4.7	Cradoc is one of only two rural schools that feeds Brecon High School. The significance of rural schools has been noted by the Welsh Government ruling that all viable alternatives must be considered before closing a rural school. I do not believe that Powys County Council has done so.	As above.
4.4.4.8	To say that rural schools and urban schools are the same is not true and Welsh Government recognizes that fact so why doesn't Powys County Council. Cradoc School should and must be treated differently.	The Welsh Government's School Organisation Code does not say that rural and urban schools must be treated differently. The Code includes some additional requirements which local authorities must address when proposing to close schools identified as 'rural schools'. The Council has complied with these requirements in respect of these proposals.
4.4.4.9	Cradoc School is fortunate to enjoy rural status. According to Welsh Government guidance, rural schools should be regarded differently to urban schools when considering closure. This has not been the case. Instead, the Council has	As above.

	lumped in Cradoc School with two urban Brecon schools which is absolutely unacceptable and contradicts Welsh Government guidance.	
4.4.4.10	Welsh Government guidance states that rural schools have a protected status and should be treated differently to urban schools when considering closure. Cradoc Primary School has not been treated differently to the Brecon urban schools.	As above.
4.4.4.11	Cradoc is a rural school and Welsh Government guidance states that as a rural school it has to be treated differently to town schools when considering closure. This has not happened in the case of Cradoc. Powys CC has put Cradoc School into a joint proposal with two other urban schools in Brecon and has looked to treat Cradoc the same as these two urban schools. This is fundamentally and legally wrong and as I have already pointed out goes directly against Welsh Government guidance. Cradoc Primary School is classed as a rural school, Mount St Infants and Junior Schools are classed as Urban Schools. They should never have been placed together in the same consultation process.	As above.
4.4.4.12	PCC has treated Cradoc County Primary School in the same way as an urban school.	As above.
4.4.4.13	I understand that it is Welsh government policy to maintain rural schools at the heart of rural communities and that closure should only be considered as a last resort. The Welsh Government also state that ‘federation’ should be one of the considerations. I would be interested to know if this has been seriously considered.	The Council fully acknowledges the role of rural schools in their communities. The Council has complied the requirements of the School Organisation Code’s ‘presumption against closure of rural schools’ in respect of the Proposals.

		Federation options were considered when developing the current proposals. Two federation options were outlined in the Consultation Document published in respect of this proposal.
4.4.4.14	With regards to Cradoc Primary school, The Welsh Government School Organisation Code not only specifies a 'presumption against the closure of rural schools', but also that 'special attention should be given to … whether the possibility of making fuller use of the existing buildings as a community or educational resource could be explored'. I could find no evidence in the consultation or the consultation report that this had been done. The support given to the primary school by residents of Cradoc and the surrounding villages in their campaign against closure would imply that these communities would be happy to use the school building for community activities and events: it is worth investigating. This would then make a new build for Cradoc more likely to be granted 21st Century schools funding from the Welsh Government.	The Community Impact Assessment which was prepared with input from Cradoc School indicates that there is already extensive use of the school building by the community. The main challenge in respect of Cradoc C.P. School relates to the condition of the school building. Making fuller use of the buildings as a community or educational resource would not address these issues.

4.4.5 Parents should be able to choose a rural school

4.4.5.1	I wish my children's education to continue in a rural school in a rural environment.	The Council recognises that parents can choose to apply for a place for their child(ren) in any school they wish, however there is no requirement for the Council to provide a choice of schools of certain types or of certain sizes. There are currently 7 schools which provide primary education in the Brecon catchment. The current proposal is proposing to merge 3 of these schools, however there would still be 5 schools in the catchment

		which would continue to provide choice. This includes community primary schools, Church in Wales provision, a Welsh-medium primary school and a school located in a rural area.
4.4.5.2	The children of Cradoc have the right to attend a smaller, rural school, in the heart of their community.	As above.
4.4.5.3	Why should our children have to consider education in an urban school when Cradoc was chosen as their place of education based on its location, environment and the provision offered?	As above.
4.4.5.4	I fear for the future choice that the Council will be giving parents, parental choice has been a parents right for many years and should be not taken away or limited. It's important that they can choose a school in a rural setting and to be welcomed into a rural community.	As above.
4.4.5.5	The school attracts many agricultural families and provides an alternative approach to learning; this need would not be met if rural students are educated in an urban environment such as has been proposed by your council	As above.
4.4.5.6	Where is the choice going to be after these changes?	As above.
4.4.5.7	Where is the option for parental choice when all choices are urban? Sennybridge is a rural school but the increased travel from Brecon or one of the valleys would have a detrimental effect on the Council's aims to achieve net zero by the end of this decade.	As above.

4.5 Comments about other schools

4.5.1 Sennybridge

4.5.1.1	Powys County Council is proposing building a 180 place school in Sennybridge when there are currently only 126 pupils on roll and pupil numbers are expected to decrease by 9.3% (11.718 pupils) over the next 5 years. Why is it acceptable to have 54 surplus places at Sennybridge when Powys County Council state that change is needed because of decreasing pupil numbers and surplus places?	The capacity figures provided in the PBC for the proposed new buildings at both Sennybridge and Brecon were indicative. Having further reviewed the requirements, the Council is now planning a new building in Sennybridge for a reduced capacity of 150 pupils. This would not have 54 surplus places.
4.5.1.2	Why is the new build at Sennybridge planned to have 54 surplus places?	As above.
4.5.1.3	Why does PCC believe it is acceptable to have 54 surplus places at Sennybridge, when it also states change is needed because of decreasing pupil numbers in other schools and there is a need to reduce surplus places?	As above.
4.5.1.4	Some parents would prefer their children to attend Sennybridge, the nearest rural school. Have these prospective pupil numbers been included in the plan for their new school?	Should the Council proceed with implementation of these proposals, the Council's intention is that all pupils currently attending Mount Street Infants, Mount Street Juniors and Cradoc CP School would attend the new school, initially on their existing site, and that eventually they would transfer to the new building. However, parents can apply for a place at whichever school they choose, and should the Council proceed with the Proposals, parents could apply for places at other schools should that be their preference. Places

		will be allocated in accordance with the relevant Admissions Policy. The Council is currently developing plans for a new build school in Sennybridge C.P. School with a capacity of 150. This is based on the current and projected pupil numbers at Sennybridge C.P. School, however this would allow some surplus places which would be available for any pupils living in the area currently served by Cradoc C.P. School who may wish to apply for a place at the school in the future, should the Council proceed with these proposals.
4.5.1.5	Concern that there has been a decision to rebuild Sennybridge School without first considering amalgamation with Cradoc, which would seem a more natural fit for two rural schools likely to be drawing children from the same catchment.	Amalgamation with Sennybridge was not considered as an option within the further options appraisal carried out in respect of Mount Street Infants School, Mount Street Juniors School and Cradoc C.P. School or in the Consultation Document published in respect of the current Proposals, as options involving Sennybridge had been discounted in the Programme Business Case – these papers were focussed on options for the three schools. Merging Cradoc C.P. School and Sennybridge C.P. School was suggested during the consultation period, and therefore was considered as a 'reasonable alternative' in the Consultation Report. However, having considered the reasonable alternatives suggested during the consultation period, the Council's view was that the current proposal continues to be the most appropriate response to the reasons outlined for the proposals.

4.5.2 Brecon High School

4.5.2.1	Powys County Council are incapable of building a school sufficient to cater for the number of pupils, demonstrated with the dining hall and assembly hall at Brecon High School, both being too small for even half capacity for purpose. We don't want to see mistakes like this being made again.	The Brecon High School building has been designed according to the Building Bulletin 1998 Schools Building Framework, and in line with Welsh Government funding requirements. The leadership of the school were heavily involved in developing the designs and provided input from an education and pedagogical perspective. The new Brecon High School has replaced a very poor building at the old Brecon High School and that the learning environment is far superior to the old one. The staff and pupils have also benefited from new, state of the art specialist ICT, STEM, drama, music, and sports equipment and facilities as part of the project.
4.5.2.2	The dining hall at the new Brecon High School is too small for all pupils to eat at the same time – only about a third can actually eat in the dining hall, another third is put up in the assembly hall and the rest stand or sit on the floor or eat their packed lunch outside if it's warm and dry.	As above.
4.5.2.3	Instead of building an assembly hall big enough to fit everyone in and to enable the school to put on large scale school performances, the Council cut corners and built one that's too small – what hope is there for a new primary school to be built that actually meets everyone's needs?!	As above.

4.5.2.4	It resembles a prison or a hospital. There is not enough room in the dining hall there for all students to eat or attend assembly at the same time, the sixth formers have no common room, the floors are a ghastly yellow colour and I could go on.	As above.
4.5.2.5	The newly built Brecon High School has capacity for 888 pupils but the Admissions document states that there are only 474 pupils on roll. This is a staggering 414 surplus spaces.	Comment noted.
4.5.2.6	The disruption caused by Covid and by this proposal will land at the doors of the High School in due course, meaning that the high School could end up back in the same situation it has recently escaped from i.e. poor reputation and parents running to an alternative.	The Council recognises that all school reorganisation proposals create a period of uncertainty for all involved, and that the pandemic has added another layer of uncertainty. However, the three schools must be congratulated for providing consistency and support to children throughout the pandemic and also during the consultation. However, the Council does not agree that Brecon High School would be negatively impacted by the intake from these three schools.

4.5.3 Welshpool

4.5.3.1	Welshpool Church in Wales Primary School opened its doors for children on January 6th 2021. The consultation process for this new school commenced in 2016. Has a formal review taken place with all the stakeholders in the process for Welshpool Schools to evaluate the strengths and weaknesses of the process? If not, why not? If it has why hasn't it been published alongside these proposals?	The Council is fully aware that the Welshpool catchment project faced unforeseen challenges, including Cadw listing, main contractor liquidation, and a global pandemic. The Council is currently preparing to submit a project closure report specifically relating to the Welshpool CiW Primary School project to Welsh Government, this report will include lessons learned.

		Project closure reports are usually sent to the Welsh Government following the 12-month defect period, which for this scheme, would be after January 2022. This is nearing completion. The same process will apply for the Ysgol Gymraeg y Trallwng project.
4.5.3.2	The Local Authority quotes success with amalgamation of three schools in Welshpool. The process there was protracted and disrupting. As far as we are aware Cabinet has not yet had access to the full report on the Welshpool amalgamation – what worked/ didn't work, so presumably cannot make a proper assessment of the proposal for MSI, MSJ and Cradoc. We had personal testimony from the Headteacher at Welshpool on the hardship of the process she had to manage and the massive negative impact on her and her staff.	As above.
4.5.3.3	The experience from the recent Welshpool amalgamation took 5-6 years – leading to negative impacts on staff including stress and in the case of the Welshpool amalgamation placed excessive pressures on a head teacher covering three schools over separate sites for an extended period of time.	As above.
4.5.3.4	Communication with the head teacher at Welshpool confirmed that "Timescales were absolutely NOT adhered to" and that the "The impact of this was huge....We all despaired of it ever happening at many points in the journey"	As above.
4.5.3.5	The Council's constant reference to the success of the Welshpool schools was misleading, especially given that the	As above.

	'Lesson Learnt' document from Welshpool Area is not yet in the public domain.	
4.5.3.6	In point 4.6.4.1 of the Consultation Report PCC state that "The Council is currently preparing to submit a project closure report specifically relating to the Welshpool CiW Primary School project". These proposals should be suspended until such time as the project closure report is available to the stakeholders so that everyone can learn from the mistakes made during the Welshpool project.	Comment noted.

4.5.4 Ebbw Fawr Learning Community

4.5.4.1	In Ebbw Vale, Blaenau Gwent closed three local primary schools and made a large, so-called 'super school' much like PCC are proposing for Mount Street and Cradoc. This situation was different as the three schools were town schools. This brought with it a compilation of problems that nobody had foreseen. Did standards rise? No! There are 350 pupils in the primary school. They are now rating as 'adequate' on their Estyn reports, which were 'good' on two out of the three primary schools that merged. Standards have fallen.	The Council acknowledges the experiences of this respondent of an amalgamation in a neighbouring authority. However, not all school amalgamations are the same. The Council would work with the new governing body to ensure that the school ethos is supportive, inclusive and open.
4.5.4.2	Ebbw Fawr Learning Community has taken away far more than it has created. 'Community' the name of the new 'super school', is the very thing that it has failed to achieve. The new community school has put up walls both physically and metaphorically. The sheer number of pupils means that the operation of the school is far more regimented and institutional than anything that any of the children had	As above.

	experienced before. The physical walls took the form of fences, which kept parents apart from staff and children, meaning that opportunities for communication were lost. All communication immediately became formal, by appointment only, or by e-mail.	

4.5.5 Gwernyfed catchment schools

4.5.5.1	In Llanfaes, Llyswen, Talgarth, Clyro and Hay you built small new schools to replace older buildings. Why do we as parents and children at Mount Streets and Cradoc not deserve the same?	The capital investment in schools in the Gwernyfed area was a result of an area school reorganisation which saw the number of schools reduce from 10 to 5.
4.5.5.2	Powys County Council has built new schools that are too big which has resulted in surplus spaces. The newly built Clyro school has capacity for 119 pupils & has 33 surplus spaces. Llangors C in W school has capacity for 175 pupils & has 14 surplus spaces. Hay on Wye school has capacity for 210 pupils and has 41 surplus spaces. Ysgol Y Mynydd Du has capacity for 147 pupils and has 43 surplus spaces. In these 4 schools alone there are 131 surplus spaces.	Comment noted.

4.5.6 Other comments

4.5.6.1	Will the other schools which aren't affected be extended to make bigger classes for parents who decide not to send their children to the new schools? Parents will have difficult decisions to make when it comes to applying for a place for their children who will start full time school next year.	The Council currently has no plans to extend any other schools in the Brecon catchment.

4.6 Financial impact

4.6.1 Comments about costings / estimated savings

4.6.1.1	The savings are not sufficient to support the proposal, or to justify spending £9m – £10m to build a new school.	The case for change is clearly set out in the Consultation Document. The Council is facing the combined challenges of a high proportion of small schools, decreasing pupil numbers, high numbers of surplus places, issues with building condition of some schools and ongoing financial pressure combined with inequity of provision. The Strategy for Transforming Education in Powys 2020-2030 sets out the Council's priorities in addressing these challenges which includes the aim to **"improve learner entitlement and experience"** and this aim includes an objective to 'rationalise primary provision'. The decision to consult on the merging of the schools to create a new primary is in line with these priorities. The revenue savings identified are recurring savings that the Council will benefit from each year. Savings estimates are based on the best information available at the time they are calculated and are subject to change, for example, due to changes in pupil numbers, parental choice, staff changes etc. The calculations are reviewed by a range of officers and sensitivity analysis is also carried out.

		It should be noted that following the revision of the school funding formula for primary phase schools, the estimated saving is now approximately £6,400 for Phase 1 and then £137,410 per annum for Phase 2, recurrently each year afterwards.
4.6.1.2	Can PCC explain how the expected savings in delegated funding are calculated given this is likely to change with the vagaries of school budget calculations and uncertainty over projected future pupil numbers?	Savings estimates are based on the best information available at the time they are calculated and we acknowledge that they are subject to change, for example due to changes in pupil numbers, parental choice, staff changes etc. Estimated costs of the proposed model of provision are compared with the estimated costs of the current provision, based on the same data and projected pupil numbers. The calculations are reviewed by a range of officers and sensitivity analysis is also carried out. The pupil numbers used in the calculations are those as at the count date (5th November 2021) and those estimated by the schools themselves for future years (2023-24 & 2024-25). For the calculations for Phase 2 we have used the current estimated pupils for 24-25 and rolled this forward.
4.6.1.3	The report states that a move to one new building would result in estimated revenue savings in delegated funding amounting to £184,306 per annum and £35,760 for catering functions. This may be based on current pupil numbers and a vague indication that the new school will cater for 360 pupils. It does not take into consideration the fact that most pupils from rural areas attending Cradoc school are likely to disperse to other rural schools – either Sennybridge or Builth. Those	As above. Following the revision of the school funding formula for primary phase schools, the estimated saving is now approximately £6,400 for Phase 1 and then £137,410 per annum for Phase 2, recurrently each year afterwards. The potential increase in the allocated

	coming from Brecon may well disperse to closer schools in Llanfaes or Priory. This could leave the school with a very difficult budget scenario – if all staff are kept on as proposed with fewer pupils than expected. The Governing Body will be left to oversee further restructuring and redundancies.	budget for other schools has been considered when calculating the estimated saving. The calculations are reviewed by a range of officers and sensitivity analysis is also carried out. It is not possible to predict at this stage how parents will exercise their parental choice with regard to the school that their children will attend, but this will be kept under review as the phases of this proposal progress. The new school would be expected to manage within the resources available to it, as is the case with all schools.
4.6.1.4	Phase one will result in a saving of £9,438.92 in 2022/23 and £6,742.08 in 2023/24 but the set up cost will be in the region of £50k. Therefore, if the new school opens in 2024, phase one will have cost Powys County Council at least £33,819.00.	Following the revision of the school funding formula for primary phase schools, the estimated saving is now approximately £6,400 for Phase 1 and then £137,410 for Phase 2 and recurrently each year afterwards. The calculations are reviewed by a range of officers and sensitivity analysis is also carried out. The estimated savings are recurring annual savings that the Council will benefit from each year. It is acknowledged that there will be one off set up costs of establishing a new school of approximately £50,000. Savings estimates are based on the best information available at the time they are calculated and are subject to change, for example, due to changes in pupil numbers, parental choice, staff changes etc.
4.6.1.5	Why hasn't a review of the costs involved been published given that there is a new funding formula?	Following the revision of the school funding formula for primary phase schools, the estimated saving is now

		approximately £6,400 for Phase 1 and then £137,410 for Phase 2 and recurrently each year afterwards.
4.6.1.6	PCC has not taken into consideration the impact on any savings in the light of recent changes to the School Funding Formula.	As above.

4.6.2 Suggestion that the only reason for the proposal is to save money

4.6.2.1	This whole proposal reeks of a money saving exercise, not a thought out, considered improvement to educational provision for our children.	The case for change is clearly set out in the Consultation Document. The Council is facing the combined challenges of a high proportion of small schools, decreasing pupil numbers, high numbers of surplus places, issues with building condition of some schools and ongoing financial pressure combined with inequity of provision. The Strategy for Transforming Education in Powys 2020-2030 sets out The Council's priorities in addressing these challenges which includes the aim to **"improve learner entitlement and experience"** and this aim includes an objective to 'rationalise primary provision'. The decision to consult on the merging of the schools to create a new primary is in line with these priorities. Whilst the 21st C Schools Programme supports remodelling of schools as well as new build, the Council is committed to providing the children and staff of the three schools with a high-quality learning environment, which will include modern, purpose-built facilities and technology fit for the 21st Century, further enhancing

		the school's ability to implement the new Curriculum for Wales, for the benefit of all pupils. The Council is of the view that building one larger school rather than remodelling three smaller schools in one area provides the most cost-effective long-term solution for improving the learner entitlement and experience not only for the learners that would attend this school but for all learners across Powys as scarce resources would be used more effectively. In addition to the benefits to learners and staff of having an improved learning environment, there are also benefits from being part of a larger school. There would be the opportunity to share good practice across all sites, meaning that provision would benefit from shared expertise from all teachers. With the introduction of the new Curriculum, this approach will have a positive impact on improving outcomes for pupils. Each school brings its own individuality, however, there are also many areas where, by amalgamating, staff would benefit from working together, sharing good practice, sharing knowledge and experiences in preparation for the implementation of the new Curriculum, ensuring consistency in approaches to literacy and numeracy, for example. All three schools currently provide good quality education and are self-improving schools. It is recognised that they have different strengths, however,

		this will be a benefit to a new school as the school will be able to meet the needs of all pupils. With an amalgamation of the three schools, the strength in leadership and excellence identified by Estyn and the Council would be shared within the new school, impacting positively on standards and leadership.
4.6.2.2	Schools should not be closed to save money, yet the Education Department admit one of the reasons to close Cradoc School is ‘To realise a financial saving’.	‘To realise a financial saving’ is only one of ten ‘reasons for formulating the proposal’ which are listed in the Statutory Notice published in respect of these proposals. Realising a financial saving means that PCC can redistribute funding more equitably between other schools and improve learner experience. The Council is of the view that building one larger school rather than remodelling three smaller schools in one area provides the most cost-effective long-term solution for improving the learner entitlement and experience not only for the learners that would attend this school but for all learners across Powys as scarce resources would be used more effectively.
4.6.2.3	One point I strongly disagree with is your reason to close Cradoc School 'to realise a financial saving': this is not acceptable – to close a very well run, successful rural school just to save money!!	As above.

4.6.2.4	One of the reasons for the proposal is 'To realise a financial saving'. How does this enhance the child-centred education which is the fundamental point in the new curriculum?	As above.
4.6.2.5	I understand the financial constraints faced but I also know that you cannot close the school based on finances alone – all other reasons listed in your document are opinions without evidence.	The Council is not 'closing the school based on finances alone.' 'To realise a financial saving' is only one of ten 'reasons for formulating the proposal' which are listed in the Statutory Notice published in respect of these proposals. Realising a financial saving means that PCC can redistribute funding more equitably between other schools and improve learner experience. The Council is of the view that building one larger school rather than remodelling three smaller schools in one area provides the most cost-effective long-term solution for improving the learner entitlement and experience not only for the learners that would attend this school but for all learners across Powys as scarce resources would be used more effectively.
4.6.2.6	Whatever excuses you make, the motive is purely financial, however the Welsh Government has decreed that no rural school should close on financial grounds alone.	The Council's motive for these proposals is not 'purely financial', as stated above, one of the main aims of the Strategy for Transforming Education in Powys is to **"improve learner entitlement and experience"** for all Powys learners. Maximising the cost effectiveness of provision across the County is key to delivering this.

		‘To realise a financial saving’ is only one of ten ‘reasons for formulating the proposal’ which are listed in the Statutory Notice published in respect of these proposals. Realising a financial saving means that PCC can redistribute funding more equitably across all schools and improve learner experience for all learners across the county.

4.6.3 Concern about additional costs that will be incurred to implement the proposal

4.6.3.1	It does not make sense to be incurring additional costs when budgets are so tight and when some schools have recently been through the pain of budget cuts and staff redundancies. It is painful to see a proposal that is incurring additional costs that is not leading to any immediate improvement for children’s education or for staff development.	It is anticipated that the £50k estimated additional setup costs would be a one off cost. The Council can justify the additional costs incurred in Phase 1 of the Proposals because Phase 1 is an inherent and necessary part of the process to achieve the outcome of Phase 2 which is to provide the children and staff of the three schools with a high-quality learning environment, which will include modern, purpose-built facilities and technology fit for the 21st Century, further enhancing the school’s ability to implement the new Curriculum for Wales, for the benefit of all pupils. NB: Following the revision of the school funding formula for primary phase schools, the estimated annual revenue saving is now approximately £6,400 for Phase 1 and then £137,410 for Phase 2 and recurrently each year afterwards.

4.6.3.2	How does PCC justify additional costs in transformation when schools are penalised for going into deficit budgets?	As above.

4.6.4 Concern about loss of MOD funding

4.6.4.1	There will be a loss of Ministry of Defence (MoD) funding support to Teaching Assistants. At least 2 of the schools in question have recently applied for and received various grants from the MoD which in total are worth in excess of £60K pa (including ESF, Covenant etc.). Given that these grants are issued school by school, rather than pupil by pupil, an amalgamation of the three schools would see those grants effectively reduce by 1/3. These are significant amounts of money and, for example, if the new school were to apply for 3 TAs to look after the Nepalese and military families it is unlikely to be forthcoming. However if each of the current 3 schools applied then the chances are, they would. Therefore the proposals are directly, negatively impacting on (reducing) the provision of support to the military community.	As far as the Council is aware, both Mount Street Infants and Mount Street Juniors have applied for the MoD grant funding, and have been successful with this. Should the grant continue to be available from the MoD, the new school will be able to apply for it. The application process would require the school to set out how the grant will support military children and the school would need to spend the grant in line with that application, if successful. Given the success of the existing schools in accessing this funding, the Council does not foresee difficulties in future applications.
4.6.4.2	This report does not take into account loss of funding from the Ministry of Defence (MOD). Mount Street Infant School & Mount Street Junior School have applied for and received grants from the MOD which total more than £60k per annum. As these grants are issued on a school basis rather than a pupil basis an amalgamation of the schools would see these grants reduced. What mitigation will there be for the potential loss of MOD grant funding?	As above.

