

Public Document Pack

Cabinet

Meeting Venue
By Teams

Meeting date
Tuesday, 13 July 2021

Meeting time
10.30 am

For further information please contact
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County Hall
Llandrindod Wells
Powys
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7 July 2021

Mae croeso i chi siarad yn Gymraeg neu yn Saesneg yn y cyfarfod.
Rhowch wybod pa iaith rydych am ei defnyddio erbyn hanner dydd, ddau ddiwrnod
gwaith cyn y cyfarfod.
You are welcome to speak Welsh or English in the meeting.
Please inform us of which language you wish to use by noon, two working days
before the meeting.

AGENDA

1.	APOLOGIES
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To receive apologies for absence.

2.	DECLARATIONS OF INTEREST
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To receive any declarations of interest from Members relating to items to be considered on the agenda.

3.	CASTLE CAEREINION CHURCH IN WALES SCHOOL
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To consider a report by County Councillor Phyl Davies, Portfolio Holder for Education and Property.
(Pages 5 - 356)

4.	LLANFYLLIN / NORTH WELSHPOOL AREA TRANSFORMATION PHASE 2 PROPOSAL PAPER
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To consider a report by County Councillor Phyl Davies, Portfolio Holder for Education and Property.
(Pages 357 - 542)

5.	SCHOOL OUTTURN POSITIONS 31 MARCH 2021 AND BUDGET PLANS 2021-22
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To consider a report by County Councillor Phyl Davies, Portfolio Holder for Education and Property and County Council Aled Davies, Portfolio Holder for Finance and Transportation.

(Pages 543 - 556)

6.	APPROVAL OF THREE LOCAL DEVELOPMENT PLAN SUPPLEMENTARY PLANNING GUIDANCE DOCUMENTS - ARCHAEOLOGY, HISTORIC ENVIRONMENT, NEWTOWN & LLANLLWCHAIARN PLACE PLAN
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To consider a report by County Councillor Iain McIntosh, Portfolio Holder for Housing, Planning and Economic Regeneration. The appendices and supporting evidence for the Newtown Place Plan can be found here <https://newtown.org.uk/consultations/placeplan.html>

(Pages 557 - 962)

7.	ANNUAL INFORMATION GOVERNANCE REPORT 2020-2021
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To consider a report by County Councillor Beverley Baynham, Portfolio Holder for Corporate Governance and Regulatory Services.

(Pages 963 - 976)

8.	AMENDMENTS TO GROWING MID WALES INTER AUTHORITY AGREEMENT
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To consider a report by the Head of Legal and Democratic Services.

(Pages 977 - 1016)

9.	POWYS AFFORDABLE HOUSING PROGRAMME DELIVERY PLAN GUIDE
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To consider a report by County Councillor Iain McIntosh, Portfolio Holder for Housing, Planning and Regeneration.

(Pages 1017 - 1048)

10.	FORWARD WORK PROGRAMME
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To consider the Cabinet forward work programme.

(Pages 1049 - 1050)

11.	EXEMPT ITEMS
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The Monitoring Officer has determined that category 1 of the Access to Information Procedure Rules applies to the following item. His view on the public interest test (having taken account of the provisions of Rule 14.8 of the Council's Access to Information Rules) was that to make this information public would disclose personal data relating to an individual in contravention of the principles of the Data Protection

Act. Because of this and since there did not appear to be an overwhelming public interest requiring the disclosure of personal data he felt that the public interest in maintaining the exemption outweighs the public interest in disclosing the information. Members are asked to consider these factors when determining the public interest test, which they must decide when considering excluding the public from this part of the meeting.

12.	MOVING ON UP PROPOSAL FOR A REDESIGN OF POWYS COUNTY COUNCIL HOUSING SERVICES
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To consider a report by County Councillor Iain McIntosh, Portfolio Holder for Housing, Planning and Economic Regeneration.

(Pages 1051 - 1114)

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CYNGOR SIR POWYS COUNTY COUNCIL.

CABINET EXECUTIVE

13 July 2021

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

REPORT TITLE: Castle Caereinion C. in W. School

REPORT FOR: Decision

1. Purpose

- 1.1 Further to the decision made by Cabinet on the 9th February 2021, the Council has carried out consultation on the following proposal:
- To close Castle Caereinion C. in W. School from the 31st August 2022, with pupils to attend their nearest alternative schools
- 1.2 The purpose of this report is to inform Cabinet members of the responses received to the consultation and to determine whether or not to proceed with the statutory process to close the school.
- 1.3 The report is supported by the following appendices:
- **Appendix A** – Consultation Document
 - **Appendix B** – Consultation Report
 - **Appendix C** – Minutes of meetings with School Council, Governors and Staff
 - **Appendix D** – Updated Impact Assessments
 - **Appendix E** – Comments from the Learning and Skills Scrutiny Committee (To follow)

2. Background

Strategy for Transforming Education in Powys

- 2.1 On the 14th April 2020, a new Strategy for Transforming Education in Powys was approved by the Leader via a delegated decision.
- 2.2 The Strategy was developed following extensive engagement with a range of stakeholders during two separate periods between October 2019 and March 2020. The Strategy sets out a new vision education in Powys, as follows:

'All children and young people in Powys will experience a high quality, inspiring education to help develop the knowledge, skills and attributes that will enable them to become healthy, personally fulfilled, economically productive, socially responsible and globally engaged citizens of 21st century Wales.'