4.6.4.3	Are PCC aware of the impact this loss of MOD funding will have on pupil outcomes and made any assessment to mitigate this loss of funding?	As above.
4.6.4.4	PCC have not acknowledged the impact the loss of MOD funding will have on pupil outcomes and made any assessment to mitigate this loss of funding.	As above.

4.6.5 Other comments

4.6.5.1	The only recurrent costs identified in the consultation document are an extra £14,000 increased rates charge. How has this figure been arrived at when “no designs for the building have been developed yet”?	This is an estimate based on the non-domestic rates charged for a similar sized new build school.
4.6.5.2	Does Powys County Council agree that the “significant variations in the budget share per pupil across Powys schools” are caused by flaws in the fairer funding formula introduced by Powys County Council?	The current school funding formula was introduced in April 2019 to bring stability to the budgets of the existing schools estate, particularly the smaller schools. 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 prior to their implementation. A new funding formula for Primary Phase schools has recently been approved by Cabinet – its development was overseen by the Formula Working Group as outlined above.

		Both the new funding formula and the existing funding formula comply fully with all the requirements of the School Funding (Wales) Regulations 2010 and associated guidance.
4.6.5.3	No account has been taken of increased pupil numbers in years to come. Up to 1700 houses may be built within 1.5km of the proposed school site. If the existing proposal goes ahead, another school will be needed in the near future. This has not been taken into account in the cost-benefit analysis.	The latest Joint Housing Land Availability Study (2019) published by the Brecon Beacons National Park Authority stated that there were 312 residential units remaining to be built in the Brecon area. This includes 119 units opposite Brecon High School. Any potential increase in pupil numbers as a result of housing development would need to be accommodated within the existing schools estate at that time. As the plans for the new school are developed, they will need to take account of any developments which could impact on future pupil numbers.
4.6.5.4	The saving of £5,218,227 between the lifetime costs of the status quo option and a new school building over a 60 year period does not justify the cost of the new build.	One of the main aims of the Strategy for Transforming Education in Powys is to **"improve learner entitlement and experience"** for all Powys learners. Maximising the cost effectiveness of provision is key to delivering this. The decision to consult on the merging of the schools to create a new primary is in line with these priorities.
4.6.5.5	In the Consultation report PCC state that over £500,000 has been spent on maintenance at the three schools over the last few years and that they will continue to maintain these schools until a new school might be built. This is a complete waste of tax payers' money, especially in regards to the car park at Cradoc School, to then spend a further £10m on a	The Council has a duty to maintain all schools to acceptable standards, even if they are subject to review.

	new building. It would be far more financially prudent to apply for 21st century funding to refurbish the existing buildings.	
4.6.5.6	Funding of £2.2m has already been secured for the maintenance of schools in Powys and the Education Minister announced on 16th March 2021 that an additional £45m was being allocated to schools across Wales to support revenue maintenance costs. Has Powys County Council applied for a share of the additional £45m funding and, if so, how much has been allocated to Powys?	Additional funding was announced by the Welsh Government in March 2021 to support large scale maintenance projects in schools. Powys County Council was allocated £2.2 million from this funding.
4.6.5.7	External funding is available to build community halls/centres for communities throughout the country. This option should have been considered, to include a new school building as part of the same project, to reduce costs and increase community facilities within the Yscir ward.	The Council is not aware of any funding of this type that is available.
4.6.5.8	There is no guarantee that the proposed redundant sites would realise a capital receipt. The consultation document states “could realise a capital receipt” and therefore is acknowledging that this is not guaranteed. Will Powys County Council agree that this is a risk and being unable to realise a capital receipt should be listed as a threat to Option 4 in the SWOT and Critical Success Factor Analysis?	The Council does not agree that being unable to realise a capital receipt is a threat to the Proposals. Implementation of the proposal is not dependent on receiving a capital receipt from sale of the sites. All surplus assets are subject to the process of disposal as outlined in the Council’s Asset Management Policy. Some schools that have closed have been transferred to other service areas e.g. housing or to a community. In other case they have been sold to third parties. This provides the Council with a capital receipt that is then re-invested in the Council’s corporate budget, which in turn supports education.

4.7 Comments about Council / Welsh Government Strategies

4.7.1 Comments about the Council's Strategy for Transforming Education in Powys

4.7.1.1	Powys County Council is prioritising money rather than education. This is 'Transforming Education in Powys' by closing rural schools, encouraging rural de-population, increasing congestion and air pollution, instead of providing community-focused schools in the community	The Council's Strategy for Transforming Education in Powys is intended to improve learner entitlement and experience and to ensure equity across the system. The Council is committed to ensuring that all pupils are able to be educated in the highest quality learning environments. The Strategy concerns fairer distribution of resources rather than saving money.
4.7.1.2	One of the strategy's guiding principles is to have "Community-focused schools that are the central point for multi-agency services to support children, young people, families and the community." This proposal goes against that principle as it will have devastating consequences on Yscir children, young people, families and the community, by having their school, as the central point for their community, removed.	The Council has recognised within the Consultation Document and the draft Community Impact Assessment that full implementation of the proposals would eventually mean that there would be no school in Cradoc, which would have a negative impact on the community. The Community Impact Assessment was updated to reflect information about the impact on the community which has been received during the consultation, and an updated version was considered by the council's Cabinet when determining how to proceed with the proposals. This will be updated again to reflect comments received during the objection period, and the updated version will be considered by the Cabinet when determining whether or not to proceed with implementation of the proposals. It is correct that one of the guiding principles in the Council's Strategy for Transforming Education is

		‘community-focused schools that are the central point for multi-agency services to support children, young people, families and the community.’ However, this is within the context of the Strategy, which includes a commitment to maintaining and developing provision in the 13 localities across Powys, not at a micro level.
4.7.1.3	Your proposals go against your own principle of "Community focussed schools" in your Strategy for Transforming Education in Powys.	As above.
4.7.1.4	This proposal appears to contradict the ‘Transforming Education Strategy’ which was approved in 2020 of which a guiding principle is to have “community-focused schools that are the central point for multi agency services to support children, young people, families and the community.” If Cradoc school closes it would not promote community cohesion as per Welsh Government guidance and Powys County Council policy. The Yscir ward where Cradoc school is located is not a community within Brecon town – not geographically, and certainly not in public feeling.	As above. Whilst noting the comment that the Yscir ward is not a community within Brecon town, many of the pupils attending Cradoc C.P. School live in Brecon.
4.7.1.5	Transformation in education is much more than simply building new schools!	The Council fully agrees that transforming education is about much more than simply building new schools.

4.7.2 Comments about other Council Strategies

4.7.2.1	The Powys draft document, Red Kite Climate Vision and Strategy, A healthy and sustainable net positive Powys 2021-2030, states that decisions relating to the future plans must ‘give local communities a voice.’ (page 11)	Local communities have had the opportunity to have their voice heard as part of the consultation process, which was widely responded to.

4.7.3 Comments about the Well-being of Future Generations Act

4.7.3.1	The Well-being of Future Generations Act enshrines in law the goal of achieving 'A Wales of Cohesive Communities'. For Cradoc and the surrounding area, the primary school is the most important institution through which this can be achieved. Its closure would be a major step backward from that goal. Guidance issued by the Future Generations Commissioner for Wales on achieving Cohesive Communities states that this goal is less likely to be achieved it 'Public bodies work in silos and don't take 'place-based' approaches to what matters to people'. I'm afraid it is all too clear that the 'silo' mentality has taken hold in Powys County Council and the needs of local people are in danger of being ignored. This would appear to risk being a breach of the Council's obligations under the Act.	The Council's impact on community cohesion is considered in the impact assessment. The Council has also carried out a community impact assessment with input from the affected schools. These assessments will be updated at each stage of the process to reflect comments received, and updated versions will be considered by the Council's Cabinet when determining whether or not to proceed with the proposal.
4.7.3.2	The need to retain and enhance thriving local communities is widely recognised, not just in the Well-being of Future Generations act but in guidance such as Planning Policy Wales, which stresses the need to make 'places where people want to be and interact with others', and in forward thinking initiatives such as the Placemaking Wales Charter. The Welsh Government's policy of creating 'Community-focused schools' recognises the importance of schools to communities – and in fact 'community-focused' is in practice exactly what Cradoc school is – the Council should be supporting and enhancing that role rather than destroying it. The closure of this school would be a backward thinking decision which future generations would come to regret deeply.	As above.

4.8 Criticism of Powys County Council

4.8.1	Powys County Council put an alarming emphasis on new build schools to provide a better quality education. In my experience new build schools provide a more pleasant physical environment but they do not determine the quality of education. This is determined by excellent leadership, good governance and effective partnerships between staff, parents and pupils.	The Council fully agrees that new buildings alone do not determine the quality of education, however the Council agrees with the statement that they 'provide a more pleasant physical environment'. The Council does not agree that it 'puts an alarming emphasis on new build schools to provide a better quality education.'
4.8.2	The Epynt farming families gave up their homes for the safety of the nation, Powys County Council want to take Cradoc School away purely for money.	It is not true that the Council wants to 'take Cradoc School away purely for money.' 'To realise a financial saving' is only one of ten 'reasons for formulating the proposal' which are listed in the Statutory Notice published in respect of these proposals. Realising a financial saving means that PCC can redistribute funding more equitably between other schools and improve learner experience.
4.8.3	These decisions need to be made by persons that have visited and know something about the schools they propose to close and see the damage that they will be doing to communities and not just make decisions from looking at figures written down on a spreadsheet. Powys is a large county and I expect that many persons on these committees have never visited the areas they are planning to unroot and possibly damage for generations.	The aim of the consultation exercise is to enable all stakeholders to let the Council know their views on the proposals and to enable any issues to be identified and taken into consideration. Cabinet members have visited the three schools affected by this process.

4.8.4	How can these decisions be made by people who have never been to the school, who don't know the children and have no links with the community?	As above.
4.8.5	The Transformation Team seem so consumed by their need to make changes that they are ignoring the many concerns highlighted by the families that are being affected and the staff that Powys employ.	This statement is untrue. An extensive 425 page consultation report was prepared with 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 these proposals, as well as updated versions of the impact assessment which reflected feedback received during the consultation period. The Cabinet will consider this Objection Report which summarises the Objections received following publication of a statutory notice when determining whether or not to proceed with implementation of the proposal. Whilst it is possible that the Cabinet will decide to proceed with implementation of the proposal, the Cabinet can also decide to abandon the proposal, as happened recently following consultation on the proposal to close Churchstoke C.P. School.
4.8.6	I genuinely hope Powys CC staff involved with this stupid decision are held personally accountable for their actions.	The process has been carried out in accordance with the requirements of the School Organisation Code.

4.8.7	This suggested closure seems to go against all relevant policies and guiding principles, whether party policies or those from the Welsh Assembly.	As above.
4.8.8	When I enquire about the council's current workload I am told it is 'business critical' only and yet here you are making long term, large decisions. Someone cynical (and due to past dealings with the Council that has become me) would say this has been done now on purpose to avoid too much fuss, public meetings and actually answering the questions and concerns raised. The council talks about co-production, consultation, person centred, unfortunately, this appears to be all talk. We ask you to please reconsider these proposals, look at the other options on the initial discussions and do so at a time when we can come together to fully discuss what is the right action for our children with minimal interruptions to them.	Following Estyn's inspection of Powys Education Services in 2019, the Council stared to develop a new Strategy for Transforming Education in Powys, which was approved in April 2020. In order to address the issues raised by Estyn regarding the organisation of its schools, it was necessary for the Council to continue with the development and consultation on proposals during the current pandemic. An extensive 425 page consultation report was prepared with 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 these proposals, as well as updated versions of the impact assessment which reflected feedback received during the consultation period. The Cabinet will consider this Objection Report which summarises the Objections received following publication of a statutory notice when determining whether or not to proceed with implementation of the proposal. The process was carried out in accordance with the requirements of the School Organisation Code.

4.8.9	The Cradoc School catchment area map held by Powys County Council is inaccurate. Powys County Council should ensure that their records are correct.	The Council is currently in the process of drafting catchment maps and will be consulting with school communities to verify these, before publishing these along with school admissions information.
4.8.10	Catchment area – the Cradoc Primary School catchment area map held by Powys County Council is inaccurate.	As above.
4.8.11	The Cabinet member for Education and Property constantly changes his mind as to the ideal pupil number for a school.	The Council does not have an 'ideal pupil number for a school'.
4.8.12	The Conservative member of Parliament, Fay Jones MP, and Welsh Parliament member, James Evans MS, together with The Brecon & Radnorshire Conservative Association and The Welsh Conservative Party, do not support the closure of Cradoc Primary school. I therefore do not understand why the Conservative group leader and Conservative cabinet member for education within Powys County Council, do both support the closure of Cradoc Primary School.	All Cabinet members consider all the information provided prior to making any decisions, regardless of their political affiliation.
4.8.13	We understand that it is current Conservative Party policy not to close any school, which is able to deliver the curriculum (which Cradoc patently is) without the agreement of governors, teachers and parents. For some reason, the Conservative Cabinet members of Powys County Council have chosen to ignore this policy. Why, does it not apply to them?	As above.

4.9 Comments about the Welsh language

4.9.1	The proposals are lacking ambition in relation to the Welsh Language. This is very disappointing as I thought the ambition of all Welsh schools was to be bilingual.	The Council does not claim that the Proposals would expand the availability of Welsh language provision – as stated on page 38 of the Consultation Document issued in respect of this proposal, 'The intention is to amalgamate three English-medium schools in order to establish one new English-medium primary school. The Proposals are not linked to the targets in the Council's Welsh in Education Strategic Plan. The Proposals would not expand or reduce the availability of Welsh language provision.' There is already access to designated Welsh-medium provision in Brecon at Ysgol y Bannau. Should the Council proceed with implementation of the proposals, it would welcome the opportunity to work with the new school to develop Welsh language provision at the school, should that be the school's wish.
4.9.2	Can PCC explain how it is acceptable that this proposal does nothing to promote the Welsh language?	As above.
4.9.3	Does Powys County Council agree that this proposal does nothing to promote the Welsh language?	As above.
4.9.4	Why has PCC not included any aspirations for bilingualism in its proposals?	As above.
4.9.5	The proposals appear to have no aspirations as regards encouraging the use of Welsh Language. It is disappointing that the proposal does not expand the availability of the Welsh	As above.

	language provision. It states in the WESP "It will also be necessary to increase the number of learners in English-medium schools who learn Welsh successfully by developing Welsh-medium provision in the statutory education period, and this will form an integral part of the new curriculum".	
4.9.6	It is disappointing that the proposal would not expand the availability of the Welsh language provision.	As above.
4.9.7	This consultation misses the opportunity to have an open and inclusive discussion about the future development of the Welsh Language during Phase 1 or Phase 2. Including Ysgol y Bannau in the proposals for a new large Brecon school could have been really exciting.	As above.
4.9.8	In our view the proposals offer nothing to enhance the provision of bilingualism as it relates to Mount Street Infants school.	As above.

4.10 Alternative options

4.10.1 Repair / improve the current school buildings

4.10.1.1	The Council could use 21st Century Schools funding to improve the three current school buildings.	'Do minimum – backlog maintenance only' and 'Remodel all primary schools in current locations' were considered in the Brecon catchment PBC, however these options were discounted.
4.10.1.2	Welsh Government has earmarked an extra £50m funding for large scale maintenance projects. PCC has been allocated £2.2m of the original £50m. This money could be used to	As above.

	sustainably refurbish the existing schools in this consultation and allow the authority to focus on higher priority areas for school transformation.	
4.10.1.3	Update the current facilities of the current schools which I imagine would cost significantly less than building a new school and would not cause the disruption to the pupils, parents, and teachers that the proposed plan will cause.	As above.
4.10.1.4	Invest the funds in improving current buildings rather than relocating.	As above.
4.10.1.5	Why has Powys CC not included an option to draw down 21st Century Schools Funding to repair and improve the schools on the current sites?	As above.

4.10.2 Merge the Mount Street schools but not Cradoc School

4.10.2.1	A better alternative would be to merge Mount Street Infants and Juniors, but not Cradoc. This would improve the connection and transition between the two schools.	'Merge Mount Street Infants School and Mount Street Junior School to create a new primary school. Cradoc C.P. School to continue to operate as a separate school' was one of the options considered in the options appraisal exercise in respect of the current Proposals. Whilst this was not the preferred option identified following this exercise, the option did not fail to meet any of the critical success factors. This option was further reviewed in the 'Further assessment and conclusion' section of the Consultation Report. However, the Council's view was

		that the current proposal remains the most appropriate response to the reasons outlined for the Proposals.
4.10.2.2	Merging Mount Street Infants and Juniors is a logical step to take.	As above.
4.10.2.3	The Mount Street schools alone should be merged and either re-developed or rebuilt on the Penlan site.	As above.
4.10.2.4	It would be more appropriate to re-develop the Mount Street schools only on the Penlan site, not the three schools.	As above.
4.10.2.5	The Council should consider Mount Street Infants and Mount Street Juniors separately.	As above.

4.10.3 Retain / rebuild Cradoc School in Cradoc

4.10.3.1	Rebuild Cradoc School in Cradoc.	The following options which would provide a new building in Brecon and Cradoc were considered in the PBC: • *Option 4A – New build Sennybridge, new build Brecon primary school, close Cradoc* • *Option 4B – New build Cradoc, new build Brecon primary school, close Sennybridge* • *Option 4C – New build Sennybridge, new build Brecon primary school, new build Cradoc* • *Option 4D – Close both Sennybridge and Cradoc, build new school on alternative site, new build Brecon primary school*

		• *Option 5B – New build Cradoc, establish new all-through school in Brecon with new build, primary, close Sennybridge* • *Option 5C – New build Sennybridge, establish new all-through school in Brecon with new build primary, new build Cradoc* An appraisal of all options was carried out, and options 4B, 4C, 4D, 5B and 5C were discounted at this stage. The consultation included an opportunity for consultees to suggest alternative options. All alternative options suggested were outlined in the consultation report, and a further assessment was carried out in accordance with the requirements of the School Organisation Code. This option was further reviewed in the 'Further assessment and conclusion' section of the Consultation Report. However, as explained, 'Building a new school in Cradoc alone would not address the issues raised in respect of the three schools, therefore alone would not be a viable alternative option.' Further consideration was also given to an option to provide 2 new buildings, 1 in Brecon and 1 in Cradoc. However, having considered the alternatives suggested during the consultation period, the Council's view was that the current proposal remains the most appropriate response to the reasons outlined for the proposals.
4.10.3.2	A new school building on the current Cradoc playing field is the obvious solution.	As above

4.10.3.3	To rebuild the school and keep Cradoc where it is will keep everyone happy and will benefit the entire Cradoc community.	As above.
4.10.3.4	Building a new school in Cradoc would give rural children the environment they deserve, as well as attracting more families to send their children there.	As above.
4.10.3.5	A new school building in Cradoc, which could include a voluntary run community centre that could support the area, provide sport/YFC/events, farming/mental health courses, safety on the farm.	As above.
4.10.3.6	Would PCC consider the development of a combined school and community centre to maximise the potential of the site? One consequent advantage to PCC would be an extension of the number of funding resources available for the project.	As above.
4.10.3.7	The best solution for our growing community is to build a new school and community facility on the current site, which will meet the educational needs of our children and provide a facility for all ages within our area.	As above.
4.10.3.8	Building a new school on the existing site of Cradoc School would ensure that there is sufficient capacity in the Brecon area for the housing growth that will be occurring.	As above.
4.10.3.9	A new building in Cradoc could be up and running well before the preferred option in Brecon.	As above.

4.10.3.10	Powys County Council claim that building a new school in Cradoc would not be feasible due to excess disruption to pupils. This claim is not accurate and contradicts claims made by previous Cabinet members.	As above. This assessment included a SWOT assessment of the various options, which identified 'potential disruption during construction' as a weakness for may of the options and for all of the affected schools. Whilst this is identified a weakness, this is not the reason why any of the options to provide a new building at Cradoc was discounted.
4.10.3.11	The grounds at Cradoc could easily be built on, with no disruption to the existing building or the education of its pupils.	As above. This assessment included a SWOT assessment of the various options, which identified 'potential disruption during construction' as a weakness for may of the options and for all of the affected schools. Whilst this is identified a weakness, this is not the reason why any of the options to provide a new building at Cradoc was discounted.

4.10.4 Alternative rebuild options for the Mount Street schools

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

4.10.4.2	Build a two storey building on the infants school playing field, with the entrance to the school at the top end, then use the current juniors school for parking.	As above.
4.10.4.3	Create a Mount Streets Primary School on the current sites.	As above.
4.10.4.4	Use 21st Century Schools funding to build a new Mount Streets school on the site of the infants using 21st Century Schools funding. The junior school building / site could then be used to house the PRU.	As above.
4.10.4.5	A new Mount Street Infants building could be built on the other site of the playing field while the old school is still being used, and it must be possible to fix whatever is wrong with Mount Street Junior School.	As above.
4.10.4.6	Purchase the land that is currently on the market which adjoins forest school and incorporate it into the Mount Street Infant School grounds. Build a new school in the grounds of Mount Street Infants School.	As above.
4.10.4.7	Why has PCC not properly reviewed and costed the option to rebuild new schools in their current locations or create a new primary school for Mount Street Infants / Juniors using the existing land / buildings?	Remodelling the current primary schools in their current locations was considered and discounted in the Programme Business Case for the Brecon catchment. Alternative rebuild options for the two Mount Street schools were also suggested as alternatives during the consultation period and were considered in the Consultation Report. As indicated in the Consultation Report, the constraints surrounding the existing sites of Mount Street Infants School and Mount Street Junior School mean that rebuilding these schools in their

		current location would be challenging. The Council has no other suitable land in Brecon where a new building could be located.

4.10.5 Merge Cradoc with Sennybridge or Priory

4.10.5.1	Look into combining Sennybridge with Cradoc. They are closer and more of the same dynamic in terms of schools.	Whilst options involving Sennybridge were considered in the Business Case for the Brecon catchment, these were discounted. Amalgamation with Sennybridge was not considered as an option within the further options appraisal carried out in respect of Mount Street Infants School, Mount Street Juniors School and Cradoc C.P. School or in the Consultation Document published in respect of the current Proposals, as options involving Sennybridge had been discounted in the Programme Business Case. The option to merge Cradoc C.P. School with Sennybridge C.P. School was suggested during the consultation period, and was assessed as a reasonable alternative option in the Consutlation Report. However, having considered the alternatives suggested during the consultation period, the Council's view was that the current proposal remains the most appropriate response to the reasons outlined for the proposals.

4.10.5.2	It seems more logical to merge Cradoc School with Sennybridge School as they are both rural schools and the new build Sennybridge School will have surplus spaces.	As above.
4.10.5.3	As Powys County Council are building a large new school in Sennybridge it would seem to be more sensible to amalgamate Cradoc School with Sennybridge School.	As above.
4.10.5.4	Why did PCC NOT consider an amalgamation between Cradoc and Sennybridge in the options appraisal?	As above.
4.10.5.5	A much better option for Cradoc would be to consider federating with another rural school in the area such as Sennybridge where there could be a shared headteacher and governing body. Staff expertise and best practice could be shared across the two schools.	Whilst federating Cradoc with Sennybridge C.P. School was not suggested during the consultation period, the assessment for an option to federate the two schools would be similar to the assessment of the option to merge the two schools, which was considered in the Consultation Report. Federating Cradoc C.P. School with Sennybridge C.P. School would not address the challenges outlined in the Consultation Document.
4.10.5.6	It would be better for Cradoc pupils to merge with Priory as Priory is their closest school if PCC want to merge Cradoc with an urban school.	Priory C. in W. School was considered outside the scope of the Business Case for the Brecon catchment, therefore options involving Priory C. in W. School were not considered. The option to merge Cradoc with Priory C. in W. School was suggested during the consultation and was assessed as a reasonable alternative option.

		However, having considered the alternatives suggested during the consultation period, the Council's view was that the current proposal remains the most appropriate response to the reasons outlined for the proposals.
4.10.5.7	School buses will be passing Priory School on the way to the Penlan site, so Priory School is a better fit for a merger with Cradoc School.	As above.

4.10.6 Other suggestions

4.10.6.1	Extend Priory School to accommodate pupils attending Mount Street Infants, Mount Street Juniors and Cradoc School for whom Priory is currently the closest school.	The Council currently has no plans to extend any of the other schools in Brecon.
4.10.6.2	Rebuild the existing schools on their current sites.	Whilst 'remodel all primary schools in current locations' was considered and discounted in the PBC for the Brecon catchment, rebuilding all three schools was not considered. Given the constraints surrounding the existing sites of Mount Street Infants School and Mount Street Junior School, rebuilding these schools in their current location would not be a realistic option, and rebuilding 3 new schools would not provide value for money.
4.10.6.3	I think the least bad option is just to close Cradoc, eliminating the under capacity and maintenance backlog there, because it minimises the disappointment and disruption to one school community and to the smallest school community. Although it	'Merge Mount Street Infants School and Mount Street Junior School to create a new primary school. Close Cradoc C.P. School, with pupils to attend alternative schools' was one of the options considered in the

	would be seen as unjust and unfair by all those who treasure Cradoc school, it minimises the overall trauma and perhaps allows the county council to implement an innovative and acceptable transport solution to Mount Street. It certainly reduces the management and administrative burden on the education department over the next decade compared with the new build plan.	options appraisal exercise in respect of the current proposals. Whilst this was not the preferred option identified following this exercise, the option did not fail to meet any of the critical success factors and was therefore identified as a 'possible' option. Options were reviewed again following the consultation period, however the Council's conclusion was that the current proposal remains the most appropriate response to the reasons outlined for the proposals.
4.10.6.4	Why have the other primary schools in Brecon not been considered, particularly if the long term plan is 4-18 education for all Brecon children.	The Programme Business Case for the Brecon catchment considered the whole Brecon catchment. However, as indicated in the PBC, 'Of the schools within this catchment, several operate within buildings that are assessed as being of a condition A standard, with no outstanding backlog maintenance issues…For the purposes of this PBC, all Condition A primary schools within the catchment have been considered out of scope, as they present only limited drivers for capital investment.'
4.10.6.5	If PCC is truly committed to improving the education provision for all pupils in the Brecon Catchment – where is the joined up approached for this provision?	As above.
4.10.6.6	Ysgol Y Bannau, Brecon has 45 surplus spaces. Sennybridge C.P. School has 45 pupils learning through the medium of Welsh. Transfer 45 pupils from Sennybridge to Brecon which solves the problem of surplus spaces at Ysgol Y Bannau. The 95 pupils at Cradoc School could transfer to	This suggestion would mean that Sennybridge C.P. School would become an English-medium school. The Council has no intention to change the language category of Sennybridge C.P. School to become an English-medium school.

	the new Sennybridge C.P. School and join the 81 remaining Sennybridge pupils. This would give a pupil number of 176 resulting in 4 surplus spaces as opposed to 54 surplus spaces at the new Sennybridge school. Repair or rebuild Mount Street Infants School and repair Mount Street Junior School. Of the 95 pupils at Cradoc C.P. School transfer 57 to the new build Sennybridge C.P. School, transfer 3 pupils to Builth Wells C.P. School, transfer 7 to Llanfaes CP School, transfer 10 to Mount Street Infants/Juniors, transfer 16 to Priory & transfer 2 to Ysgol Bro Tawe. Apart from the pupils whose closest school is Cradoc, all other pupils would be attending their closest schools. Also, as the other schools have surplus spaces, according to the Powys Admissions Policy, this would reduce the number of surplus spaces in these schools. Repair or rebuild Mount Street Infants School and repair Mount Street Junior School.	The Programme Business Case for the Brecon catchment considered the whole Brecon catchment. However, as indicated in the PBC, 'Of the schools within this catchment, several operate within buildings that are assessed as being of a condition A standard, with no outstanding backlog maintenance issues…For the purposes of this PBC, all Condition A primary schools within the catchment have been considered out of scope, as they present only limited drivers for capital investment.'

4.11 Comments about the process

4.11.1 Comments about the process being carried out during the Covid pandemic

4.11.1.1	Whilst it is not illegal to have a consultation on closing a school during a pandemic, it could be construed as not the ideal time to do such an underhand thing when people are focused and preoccupied with the 'health and safety' of their families rather than the future long term sustainability of a rural community.	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.

		Following Estyn's inspection of Powys Education Services in 2019, the Council stared to develop a new Strategy for Transforming Education in Powys, which was approved in April 2020. In order to address the issues raised by Estyn regarding the organisation of its schools, it was necessary for the Council to continue with the development and consultation on proposals during the current pandemic. The Welsh Government provided non-statutory guidance for local authorities to manage consultations during periods of lockdown. The level and detail of responses received to all recent consultations outlines that stakeholders have engaged fully in the consultations, even though there have been restrictions in place. The process was carried out in accordance with the requirements of the School Organisation Code.
4.11.1.2	Conducting a consultation during a world pandemic has allowed the Transformation team to neglect their full duties to the people they are meant to serve.	As above.
4.11.1.3	We do not believe the consultation process has been inclusive of all stakeholders / parents in the context of COVID restrictions.	As above.
4.11.1.4	Under normal circumstances, the public would have the right to hold meetings to discuss the proposals and form a cohesive community response. That right has been taken	Whilst noting this concern that it has been more difficult for communities to meet to discuss the proposals due to the pandemic, the process has been

	away from them by holding this consultation process during the Covid-19 lockdown period.	carried out in accordance with the requirements of the School Organisation Code.
4.11.1.5	As a community our rights to hold meetings to discuss the proposals and form a community response has been taken away from us due to the Coronavirus restrictions. As much as virtual and online sessions can be useful, they are nowhere near the same as physical responses.	As above.
4.11.1.6	We felt hugely disadvantaged that the timing did not permit us with the ability to fully interact with our wider community due to travel restrictions and social distancing to communicate the proposals and involve all of those effected with your consultation process fully.	As above.
4.11.1.7	Due to Covid restrictions, the school was limited in terms of how they could communicate with stakeholders.	As above.
4.11.1.8	The timing of this consultation was poorly judged and mismanaged by the Transformation team, possibly in their eagerness to accept praise from Estyn for their 'Vision'.	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. Following Estyn's inspection of Powys Education Services in 2019, the Council stared to develop a new Strategy for Transforming Education in Powys, which was approved in April 2020. In order to address the issues raised by Estyn regarding the organisation of its

		schools, it was necessary for the Council to continue with the development and consultation on proposals during the current pandemic. The process was carried out in accordance with the requirements of the School Organisation Code.
4.11.1.9	The consultation process was deliberately undertaken during Covid lockdown, with the Council knowing the difficulties in gathering together to discuss the proposals within our communities.	As above. The consultation process was not 'deliberately undertaken during Covid lockdown'. The process was carried out in accordance with the requirements of the School Organisation Code.
4.11.1.10	Welsh Government published new guidance on best practice in regard to consultation on school organisation proposals during the pandemic. Within the document it recommends consultation periods should be lengthened to allow as many people as possible to consider the proposal and have their say. Carmarthenshire has decided to extend all consultations for reviewing the number and type of schools until July 16th. Similar action in Powys could help the school community take action to secure educational recovery and ensure everyone has an opportunity to express their opinion.	The original consultation period was seven weeks, which is longer than the minimum period required by the School Organisation Code. The consultation was subsequently extended during the consultation period to enable Consultation Documentation to be provided in Nepalese. In total, the consultation period lasted 76 days, which is in excess of the minimum length of time required by the School Organisation Code.
4.11.1.11	Carmarthenshire have taken on board Welsh Government advice and have extended their consultation period for schools so that all their stakeholders feel included and that their opinions are valued. Powys, however, does not appear to value the opinions of parents.	As above.

4.11.2 Concern that no meetings with parents / communities were held

4.11.2.1	I would have liked to liked Powys County Council to have held a public meeting even if it had to be a zoom meeting. I don't think that this has therefore been an open and fair consultation.	The School Organisation Code (2018) does not require public meetings to be held as part of statutory proposals. However, as part of the consultation, virtual meetings were held with pupils, staff and governors at the three schools. The process has been carried out in accordance with the requirements of the School Organisation Code.
4.11.2.2	The fact that no meetings were held with Parents, Grandparents or members of the Community meant that not all stakeholders understood the process they were being asked to consult on.	As above.
4.11.2.3	Powys will not even entertain holding an online meeting with parents – apart from issuing the consultation document, you are not engaging with the main stakeholders, the parents.	As above.
4.11.2.4	Whilst virtual meetings have been held with staff, governors and children, parents have been denied this vital opportunity to explain their opinions. The voice of the parents and wider community has been weakened as the use of ICT does not capture all opinions.	As above.
4.11.2.5	The consultation has not been full and fair as there have been no meetings with parents or members of the community.	As above.
4.11.2.6	Bringing this proposal forward all through a pandemic is highly unfair, we haven't been able to have a public meeting	As above.

	so that the council could see first hand the level of objection to this proposal.	
4.11.2.7	COVID lockdown prevented public meeting to question and challenge the proposals put forward; this whole process should have been delayed.	As above.
4.11.2.8	It has very much suited Powys County Council that meetings could not be held. This has meant that they haven't been able to see the passion the community has for Cradoc School.	As above.
4.11.2.9	The Powys CC Transformation Team has made no effort to engage the parents and communities of the schools impacted either online or at COVID safe face to face events. Other Local Authorities have managed to do this for eg Monmouthshire CC during the consultation to build an all through school in Abergavenny to replace King Henry VIII and Deri View Primary, held face to face meetings and those attending were able to view plans of the school and a scale model (see link to King Henry VII. Page 9 on Consultation Report https://www.monmouthshire.gov.uk/app/uploads/2021/06/ConsultationDocument_210423_v2.pdf)	As above.

4.11.3 Comments about meetings with stakeholders held during the process

4.11.3.1	The minutes of the meeting between PCC officers and the governors of Mount Street Nursery and Infants School are not a true record of the meeting.	The Council disagrees that the minutes of the meeting between PCC officers and the governors of Mount Street Nursery and Infants School are not a true record of the meeting. The minutes were verbatim minutes prepared by the Council using a recording of the

		meeting. Whilst not all of the introductory presentation was included in the minutes, all of the questions raised in the meeting were included in the minutes, as well as the verbatim responses provided by the Council. The draft minutes were shared with the governing body for comment, and the amended version received from the governing body was included in 'Appendix C' which was attached to the paper considered by Cabinet on the 14th December 2021.
4.11.3.2	The Governing Body were able to have a virtual meeting with Powys CC on March 16th but did now receive minutes from the meeting until the end of April. The minutes provided by Powys CC were incorrect. Sections had been added and also some discussion had been left out. This is very unfortunate as it becomes more and more difficult to believe in the fairness of this process.	The Council notes the comments regarding the time taken to share the draft minutes with the governing body. This was due to the Easter holidays taking place at the end of March / early April. The minutes were not incorrect. The minutes were verbatim minutes prepared by the Council using a recording of the meeting. Whilst not all of the introductory presentation was included in the minutes, all of the questions raised in the meeting were included in the minutes, as well as the verbatim responses provided by the Council. The draft minutes were shared with the governing body for comment, and the amended version received from the governing body was included in 'Appendix C' which was attached to the paper considered by Cabinet on the 14th December 2021.

4.11.3.3	None of the answers given by PCC officers to the questions from staff and governors of the three schools have been published.	The comments made by staff and governors in the virtual meetings held during the consultation period were included in the Consultation Report published in respect of this proposal. In addition, the full minutes of the consultation meetings which took place were attached as Appendix C to the paper considered by Cabinet on the 14th December 2021.
4.11.3.4	Information given to Governors about the process at a meeting on 7th Dec 2020, stated that objections could be placed as part of the consultation but when consultation was launched in February 2021 it was clear that this could only happen at the objection phase after the Cabinet has made a decision on the PCC's Consultation Report.	The process is clearly outlined on pages 42-43 of the Consultation Document. Many of the consultation responses received indicate that the respondents do not agree with the Proposals, however it is correct that 'objections' can only be submitted during the 28 day objection period which would follow the publication of a Statutory Notice.
4.11.3.5	These children who were asked to respond to minutes of your meeting with the school council were only given 5 days. Given the state of mind of these children, who were in the middle of a World Wide Pandemic, with an unknown outcome for many families, this was totally unreasonable. We also do not believe that this is in line with the article 12 of the United Nations convention on the rights of the child.	The draft minutes of the meeting with the School Council were sent to the school, with a request that any amendments were provided within a week, however this was not a set deadline. Communication was received back from the school stating that it would be difficult to provide feedback within a week, to which officers responded asking that the school 'get back to us as soon as you are able.'
4.11.3.6	Children's responses – Cradoc School pupils were only given five working days to respond to the minutes of a meeting between Powys County Council and the school council. I do not believe this is in line with article 12 of the United Nations convention on the rights of children.	As above.

4.11.3.7	Of concern also is that Cradoc school children were only given 5 days to respond to minutes of a meeting between PCC and the school council.	As above.
4.11.3.8	Cradoc School children were only given 5 working days to respond to the minutes of a meeting between Powys County Council and the school council. This is believed to be unlawful.	As above.

4.11.4 Comments about protected characteristic groups

4.11.4.1	There has been a lack of consultation on the proposal especially with Nepalese community.	Members of the Nepalese community who are pupils, parents, governors or members of staff at the affected schools would have been informed of the consultation in the same way as all other pupils, parents, governors and members of staff. Following comments made by the governors at Mount Street Infants School at the consultation meeting held with them, arrangements were made for arrangements were made for some of the documentation and the consultation response form to be translated into Nepalese. Stakeholders were informed of the availability of these document on the 13th April 2021. All subsequent communication with stakeholders as part of this proposal, including the Statutory Notice, has been translated into Nepalese, and Nepalese versions have been issued at the same time as English / Welsh versions.

4.11.4.2	Powys County Council have forgotten about our Nepalese community.	As above.
4.11.4.3	The consultation has made a tokenistic and begrudging nod to engagement with the schools Nepalese Community.	As above. The Council does not agree with the statement that it 'has made a tokenistic and begrudging nod to engagement with the schools Nepalese Community.'
4.11.4.4	There was no early appraisal of the school community in respect of language and therefore the need to provide information in Nepalese which had to be addressed at a later stage leading to PCC having to extend the consultation period.	It is acknowledged that the need to provide information in Nepalese was not addressed before the start of the consultation period. However, the consultation period was extended to enable some of the documentation and the consultation response form to be translated into Nepalese. Stakeholders were informed of the availability of these document on the 13th April 2021.
4.11.4.5	Why have Powys County Council only allowed the Nepalese community a 4 week consultation period?	The consultation period ran for a total of 76 days. Members of the Nepalese community could have responded to the consultation at any time during this period.
4.11.4.6	The Nepalese community had only four weeks to read the translated copy of the children's and young person's version of the consultation document and were not provided with a full translated version of the consultation document.	The Council translated the Consultation Response Form, the summary presentation which gave an overview of the consultation, the Young People's Version and the Children's Version of the Consultation Document into Nepalese. The Council's view is that translation of these documents was reasonable.
4.11.4.7	The only reason that this consultation period has been extended is because Powys County Council forgot about our	It is true that the consultation period was extended to ensure that the Nepalese community were able to

	Nepalese community and had not made a Nepali translation available not because they wanted to allow as many people as possible to have their say.	respond to the consultation following the publication of the Nepalese translations of some of the documentation. However, this meant that the consultation period lasted a period of a total of 76 days which is more than the 42 days required by the School Organisation Code.
4.11.4.8	Powys County Council did not fully engage with the Nepalese Community. Not all documents were translated for the Nepalese community leaving them to feel that their opinions don't matter. In fact, even after being made aware of the Nepalese Community, no translation into Nepalese of the Consultation Report has been published.	PCC disagree that it did not fully engage with the Nepalese community. Members of the Nepalese community who are pupils, parents, governors or members of staff at the affected schools would have been informed of the consultation in the same way as all other pupils, parents, governors and members of staff. Following comments made by the governors at Mount Street Infants School at the consultation meeting held with them, arrangements were made for arrangements were made for some of the documentation and the consultation response form to be translated into Nepalese. Stakeholders were informed of the availability of these document on the 13th April 2021. All subsequent communication with stakeholders as part of this proposal, including the Statutory Notice, has been translated into Nepalese, and Nepalese versions have been issued at the same time as English / Welsh versions.

4.11.4.9	There has been no attempt to engage with the Gypsy and Traveller Community.	The Gypsy and Traveller Community were able to take part in the process in the same way as any other members of the community could.
4.11.4.10	Powys County Council did not fully engage with the Gypsy/Traveller Community.	As above.

4.11.5 The process has been pre-determined

4.11.5.1	Decision making has clearly been predetermined given the comments made by individual members of the Cabinet during the meeting on 14th December 2021 and the PCC officers refusal to take on board any concerns raised during consultation.	The process has not been predetermined. 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. The Cabinet will consider this Objection Report which summarises the Objections received following publication of a statutory notice when determining whether or not to proceed with implementation of the proposal. Whilst it is possible that the Cabinet will decide to proceed with implementation of the proposal, the Cabinet can also decide to abandon the proposal, as happened recently following consultation on the proposal to close Churchstoke C.P. School.
4.11.5.2	PCC has not understood the existing schools strengths; has not listened to its amazing professional school staff; has	The Council fully acknowledges the strengths of each of the three current schools.

	ignored the Governing Bodies concerns. This proposal is clearly a predetermination.	An extensive 425 page consultation report was prepared with 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 these proposals, as well as updated versions of the impact assessment which reflected feedback received during the consultation period. The Cabinet will consider this Objection Report which summarises the Objections received following publication of a statutory notice when determining whether or not to proceed with implementation of the proposal. Whilst it is possible that the Cabinet will decide to proceed with implementation of the proposal, the Cabinet can also decide to abandon the proposal, as happened recently following consultation on the proposal to close Churchstoke C.P. School. The outcome of this process has not been pre-determined.
4.11.5.3	The whole consultation is a pretence – the three schools are just being viewed in pound signs for their land value, with no consideration being given to local rural children or their parents.	This statement is untrue. See the above comments.

4.11.6 The Council has not listened to comments raised during the process

4.11.6.1	I contributed to the consultation, but I don't feel as though my concerns have been heard.	The Council produced an extensive 425 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 these proposals, as well as updated versions of the impact assessment which reflected feedback received during the consultation period. The Cabinet will consider this Objection Report which summarises the Objections received following publication of a statutory notice when determining whether or not to proceed with implementation of the proposal.
4.11.6.2	We do not feel heard by Cabinet, despite our continued objections against the closure.	As above.
4.11.6.3	Powys County Council has ignored the local community.	As above.
4.11.6.4	I was one of many parents who sent a response to the consultation, and from what I can tell all of these responses have been flat out ignored as not one parent or teacher I have spoken to was in favour of the proposal.	As above.
4.11.6.5	It is quite clear that as someone who sent a response to your consultation last year that all concerns raised by pupils, parents, grandparents, governors, community members and the general public have been totally disregarded and despite any issues raised you are proceeding with your plans without full consideration for all possible options.	As above.

4.11.6.6	The fact that Powys County Councillors have ignored our objections and propose to go ahead regardless sadly does not come as a surprise to me as during my many years living in this county I have not seen much evidence of the council having local residents interests at heart.	As above,
4.11.6.7	Many valid points have been made about the objection to these schools being merged but it feels as if they are being ignored and that plans will go ahead despite so many people feeling that this is not the best plan nor beneficial.	As above.
4.11.6.8	The proposals have been presented as a fait accompli with no genuine review of comments made during consultation and no real acknowledgement of the feedback from pupils, staff and governors**.**	As above.
4.11.6.9	The Local Authority has not taken on board the concerns raised by the Governing Body during consultation.	As above. The Council fully acknowledges the concerns raised by the Governing Body and other stakeholders during the consultation. These have been included and responded to in the Consultation Report.
4.11.6.10	I do not believe that the Transformation team has understood the genuine concerns raised during the consultation process regarding the impact on pupils and on staff morale, health and well-being.	As above. The Council fully acknowledges the concerns raised by stakeholders during the consultation, including those relating to the impact on pupils and on staff morale, health and well-being. These have been included and responded to in the Consultation Report.

4.11.6.11	The process has not been equitable, accessible or fair for stakeholders / parents / carers. These processes should engage and empower pupils, teachers, parents and governing bodies, not leaving them feeling battered, bruised, despondent and un-listened to.	The Council fully acknowledges that this process has been difficult for all stakeholders involved. However, the Council is required to follow the process outlined by Welsh Government in the School Organisation Code when carrying out any school reorganisation processes. The Council fully acknowledges the concerns raised by pupils, teachers, parents and governing bodies during the consultation. These have been included and responded to in the Consultation Report.
4.11.6.12	Pupils on the student council at Cradoc school feel like they have been totally ignored.	A consultation meeting was held with the student council of all schools, including Cradoc. Pupils were given the opportunity to ask questions and put forward their views. The notes of this meeting, as well as any other comments received from pupils, were included in the Consultation Report which was considered by the Council's Cabinet when determining whether or not to proceed with these proposals.

4.11.7 Comments about who the Council has consulted with

4.11.7.1	I live in the community but there has been no engagement with members of the community.	The process has been carried out in accordance with the requirements of the School Organisation Code (2018). Any members of the community were able to respond to the proposals as part of the process.
4.11.7.2	Why have the Council chosen to proceed with this consultation in a way that excludes proper and thorough	The Council has not 'chosen to proceed with this consultation in a way that excludes proper and thorough discussion with the local community who live,

	discussion with the local community who live, work and raise their families in Brecon?	work and raise their families in Brecon'. The process has been carried out in accordance with the requirements of the School Organisation Code (2018).
4.11.7.3	Has Powys County Council consulted with the Ambulance Service of Powys Teaching Health Board given that the ambulance station and the hospital are located on Cerrigcochion Road?	The Council has not consulted with the Ambulance Service of Powys Teaching Health Board. This is not a requirement of the School Organisation Code. Should the proposals be implemented, the Council would need to consult with residents and organisations in the locality as part of the building design process.

4.11.8 Comments about engagement / communication throughout the process

4.11.8.1	I would have hoped that PCC would have had early engagement with Mount Street Infants and their professional staff to help inform the transformation process and to ensure the consultation was based on achieving positive outcomes for children and that the information presented for consultation was accurate.	Comment noted. The process has been carried out in accordance with the School Organisation Code (2018), which does not require early engagement to take place. The current proposals are being taken forward in order to contribute to the implementation of The Council's Strategy for Transforming Education in Powys, which was developed following extensive engagement with a range of stakeholders, including the public.
4.11.8.2	There was no engagement with the schools prior to the consultation. All decisions have been made using data of varying accuracy and consultant reports that have not had any direct contact with the schools under this consultation. In the case of Mount Street Infants this left huge gaps in PCC staff's understanding of the schools budget, building condition, and most importantly the makeup of the school	As above.

	community, especially a poor understanding of the Nepalese community needs.	
4.11.8.3	PCC made no effort to engage early on with the school and its community which has lead to poor communication and engagement with parents, especially the Nepalese and Gypsy Traveller communities. This has still not been properly addressed during the consultation process.	As above.
4.11.8.4	There has been no attempt by the Council to garner support from the existing Governing Bodies for these proposals, as far as we have experienced.	The process has been carried out in accordance with the School Organisation Code, which provides an opportunity for all stakeholders, including the existing Governing Bodies, to give their views on the proposals. Consultation meetings were held with the three governing bodies during the consultation period, which provided a further opportunity for governors to let the Council know their views on the proposals.
4.11.8.5	There has been poor communication and provision of information throughout the consultation and many delays and last minute changes to dates and deadlines leading up to and during the consultation.	The process has been carried out in accordance with the requirements of the School Organisation Code. The timescales provided throughout were indicative, and are always subject to change.
4.11.8.6	The process for consultation was poorly communicated with lack of clarity over timescales, the dates for information going to Cabinet were changed at short notice (end of 2020) and it was not made clear how the school governors could engage with those meetings.	The process has been carried out in accordance with the requirements of the School Organisation Code. The timescales provided throughout were indicative, and are always subject to change. All Cabinet meetings are available to view via the Council's website, however there is no other opportunity for governors to participate in Cabinet meetings. Local members are able to speak at Cabinet

		meetings to represent local residents, a number of local members have spoken at the Cabinet meetings which have taken place as part of this process.
4.11.8.7	The first I heard that Powys County Council was considering closing Cradoc School was through Facebook and not from Powys County Council itself. Does Powys County Council think that this way is the proper way to go about such a sensitive matter?	The process was carried out in accordance with the School Organisation Code 2018. Stakeholders which are listed in the Code were notified of the consultation, and information about the consultation was also available on the Council's website. Information was also shared in the local press, and on the Council's social media accounts.