2.3 The new strategy also sets out a number of guiding principles which will underpin the transformation of education in Powys. These are as follows:

- *A world class rural education system that has learner entitlement at its core*
- *Schools that are fully inclusive, with a culture of deep collaboration in order to improve learner outcomes and experience*
- *A broad choice and high quality of provision for 14 – 19 year old learners, that includes both academic and vocational provision, meeting the needs of all learners, communities and the Powys economy*
- *Welsh-medium provision that is accessible and provides a full curriculum in Welsh from Meithrin to age 19 and beyond Provision for learners with Special Educational Needs (SEN)/Additional Learning Needs (ALN) that is accessible as near to home as is practicably possible, with the appropriate specialist teaching, support and facilities that enables every learner to meet their potential*
- *A digitally-rich schools sector that enables all learners and staff to enhance their teaching and learning experience*
- *Community-focused schools that are the central point for multi-agency services to support children, young people, families and the community*
- *Early years provision that is designed to meet the needs of all children, mindful of their particular circumstances, language requirements or any special or additional learning needs*
- *Financially and environmentally sustainable schools*
- *The highest priority is given to staff wellbeing and professional development*

2.4 The new strategy sets out a number of Strategic Aims and Objectives, to shape the Council's work to transform the Powys education system over the coming years. One of the Strategic Aims of the Strategy is to *'improve learner entitlement and experience'* Within this aim, the Strategy sets out a Strategic Objective to *'rationalise primary provision'*.

2.5 On the 9th February 2021, the Council's Cabinet considered an options appraisal paper in respect of Castle Caereinion C. in W. School, and agreed to carry out consultation on the following:

- To close Castle Caereinion C. in W. School from the 31st August 2022, with pupils to attend their nearest alternative schools

The Consultation Period

- 2.6 Consultation on the proposal to close Castle Caereinion C. in W. School commenced on the 14th April 2021 and ended on the 2nd June 2021.
- 2.7 The consultation document was available on the Council's website throughout the consultation period. The document was also distributed to stakeholders as required by the School Organisation Code (2018). The consultation document that was issued is attached as Appendix A.
- 2.8 Consultees were asked to respond to the consultation by either completing the online consultation form, filling in a paper copy of the form and returning it to the Transforming Education Team, or by writing to the Transforming Education Team.
- 2.9 During the consultation period, virtual meetings were also held with the following:
- Staff of Castle Caereinion C. in W. School
 - Governors of Castle Caereinion C. in W. School
 - School Council of Castle Caereinion C. in W. School

The minutes of these meetings are attached as Appendix C, and the issues raised in the meetings are included in the Consultation Report (Appendix B).

Consultation Responses

- 2.10 68 respondents completed the consultation response form which was included in the consultation document. This included paper copies as well as responses submitted using the online response form. In addition, 25 written responses were received from respondents including Estyn, by e-mail or post.
- 2.11 As well as responses from parents, pupils, staff and governors at Castle Caereinion C. in W. School and members of the local community, responses were received from the following organisations:
- Castle Caereinion Community Council
 - Diocese of St Asaph
 - The Bishop of St Asaph
 - St Garmon's Church, Castle Caereinion
 - Trustees of the Castle Caereinion Recreation Association
 - Accessibility Powys

- 2.12 Estyn's response to the consultation is provided on page 18 of the Consultation Report (Appendix B).
- 2.13 The consultation response form asked respondents to answer a number of questions. The findings are provided in full on pages 5 to 8 of the Consultation Report (Appendix B).