4.11.9 Comments about dates / timescales

4.11.9.1	Were all the consultees advised that the consultation period had been extended until 12th May 2021 and given the reasons for the extension?	Consultees listed on pages 27-28 of the School Organisation Code (2018) were advised that the consultation had been extended. A press release was also issued to advise of the change to the closing date. The communications issued to inform consultees of the extension did not give the reasons for the extension.
4.11.9.2	How was the extension to the consultation period communicated to the wider community of Brecon?	Consultees listed on pages 27-28 of the School Organisation Code (2018) were advised by letter that the consultation had been extended. A press release was also issued to advise of the change to the closing date. This was shared on The Council's social media channels and was also published in the local press.
4.11.9.3	The Consultation Report was originally to be published by 25th May but now will not be available until 21st September. A delay of 4 months.	Comment noted. The timescales provided throughout were indicative and are always subject to change.

4.11.10 Comments about Council meetings which took place during the process

4.11.10.1	The Proposal was not properly scrutinised by the Learning and Skills Scrutiny Committee on 8th December 2021. There was insufficient time between the document being published and the scrutiny meeting for the Councillors to read and absorb all the information in the Consultation Report. If they had read the document they would have questioned the errors and anomalies in the report.	The papers for the meeting of the Learning and Skills Scrutiny Committee which was held on the 8th December 2021 were published in accordance with the required timescales.
4.11.10.2	The Chair of Scrutiny advised that not all members were aware of the site. A proposal cannot be properly scrutinised if the committee members are not aware of all the facts, with knowledge of the site being a fundamental requirement.	Phase 2 of the proposal is to build a new school on the site of the old Brecon High School, Penlan, Brecon. This was included in the Consultation Document and the Consultation Report which were scrutinised by Scrutiny members.
4.11.10.3	Questions posed by the Scrutiny Panel that were not addressed at the time of the meeting have still not been addressed. A commitment to have the answers by the time of the Cabinet meeting was NOT upheld but was instead ignored by the 6-strong Cabinet members who were present for voting.	Following a Scrutiny meeting, the Committee's written recommendations are sent to officers for a response. This was included in the papers considered by Cabinet on the 14th December 2021.
4.11.10.4	Insufficient time between the document being published and the Cabinet Meeting on 14th December 2021 for the Councillors to read the whole document and absorb the information and ask informed questions.	Cabinet members had received the Consultation Report and associated papers well in advance of the meeting as per the usual requirements.

4.11.10.5	During the meeting on December 14th, one topic kept being raised by Cabinet Members. It was money. Money talk dominated on this day and quite simply it shouldn't have done. What it did show was what was on the mind of Cabinet Members. Schools should not be closed to 'realise a financial saving'.	It is not true that money was the main topic that was discussed in the Cabinet meeting on the 14th December. 'To realise a financial saving' is only one of ten 'reasons for formulating the proposal' which are listed in the Statutory Notice published in respect of these proposals. Realising a financial saving means that PCC can redistribute funding more equitably between other schools and improve learner experience.
4.11.10.6	The vote at the Cabinet Meeting on 14th December 2021 was unduly influenced by Cllr Myfanwy Alexander and Cllr Aled Davies advising Cllr Beverley Baynham, Cllr Rosemary Harris & Cllr Rachael Powell that they would be voting for the proposal before the vote was taken.	All Cabinet members are responsible for their own decisions and behaviour at Cabinet meetings. Even though some councillors had announced their intention to support the proposals, all Cabinet members were free to make their own decision on whether to support the proposals.
4.11.10.7	Two members of the Education Committee publicly stated their voting intention before casting their vote, thus undermining the democratic process.	As above.
4.11.10.8	During the virtual discussions on December 14th 2021, valid points were made as to why Cradoc School should remain open. Some of these points were either insufficiently answered or ignored by Cabinet members of Powys County Council.	Cabinet listened to and considered the views of all speakers at the Cabinet meeting.
4.11.10.9	It was suggested in the Cabinet meeting (14/12/21) that the Transformation team would like to eventually create a 3-19	The Council's Strategy for Transforming Education in Powys includes a strategic objective to establish all-

	school on the Penlan site. However, there is no published impact assessment available to ensure equality of provision across the curriculum and for transition from KS2 to KS3 for ALL the children attending primary schools in the Brecon catchment area. So surely, there would be a consultation process for this proposal too which would mean the staff, parents, carers and pupils of Mount Street Infants would have to go through this process all over again but in the guise of an all-through school in the future? This would not be conducive to staff wellbeing.	age schools across the 13 localities in Powys. However, with regard to Brecon, this is a long term ambition, and is not part of these proposals. A separate proposal and school reorganisation process would be required to establish an all-age school.
4.11.10.10	The Brecon Catchment Consultation Report document and discussions at the Powys CC Learning and Skills Scrutiny Committee Meeting on 8.12.2021 and the Powys Education Cabinet Meeting on 14.12.2021, ALL failed to answer many detailed questions regarding the proposal.	The questions asked in both meetings were responded. In addition, a written response was provided to the Scrutiny committee's recommendations.
4.11.10.11	Despite the representation made by Local Authority staff at recent scrutiny and cabinet meetings I do not believe there has been a proper / thorough feasibility carried out of the preferred site for a new school at Penlan.	Officers have been clear throughout that no feasibility work has been started on the Penlan site.
4.11.10.12	Powys County Council (PCC) have failed to take on board either at Scrutiny Committee on 8th December 2021 or the Cabinet meeting14th December 2021 all the negative points raised by Estyn.	Estyn's response to the consultation was included in the Consultation Report which was considered by the Learning and Skills Scrutiny Committee on the 8th December 2021 and by Cabinet on the 14th December 2021. The Consultation Report includes responses to the concerns raised by Estyn.

4.11.11 Comments about the Council's constitution

4.11.11.1	Powys County Council Constitution - Powys County Council's constitution, at 13.2.4 (principles of Decision Making), states: "All decisions of the Council will be made in accordance with the following principle: The consideration of any alternative options." It would appear that the Council has breached its own Constitution (13.2.4) by not considering the preferred option of rebuilding Cradoc School on 14.12.21.	A range of options have been considered when developing these proposals. This has included options considered in the Programme Business Case for the Brecon catchment which was considered by Cabinet in September 2020, options considered in the options appraisals which were undertaken, which are outlined in the Consultation Document, and further options suggested during the consultation period which were considered in the consultation report. The option to retain and rebuild Cradoc School has been considered during the process. The following options which would provide a new building in Brecon and Cradoc were considered in the PBC: • *Option 4A – New build Sennybridge, new build Brecon primary school, close Cradoc* • *Option 4B – New build Cradoc, new build Brecon primary school, close Sennybridge* • *Option 4C – New build Sennybridge, new build Brecon primary school, new build Cradoc* • *Option 4D – Close both Sennybridge and Cradoc, build new school on alternative site, new build Brecon primary school* • *Option 5B – New build Cradoc, establish new all-through school in Brecon with new build, primary, close Sennybridge* • *Option 5C – New build Sennybridge, establish new all-through school in Brecon with new build primary, new build Cradoc*

		An appraisal of all options was carried out, and options 4B, 4C, 4D, 5B and 5C were discounted at this stage. The consultation included an opportunity for consultees to suggest alternative options. All alternative options suggested were outlined in the consultation report, and a further assessment was carried out in accordance with the requirements of the School Organisation Code. This option was further reviewed in the 'Further assessment and conclusion' section of the Consultation Report. However, as explained, 'Building a new school in Cradoc alone would not address the issues raised in respect of the three schools, therefore alone would not be a viable alternative option.' Further consideration was also given to an option to provide 2 new buildings, 1 in Brecon and 1 in Cradoc. However, having considered the alternatives suggested during the consultation period, the Council's view was that the current proposal remains the most appropriate response to the reasons outlined for the proposals.
4.11.11.2	The preferred option expressed by the community councils, governing body and parents was to save the school and rebuild. This was ignored by the cabinet when the decision was made on 14th December. This preferred option was not considered under "The consideration of any alternative options" – Powys Council's Constitution.	As above.

4.11.11.3	PCC have not considered all alternative options with regards to the future of Cradoc County Primary School, which is a breach of its own constitution which states that "Consideration will be given to any alternative options" – there was an alternative option put forward by the community action group Save & Rebuild Cradoc School and which is supported by this Community Council.	As above.

4.11.12 The proposal has changed during the process

4.11.12.1	The proposal regarding Cradoc School has changed, post consultation. Originally phase 1 of the proposal stated "to amalgamate Mount Street Infant School, Mount Street Junior School and Cradoc CP School to create a new primary school that would operate from the current three sites, commencing in 2022". This has recently changed to 2023. This is a fundamental alteration!	Whilst the Council's original proposal was to amalgamate the three schools from the 1 September 2022, the need to extend the consultation period and the subsequent delay in Cabinet considering the Consultation Report in respect of these proposals meant that it would not be possible to meet the original implementation date. This is explained in the Consultation Report published in respect of this proposal: *'as it has taken longer than anticipated to conclude this consultation report, it will no longer be possible to implement the Proposals in accordance with the timescales which were outlined in the Consultation Document, therefore there will be a need to review the implementation timescales. The recommendation is to proceed with the Proposals as outlined in the Consultation Document, however to amend the proposed implementation for Phase 1 to September*

		2023, and to amend the proposed implementation date for Phase 2 to 2025/26.' This amended timeline was reflected in the recommendation approved by Cabinet on the 14th December 2021, and the proposal outlined in the Statutory Notice is to establish the new school on the three existing sites from September 2023, with a move to the planned new building during 2025/26.
4.11.12.2	Any changes to a proposal during the consultation process mean that an entirely new proposal should then be started, not just carried on with as has been the case with Cradoc.	As above.

4.11.13 Comments about the School Organisation Code

4.11.13.1	We do not believe the consultation has been conducted as required by the Schools Organisation Code (2018) and in particular where the code states very clearly: "3.2 – Attention to Detail. It is essential that proposers seek and achieve high standards both in the information that underpins school consultations and in the consultation documents that are published. These will be examined by communities, school staff and parents and errors in detail can easily undermine confidence in a proposal. Failure to provide accurate, high quality consultation documents can result in consultations being abandoned, taking much longer than expected and to increased conflict with communities."	The Council's view is that the consultation has been carried out in accordance with the requirements of the School Organisation Code.
4.11.13.2	The School's Organisation Code requires that when a Local Authority wants to close a school it must consult	The process has been carried out in accordance with the requirements of the School Organisation Code.

	‘stakeholders at the formative stage.’ This means that consultation must be done before proposals are agreed by cabinet. Again, this did not happen.	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. At this point, Cabinet could have decided to proceed with the process, or they could have decided to abandon the proposals, as happened recently following consultation on the proposal to close Churchstoke C.P. School. There is a further decision point in this process, when Cabinet will consider this Objection Report. At this point, it is possible that the Cabinet will decide to proceed with implementation of the proposal. However, they can also choose to abandon the proposals.
4.11.13.3	The schools organisation code requires that when a Local Authority wants to close a school it must consult "Stakeholders at the formative stage". This has again not been the case with the Cradoc proposal.	As above.
4.11.13.4	The School Organisation Code (2018) states that from case law one of the four principles for consultation should: “include sufficient reasons and information for particular proposals to enable intelligent consideration and response”. Because there is a wholesale lack of information about Phase 2 it is impossible make any intelligent decision or comment on this part of the proposal. There are still clearly many unknowns.	The Council does not agree with this statement. The information provided is in line with the requirements of the School Organisation Code. A new school building in itself does not require consultation, however there is a requirement to consult where the new building is located more than one mile from the current location.

		The Council is of the view that consulting on the proposals is the first step that needs to be undertaken to ensure that the views of stakeholders are known before the Council commits to a significant capital investment. Should the Council proceed with the proposals, there would be further engagement opportunities when developing the new building, and further consultation processes would be undertaken as part of this work, including planning processes.
4.11.13.5	It has not been possible for consultees to comment properly on Phase Two plans when no detail has actually been provided, which is required by the School Organisation Code (2018).	As above.
4.11.13.6	The School Organisation Code – under 1.8 of the code it clearly states 'It is important to ensure that all reasonable alternatives identified are properly explored before the proposer decides to proceed to consult on closure'. Please explain where the other alternatives are in this case e.g. Building a new school at Cradoc or consideration of merging with another rural school in the area (Sennybridge). I raised this in my initial concerns and it's disappointing that we have to point out these failings because as far as this is concerned Powys have failed in following this code.	A range of options have been considered when developing these proposals. This has included options considered in the Programme Business Case for the Brecon catchment which was considered by Cabinet in September 2020, options considered in the options appraisals which were undertaken, which are outlined in the Consultation Document, and further options suggested during the consultation period which were considered in the consultation report.
4.11.13.7	When proposing significant changes to schools, including opening, closing and making regulated alterations to schools, proposers must comply with the 2013 Schools Standards and Organisation (Wales) Act and the School Organisation Code and must take into account a range of factors; the prime consideration being the interests of	As above. The Council has complied with the requirements of the presumption against the closure of rural schools in respect of these proposals.

	learners. The Code was strengthened in 2018 to establish a procedural presumption against the closure of rural schools. I do not believe there is a strong case for closure of Cradoc School and it is not evident that all viable alternatives have been explored.	
4.11.13.8	The schools code states that relevant bodies should place the interests of learners before all else when considering school closures. I asked in my consultation response whether PCC had conducted a Children's Rights Impact Assessment (CRIA), considered best practice before public body decisions involving children. The answer was no, with no explanation why not or attempts to complete this. One can only question whether these decisions can be proven to be in children's best interests when such an assessment has not been carried out.	The Council has not carried out a standalone children's rights assessment (CRIA) on the plans, as this is not necessary under the Schools Organisation Code. Consultation meetings were held with pupils at the 3 schools as part of the process, and the comments made by pupils at these meetings, as well as any other consultation responses received from pupils, were included in the Consultation Report. Other comments have been received during the process relating to the impact on pupils, and these will be considered when determining whether or not to proceed with the proposals. The proposals are being taken forward to implement the Council's Strategy for Transforming Education in Powys, which aims to improve learner experience and entitlement for all Powys pupils.
4.11.13.9	The schools code states likely walking routes for safety and accessibility should be assessed prior to bringing forward proposals. Can I ask that PCC publish their hazardous school route assessments completed prior to the recent	'Walking routes to school' were considered on page 38 of the Consultation Document published in respect of these proposals.

	proposals and that please could I be sent them in response to this objection	In addition, comments about walking routes to schools were received during the consultation period, and are reflected in the consultation report. Should the Council proceed with implementation of these proposals, providing Active Travel routes would continue to be an important consideration when developing plans for the proposed new building.

4.11.14 Request that the Council considers the Objections received

4.11.14.1	I would also ask that the Transformation team read the objections that are received very carefully. I think that they will be helpful and informative. I hope that they will receive a response which reflects the care that people have put into preparing them.	All objections received have been read and carefully considered. The issues raised in the objections have been summarised in this Objection Report, which will be considered by Cabinet when determining whether or not to proceed with implementation of the proposals.
4.11.14.2	I hope the volume of objections you receive at this stage of the process will make you stop and consider that the needs of our children are not meet or their educational environment improved by this proposal.	As above.

4.11.15 Other comments

4.11.15.1	This consultation process hugely devalues each school's status in assessing them under one consultation. They are three schools and should be considered separately.	The current proposals are to merge the three schools in order to establish one new school, initially on the three current sites but eventually moving to a new building in Brecon. As it is one proposal, one

		consultation had been carried out. However, separate consultation meetings were held with staff, governors and pupils at the three schools, which provided the opportunity for each school community to give their views on the proposals, and specific comments made which relate to individual schools have been identified in the consultation report / objection report.
4.11.15.2	The consultation process has been wholly lacking and has done nothing to carry the school communities it impacts with it.	The consultation process has been carried out in accordance with the School Organisation Code.
4.11.15.3	The Mount Street Infant School Action Group would have welcomed the opportunity to be properly valued and consulted on the changes planned for their children's school.	The Mount Street Infant School Action Group have had every opportunity to give their views as part of the process.
4.11.15.4	The Council has not included an evaluation of impact on ALN / SEN provision.	The impact on vulnerable groups, including children with Special Educational Needs (SEN) is considered on pages 32-33 of the Consultation Document. This is also considered in the draft impact assessment document which was published with the Consultation Document. The draft impact assessment document was updated to reflect comments received during the consultation period, and an updated document was considered by the Council's Cabinet when determining whether or not to proceed with these proposals. This will be further updated to reflect comments made in the Objections, and a final version will be considered by Cabinet when determining whether or not to proceed with implementation of the proposals.

4.12 Comments about Documentation

4.12.1 Comments about the Consultation Document

4.12.1.1	The evidence set out in the 'case for change' does not support this proposal: Need to reduce the number of small schools: Mount St Infants and Juniors are not small schools. Surplus places: Surplus places are not evidenced in the consultation document in relation to the roll of Mount Street Schools. Reducing Pupil Numbers: According to the consultation document the numbers for Mount Street Infants increase between 2021-25. Building Condition: The consultation document states that the current building condition of Mount Street Infants School is categorised as C and needs circa £712,000 to bring it up to standard. Financial Pressures Facing Powys: The Mount Street Schools are £4,618 (MSI) £3,821 (MSJ). Whilst MSI is just above the Powys primary average of £4,264 we do not see this as a sufficiently strong financial driver for change. Inequality in access to Welsh Medium: This proposal is for English Medium. Limited Post 14 /16 offer: N/A. Inequality in Access to SEN provision: Available at MSI and excellent. Historical Lack of decision making: Picked up by Estyn but not applicable as it relates to delays/ avoidance of small school closures.	These factors are listed in section 2 of the Consultation Document, which has the title 'Why change is needed in Powys.' This section outlines the challenges facing education in Powys as outlined in the Council's Strategy for Transforming Education. The Council does not claim that all of these factors are challenges in respect of Mount Street Infants School, Mount Street Junior School and Cradoc CP School. The challenges in respect of Mount Street Infants School, Mount Street Junior School and Cradoc CP School were outlined in section 4 of the Consultation Document, 'Why change is needed in Mount Street Infants, Mount Street Juniors and Cradoc.'

4.12.1.2	Apart for building condition none of the main challenges facing the Council can be applied to Mount Street Infants School.	As above.
4.12.1.3	Educational standards at Mount Street Infants have been appraised jointly with the three other schools within the consultation document. This is inaccurate. Estyn (2020) found standards to be excellent or good. The National School Categorisation System for 2019 determined the school to have an A for Improvement Capacity and Green for Support Capacity. This is better than the other two schools.	Comment noted. The comment that 'Standards of education an progress at all three schools are currently good' is an overall judgement on the three schools affected by this consultation. Information about the outcome of 4the latest Estyn inspection for each school is also provided in the Consultation Document , however it must be noted that there is nearly four years between the earliest inspection and the latest inspection.
4.12.1.4	The statement that the quality of teaching is currently good in all 3 schools is again not correct. The quality of teaching is good at both Mount Street Infants School & Mount Street Junior School but is only adequate at Cradoc C.P. School. Will Powys County Council correct their statement?	Estyn inspections provide information about the provision at each school at the time when the inspection was carried out, therefore cannot be used to directly compare the provision at each school. All three schools provide good quality education, the amalgamation of the three schools should not have a negative impact on standards.
4.12.1.5	The document states that the provision of skills is strong in all three schools, again this is an incorrect statement. If, however, the provision is strong how would amalgamating the schools strengthen something that is already strong? Isn't it possible that the strength could be weakened?	The impact of the proposals on pupils' skills is considered on page 28-9 of the Consultation Document, where the Council states that *'It is also anticipated that amalgamating the three schools would have a positive impact on the skills of all pupils, including literacy, numeracy and ICT, through improved opportunities to share staff expertise and*

		resources across, and through improved ability to monitor pupil progress in these aspects.' The Council does not believe the proposals would have a negative impact on pupils' skills.
4.12.1.6	The statement that wellbeing and attitudes to learning are currently strong is misleading. Whilst the Estyn report rates Mount Street Infants as excellent, Mount Street Juniors is rated as good and Cradoc C.P. School as adequate. Will Powys County Council again acknowledge that their statement is incorrect?	The Council does not agree that the statement is incorrect. The Council has no concern about wellbeing and attitudes to learning at either of the three affected schools.
4.12.1.7	Although the current cost per pupil is reported there is no information on the projected cost per pupil for the new build. How can consultees know whether the cost per pupil will be less, the same or more per pupil without this information?	It is not currently possible to estimate the per pupil costs following the proposed move to a new building because the delegated budget is based on a number of factors, including number of ALN pupils, size of premises etc. These factors aren't known yet.
4.12.1.8	Incorrect budget data for Mount Street Infants was provided in the Consultation Document, which claimed "Mount Street Infants is projecting to be in a deficit budget position during 2020/21, 2021/22 and 2022/23". This statement was proved to be incorrect and Powys County Council had to issue an addendum to the consultation document stating that an error had been made and the word not had been added.	It is correct that the Council was alerted to an error in respect of the information provided for Mount Street Infants soon after the start of the consultation period. This was amended to correct the error, and an addendum was issued to advise stakeholders of this.
4.12.1.9	Information within the consultation document concerning the condition of the building and the source of the data is not consistent. The Mount Street Infant School Governors were informed that the 2009 Building Condition Survey was used	Mount Street Infants School was reassessed in 2016, which indicated that the school building condition was C. This assessment has subsequently been included in the Council's annual return to Welsh Government.

	for the report, which gave the building an overall B. However, the building is given C in the consultation document.	The reference to the 2009 survey in the Consultation Document is incorrect. The Council commissioned a further assessment of the building condition in 2020, which assessed the building condition as C-.
4.12.1.10	We understand that the data for comparison for Building condition was taken from a 2009 survey. However, for MSI that survey gave a school condition rating of B. The consultation report states a condition rating of C which is the score taken from the 2020 survey. This is inconsistent and misleading. Can PCC provide an explanation for this inconsistency in Building Condition scoring?	As above.
4.12.1.11	The consultation document does not set out any detail on how the proposed site would meet the needs of the three schools. No detail about the other services and community facilities being proposed in Brecon, for example, early years centre, new community pool, pupil referral unit and how these might affect all the other schools in the Brecon Catchment or be better linked to or aligned with the overall education provision and accessibility to services within Brecon thus demonstrating an integrated approach to improving services and education	It is true that at this early stage, prior to any work being carried out on Phase 2 of the Proposals, there is limited information available regarding the proposed new building and the wider site. The Council has not progressed any feasibility or design work in order to ensure that the views of stakeholders are known before it commits any capital funding. However, the information provided in the Consultation Document is in line with the requirements of the Welsh Government's School Organisation Code. Should the Council proceed with implementation of the proposals, links between any other services located on the site in the future and other schools in Brecon will be considered as the work moves forward.

4.12.1.12	I believe there has been inadequate consideration of alternatives in the proposal and consultation document. Particularly in relation to existing mount street sites being considered as a location for a mount street only rebuild.	'Alternative rebuild options for the Mount Street schools' was an alternative option suggested in the consultation period which was considered in the Consultation Report. As explained in the Consultation Report, *'The constraints surrounding the existing sites of Mount Street Infants School and Mount Street Junior School mean that rebuilding these schools in their current location would be challenging. The Council has no other suitable land in Brecon where a new building could be located.'*
4.12.1.13	In our view there has been no proper consideration of the option to rebuild schools on their existing sites. There are no comparisons of costs or appraisal of pros and cons in the initial consultants report. This should have been an absolute baseline for any comparison if this consultation had been conducted properly.	Rebuilding the schools on their existing sites was considered in the Programme Business case for the Brecon catchment which was considered by Cabinet in September 2020. This option was discounted as it would not provide value for money. Options to rebuild the schools on their existing sites was also suggested in the consultation period. An option to provide 2 new buildings, 1 in Cradoc and 1 in Brecon was assessed as a reasonable alternative, however the Council's view was that the current proposal continued to be the most appropriate response to the reasons outlined for the proposal, to ensure improved management of the Powys schools estate and to ensure that the best possible educational opportunities can be provided to the pupils currently attending the three schools and across Powys in the future.

4.12.1.14	According to the analysis of options there is very little which precludes 3a/3b. In respect of 3a/3b the main argument against this option is 'impact on staff losing jobs. This is a risk with any amalgamation/ new build because one of the drivers is to reduce costs.	Comment noted.
4.12.1.15	Queries about the SWOTs included in the Consultation Document	The SWOTs were prepared from the Council's point of view to assess the options identified in the options appraisal. A number of comments on the content of the SWOTs were received during the consultation period, these were listed and responded to in the Consultation Report.
4.12.1.16	Queries about the assessment against Critical Success Factors included in the Consultation Document.	The assessment against the Critical Success Factors was carried out from the Council's point of view in discussion with officers from a range of services. The scoring was agreed by consensus. A number of comments on the scoring were received during the consultation period, these were listed and responded to in the Consultation Report.
4.12.1.17	Queries about the risks outlined in the documentation.	Initial risks relating to the proposal were identified in the Consultation Document / impact assessment, however risk management is an ongoing process, and should the Council proceed with the proposals, risk would continue to be monitored throughout the implementation process.

		A number of comments on the scoring were received during the consultation period, these were listed and responded to in the Consultation Report.

4.12.2 Comments about Nepalese versions of the consultation documentation

4.12.2.1	Why was the full consultation document not translated into Nepalese?	Following comments made by the governors at Mount Street Infants School at the consultation meeting held with them, arrangements were made for arrangements were made for some of the documentation and the consultation response form to be translated into Nepalese. Stakeholders were informed of the availability of these document on the 13th April 2021. The Council translated the Consultation Response Form, the summary presentation which gave an overview of the consultation, the Young People's Version and the Children's Version of the Consultation Document into Nepalese. The Council's view is that translation of these documents was reasonable.
4.12.2.2	It is also not acceptable that not all the consultation documents were translated into Nepali and that only a Summary of the Proposals was made available in Nepali not the complete consultation document.	As above.
4.12.2.3	Why did Powys Count Council only translate a summary of the consultation document into Nepali?	As above.
4.12.2.4	Imagine how insulting it must be to the Nepalese parents that the only versions of the documents to be translated were	As above.

	those for Children and for Young People. This is extremely unfair and disrespectful of the Nepalese community.	
4.12.2.5	Why has Powys County Council not translated the Impact Assessment document into Nepali?	As above.
4.12.2.6	Why was the closing date for the consultation 5th April 2021 on the Nepali Consultation Response Form?	Apart from one minor amendment made on the first few days of the consultation period following comments received from one of the affected schools, no amendments were made to the published Consultation Documentation throughout the consultation period. The Nepalese versions were translations of the published versions of the documents. Whilst the documentation was not changed to reflect the amended closing date, consultees were advised by letter that the consultation had been extended, and a press release was also issued. The Council's website was also amended to show the revised closing date.
4.12.2.7	Why wasn't the consultation period extended to 25th May which would have given the Nepalese community the required 6 weeks from publication in Nepali to respond to the consultation?	The consultation period ran for a total of 76 days. Members of the Nepalese community could have responded to the consultation at any time during this period.

4.12.3 Comments about Impact Assessments

4.12.3.1	There has been no impact assessment specifically for Cradoc Primary School and the community it serves.	The Council is carrying out a single process on one set of proposals which affect three schools. It is true that one overall draft impact assessment was carried out which considered the impact of the proposals, however

		this included reference to the individual schools / communities affected by the proposals. In addition, the draft impact assessment document which was published as part of the Consultation Documentation included a draft community impact assessment. This includes a separate section for each of the three affected schools. The impact assessments have been updated to reflect comments received during the consultation period. The updated impact assessments consider the impact of the proposals on a number of different factors, and where the impact is deemed to be different for the different schools/communities, this is outlined in the document. In particular, the community impact assessment shows the impact on the three school communities separately. The impact assessments will be further updated to reflect the comments received during the objection period, and the updated versions will be considered by Cabinet when determining whether or not to proceed with implementation of the proposals.
4.12.3.2	Concern that only one impact assessment has been compiled for the three schools when the impact on each individual school varies widely – they are very different schools, and the impacts cannot be classed as 'the same'.	As above.
4.12.3.3	PCC has not undertaken a separate impact assessment in respective Cradoc County Primary school despite the fact	As above.

	that it is fundamentally different to the two Mount St schools due to its rurality.	
4.12.3.4	Concern that there was a single Impact Statement covering all three schools (denying Cradoc the opportunity for a Cradoc-specific Impact Assessment)	As above.
4.12.3.5	There was no impact assessment for Cradoc – specific impacts have not been considered in regards to Cradoc School.	As above.
4.12.3.6	The community impact assessments should be separate for each school as the impact on an urban community is vastly different to that on a rural community. Does Powys County Council agree that it is not a fair process to combine the 3 impact assessments?	As above.
4.12.3.7	It is difficult to have confidence in the Impact Assessments pertaining to this as they have been combined for the 3 schools leading to generalised, rather than specific impact assessments which undermines their validity and reliability.	As above.
4.12.3.8	No impact assessment for Cradoc – as the three schools within the proposals are considered as one project, only one impact assessment has been created by Powys County Council for all three schools together. This ignores impacts specific to Cradoc Primary school.	As above.
4.12.3.9	I am shocked that no specific impact assessment has been done for Cradoc school in the consultation, as the school is very different to Mount street. No consideration has been given to those living outside of Brecon.	As above.

4.12.3.10	How can one rural school be combined with two urban schools and have an equitable chance to be reviewed? When looking at scoring an Impact Assessment, a positive impact for Mount Street Schools appears to mask the very negative impact on Cradoc School. This cannot be considered to be a fair and true assessment under any circumstances.	As above.
4.12.3.11	Cradoc School should have its own impact assessment. I believe the Council have grouped Cradoc School with two urban schools in order to diminish the overall impact of closing a rural school.	As above.
4.12.3.12	Concern about the lack of an impact assessment for Cradoc school and the effect its closure would have on neighbouring villages.	As above.
4.12.3.13	After school clubs & activities – A three school project impact assessment has been created, instead of a separate one for Cradoc School. The impact on after school clubs and other activities has not been accurately assessed or considered.	The community impact assessment includes separate sections for each of the three schools, which outlines the after school clubs / activities which take place at each school.
4.12.3.14	This impact assessment was pulled together without real thought and understanding or involvement from the Community. There are two clubs working from Cradoc School. From what I understand at no point has anyone asked them to complete an impact assessment.	The initial draft community impact assessments were prepared with input from the three affected schools. The impact assessments have been updated at each stage of the process to reflect feedback received as part of the process.
4.12.3.15	The Community Impact Assessment that was carried out for Cradoc Primary was woefully inadequate and completely	As above.

	lacking in detail. Who was the person or persons within the Council that carried out the impact assessment and did they actually visit the Cradoc area while carrying out the assessment? These are valid questions that require an answer. I have spoken to many people within the community who were equally appalled at how vague and lacking in detail the results of the impact assessment were. Interestingly, not one of these people were questioned by anyone from the council regarding a community impact assessment and what it would mean to them if the school was to close. If the Council cannot show who carried out the assessment or how the impact conclusions were actually reached then surely that means the results of the Community Impact Assessment for Cradoc should be discounted and removed completely from the consultation process, with a new Impact Assessment carried out properly.	
4.12.3.16	Throughout the consultation report it states that Impact Assessments will be updated and considered by Cabinet. These have not been shared with respondents or stakeholders.	The impact assessment document was updated to reflect feedback received during the consultation period. The updated document was included as an appendix to the paper considered by Cabinet on the 14th December 2021, which was available on the Council's website. The impact assessments will be further updated to reflect comments made in the Objections, and the updated versions will again be included as an Appendix to the paper considered by Cabinet. These will also be available on the Council's website.

4.12.3.17	The Council has not carried out an evaluation of impact on transient pupils in this process.	The impact assessments will be further updated to reflect comments received during the objection period.

4.12.4 Comments about the Consultation Report

4.12.4.1	The respondents have taken a lot a time to read and respond to the consultation document. PCC have responded to 928 questions and statements with the words "As above" and 307 times with the words "Comments noted". Who have the comments been noted by and who will act on them?	The comments have been noted by officers responding to the comments and also by Cabinet members when reading the report. Where action is required, this action will be taken by officers as appropriate.
4.12.4.2	1.1.2.3.1: PCC state that "the advantages offered by single school provision for primary age pupils are well known and evidence based." However, having googled this statement I have failed to find any evidence to substantiate it so would disagree that it is well known and evidence based. If this statement were true it is obviously not well known by Christ College Brecon as their pupils don't start their education at the school until the age of 7 so transition is clearly not seen as an issue, they are classed as excellent by Estyn in all categories and have been educating children since 1541.	Professor Graham Donaldson in his Successful Futures report 2015 states that "The new national curriculum should be organised as a continuum of learning from 3 to 16 without phases and key stages. Progression should be described in relation to a continuum of learning in each Area of Learning and Experience from when a child enters education to the end of statutory schooling." This curriculum will commence in all schools in Wales in September 2022.
4.12.4.3	1.1.2.5.1.5: PCC state that "£15,000 has been allocated to improve the entrance at Mount Street Infants School this year." However, the report fails to inform that the heating system at Mount Street Infants School has been replaced, repairs to the roof have been undertaken and canopies have been renewed. The report also fails to inform the cost of this maintenance work.	The expenditure on Mount Street Infants School over the last 5 years is as follows: • £21,805 Partial replacement of flat roof • £26,100 External fire door works • £12,032 early years alteration works

4.12.4.4	1.1.3.3.5: PCC state that “£150,500 has been spent on Mount Street Junior School between 2012 and 2019.” They further state that “With appropriate maintenance, the expected lifespan of a new school building is 65 years.” By their own admission Mount Street Infants School, Mount Street Junior School and Cradoc C.P. School have not been appropriately maintained by PCC and the stakeholders can have no confidence that the new school will be appropriately maintained either.	The Council does not agree with the statement that the three schools have not been appropriately maintained. The Council has a duty to maintain all its school buildings. However, as stated in the Strategy for Transforming Education, one of the challenges facing the Council is school building condition, with associated maintenance costs. The Council has to maintain over 90 school buildings, but the funds available to do so are limited. Therefore, the Council must carefully prioritise how the Schools Major Improvements budget is allocated – this is done through a scoring methodology based on criteria outlined in the Council’s Schools Asset Management Policy. Any new schools that are built are also appropriately maintained by the Council.
4.12.4.5	1.2.4.5 states that PCC has spent £375,000 on works to Cradoc school. This is a complete waste of tax payers’ money if there is not going to be a school in Cradoc. It would be financially better to apply for 21st century school funding to continue to improve the condition of the building having spent this vast amount already.	As above. The Council has a duty to maintain all schools even if they are being reviewed as part of the Schools Transformation Programme. There were issues that needed to be addressed at Cradoc C.P. School which meant that £375,000 has needed to be spent on the school over the last few years.
4.12.4.6	1.2.4.5 states that “The Council has duty to maintain its school estate”. This clearly has not happened in these schools if the buildings are in poor condition.	The Council has a duty to maintain all its school buildings. However, as stated in the Strategy for Transforming Education, one of the challenges facing the Council is school building condition, with

		associated maintenance costs. The Council has to maintain over 90 school buildings, but the funds available to do so are limited. Therefore, the Council must carefully prioritise how the Schools Major Improvements budget is allocated – this is done through a scoring methodology based on criteria outlined in the Council's Schools Asset Management Policy. Expenditure on Mount Street Infants School over the last 5 years has been as follows: • £21,805 Partial replacement of flat roof • £26,100 External fire door works • £12,032 early years alteration works £150,500 has been spent on Mount Street Junior School as part of the major improvement programme between 2012 and 2019, on safeguarding fences, a new boiler, roofing works and external fire doors. £375,000 has been spent on works to Cradoc, including the car park which cost £180,000. This included refurbishing mobile classroom, new boilers and controls, environmental health works to the kitchen and rewiring works.
4.12.4.7	2.2.1 states that "An experienced member of staff from the Council is supporting school leaders." This member of staff has limited experience in EAL pupils, pupils entitled to free school meals, pupils in specialist units.	The experienced member of staff from the Council has extensive experience in teaching and learning and as an Estyn Inspector has inspected many schools incorporating all groups of learners.

4.12.4.8	2.2.23 states that “The practices and strategies employed at the school would be retained within the new school. However, this relies on retaining the current staff. With the risk of job losses at the new school is high risk the current staff will be looking for permanent positions at other schools. This is evidence by the loss of the Head teacher at Cradoc School.	The Council is aware that the Headteacher of Cradoc C.P. School left the school at the end of 2021. The Council has identified a risk that ‘Uncertainty for staff during the transition period may result in some staff leaving.’ The Council aims to conclude this process as quickly as possible in order to minimise the period of uncertainty for staff.
4.12.4.9	2.4.18 asks the question “What benefits are there for the children of Mount Street Infants School of a merger with Cradoc C.P. School? This question has been answered with “As above” but the answer at 2.4.1 does not answer the question.	The heading of section 2.4 of the Consultation Report is ‘**Concern about mixing rural and town schools’**. The comment made in 2.4.18 of the Consultation Report states: *‘What benefits are there for the children of Mount Street Infants School of a merger with Cradoc C.P. School? Mount Street Infants School has no history with this rural school’* Therefore the response to comment 2.4.1 explains how all schools in the Brecon cluster collaborate and work well together, even if they are schools located in the town or in rural areas.
4.12.4.10	2.5.4. states “In Powys there are examples of headteachers successfully managing schools across more than one site”. It has been well documented that this is not entirely true. Head teachers have admitted that it has been a very difficult task. PCC must wait for the “lessons learnt” report regarding transformation in Welshpool to be published before closing the 3 schools.	The heading of Section 2.5 of the Consultation Report is **‘Concern about leadership arrangements’.** The comment in 2.5.4 states: *‘It is an impossible task for one headeacher to look after three site’.* The response states:

		'In Powys there are examples of headteachers successfully managing schools across more than one site, including a three-school federation across three school sites. This has been successfully implemented with standards being maintained across each of the schools.' This response is correct and refers to the successful federation of Ysgol Carno, Ysgol Llanbrynmair and Ysgol Glantwymyn. It is recognised that the situation at Welshpool C.i.W Primary School was challenging due to the new build school being delayed due to specific factors related to that project. The school had to operate across three sites in the town of Welshpool for longer than anticipated in challenging circumstances. A 'lessons learnt' document is being prepared and these lessons will apply to any merger and building of a new school in Powys.
4.12.4.11	2.5.24: The question asks "If the schools are amalgamated and funding is not made available will the schools revert to 3 separate schools with 3 headteachers?" This question has not been answered.	If the schools are amalgamated and Phase 2 of the Proposal does not go ahead, the schools would not revert to 3 separate schools – a new reorganisation proposal and consultation would be required to 'de-amalgamate' the school.
4.12.4.12	2.5.34: The question asks "Who will take that teacher's class when that person has to leave the classroom to sort out any one of the many daily issues that our Headteacher would normally deal with?" Again, PCC have not answered this question.	Comment 2.5.34 states: *'Due to Staff reorganisation in 2019, MSIS does not have a deputy head teacher. Who will be in charge on the days that the new Headteacher is off-site? Who will take that teacher's class when that person has to*

		leave the classroom to sort out any one of the many daily issues that our Headteacher would normally deal with on our behalf, as mentioned above?' The response to 2.5.34 states: *'Each site would have a deputy headteacher or teacher in charge to oversee the school while the headteacher was not on site. They will have designated roles and responsibilities which would include what to do when the headteacher was not on site.'* Should the Council proceed with implementation of the proposal, issues such as these would be addressed by the temporary governing body when developing a staffing structure for the new school. Systems would need to be put in place to release staff to deal with any incidents that occur, should the Headteacher not be on site at the time. Should there be a major incident, the Headteafcher would have the flexibility to attend any site at any time. There are currently schools in Powys where there are teacher in charge positions. The governing bodies have allocated dedicated time to the teacher in charge to deal with day to day incidents when the headteacher is not at the school or allocated support to cover for times when the member of staff is called to deal with an incident.
4.12.4.13	2.5.36 states "In Phase 1 there will be even more responsibility placed on leadership teams in each school	The response to comment 2.5.36 is incorrect and should have said '*See comment 2.5.27'.*

	with a headteacher stretched over three sites." The response is "See comment 2.5.33." However, comment 2.5.33 is a response regarding breakfast club and doesn't address the comment made at 2.5.36.	The response to comment 2.5.27 states: *'When a new leadership team is established, the roles and responsibilities of each member will be clear. There are statutory roles that only headteachers can undertake, such as exclusions. In terms of safeguarding, each site would have a safeguarding lead. This does not have to be the headteacher. In other multi-sited schools, each site has a deputy headteacher or teacher in charge that supports the headteacher when they are not on site.'*
4.12.4.14	2.5.37 states "One headteacher covering three school sites will NOT have adequate time to support staff. The deputies at each school will have to become the leader of each separate school site and will have to pick up the day to day running of the schools with an overall loss in teaching resource." Again the response from PCC is "See comment 2.5.33". The response refers to breakfast club and again does not address the comment at 2.5.37.	As above – the response to comment 2.5.37 should have said '*See comment 2.5.27'.*
4.12.4.15	2.5.42 states "There would be additional pressure on the headteacher, as supported by feedback received from the headteacher at Welshpool." The response is "Comment noted" which would appear to accept that there would be additional pressure on the Head teacher. However, it is incorrect to state that the situation was unique to Welshpool as the same situations could occur with this proposal. Y Gaer in Brecon is another example of a PCC project taking significantly longer than expected and of going significantly over budget.	Comment 2.5.42 states: *'There would be additional pressure on the headteacher, as supported by feedback received from the headteacher at Welshpool.'* The Council's response to comment 2.5.42 is: *'Comment noted. The situation in Welshpool was unique to Welshpool. Due to the contractor becoming*

		insolvent, the new building took significantly longer than expected and the school remained on multi-sites for longer than expected.' The Council disagrees with the assertion made that 'it is incorrect to state that the situation was unique to Welshpool'. There were a combination of factors that delayed the opening of Welshpool C.i.W Primary School. However, the Council recognizes that there is always a risk of to the timescales of construction projects and projects going over-budget. The comment is 'noted' because the respondent makes reference to feedback received from the headteacher of Welshpool C.i.W Primary School.
4.12.4.16	2.6.3 states "Concern that the SLT team would be fragmented which would negatively impact pupils." PCC respond by stating that "there are other schools in Powys that are multi-sited". However, an example of a multi-sited school is Ysgol Calon Cymru of which PCC has recently stated that "it has become clear that the school's dual sited model is restricting its ability to continue to grow and develop." This is yet another example to PCC getting things wrong & not improving learner entitlement & experience.	The intention of these Proposals is to merge the three schools to become one school, with the schools staying on their current sites **temporarily** until they transfer to the new building. It is not the intention to establish a permanent multi-sited school in Brecon. Ysgol Calon Cymru has been established as a **permanent** dual-sited school, but the dual-sited nature of the school is only one factor that needs to be addressed, others include poor building condition and the need to improve Welsh-medium provision in the area.
4.12.4.17	2.6.16 The question asks "Does Powys County Council agree that this would increase travel costs, staff would need business insurance?" The response given is "would not add	It is not expected that staff would move between sites, although there would be occasions when the whole group of staff would come together for professional

	to additional travel for staff." However, the response given 2.8.11 states "Any staff affected by this may be eligible for payments under the disturbance policy and/or claim mileage for travel between sites." This again shows inconsistencies is the responses from PCC.	learning, team building etc. However it is not expected that there would be significant additional travel for staff, as two of the three sites are located next to each other, and the other is only a few miles away. As indicated in the consultation report, any staff affected by this may be eligible for payments under the disturbance policy and/or claim mileage for travel between sites. Each individual member of staff would be responsible for making their own insurance arrangements.
4.12.4.18	2.7.5 The question asks "Is it possible that Phase 1 could begin before the funding for phase 2 has been secured?" PCC have again not answered this question.	It is correct that Phase 1 can begin before the funding for Phase 2 has been secured. The Council recognises that no funding has been allocated to this project yet in order for the Council to fully understand the views of stakeholders before it commits capital funding. However, the Council has included the development of new schools in the Brecon catchment in its revised Strategic Outline Programme for the Sustainable Communities for Learning Programme (previously known as the 21st C Schools Programme). Should the Proposals be approved by Cabinet, then the Council would commission the first stages of the design process and develop a Strategic Outline Case for the approval of Cabinet and the Welsh Government. It would then further work up the plans through the RIBA stages, and develop an Outline Business Case, again for Cabinet and Welsh Government approval. Following

		this, a Full Business Case would be prepared, and once approved by Cabinet and the Welsh Government, construction would commence. Welsh Government do not release funding until the Full Business Case is approved – up to this point, any approvals given by the Welsh Government are approvals 'in principle'.
4.12.4.19	2.7.7 States "families may end up with siblings attending different sites". The response from PCC at 2.7.1 does not address this issue.	Comment 2.7.7 states: *'A new school operating on 3 sites indefinitely with no secure funding for Phase 2 with the extra challenges that brings cannot easily ensure well-being of children and staff, also families who may end up with siblings attending different sites according to space available or reorganisation by a new Governing Body and Head.'* It is not expected that the new Governing Body and/or Headteacher would make changes which would result in siblings attending different sites (i.e. one sibling attending a Brecon site, another attending the Cradoc site). Admissions for the new school would be managed by the Council, and applications for places would be considered in accordance with the Council's Admissions Policy.
4.12.4.20	2.7.8 States "The recent Welshpool amalgamation took 5-6 years, which had a negative on staff and placed excessive pressures on one head teacher covering three schools over separate sites for an extended period of time". The	There are several comments in the Consultation Report which relate to the Welshpool amalgamation. It is acknowledged that the responses provided to some of the other comments would have been a more appropriate response to comment 2.7.8. For example,

	response from PCC at 2.7.1 does not apply to this statement.	the following response, which was provided to comment 2.5.42: *'Comment noted. The situation in Welshpool was unique to Welshpool. Due to the contractor becoming insolvent, the new building took significantly longer than expected and the school remained on multi-sites for longer than expected.'*
4.12.4.20	2.7.10 States "The proposed time frames are unrealistic. The consultation gives no certain future end date for a new school other than at the earliest 2024". The response from PCC at 2.7.1 does not refer to timescales & therefore does not address this comment. However, the responder is correct in their statement as time scales have already been moved forward by a year and we are only still at the proposal stage. 2.7.11, 2.7.12 & 2.7.13 regarding time scales have also not been answered.	The Council acknowledges that the response provided at 2.7.1 does not respond to the queries raised regarding timescales. The Council responded to queries about timescales in section 4.10.13 of the Consultation Report, for example, the following response, which was provided to comment 4.10.13.3: *'Comment noted. The timescales provided were indicative and are always subject to change. Should the Council proceed with the Proposals, the timescales will be reviewed and updated timescales will be provided in the Statutory Notice, should there be a need to publish a Statutory Notice.'* The Council has now reviewed the timescales. The amended timescale as outlined in the Statutory Notice is to establish a new school on the three existing sites from September 2023, with a planned move to one new building from 2025/26.

4.12.4.21	2.8.1 PCC state that “It is estimated that annual revenue savings would equate to £16,181 as Part of Phase 1 and £220.066 for Phase 2.” Finance officers have confirmed that these figures are now lower due to the new funding formula.	The estimated savings have been recalculated based on the new funding formula. Following the revision of the school funding formula for primary phase schools, the estimated saving is now approximately £6,400 for Phase 1 and then £137,410 for Phase 2 and recurrently each year afterwards.
4.12.4.22	2.8.2 PCC state “It is not expected that any pupils would transfer to other schools during Phase 1 of the Proposals.” Again PCC are incorrect in this statement as there is evidence that pupils are already moving to Priory School. At 2.10.9 PCC acknowledge “Parents/pupils can apply for a place in any school they choose and they are entitled to move to other schools is that is their preference”. Again, another example of inconsistency of responses.	The latest information held by the Council’s admissions team does not support this suggestion that there has been significant movement of pupils from Mount Street Infants, Mount Street Juniors and Cradoc to Priory C. in W. school. The Council does not agree that these statements are inconsistent – it is correct that the Council would not expect any pupils to transfer to other schools during Phase 1, however it is also true that parents/pupils can apply for a place in any school they choose, therefore they are entitled to move to other schools should they wish to do so.
4.12.4.23	2.8.11 Although PCC state that “Any staff affected by this may be eligible for payments under the disturbance policy and/or claim mileage for travel between sites.” It is not stated that staff would need business insurance for travelling for work purposes.	Each individual member of staff would be responsible for making their own insurance arrangements.
4.12.4.24	2.8.4 PCC state that the statement “There are no financial benefits” is incorrect. However, it has already been shown	It is incorrect that the figures have been over estimated – these estimates were correct based on

	that the estimated figures of £16,181 for Phase 1 and £220,066 have been over estimated.	the current schools funding formula and other information available at the time they were calculated. The estimated savings have been recalculated based on the new funding formula for primary phase schools. The estimated saving is now approximately £6,400 for Phase 1 and then £137,410 for Phase 2 and recurrently each year afterwards.
4.12.4.25	2.9.1 PCC state that "The Council is committed to providing the children and staff of the three schools with a high-quality learning environment." How can parents believe this statement when it is Powys County Council who have NOT maintained these three schools and have allowed them to be in poor condition. It appears that PCC only care about the children of the future.	Phase 2 of the proposals clearly outlines that the Council intends on building a new school to replace the current three schools. The Council does not agree with the statement that the three schools have not been appropriately maintained. The Council ensures that all schools are maintained and must carefully prioritise how the Schools Major Improvements budget is allocated – this is done through a scoring methodology based on criteria outlined in the Council's Schools Asset Management Policy.
4.12.4.26	2.10.10 states "Phase 1 of this proposal will only give uncertainty and cause increased anxiety amongst the whole of the school community. PCC response to this is "Comment noted". One would have to infer from this response that PCC are in agreement that this is what they will cause to happen to our school community.	It is clear from the comments received to both the consultation and during the objection period that there are many concerns, anxieties and uncertainties amongst stakeholders with regard to Phase 1, and the Council duly notes this, therefore the phrase 'comment noted' was used.

4.12.4.27	2.10.11 The response from PCC is again “Comment noted”. The inference again would be that PCC agree that they will cause two periods of disruption in addition to that already caused by Covid, there will be extra pressure on staff and a Head teacher will be stretched over 3 sites.	It is clear from the comments received to both the consultation and during the objection period that these are concerns raised by many stakeholders, and the Council duly notes this, therefore the phrase ‘comment noted’ was used.
4.12.4.28	2.10.12 states “it will inevitably lead to movement of pupils whose parents will seek alternative establishments”. Once again, the response from PCC is “Comment noted” which is a contradiction of the response given at 2.8.2. This again shows inconsistencies in the responses from PCC.	The Council does not agree that the response provided to 2.10.12 contradicts the response provided to 2.8.2.
4.12.4.29	2.10.13 PCC admit that there is an error at page 17 of the Consultation Document and the capacity of the new school will be 476 and not 420.	The Council recognises that there was an error in the Consultation Document in respect of the capacity of the new school operating on three sites. The proposed capacity of the new school on three sites would be 476, based on the combined capacity of the three schools.
4.12.4.30	2.11.3 PCC state that “There would be no expectation for pupils currently attending provision is Brecon to transfer to the Cradoc site.” What is not explained is what would happen, following a merger of the schools, if there were 40 children in Year 2 in Mount Street and 5 children in Cradoc. Mount Street would need 2 teachers due to the teacher to pupil ratio and Cradoc would need 1 teacher (a total of 3 teachers). However, as it would be one school the total number of pupils in Year 2 would be 45 and with the teacher/pupil ratio is 1:30 there would only be a requirement for 2 teachers. PCC do not state if there would be increased funding for 3 teachers. If there were, this would	During Phase 1, both the current formula and the new formula would fund the school based on the three separate school sites which is why the majority of the estimated savings are not realised until Phase 2 is complete. This has been taken into account in calculating the estimated savings. It should also be noted that the estimated savings have been recalculated based on the new funding formula for primary phase schools.

	therefore affect the savings of £16,181 & would lead to a deficit.	The estimated saving is now approximately £6,400 for Phase 1 and then £137,410 for Phase 2 and recurrently each year afterwards. Staffing arrangements would be determined by the governing body of the new school.
4.12.4.31	2.11.7 A huge weakness in this proposal is lack of information regarding the 3+ setting. PCC state "The Council is unable to provide definitive information at this stage". PCC are presenting too much uncertainty for parents with the lack of detail in these proposals.	Comment 2.11.7 states: *'What is the plan for the 3+ setting?'* The Council's response to comment 2.11.7 states: *'The impact on nursery / early years provision is considered on pages 23-25 of the Consultation Document, where the Council states that:* *'It is not anticipated that Phase 1 of the Proposals would impact on the funded early years education provision outlined above, which would continue to operate in the same accommodation under the management of the new school'* *and in respect of Phase 2:* *'Eventually, the intention is that the new school moves to a new building located on the site of the old Brecon High School. Accommodation to provide funded early years education would be provided as part of the new building, and it is anticipated that there would be at least the same number of places available as are currently available at Mount Street Infants School and*

		Cradoc C.P. School. The demand for nursery places in the area will be reviewed as the proposal moves forward, to ensure that sufficient places are provided to accommodate demand. Should all provision move to the new building, this would mean that funded early years education provision and childcare provision would no longer be available at Cradoc, and families currently accessing this childcare at Cradoc would need to travel further in order to access this provision. This could mean that some families currently accessing funded early years education provision and childcare provision at Cradoc may not access the alternative provision in Brecon.' *The Council is unable to provide definitive information at this stage about the exact provision that would be available following a move to the proposed new building, however this would be considered as part of the design development for the new building, with input from the school and the early years providers.'* As stated in that response, there is no impact on early years provision during Phase 1 of the Proposals and the Council intends on building early years provision into the new building during Phase 2. It would be the intention that the new school building would have full wraparound provision but the exact nature of this is as yet undefined. This would be worked up through input from the school and early years providers should the Proposals be approved and design development begins.

4.12.4.32	2.10.11 PCC state that the community impact assessments will be updated and considered by the Council's Cabinet. These documents have not been made available to respondents.	Community impact assessments have been updated following the consultation period and again following the objection period. These have been presented to Cabinet and published as part of the 14th December 2021 Cabinet reports. The final community impact assessments will be published with the Cabinet reports when Cabinet consider this Objection Report.
4.12.4.33	3.1.0 PCC state that "If the Welsh Government's contribution to the project was not available, the Council would fund the project directly from its own capital programme, through a combination of asset sale and borrowing." However, PCC are currently advertising 11 properties and pieces of land for sale with a value of over £1 million (not all have a published value) with some having been on the market for a long time and some being reduced in price. There is, therefore, no guarantee that PCC will be able to sell the assets and fund the project. Again, another weakness in the proposals.	It is correct that if Welsh Government's contribution to the project was not available, the Council would fund the project directly from its own capital programme through a combination of asset sale and borrowing. It is also correct that there is no guarantee that the Council would be able to sell assets, however the Council has many assets which it could attempt sell if needed.
4.12.4.34	3.1.3 PCC state that "consulting on the Proposals is the first step that needs to be undertaken to ensure that the views of stakeholders are known." PCC are not listening to the view of the stakeholders. Four local Councillors, who are the voices of the community, spoke against the proposal at the Cabinet meeting on 14th December 2021. These Councillors know Brecon and Cradoc and know the geography of the locality and know the reasons that these Proposals are not right for the community. However, six Cabinet members without this knowledge ignored the objections from the local Councillors and voted, as they always do, to support their fellow Cabinet member.	Cabinet considered a detailed report of 425 pages which included the views of all stakeholders. Cabinet also considered the views of local councillors and the Learning and Skills Committee, as well as the views of Estyn.

4.12.4.35	3.1.9 PCC state that “feasibility work will be required to confirm the site’s suitability.” As has been proven recently, Proposals may have to reconsidered due to the outcome of a feasibility study.	It is correct that feasibility work will be required to confirm the site’s suitability – this is the first RIBA stage when developing a new school building. If the feasibility work identifies issues, then the Council would need to consider what actions are required to overcome these issues – again a normal part of any construction process.
4.12.4.36	3.1.11 PCC state that “The Council has not yet developed a business case for funding prior to consultation to ensure that the views of stakeholders are known.” Apart from acknowledging that it will be difficult for grandparents and pregnant mothers to walk to the proposed new site, none of the view of the stakeholders were mentioned by any of the current Cabinet members at the meeting on 14th December 2021.	Cabinet considered a detailed report of 425 pages which included the views of all stakeholders. Cabinet also considered the views of local councillors and the Learning and Skills Committee, as well as the views of Estyn.
4.12.4.37	3.1.13 As above	The Council does not understand this comment – point 3.1.13 in the Consultation Report does not relate to 3.1.11 above.
4.12.4.38	3.1.16 PCC state that “The Council has a duty to ensure that all schools are maintained appropriately.” Powys County Council has seriously failed in their duty to Mount Street Nursery & Infants School, Mount Street Junior School and Cradoc C.P. School.	The Council does not agree with the statement that the three schools have not been appropriately maintained. The Council ensures that all schools are maintained and must carefully prioritise how the Schools Major Improvements budget is allocated – this is done through a scoring methodology based on criteria outlined in the Council’s Schools Asset Management Policy.

4.12.4.39	3.2.1 – 14 PCC continues not to listen to the views of stakeholders. Stakeholders have advised that there is insufficient information about phase 2. The response from PCC is “The information provided is in line with the School Organisation Code”. Surely PCC has a duty to the stakeholders to provide more information on Phase 2 rather than hiding behind this statement.	At this early stage, prior to any work being carried out on Phase 2 of the Proposals, there is limited information available regarding the proposed new building. The Council has not progressed with any feasibility or design work in order to ensure that the views of stakeholders are known, before it commits any capital funding. However, the information provided in the Consultation Document, the Consultation Report and this Objection Report, is in line with the requirements of the Welsh Government’s School Organisation Code.
4.12.4.40	3.4.1.1.12 At recent anti-bullying training is was stated that a lot of bullying amongst children takes place on school buses.	The Council does not recognise this comment. Bullying behaviour can take place in any setting, and increasingly is becoming an online issue due to the increasing use of the internet and social media. Powys County Council has in place a Travel Behaviour Code which addresses unacceptable behaviour on school transport. Transport providers keep in close communication with the Council’s Transport Unit and with schools, and any issues can be dealt with swiftly.
4.12.4.41	3.4.4.1 PCC state that “there are ways of providing forest school experiences without the need for a mature woodland area.” However, the Forest School Association states “Forest School takes place in a woodland or natural	The Council stands by this comment: ‘*The Council recognises the importance of outdoor space and forest schools provision to the development and wellbeing of children. It is also recognised that the*

	environment to support the development of a life-long relationship between the learner and the natural world." The forest school shown at Welshpool appears to be a wooden shed with electricity in it. Compared with what the children at Mount Street and Cradoc currently have this would be a lot worse than they have now.	*forest school at Mount Streets Infants School is located in an area of mature trees. Should the Council proceed with the proposals, pupils would eventually transfer to a new building in Brecon. The Council would ensure that there would be a forest school area and other outdoor areas at the new school. It is recognised however that this wouldn't be the same as the current forest school area at Mount Street Infant School for a number of years. However, the Council believes that forest school provision can be delivered in a variety of ways and does not solely rely on the availability of an area of mature trees.'* Welshpool CiW Primary School has only been open for just over a year. The Forest School area needs to be developed further, however the school is able to use the current Forest School environment to provide pupils with the appropriate experience. The Council is fully aware of the outdoor learning environments at the current schools, and should the Council proceed with implementation of these proposals, would work closely with the new school to explore and develop appropriate outdoor learning environments in the new school.
4.12.4.42	3.4.3.20 PCC states that there are "dedicated forest school areas at Ysgol Gymraeg Y Trallwg, Bro Hyddgen Community Campus, Dedewain, and Brynllywarch developments. These schools are in the north of the County. There is nothing listed for the schools at Llanfaes,	All new build school include outdoor learning spaces, however these are different in each development depending on each school's circumstances / requirements.

	Priory, Llangorse, Clyro, Talgarth, Llyswen and these are all new schools.	The Council is fully aware of the outdoor learning environments at the current schools, and should the Council proceed with implementation of these proposals, would work closely with the new school to explore and develop appropriate outdoor learning environments in the new school.
4.12.4.43	3.4.4.2 PCC state that “it is important to understand the views of all stakeholders”. However, PCC are not taking account of the views of stakeholders.	Cabinet considered a detailed report of 425 pages which included the views of all stakeholders. Cabinet also considered the views of local councillors and the Learning and Skills Committee, as well as the views of Estyn. Cabinet will be considering this detailed Objection Report before a final decision is made on the proposals.
4.12.4.44	3.4.4.5 PCC state that “inclusion of a specialist unit would be discussed when the project brief is defined”. This is too late! PCC should be discussing this with parents and teachers now as it appears at the moment that children with ALN are not important to PCC and will be an afterthought.	Children with ALN are not an afterthought. The Council has developed a new strategy for children with ALN/SEN, and is currently implementing this strategy. The current specialist units at Mount Street Infants and Mount Street Juniors would remain in place during Phase 1 of the proposals, and the inclusion of a specialist unit in the new build would be discussed when developing the project brief.
4.12.4.45	3.5.1.2 PCC state that a feasibility study would be undertaken should the Proposals be implemented. If, as has previously happened, the feasibility study shows that this site isn’t suitable for a Nursery, Infant and Junior school PCC will needlessly have wasted a lot of money on this Proposal at a time when we hear that PCC will, from 1st April 2022, have to meet any additional costs of the pandemic itself through its own budget. Also, PCC needs to	It is correct that feasibility work will be required to confirm the site’s suitability – this is the first RIBA stage when developing a new school building. If the feasibility work identifies issues, then the Council would need to consider what actions are required to overcome these issues – again a normal part of any construction process.

	find savings of £7.7m in order to balance the budget by March 2023.	The cost of any feasibility work for a new school building must be compared with the on-going costs of maintaining 3 separate school buildings should Phase 2 not be implemented. Identifying potential revenue savings is a necessary part of all Councils' budget setting processes, aimed at ensuring that services are provided as cost effectively as possible, prioritizing Vision 2025 and service improvement objectives. 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.
4.12.4.46	3.5.1.8 It is an indicator of PCC's lack of knowledge of the site that they dismiss the comments about the unsuitability of the site simply by saying that "the location and situational aspects would be considered in order to design the school in accordance with its environment. PCC Cabinet members may consider themselves to be all powerful but even they cannot stop the wind blowing and level off a hill.	The Council stands by the comment 'the location and situational aspects would be considered in order to design the school in accordance with its environment.' This is a normal part of the school design and construction process.
4.12.4.47	3.5.2.1 The Council's view that the walking route to school is not excessive is ill informed. A recent walk from Woodlands Crescent, Brecon (within the catchment area) to the entrance to the new school site took 35 minutes. This is a very long walk for 5 year old children.	The Council's view is that this walking route is not excessive.
4.12.4.48	3.5.2.22 PCC state that "there is public transport to the Penlan site." PCC are not entirely correct with this	Should Phase 2 of the Proposals be implemented, the Council would consider public bus arrangements and

	statement. There is a public bus which leaves Uplands at 0844 and arrives at the High School at 0854. However, there is no bus from the High School back to Uplands until 1533. Parents would either have to walk all the way back home or pay for a taxi. Also there is no bus back to the High School site in time for parents to collect their children at 1530. The first bus from Woodlands Crescent leaves at 0954, nearly an hour after school starts and only goes as far as Brecon Interchange 1. There is no connecting bus to the High School site. There is also no bus back to the High School site in time for parents to collect their children at 1530.	timetables in order to ensure that they provide convenient access to the Penlan site.
4.12.4.49	3.5.2.24 PCC state that "Pupils who can currently walk to school should be able to continue to be able to walk to school." PCC fails to understand that the pupils currently walking to school will have to walk a further .7 mile up a very steep hill and that some of these pupils are as young as 3 years of age.	The Council does not consider these walking distances to be excessive.
4.12.4.50	3.5.2.30 If PCC had studied the public bus timetables they would have known that there are no suitable buses for parents and children to catch to get to school on time or to get home.	Should Phase 2 of the Proposals be implemented, the Council would consider public bus arrangements and timetables in order to ensure that they provide convenient access to the Penlan site.
4.12.4.51	3.5.2.32 See above	As above.
4.12.4.52	3.5.2.34 Having noted the comment PCC should have updated the community impact assessment to state that the proposed site is totally unsuitable as it sits on top of a very steep and dangerous hill.	It is acknowledged that the proposed site is on top of a hill, and the comments and concerns raised during the consultation period about the proposed location are reflected in the Consultation Report and in the updated impact assessments. However, the Council

		does not agree that the proposed site is 'totally unsuitable'.
4.12.4.53	3.5.2.35 See above.	As above.
4.12.4.54	3.5.3.1 The PRU should have been located with the High School. The only reason it is part of these Proposals is the PCC will attract an extra 10% funding from Welsh Government.	The reason for including the PRU within the original Programme Business Case is to provide the pupils of the PRU with high quality accommodation that is fit for purpose and meets their learning entitlement, and not to attract extra funding. There is no reason that a PRU needs to be located with a high school. Within the Welsh Government's Sustainable Communities for Learning (previously known as the 21st C Schools Programme), the normal contribution rate from Welsh Government for mainstream school building projects is 65%, with the remaining 35% funded by local authorities. The contribution rate for special school provision is 75% from the Welsh Government.
4.12.4.55	3.6.11 PCC make no reference to any investigations made to answer the question about the land being used for education purposes only.	The Council's legal team investigated this matter.
4.12.4.56	3.6.12 PCC appear to have ignored this very detailed comment.	The Council has not ignored this comment. As indicated above, the Council's legal team investigated this matter.

4.12.4.57	3.7.1.3.7 PCC state that “an initial search had identified some alternative locations in the area where community events could take place.” PCC have not identified where these locations are to allow the community to assess their suitability.	The community would be well aware of any alternative locations in the area where community events could take place.
4.12.4.58	3.7.2.1.2 PCC state that “a new school would be located in Brecon” but fail to appreciate that the site is on the outskirts of Brecon and not in the town. PCC also do not appreciate the young age of the children who would be walking up and down this steep hill.	The Council identified in the draft community impact assessment that Phase 2 of the Proposals could mean that less pupils currently attending Mount Street Infants School and Mount Street Junior School would walk to school: ‘the new school building would be located approximately 0.6/0/7 miles from the current school buildings, and would be located up a hill, which could mean that parents would be more likely to drive their children to school rather than walk / cycle.’ However, as indicated in the Consultation Document published in respect of these proposals, ‘Should the Proposals be implemented, the new school would initially be established on the sites where Mount Street Infants School, Mount Street Junior School and Cradoc C.P. School are currently located, therefore during Phase 1, walking routes to the new school would be the same as the current walking routes to these three schools. Eventually, the intention is that the school would move to a new building located on the site of the old Brecon High School, Penlan, Brecon, LD3 9SR. Active travel is a key consideration when developing new school buildings, therefore every effort would be made to encourage walking / cycling to school when developing the new building…’

		The impact assessments have been updated to reflect the comments received in the consultation responses, and the updated versions were considered by the Council's Cabinet when determining whether to proceed with the Proposals. They will be updated again to reflect comments made in the Objections, and these will be considered by Cabinet when determining whether or not to proceed with implementation of the proposals.
4.12.4.59	3.8.1.1 PCC state that "many pupils of primary age are transported to school by bus with no detrimental impact." There is no evidence provide to stakeholders to support this statement.	Because of the rural nature of Powys, pupils of primary age travelling to school by buses is not uncommon. This happens routinely and without problem.
4.12.4.60	3.8.1.17 PCC state that "the furthest travel distance for pupils to attend the new school on the Penlan site would be 9.6 miles" but it is not made clear whether this is for a child currently attending one of the schools or whether it is for the house farthest away in the catchment area. The word currently should have been used when making the statement "The closest school for the 91 pupils (currently) attending Cradoc C.P. school." The word currently should have been used when making the statement "This suggests that 50% of pupils (currently) attending Cradoc C.P. School." PCC fail to mention that 45.1% of pupils live closer to other schools and may attend these schools rather than the Penlan site.	The reference to furthest travel distance for pupils relates to current pupils at the school.
4.12.4.61	3.8.4 There are 24 comments from respondents regarding the impact on traffic in Brecon. PCC response is that "these concerns are noted and further consideration would be	Whilst it is correct that these concerns relate to traffic congestion rather than plans for the building, the Council is required to consider impact on traffic when

	given to this aspect when developing plans for the building." Building plans will have no impact on the traffic congestion in the town of Brecon. An impact assessment must be undertaken before developing plans for a building.	developing plans for new buildings. This is why the response refers to developing plans for the building.
4.12.4.62	3.8.4.9 The response states "I'm just glad I don't live in Llanddew or Cwm Anod." Despite members of scrutiny acknowledging that they don't know the area, not one member asked what effect these proposals could have on Llanddew and Cwm Anod. This makes me think that members have not fully read the consultation report.	Comment noted – the response provided should have referred to 'Brecon and the surrounding area'. It is the responsibility of each individual member of Cabinet or the Learning and Skills Scrutiny Committee to ensure that they read the consultation report thoroughly.
4.12.4.63	3.8.6.1 PCC state that "Once the new school is established, the Council will redefine its catchment and transport will be provided to the new school for all pupils living within its catchment." PCC are moving the goal posts and are not equipping its stakeholders with all the information to make informed responses and judgements.	The Council does not agree with this comment.
4.12.4.64	3.8.6.11 See above.	As above.
4.12.4.65	3.10.6 PCC state that "all pupils currently attending the three affected schools would have place in the new school". This statement is incorrect as pupils currently attending the three schools affected will have left for secondary school by the time the proposed new school is built.	It is acknowledged that some pupils currently at the 3 schools will have left for secondary school by the time the proposed new school is built. The Council's response should state: 'all pupils currently attending the three affected schools ***who are still of primary age*** would have a place in the new school.'
4.12.4.66	3.11.4 PCC states "pupils would transfer to the new building with their existing staff". This is incorrect as not all staff members will secure positions at the new building.	It is acknowledged that all staff members might not secure positions at the new building. However, it is expected that the majority of staff would transfer to

		the new building, and therefore the statement that "pupils would transfer to the new building with their existing staff" is a fair one.
4.12.4.67	4.1.1 See above.	The Council does not understand this comment – point 4.1.1 in the Consultation Report does not relate to point 3.11.4.
4.12.4.68	4.1.13 PCC state "The Council is monitoring the impact of Covid on all pupils" but fail to advise stakeholders the outcomes of the monitoring.	The Schools Service continually works with schools to monitor the impact of the pandemic on pupil attainment. Schools have termly monitoring visits where impact on well-being and standards is evaluated. This information ensures that the Council maintains a clear understanding of the impact of the pandemic in each school.
4.12.4.69	4.4.1.2.6 PCC will not confirm that there will be a specialist unit at the new school but state in this response that "good practice that currently exists will be shared at the new school." which appears to suggest that there will be a specialist unit at the new school or are PCC officers confused?	Comment 4.4.1.2.6 does not ask about the future of the specialist units. The Council responded to queries about the specialist units elsewhere in the Consultation Report, for example in response to 4.4.1.2.10 which states: *'The Council recognises the value of the support provided by specialist provisions across the local authority. It has established a clear vision and strategy for SEN/ALN which aims to provide appropriate specialist education for pupils with ALN as close to their home as possible. We have reviewed the provision for pupils with the most complex needs and have already begun a programme of improved provision. The Council has been further reviewing the provision provided by its specialist centres and will*

		produce a report of its findings in this area. This report will include the evaluation of specialist provision in the Brecon cluster. Any recommendations will be based on the needs of children and young people in the area. Having listened to the views of schools, the Council is currently reviewing the funding of specialist centres.'
4.12.4.70	4.4.3.3 It is appreciated that PCC have acknowledged that "earlier engagement with all the schools would have provided a greater level of local information at an early stage." This confirms the view that PCC could have done better in their engagement & consultation with the schools.	Comment noted.
4.12.4.71	4.4.7.4 PCC state that "this impact was not identified at the time." This again confirms the view that PCC could have done better in their engagement & consultation with the schools and community.	Comment noted.
4.12.4.72	4.4.8.1 PCC state that "this impact was not identified at the time." This again confirms the view that PCC could have done better in their engagement & consultation with the schools and community.	Comment noted.
4.12.4.73	4.5.1 PCC goes into great detail in their response about small schools but has stated at 4.11.1.1.1 that these 3 schools are not small schools and that is not one of the reasons for closing them.	The title of this section of the Consultation Report is 'Comments about small schools', and the comments being responded to are comments about the benefits of small schools.
4.12.4.74	4.5.2.1 How poignant it is that PCC are proposing to close a rural school and the origins of the word Cynefin lie in a farming term used to describe the habitual tracks and trails	The Council is aware of the origins of the word Cynefin and the requirements of the new Curriculum for Wales.

	worn by animals in hillsides. According to the new curriculum, Cynefin is defined as “the place where we feel we belong, where the people and the landscape around us are familiar, and the sights and sounds are reassuringly recognisable.” As a resident of Brecon I can assure those Cabinet members who don’t know Brecon that there is no “Cynefin” at Penlan for young children.	The Brecon area is rich and diverse and well suited to the Cynefin aspect of the new Curriculum for Wales. A school would explore the community it serves rather than where it is located. Therefore the pupils would not lose the links with the communities where they live and the whole area served by the school as part of their curriculum experience.
4.12.4.75	4.5.3 PCC’s whole response to 4.5.3.1 – 4.5.3.8 is not applicable as none of the 3 schools are classed as small schools. The statement is saying that a school bigger than we already have does not necessarily mean a better school. None of the comments made by PCC apply to any of the 3 school affected by these Proposals.	The title of this section of the Consultation Report is ‘Comments about larger schools’, and the comments being responded to are comments expressing concern about pupils attending larger schools compared with smaller schools.
4.12.4.76	4.6.4.1 PCC state that “The Council is currently preparing to submit a project closure report specifically relating to the Welshpool CiW Primary School project”. These proposals should be suspended until such time as the project closure report is available to the stakeholders so that everyone can learn from the mistakes made during the Welshpool project.	It is recognised that the situation at Welshpool C.i.W Primary School was challenging due to the new build school being delayed due to specific factors related to that project. The school had to operate across three sites in the town of Welshpool for longer than anticipated in challenging circumstances. A ‘lessons learnt’ document is being prepared and these lessons will apply to any merger and building of a new school in Powys. The Council does not agree that the proposals should be suspended until the project closure report is available.
4.12.4.77	4.6.6.5 PCC state that “the Council believes that all pupils should have the opportunity to be educated in a learning environment that is modern, fit-for-purpose with the	The Council does not agree that it is discriminating against the current pupils attending the schools.

	appropriate facilities and technology to support their learning." This is discrimination against the current pupils and pupils attending these schools until the opening day of the proposed new school. By not maintaining the schools PCC have disadvantaged past pupils, current pupils and future pupils by not ensuring, in PCC's words, that they have all been "educated in a learning environment that is modern, fit-for-purpose with the appropriate facilities and technology to support their learning."	The Council has a duty to maintain all its school buildings. However, as stated in the Strategy for Transforming Education, one of the challenges facing the Council is school building condition, with associated maintenance costs. The Council has to maintain over 90 school buildings, but the funds available to do so are limited. Therefore, the Council must carefully prioritise how the Schools Major Improvements budget is allocated – this is done through a scoring methodology based on criteria outlined in the Council's Schools Asset Management Policy.
4.12.4.78	4.7.1.1 PCC states that "Savings estimates are based on the best information available at the time they are calculated". The estimated saving in Phase 1 and Phase 2 have already decreased so it is only to be expected that the estimated saving over the lifetime of the school will also decrease.	The estimated savings have been recalculated based on the new funding formula for primary phase schools. The estimated saving is now approximately £6,400 for Phase 1 and then £137,410 for Phase 2 and recurrently each year afterwards, which will impact on the estimated saving over the lifetime of the school. However, one of the main aims of the Strategy for Transforming Education in Powys is to **"improve learner entitlement and experience"** for all Powys learners. Maximising the cost effectiveness of provision is key to delivering this. The decision to consult on the merging of the schools to create a new primary is in line with these priorities.
4.12.4.79	4.7.1.3 PCC state "in order for the Council to fully understand the views of stakeholders". PCC are not	Cabinet considered a detailed report of 425 pages which included the views of all stakeholders. Cabinet

	listening to or fully understanding the views of stakeholders. Five elected members listened to the opinion of one Cabinet member who has stated that he is not a specialist in education. He is unsure of the ideal size for a school, initially stating 150 pupils and then changing his mind to 210 pupils but is proposing a school of 360 pupils in Brecon.	also considered the views of local councillors and the Learning and Skills Committee, as well as the views of Estyn. Cabinet will be considering this detailed Objection Report before a final decision is made on the proposals.
4.12.4.80	4.7.1.12 PCC state "reducing the range of funding per pupil will allow for reinvestment across the authority". However, at 4.5.3.1 PCC state "It is clear that the Council's expenditure on children in the smallest schools is very generous". At their own admission, PCC should be concentrating on closing the small schools that costing the tax payer more than the larger schools such as the three large schools in these Proposals.	Strategic Objective 1.2 within the Strategy for Transforming Education is to reconfigure and rationalise primary education. A number of small schools have been subject to school reorganisation processes since the launch of the new Strategy.
4.12.4.81	4.7.2.1 PCC lists the challenges facing the Council as "a high proportion of small schools, decreasing pupil numbers, & ongoing financial pressure". However, these are not listed as reasons for change at Mount Street Nursery and Infants School, Mount Street Junior School or Cradoc C.P.School (see 4.11.2.1.1) The current schools are purpose-built facilities and have technology fit for the 21st century. All that hasn't happened is that PCC have not maintained them. PCC didn't sell the museum in Brecon when it needed maintenance, they modernised it and repaired it. Instead of being committed to build new schools PCC should be investing in all children not just future generations and should invest in refurbishment of existing buildings.	The Council has not suggested that these are reasons for change at Mount Street Infants, Mount Street Juniors or Cradoc C.P. School. The Council does not agree with the statement that the three schools have not been appropriately maintained. The Council has a duty to maintain all its school buildings. However, as stated in the Strategy for Transforming Education, one of the challenges facing the Council is school building condition, with associated maintenance costs. The Council has to maintain over 90 school buildings, but the funds available to do so are limited. Therefore, the Council must carefully prioritise how the Schools Major Improvements budget is allocated – this is done through a scoring methodology based on criteria

	The second paragraph of this response is not complete. It states “However, remodelling three schools would”. What are PCC not telling the stakeholders? The Council further state that “building one large school provides a better value-for money solution.” There is no evidence to support this claim. Given that potential saving in Phase 1 and Phase 2 has reduced already it is highly likely that the saving over 60 years will also reduce. At 1.1.2.4.2 PCC state that “All schools regardless of size, are able to provide for the needs of their pupils. However, PCC then contradicts itself in 4.7.2.1 by stating that a new school “will be able to meet the needs of all pupils.” PCC further state that with an amalgamation “the strength in leadership and excellence would be shared within the new school”. The reverse has happed in fact as, since the start of this Proposal the Head teacher of Cradoc has left the school weakening the strength of leadership that can be shared with the new school.	outlined in the Council’s Schools Asset Management Policy. In respect of the second paragraph of the response, the Council is not hiding anything – this was a typing error. Remodelling the current primary schools in their current locations was considered and discounted in the Programme Business Case for the Brecon catchment. The Council stands by the statement that building one larger school rather than remodelling three smaller schools in one area provides the most cost-effective long-term solution for improving the learner entitlement and experience not only for the learners that would attend this school but for all learners across Powys as scarce resources would be used more effectively. The Council does not agree that the comments at 1.1.2.4.2 contradict the comments at 4.7.2.1 – both comments state that all school, regardless of size, are able to provide for the needs of their pupils. The Council is aware that the Headteacher of Cradoc C.P. School has left the school, however the Council’s view is that this would not weaken leadership at the proposed new school.
4.12.4.82	4.7.2.7 In response to the question “Why hasn’t the securing of £2.2m for maintenance of schools been listed as one of the strengths of options 1, 2a, 3a and 3b?” the	The £2.2m received for maintenance of schools is not a solution to the challenges facing the three schools affected by these proposals.

	response from PCC is “The funding hadn’t been allocated when the option appraisals were prepared”. However, when answering the same question at 4.11.6.8 PCC’s response changes to “The £2.2m has already been allocated for projects in accordance with the priority scoring matrix in the Schools Asset Management Plan.” If the funding hadn’t been allocated when the option appraisals were prepared it could not have been already allocated for projects. Therefore, the securing of £2.2m should have been listed as a strength in Options 1, 2a, 3a and 3b.	
4.12.4.83	4.7.5.6 PCC seem more concerned about building a new school than retaining green space in the centre of the town of Brecon. They quite glibly state “The Council would have no control over what would happen to the site in the future.” PCC have control over what the site is used for now and should retain Mount Street Nursery and Infants School on its current site.	This is a factual statement made in response to the comment.
4.12.4.84	4.7.7.1 Again PCC states that “The Council has a duty to maintain its school buildings”. For these three schools PCC has woefully failed in its duty & although repeatedly saying “The Council has no intention to sell any land” PCC will take the easy way out and pass ownership to another organisation and let them apply for funding to refurbish the buildings.	The Council’s plan to merge Mount Street Infants, Mount Street Juniors and Cradoc C.P. School and to eventually provide a new building in Brecon is not ‘the easy way out’.
4.12.4.85	4.8.1.1 Again PCC has responded by stating “there is a high proportion of small schools.” Being a small school is NOT the reason for change at any of these schools.	The Council is satisfied that the response provided to 4.8.1.1 is appropriate.

4.12.4.86	4.8.2.1 See 4.5.2.1	4.8.2.1 relates to the new Curriculum for Wales' focus on Cynefin and Wellbeing. The Council is satisfied that the response provided to 4.8.2.1 is appropriate.
4.12.4.87	4.9.1.1 PCC states that "The Council's schools maintenance funding has steadily reduced over the last few years". If this is the case PCC are not going to be able to maintain the proposed new building and they will be in the same situation as they find themselves now. It would therefore be financially more beneficial to use 21st century school funding to refurbish the current buildings.	'Do minimum – backlog maintenance only' and 'Remodel all primary schools in current locations' were considered in the Brecon catchment PBC, however these options were discounted. The Council stands by the statement that building one larger school rather than remodelling three smaller schools in one area provides the most cost-effective long-term solution for improving the learner entitlement and experience not only for the learners that would attend this school but for all learners across Powys as scarce resources would be used more effectively.
4.12.4.88	4.9.3.11 PCC state that "It is not true that the Council has used the pandemic as a way of pushing through these Proposals" but there is no denying that this is how the communities they serve feel. Although other organisations have found innovative ways to communicate with their stakeholders PCC used the pandemic not to communicate. They continue to hide behind the statement "The Welsh Government provided non-statutory guidance for local authorities to manage consultations during a period of lockdown which the Council has taken into account." This means in reality that PCC have done the very minimum that they are required to do.	As indicated previously, the process has been carried out in accordance with the requirements of the School Organisation Code.

4.12.4.89	4.10.1.23 PCC state that “the consultation period lasted 76 days.” This was not because Welsh Government recommend consultation periods be lengthened it was PCC did not know about the Nepalese community. At 4.4.3.3. PCC admit that “earlier engagement with all the schools would have provided a greater level of local information at an early stage.” It was because PCC did not engage with the schools that the consultation period was extended.	Regardless of the reasons why the consultation period was extended, it is a fact that the consultation period lasted 76 days, which is significantly longer than the minimum expected.
4.12.4.90	4.10.2.1 Powys state that “the scale of the responses received indicate that the consultation has been widespread.” It could, however, be argued that there are 476 pupils in the schools and only 105 responses came from parents, carers or guardians which equates to 22.05%. There were 60 from members of the community which totals approximately 3600 for St Mary’s Ward in Brecon and the community of Yscir giving a response percentage of 1.66. These percentages do not support the Council’s statement.	The Council’s view is that the level of response is in line with the level of responses received to similar proposals in the past. In addition, many of the responses received during the consultation period and the objection period
4.12.4.91	4.10.2.13 PCC state that “All parents at the three schools have had the opportunity to respond to the consultation.” PCC did not hold a meeting with the Gipsy/Traveller Community. It is well evidence that many of this community do not read or write. No attempts were made to communicate with the Gipsy/Traveller community and as a result there were zero responses from anyone identifying as being in the ethnic group.	The School Organisation Code (2018) does not require meetings to be held as part of statutory proposals. The Council is satisfied that the response provided to 4.10.2.13 is appropriate.
4.12.4.92	4.10.2.15 PCC quote the text “there will be circumstances where proposers will consider that meeting with certain groups of consultees will assist greatly in the dissemination	As indicated above, the School Organisation Code (2018) does not require meetings to be held as part of statutory proposals.

	of information and provide a suitable platform for consultees to make their views known." PCC did not meet with members of the Gipsy/Traveller community. PCC did not meet with the Nepalese community to explain why the document had not been translated into Nepalese or to apologise for the oversight. No explanation has been given to the Nepalese community as to why only a summary of the consultation document was translated.	Responses to comments relating to the translation of documentation into Nepalese are provided elsewhere in this report, for example in section 4.12.2.
4.12.4.93	4.10.2.16 The minutes were definitely incorrect. Minutes were taken by Governors at the meeting and compared to what was presented by Powys. As stated in the response sections were added and some discussion was left out.	As stated in response to 4.11.3.1 in this report: *'The Council disagrees that the minutes of the meeting between PCC officers and the governors of Mount Street Nursery and Infants School are not a true record of the meeting. The minutes were verbatim minutes prepared by the Council using a recording of the meeting. Whilst not all of the introductory presentation was included in the minutes, all of the questions raised in the meeting were included in the minutes, as well as the verbatim responses provided by the Council.* *The draft minutes were shared with the governing body for comment, and the amended version received from the governing body was included in 'Appendix C' which was attached to the paper considered by Cabinet on the 14th December 2021.'*
4.12.4.94	4.10.3.1 PCC state that "Members of the Nepalese community would have been informed of the consultation if the same way as other pupils, parents, governors and members of staff." PCC continue to fail to realise that the	The Council notes this concern, however the Council's view is that the arrangements made to provide documentation in Nepalese were reasonable.

	information was in English and for many of our Nepalese community English is not their first language and some speak very little English.	
4.12.4.95	4.10.3.5 PCC state that “The Council’s view is that the translation of these documents was reasonable.” This was not reasonable it was disrespectful and discriminatory.	The Council does not agree with this comment.
4.12.4.96	4.10.3.11 PCC state that they do not agree that the Nepali community have been overlooked but at 4.4.3.3. PCC admit that “earlier engagement with all the schools would have provided a greater level of local information at an early stage.”	Comment noted.
4.12.4.97	4.10.3.12 PCC state that “The consultation period ran for a total of 76 days. Members of the Nepali community could have responded to the consultation at any time during this period.” This is again an incorrect statement. The members of the Nepali community who do not read and/or write English were unable to read or respond to the consultation document until the translated document was available to them. They were then only given a summary of the document in Nepalese and only 28 days to read it and respond. This was disrespectful and discriminatory.	The Council does not agree with this comment. The Council’s view is that the arrangements made to provide Nepalese translations of the consultation documentation were appropriate.
4.12.4.98	4.10.3.14 See 4.10.3.5	As stated in response to the comment made about 4.10.3.5 above, ‘the Council does not agree with this comment’.
4.12.4.99	4.10.12.2 PCC state that the extension to the consultation period “was shared on the Council’s social media channels and was also published in the local press.” This was in	The Council does not agree that the Nepali community were treated with disrespect and discrimination.

	English and not in Nepalese so once again the Nepali community were treated with disrespect and discrimination.	
4.12.4.100	4.10.15.1 PCC state that “The issues raised will be considered by the Council’s Cabinet when determining whether or not to proceed with the Proposals”. However, at 4.10.16.4 PCC state that “many of the consultation responses received indicate that the respondents do not agree with the Proposals”. The decision to continue with Proposals indicates that the Cabinet have not considered the issues raised.	Cabinet were fully aware that the responses received to the consultation indicated that respondents were not in support of the proposals.
4.12.4.101	4.11.2.1.3 The question asked is “why when there are 21 schools with fewer than 50 pupils in Powys are you impacting three schools that are all above this number?” The response is As above but the response at 4.11.2.1.2 does not answer this important question.	The Council acknowledges that the response provided to this query was not appropriate. Alongside the proposals affecting Mount Street Infants, Mount Street Juniors and Cradoc schools, the Council has also been taking forward proposals to close a number of schools that have fewer than 50 pupils.
4.12.4.102	4.11.3.2.4 PCC state that “a single primary school model reduces the number of transition stages for children”. Former pupils have advised that they benefitted from a separate Junior and Infants School. When advised at the Governors consultation meeting that transition between the Mount Street Schools is seen as a positive by pupils, parents and staff Lynette Lovell replied “so it’s good to hear and it’s really, really important that you mention that in the consultation.” PCC are not listening to the pupils, parents and staff regarding transition. There is no evidence at Mount Street Schools that transition is anything but positive.	It is untrue that ‘PCC are not listening to the pupils, parents and staff regarding transition.’ Following the consultation period, an extensive 425 page Consultation Report was produced outlining the issues raised during the consultation period, including comments regarding transition between the Mount Street Schools. The Consultation Report was considered by Cabinet when determining whether or not to proceed with implementation of the proposals.

4.12.4.103	4.11.4.1 PCC state that "a further assessment will be carried out in accordance with the requirements of the School Organisation Code." A further assessment should be carried out and SWOT analyses amended to reflect that additional funding has been made available for refurbishment of schools (see PCCs response at 4.7.2.7).	A further assessment was carried out in accordance with the requirements of the School Organisation Code and was included in the Consultation Report. Comments about the SWOT analyses received during the Consultation Report were included in the Consultation Report, however the Council does not agree that the SWOT analyses needed to be amended.
4.12.4.104	4.11.4.11 PCC states that "Do minimum – backlog maintenance only was considered and discounted." However, the former Education Minister has advised that 21st century school funding is available for the refurbishment and the extension of facilities as well". 4.7.2.7 states that "The funding hadn't been allocated when the options appraisals were prepared". It is therefore imperative that the options appraisals are reassessed to take into account the available funding.	As above.
4.12.4.105	4.11.4.11 PCC state that "all Condition A primary schools within the catchment have been considered out of scope" but given that at 4.9.1.1 PCC states that "The Council's schools maintenance funding has steadily reduced over the last few years" these schools will soon be Condition B or C and it would have been pertinent to include them.	The Council does not agree with this comment.
4.12.4.106	4.11.5.1 PCC have been advised that option 4 is not the preferred option for staff, governors, parents and pupils and the comment has been noted but not acted upon. Instead 6 councillors who do not know the schools and do not know	These statements are untrue.

	the sites have decided that they know better than anyone else and have decided to proceed with this Proposal and ignore the advice from the constituents. PCC's response that "The comments received during the consultation period will be considered by the Council's Cabinet" is just lip service. The Cabinet have been bullied by the Portfolio Holder for Education and Property into submission. As he himself has said he expects to be supported not challenged.	
4.12.4.107	4.11.5.3 PCC states that "page 60 of the Consultation Document shows that option 4 meets all of the critical success factors". This is only because PCC have put ticks in all the boxes. PCC have incorrectly marked the potential achievability of option 3b as a question mark. If options 1, 2a, 2b 3a and 4 are achievable then option 3b must be achievable also. The only difference between 3a and 3b is that Cradoc School would close and it has been proven that there are enough surplus spaces at other schools to accommodate the pupils from Cradoc. As stated by PCC at 3.8.1.17 50% of pupils attending Cradoc C.P. School live closer to other schools.	The Council is satisfied that the preferred option identified following the options appraisal continues to be the most appropriate way forward.
4.12.4.108	4.11.5.4 If PCC had ticked their potential achievability box for option 3b then options 3b and 4 would both have had 4 ticks. There is absolutely no reason why option 3b is not potentially achievable.	As above.
4.12.4.109	4.11.5.5 Due to all the uncertainties that PCC have stated in the consultation report i.e. no guarantee of obtaining funding from Welsh Government, no guarantee of realising assets, no feasibility study to confirm the site's suitability, no design, no guarantee of planning consent, no ecology	As above.

	study, no identified active travel routes, no suitable public transport for parents and children in Brecon, no consultation with Highways, no assessment regarding access for small children and parents/carers with pushchairs, negative impact on pupils attending 3+ setting, no consideration of the impact on the economy of Brecon, no developed plans for safe walking, no assessment on the impact of traffic in Brecon and no assessment on the impact on older people walking to school the potential achievability and the potential affordability of option 4 should at best be question marks.	
4.12.4.110	4.11.6.8 When asked why hasn't the successful award of £2.2m been listed as a strength in Options 1, 2a, 2b, or 3a PCC state that "The £2.2 million has already been allocated for projects in accordance with the priority scoring matrix in the Schools Asset Management Plan". However, at 4.7.2.7 when asked why the securing of £2.2m wasn't listed as a strength of options 1, 2a, 2b, 3a & 3b PCC state that "The funding hadn't been allocated when the option appraisals were prepared." Therefore, the successful award of £2.2m from Welsh Government should have been listed as a strength in Options 1, 2a, 2b, 3a and 3b and the appraisals must be reassessed. This anomaly should have been identified by Scrutiny Committee. PCC state that buildings at Mount Street Junior School, Mount Street Infant School and Cradoc C.P. School are condition C – poor and this is the reason that the schools need to be closed and a new school built. It is emphasised by PCC that it is not because they are small schools. It is therefore inexcusable that all or part of the £2.2m allocated to PCC (which we must assume it was as it couldn't have been allocated to other projects	The £2.2m received from Welsh Government should not have been included in the SWOTs – as indicated in response to 4.11.6.8, *'The £2.2 million has already been allocated for projects in accordance with the priority scoring matrix in the Schools Asset Management Plan.'*

	otherwise) was not used for the benefit of current learners to refurbish these 3 schools.	
4.12.4.111	4.11.6.11 The question asks “Why is Each school would retain its own character, ethos and identity a strength in Options 2a and 2b but not in Option 1?” The response from PCC is “these factors would also be a strength in respect of option 1”. This is another error in the SWOTs and another reason that they must be reassessed.	The Council does not agree that there is a need to review the SWOTs. ‘Option 1’ in the Consultation Document is status quo, therefore there would be no change to any of the schools, therefore no change in terms of the schools’ individual identities. The other options involve changes to governance arrangements, which have the potential to impact on each school’s individual identity, which is why this is referred to for these options but not for the status quo option.
4.12.4.112	4.11.6.12 PCC state that “No capital funding available to fund the project is identified as a risk in the Consultation Document.” If it has been identified as risk in the Consultation Document, it must therefore be identified as a threat in the SWOT analysis of option 4.	The Council’s view is that the SWOT analysis is appropriate.
4.12.4.113	4.11.6.14 PCC state that “planning permission is usually sought after RIBA stage 4 has been completed.” As planning permission has not been yet sought not being granted planning permission must be identified as a threat in the SWOT analysis of option 4.	The Council’s view is that the SWOT analysis is appropriate.
4.12.4.114	4.11.6.20 PCC state that “The Council does not agree that being unable to realise a capital receipt is a threat to the Proposals.” However, at 3.1.0 PCC state “If the Welsh Government’s contribution to the project was not available, the Council would fund the project directly from its own capital programme, through a combination of asset sale and borrowing.” Therefore, being unable to realise a capital	These comments do not necessarily relate to the same assets – the Council has many assets which could be used to fund the new build element of these proposals if required.

	receipt but be identified as a threat in the SWOT analysis of option 4.	
4.12.4.115	4.11.7.1 PCC state that “there are number of processes that would need to be completed in order to achieve this, including business case process, feasibility work, design and planning.” Therefore, PCC cannot guarantee that Option 4 is achievable and Option 4 must be scored as could meet against potential achievability. The affordability of Option 4 depends on Welsh Government funding or PCC funding the project directly from its own capital programme. No capital funding has been identified as a risk with medium likelihood and high risk. Therefore, the potential affordability of Option 4 must be scored as could meet.	The Council has no reason to believe that this option would not be achievable and is satisfied that the assessment is valid.
4.12.4.116	4.11.7.7 PCC state that “This is an error in the document” with regards to the assessment of option 3a against the Critical Success Factors. The stakeholders can have no confidence that there are not errors in the assessment of the other Options.	The Council is satisfied that the preferred option identified following the options appraisal continues to be the most appropriate way forward.
4.12.4.117	4.11.7.9 PCC admitted in 4.11.7.7 that option 3a has been assessed incorrectly. In response to this question PCC state that “scoring is agreed by consensus.” The stakeholders can have no confidence that there are not errors in the assessment of the other Options.	The Council is satisfied that the preferred option identified following the options appraisal continues to be the most appropriate way forward.
4.12.4.118	4.11.8.6 PCC state that “During Phase 1 it is likely that the staffing requirements will remain similar to the current requirements.” This however does not answer the question. The respondent isn’t asking about the number of jobs there will be during Phase 1. The respondent is advising that	The respondent in 4.11.8.6 was commenting on the Council’s assessment of a risk relating to staffing. The response responds to this aspect by stating that ‘The Council’s view is that the assessment of this risk is appropriate.’

	because of job uncertainty in Phase 2, staff will look for positions in other school as has already happened with the resignation of the Head teacher of Cradoc C.P. School. The risk assessment should therefore be amended to at least medium risk.	
4.12.4.119	4.11.8.10 Once again PCC have admitted to an error in the Consultation Document. The stakeholders cannot have confidence in the accuracy of the Consultation Document.	The comment was referring to a typo in the Consultation Document, which described 'two' schools rather than 'three' schools – this does not mean that the Consultation Document is inaccurate.
4.12.4.120	4.11.8.12 Once again PCC have failed to answer the respondent's question. The question was "Do PCC agree that it is a MAJOR RISK to amalgamate 3 schools with no certainty that a new school will be built?" The response from PCC refers to Head teachers operating across multiple sites and does not answer the question.	The comment in 4.11.8.12 refers to leadership arrangements at Mount Street Infants School, which is why the response refers to headteachers. The Council does not agree that the comments provided at 4.11.8.12 constitute a 'major risk' in respect of these proposals.
4.12.4.121	4.11.8.17 PCC response to this question again makes no sense whatsoever. The respondent asks "Why has PCC not listed no guarantee of obtaining planning permission as a risk?" PCC respond with "these risks would be captured and managed as part of the construction of the new school." PCC seem to fail to understand that they will not be able to construct the new school without planning permission.	Risk management is an ongoing process. Should the Council proceed with the proposals, risks would continue to be identified and monitored as the proposals are implemented. This would include the risk that planning permission is not granted.
4.12.4.122	4.11.10.14 PCC state "The Proposals would maintain the excellence in Wellbeing and Care, support and guidance identified by Estyn in Mount Street Infants School inspection report in January 2020. Why would PCC spend £10m just to MAINTAIN the excellence in wellbeing and care, support and guidance. This excellence has been achieved despite	The Council is committed to providing the children and staff of the three schools with a high quality learning environment, which will include modern, purpose built facilities, and technology fit for the 21st century, further enhancing the school's ability to

	the condition of the building. Maintaining is not improving learner experience.	implement the new Curriculum for Wales, for the benefit of all pupils.
4.12.4.123	4.11.10.19 PCC states “pupils now and in the future deserve to be taught in learning environments, that are modern, fit-for-purpose”. PCC are not providing these facilities for current pupils. Most of our pupils will have completed their primary education by the time the proposed new school is built. If PCC had the best interests of our current pupils at heart they would invest the 21st century funding into modernising their existing schools. PCC are becoming a throw away Authority when they should be leading by example and reduce, reuse and recycle.	The Council acknowledges that many of the current pupils at the three affected schools will have competed their primary education by the time the proposed new school is built. ‘Do minimum – backlog maintenance only’ and ‘Remodel all primary schools in current locations’ were considered in the Brecon catchment PBC, however these options were discounted. The Council is committed to providing the children and staff of the three schools with a high quality learning environment, which will include modern, purpose built facilities, and technology fit for the 21st century, further enhancing the school’s ability to implement the new Curriculum for Wales, for the benefit of all pupils.
4.12.4.124	4.11.10.20 PCC state “it is not possible to give definitive information about the facilities and opportunities that would be available.” This is not an open, honest and informed consultation when you can’t tell the stakeholders what facilities and opportunities will be available to our children. This is astonishing as you have a “successfully” given the pupils in Welshpool a new school.	The Council’s response to this comment started by stating that ‘As no designs have yet been developed for the proposed new building, it is not possible to give definitive information about the facilities and opportunities that would be available.’ The Council is satisfied that this response is appropriate.
4.12.4.125	4.11.10.21 PCC have a lot of expectations but their expectations fall short of the mark as evidenced by the expected savings they expected to make in Phase 1.	The Council does not understand this comment – the response provided to 4.11.10.21 is appropriate.

4.12.4.126	4.11.10.24 The respondent again identifies an issue with the Consultation Document and once again the stakeholders can have no confidence in the information in the Consultation Document.	The comment in 4.11.10.24 relates to the map which was included in the consultation document. Whilst acknowledging that the map did not show the whole catchment area of the three schools, the map did correctly show the locations of the three schools.
4.12.4.127	4.11.10.31 The respondent asks the question "Why did PCC NOT engage with the Mount Street Infants School early on to obtain a clear understanding of the school community and its needs?" PCC have once again not answered the question.	The process was carried out in accordance with the requirements of the School Organisation Code – there is no requirement for Council's to engage with school communities before carrying out the statutory process.
4.12.4.128	4.11.10.35 PCC's response "Comment noted" is completely unacceptable as a reply to the very valid points made in 4.11.10.35.	As indicated by the response to this comment, the Council has noted the comments made by the respondent regarding the proposed site.
4.12.4.129	4.11.10.50 The answer to this question is akin to telling someone with a heart condition to go and see an ear nose and throat specialist.	The Council does not agree with this statement.
4.12.4.130	4.11.10.53 PCC cannot disagree with the statement that there are errors in the report as they have admitted to those errors in the Consultation Report.	The Council does not agree that there are 'a grave number of errors, omissions and a general lack of detail concerning the alternative options, not to mention broad-brush figures that are poorly supported.' There are some minor errors which are noted in the Consultation Report, which was considered by Cabinet when determining whether or not to proceed with these proposals.
4.12.4.131	4.11.10.55 PCC state "that the consultation has been carried out in accordance with the requirement of the	The Council is not making decisions based on factually incorrect information. See comment above.

	School Organisation Code." However, PCC had admitted to errors in the Consultation Document. The code states that "errors in detail can easily undermine confidence in a proposal". The errors PCC has admitted have been made in the Consultation Document have undermined confidence in this Proposal.	
4.12.4.132	4.11.10.57 The 3+ setting at Mount Street Infants occupies the same building as Mount Street Infants School, it is not separate to the school. Therefore, it is incorrect to state that the 3+ setting are of the building if fine but the rest of the building isn't. One starts to think that PCC are making these answers up as they go along.	As stated in the Consultation Report, *'The description of the accommodation at the 3+ setting relates specifically to the area utilised by the setting, whilst the description of the school is based on an assessment of the whole building.'* The description of the accommodation at the 3+ setting in the Consultation Document was based on the latest Estyn / CIW inspections of the setting.
4.12.4.133	4.11.11.2.15 Why have stakeholders not had sight of the attached letter which is mentioned? Have PCC got something to hide?	The Council is not required to publish all responses / attachments which are received as part of consultation processes.
4.12.4.134	4.12.10.9 Several respondents have suggested a merger between Sennybridge and Cradoc Schools. PCC must consider this before proceeding with the new building in Sennybridge.	This has been considered – see section 4.10.5 of this report.
4.12.4.135	4.12.10.10 The suggestion was not that Sennybridge C.P. School becomes an English medium school. The suggestion was that the 45 pupils learning through the medium of Welsh could transfer to the 45 surplus spaces at Ysgol-Y-Bannau. 95 pupils could transfer to Sennybridge School and have their education in the language of choice.	The alternative option suggests that Welsh-medium pupils currently attending Sennybridge C.P. School would transfer to Ysgol y Bannau, and that English-medium pupils currently attending Cradoc would transfer to Sennybridge C.P. School. The implication

		therefore is that Sennybridge C.P. School would no longer offer Welsh-medium provision. In addition, Sennybridge C.P. School is the school located furthest away from Brecon, therefore it would not make sense to expect pupils to travel from Sennybridge to Brecon.
4.12.4.136	4.12.10.11 The reason to merge Cradoc C.P. School with Priory School is that Priory School is closer to Cradoc than Penlan is.	Comment noted. Merging Cradoc with Priory has been considered – see section 4.10.5 of this report.
4.12.4.137	4.12.11.11 If PCC knew these fields they wouldn't just have replied "Comment noted". It is obvious from the response by the author of this Consultation report that they are not familiar with Brecon.	The Council does not own 'the playing fields near the Theatre and Ysgol Penmaes' which are referred to in point 4.12.11.11 of the Consultation Report.
4.12.4.138	4.12.11.22 PCC state that "With appropriate maintenance the lifespan of a new school building is 65 years". The problem is PCC do not appropriately maintained their buildings. It is criminal to be proposing to spend £10m of tax payers' money and only expect the building to last for 65 years.	This statement is correct – with appropriate maintenance, the expected lifespan of a new school building is a minimum of 65 years. However, the Council's expectation is that buildings would last longer than this.

4.12.5 Comments about Estyn's consultation response

4.12.5.1	Estyn's comments to the consultation identify the Local Authority's lack of evidence that this proposal will, in any way, lead to improvements in learner outcomes; "Overall, the section in the proposal on its impact on standards, wellbeing, provision and leadership in all three schools is too	Estyn's response to the consultation stated the following: *'Overall, the section in the proposal on its impact on standards, wellbeing, provision and leadership in all*

	general as it lacks detail." PCC must detail the impacts before closing the schools.	*three schools is too general as it lacks detail. The proposal states that standards, wellbeing, provision and leadership in all three primary schools are currently good and that the Council would expect amalgamating to further strengthen the current situation. However, it is not clear on what this judgement is based as the proposal does not contain sufficient information on the current performance of the schools. The proposal generally has an over reliance on stating that the Council anticipates that amalgamating the three schools would have a positive impact or would strengthen standards, provision and leadership.'* The Council responded to these points in the Consultation Report published in respect of these proposals: *'The Council is committed to providing the children and staff of the three schools with a high-quality learning environment, which will include modern, purpose-built facilities and technology fit for the 21st Century, further enhancing the school's ability to implement the new Curriculum for Wales, for the benefit of all pupils. Phase 1 of the Proposals, establishing a new school initially on the current three sites, is a fundamental step in realising the outcome of Phase 2, which is the construction of a new school building.* *The intention of these Proposals is to merge the three schools to become one school, with the schools*

		staying on their current sites temporarily until they transfer to the new building. *When merging schools into a new building, the Council's approach has been to merge the schools before the new building is ready. This enables the establishment of a new governing body, the appointment of a headteacher and the development of a vision for the new school. It also allows the governors and headteacher of the new school to have direct input into the design of the new building and to ensure that the staffing of the new school is appropriate.* *However, there would also be benefits to Phase 1 in terms of supporting teaching, learning and leadership across the three sites. There would be the opportunity to share good practice across all sites, meaning that provision would benefit from shared expertise from all teachers. With the introduction of the new Curriculum, this approach will have a positive impact on improving outcomes for pupils.* *It is anticipated there would be a positive impact on quality and standards through the establishment of one new larger primary school. In respect of pupils currently attending the Mount Street Schools, this would mean that pupil progression would be monitored throughout pupils' time in primary school, from age 4 to 11, ensuring continuity in delivery and approach. As a larger school, the headteacher would be able to spend more time on leadership, enabling a greater*

		focus on improving the quality of provision. In addition, there would be a larger team of staff, enabling expertise to be shared across the school and enabling more distributed leadership and professional development opportunities. *Each school brings its own individuality, however, there are also many areas where, by amalgamating, staff would benefit from working together, sharing good practice, sharing knowledge and experiences in preparation for the implementation of the new Curriculum, ensuring consistency in approaches to literacy and numeracy, for example.* *All three schools currently provide good quality education and are self-improving schools – this is the view of the Council's School Improvement Team. It is recognised that they have different strengths, however, this will be a benefit to a new school as the school will be able to meet the needs of all pupils.* *With an amalgamation of the three schools, the strength in leadership and excellence identified by Estyn and the Council would be shared within the new school, impacting positively on standards and leadership.* *Should the Proposals be implemented, then a temporary governing body would be established. The first task would be to recruit a headteacher for the new school and to establish a strong senior leadership team. The headteacher would be able to oversee the*

		strategic development of the school as whole, supported by the senior leadership team.'
4.12.5.2	"The proposal states that standards, wellbeing, provision and leadership in all three primary schools are currently good. However, it is not clear on what this judgement is based as the proposal does not contain sufficient information on the current performance of the schools. PCC must provide further information on the current performance of each school.	As above.
4.12.5.3	"The proposal generally has an over reliance on stating that the Council anticipates that amalgamating the three schools would have a positive impact or would strengthen standards, provision or leadership." Before closing the schools PCC must be able to guarantee that amalgamation would have a positive impact and improve standards, provision and leadership otherwise the risk is too high.	As above.
4.12.5.4	Estyn's consultation response states that "the proposal does not detail clearly enough how it proposes to address the lack of nursery provision in Cradoc, as the alternative non-maintained settings listed involve travel into Brecon or Sennybridge." PCC must address this issue before closing Cradoc C.P. School.	The Council responded to this issue in the Consultation Report published in respect of these proposals: *'Should Cradoc C.P. School close, early years provision would continue to be available in Cradoc during Phase 1 of the Proposals. Phase 2 of the Proposals includes building a new school which would have integrated early years facilities, and the intention is that this would provide early years education and wraparound provision. Any parent would be able to apply for a place at this setting.*

		It is recognised that should there be no school in Cradoc then there would be a risk to the early years setting – 3@Cradoc and this may have an impact on families if they are required to travel further to access early years provision.'
4.12.5.5	"The proposal does not address how the wellbeing of the children in the village will be sustained when the only play area in the village will be lost with the closure of the school." This must be addressed before closing Cradoc C.P. School.	The Council responded to this issue in the Consultation Report published in respect of these proposals: *'Should the Council proceed with these Proposals, then the Cradoc C.P. School building would eventually be declared surplus following the move to a new building. All surplus assets are subject to the process of disposal as outlined in the Council's Asset Management Policy. Whilst it is possible that this could lead to sale of the sites to third parties, some schools that have closed have been transferred to other service areas e.g. housing or to a community - with the latter, this may allow for the space to be retained or developed for community use. This could enable the facilities to be retained for community activities, including as a play area.'*
4.12.5.6	"The proposed location of the new school is on top of a hill on the outskirts of the town, the identification of this as low risk by the proposal could be seen as too positive since parents could decide not to send their children there due to inconvenience." PCC must identify this as at least medium risk.	Whilst noting this concern, the Council's view is that the current risk rating is appropriate, due to the proposed phased implementation of the proposal. However, risk management is an ongoing process, and risks will be monitored and reviewed throughout the implementation process.

4.12.5.7	"The proposal has not looked in sufficient detail at the possible impact of the proposal on other schools should parents choose not to send their pupils to the proposed new school". PCC must give details of the impact the proposal could have on other schools before closing the schools.	The Council responded to this issue in the Consultation Report published in respect of these proposals: *'Whilst the Council recognises that there is a risk that parents may choose other schools in the area rather than the new school, it is expected that pupils would remain on their current sites as part of the new school, with their current teachers and other staff. They would then transfer together to the new building along with their teachers who would be able to provide support and consistency for pupils during the transition. The Council has not carried out a survey of parents' views on the location of the school apart from gathering information through this consultation exercise.* *The current capacity of other primary schools in the Brecon catchment are as follows:* • *Priory C. in W. School – 165 capacity, 155 currently on roll and 172 projected by 2026* • *Llanfaes C.P. School – 205 capacity, 217 currently on roll and 186 projected by 2026* • *Sennybridge C.P. School – 125 capacity, 128 currently on roll and 127 projected by 2026* • *Ysgol y Bannau – 162 capacity, 114 currently on roll and 98 projected by 2026.* **Currently on roll = 1st December 2021 Teacher Centre'*

4.12.5.8	"It lacks detail regarding how the Council would respond should there be no capital funding available to fund the project." PCC must detail how the project would be funded should there be no capital funding available before closing the schools.	The Council responded to this issue in the Consultation Report published in respect of these proposals: *'The Council has included the development of new schools in the Brecon catchment in its revised Strategic Outline Programme for the 21st C Schools Programme. Should the Proposals be approved by Cabinet, then the Council would commission the first stages of the design process, and develop a Strategic Outline Case for the approval of Cabinet and the Welsh Government. It would then further work up the plans through the RIBA stages, and develop an Outline Business Case, again for Cabinet and Welsh Government approval. Following this, a Full Business Case would be prepared, and once approved by Cabinet and the Welsh Government, construction would commence.* *If the Welsh Government 's contribution to the project was not available, the Council would fund the project directly from its own capital programme, through a combination of asset sale and borrowing.'*
4.12.5.9	"The proposal does not detail how it proposes to address travel issues related to after school activities." PCC must detail how the travel issues will be addressed before closing Cradoc C.P. School.	The Council responded to this issue in the Consultation Report published in respect of these proposals: *'The Council has recognised within the draft Community Impact Assessment that it may be challenging for pupils currently attending Cradoc C.P. School to access after-school activities following*

		implementation of Phase 2 of the Proposals. However, schools can offer extra-curricular activities during the school day as well as after school. It would be an expectation of the new Curriculum that schools provide additional experiences for their pupils. *Many schools in Powys have pupils who are using home-to-school transport, and are experienced in ensuring that all pupils are able to participate in extra-curricular activities. Schools can work with families to provide an appropriate level of extra-curricular activities for pupils, including clubs within the school day, shared transport with other parents etc.'*
4.12.5.10	Estyn's consultation response states that "it is likely that there would be an impact on families with school-age children and that the new situation could encourage these families to leave the community. Importantly, the proposal does not detail clearly enough how it proposes to address these issues." PCC must address these issues before closing Cradoc C.P. School.	Estyn's consultation response states the following: *'The reports correctly identify that should there be no school or nursery provision in Cradoc, it is likely that there would be an impact on families with school-age children and that the new situation could encourage these families to leave the community. They also identify that the proposal could discourage young families from moving to the community. Importantly, the proposal does not detail clearly enough how it proposes to address these issues.'* Concern that implementation of the proposal could mean that people may not want to live in Cradoc in the future was also raised in the consultation responses received.

		The Council's intention is to introduce the proposed changes on a phased basis, by initially establishing the new school on the three existing site, before moving to the new building in the future. The intention is that this would help with transition to the new delivery model, and would ensure that the Cradoc community are engaged with, and have the opportunity to establish links with the new school, before it moves to the planned new building in Brecon.
4.12.5.11	Estyn did not see evidence that the plan will improve outcomes.	Estyn's consultation response does not state the Estyn did not see evidence that the plan will improve outcomes. Estyn's response states that *'Estyn is of the opinion that the current proposal is likely to at least maintain the education provision for pupils in the area.'*

4.12.6 Comments about the Statutory Notice

4.12.6.1	Within your statutory notice you have a paragraph headed 'Proposal to close a rural school' including a point 'to reduce the Council's surplus spaces in primary schools'. I fail to see how your formula for spaces in Cradoc School is calculated as anyone who has visited the School will be aware that there is very little 'surplus space' available. Cradoc's capacity should be re-evaluated based on the new Donaldson's Curriculum.	The point 'to reduce the Council's surplus places in primary schools' is one of a number points listed in the Statutory Notice which outline the reasons for the current proposals. The capacity of a school is calculated using the WG Guidance – Measuring Capacity of Schools in Wales'. For primary schools, the capacity is calculated on the size of rooms designated as 'classbases'. Specialist and support rooms such as libraries, IT rooms and staff rooms are not included in the calculation but must all be measured. The spaces in classrooms are then checked against the total usable space available to see

		if there is too much or too little space available to support the core teaching activities. The capacity of Cradoc C.P. School has been calculated in accordance with this methodology.
4.12.6.2	The Statutory Notice includes 'to realise a financial saving' as a reason for the proposal. Such huge decisions should not be based on money, but the impact on the children who attend these schools and the surrounding communities by which such a loss would be felt.	'To realise a financial saving' is only one of ten 'reasons for formulating the proposal' which are listed in the Statutory Notice published in respect of these proposals. Realising a financial saving means that PCC can redistribute funding more equitably between other schools and improve learner experience.
4.12.6.3	Why would providing improved transition arrangements at the Mount Street schools be a reason to close Cradoc School?	'To provide improved transition arrangements for pupils currently attending Mount Street Infants School and Mount Street Junior School between the Foundation Phase and Key Stage 2' is listed in the Statutory Notice as one of 10 reasons for the proposals involving all three schools – the Council has not claimed that improving transition arrangements is a factor which is applicable to Cradoc C.P. School.

4.12.7 Comments about the Brecon catchment business case

4.12.7.1	I am now aware that the education department at Powys County Council has made an error in the programme business case for Cradoc Primary School.	The advantages and disadvantages of option 4C outlined in the Programme Business Case considered by Cabinet on September 29th 2020 had been omitted due to a version control error, although it was assessed against the Critical Success Factors and discounted. This error was brought to Cabinet's attention in the

		Mount Streets and Cradoc Proposal Paper on the 23rd December 2020. As explained in the Cabinet paper: *'The preferred way forward for the Mount Street schools and Cradoc CP School was outlined the Programme Business Case that was considered by Cabinet on the 29th September 2020. A number of options were considered and assessed, however, the report presented to Cabinet did not include the advantages and disadvantages of Option 4C which was to build new schools for Mount Street Infant and Junior School, Sennybridge CP School and Cradoc CP School due to an error with version control, although the option was assessed against the investment objectives and critical success factors, based on the following advantages and disadvantages, and was discounted from further assessment.'*
4.12.7.2	I must point out the error made in the Brecon school cluster transformation proposal programme business case, as raised here; https://powys.moderngov.co.uk/ieListDocuments.aspx?MId=7113&x=1. This proves the consideration of all options has not been carried out properly as part of the process to close our school.	As above.
4.12.7.3	Powys County Council claim building a new school in Cradoc would not be feasible due to excessive disruption to pupils. This claim is not accurate and contradicts claims made by previous Cabinet members.	Options involving rebuilding Cradoc School were considered and assessed in the PBC for the Brecon catchment which was considered and approved by Cabinet in September 2020. As well as various remodelling options, this includes the following new build options:

		• *Option 4B – New build Cradoc, new build Brecon primary school, close Sennybridge* • *Option 4C – New build Sennybridge, new build Brecon primary school, new build Cradoc* • *Option 4D – Close both Sennybridge and Cradoc, build new school on alternative site, new build Brecon primary school* • *Option 5B – New build Cradoc, establish new all-through school in Brecon with new build, primary, close Sennybridge* • *Option 5C – New build Sennybridge, establish new all-through school in Brecon with new build primary, new build Cradoc* An appraisal of all options was carried out, and options 4B, 4C, 4D, 5B and 5C were discounted at this stage. This assessment included a SWOT assessment of the various options, which identified 'potential disruption during construction' as a weakness for many of the options and for all of the affected schools. Whilst this is identified a weakness, this is not the reason why any of the options to provide a new building at Cradoc was discounted.

4.12.8 Other comments about documentation

4.12.8.1	One of the key complaints from staff, parents and others was that the documentation which was issued during and following the consultation was very difficult to navigate and understand, with no comprehensive summary or easy read version.	The Consultation Documentation has been prepared in accordance with the requirements of the School Organisation Code. Whilst acknowledging that the full Consultation Document is lengthy and may be difficult

		for some stakeholders to understand, a number of simpler versions were also prepared, including a children's version, a young people's version and a presentation which provided an overview of the proposals.
4.12.8.2	Why wasn't the response date on the consultation response form changed from the 15th April 2021 to 12th May 2021 when it was decided to extend the consultation?	Apart from one minor amendment made on the first few days of the consultation period following comments received from one of the affected schools, no amendments were made to the published Consultation Documentation throughout the consultation period. Whilst the documentation was not changed to reflect the amended closing date, consultees were advised by letter that the consultation had been extended, and a press release was also issued. The Council's website was also amended to show the revised closing date.
4.12.8.3	Do Powys County Council agree that by not changing the date on the consultation response form some consultees may not have responded as they would have assumed the consultation period had closed; especially when the date of 15th April 2021 is in bold and the form states that "All responses must be received by this date"?	As above.
4.12.8.4	Why does Question 5 of the Consultation Response Form state that the new school site will be at Penlan, Brecon, when the consultation document explains that the use of this site is only an intention? Question 5 is not valid and is dangerously misleading.	The Consultation Document clearly states on page 17 that 'the intention is that the school would move to a new building located on the site of the old Brecon High School, Penlan, Brecon, LD3 9SR…' No other possible locations are suggested for the new school.