Consultation Findings

- 2.14 As part of the consultation, a consultation response form was issued, which was completed by 68 respondents. 85.3% of respondents indicated that they were associated with Castle Caereinion C. in W. School, 10.3% indicated that they were associated with another school and 4.4% of respondents indicated that they were not associated with any school.
- 2.14 The issues raised in the written responses to the consultation and those raised in the consultation meetings, are listed in the Consultation Report (Appendix B) from page 22 onwards, along with the Council's response to these issues.
- 2.15 The issues raised relate to the following headings:
1. **Comments about Castle Caereinion C. in W. School**
 2. **Comments about Church in Wales provision**
 3. **Impact on pupils**
 4. **Travel implications**
 5. **Impact on staff**
 6. **Impact on the community**
 7. **Comments about pupil numbers / surplus places**
 8. **Comments about small/rural schools**
 9. **Comments about other schools pupils might transfer to**
 10. **Impact on Protected Characteristic groups**
 11. **Issues relating to Finance**
 12. **Comments about the Council's Strategies**
 13. **Criticism of Powys County Council**
 14. **Questions about / issues with the process**
 15. **Questions about / issues with the consultation documentation**
 16. **Alternative options**
 17. **Comments about impact on the Welsh language**
 18. **Comments in support of the proposal**

3 Advice

- 3.1 Based on the findings of the consultation, and further assessment of the options in accordance with the requirements of the School

Organisation Code in terms of the Presumption Against Closure of Rural Schools, the advice of officers is that the Council should proceed with the proposal to close Castle Caereinion C. in W. School by publishing a Statutory Notice.

3.2 The reasons for this are outlined below:

- To address the issue of low pupil numbers
- To reduce the Council's overall surplus capacity in primary schools
- To realise a financial saving to the Council
- To enable pupils to attend larger schools, which would be better equipped to meet the requirements of the new curriculum
- To enable pupils to attend larger schools, which could provide a wider range of educational and extra-curricular opportunities
- To enable pupils to attend schools with better quality accommodation
- The proposal meets all the Critical Success Factors

3.3 It is anticipated that the Statutory Notice would be published in September 2021, and that a further report, summarising any objections received, will be considered by the Council's Cabinet later in the autumn term 2021.

3.4 The target date to implement the closure of Castle Caereinion C. in W. School is 31st August 2022.

3.5 It must also be noted that implementation of this proposal does not preclude that school from being a part of future reorganisation proposals.

4. Resource Implications

4.1 The amount of funding provided to schools is driven by the funding formula. Any change to the formula funding provided will impact on the Council's revenue budget. Based on the current formula, it is estimated that implementation of the proposal would deliver annual revenue savings to the Council of around **£58,100**.

4.2 This overall figure comprises a potential saving on Schools' delegated funding of over £90,400 calculated by re-running the school funding formula for all the schools potentially affected should Castle Caereinion CinW School close. This takes account of any changes in funding needed to accommodate additional pupils at these schools, based on pupils attending their nearest alternative Powys school. However, the Council recognises that parents may choose any school for their children.

- 4.3 The savings from the delegated school funding is offset by estimated additional transport costs of £32,300, based on providing home to school transport for 16 pupils at £170 per school day (190 school days per annum).
- 4.2 The school had a cumulative surplus balance of £51,788 as at the 31st March 2021. The budget approved by the Governing Body for the current year shows this decreasing to £32,786 by 31st March 2022.
- 4.3 The Scheme for Financing Schools also states the following in section 3.7.2:

‘In order to ensure effective stewardship of the resources available to schools, the Authority may impose additional restrictions on a school scheduled to close, including but not limited to:

- Restriction of expenditure to agreed plans
- Removal of powers of virement’

The Council will consider the use of these powers of intervention where appropriate.

- 4.4 Implementation of the proposal would require involvement from a number of service areas, including staff from the Schools Service, HR and Finance.
- 4.5 The Council’s Schools Budget Forum responded to the consultation in respect of Castle Caereinion C. in W. School. Their response included the following:

‘The School Forum wishes to comment on the financial implications of these proposals for the overall schools’ delegated budget. At our last meeting we agreed on the importance of making sure that any savings accruing from transformation proposals are retained within the overall schools’ delegated budget. This is fundamental to the overall transformation programme being taken forward by the Council. One of the main tenets of the overall programme is to reduce the overall number of schools so that the existing level of funding could be shared more equitably and resolve the existing problem of some schools having insufficient resources.

There is a common sentence in each of the reports which says “Any savings would be reinvested in the Council’s corporate budget and any reinvestment in the schools’ system would be agreed as part of the annual budget planning cycle”. This falls a long way short of guaranteeing that the savings will be retained within the overall schools’ delegated budget. Essentially this means that it will be up to the Council each year to decide on whether the funding should be retained for schools or not. This approach is very worrying as it could

lead to the overall schools' delegated budget being reduced as a result of the Council deciding that savings should be reinvested elsewhere. That runs very much against the overall plan to share the existing resources amongst a smaller number of schools and could result in the same problem we have now – not enough funding to run all the schools.

Against this background can you please, when reporting back to the Cabinet on the results of the consultations for each of these schools, report the concerns of the Schools' Forum as set out above and change the approach to how savings are to be treated, i.e. that they are ring fenced for use within the schools' delegated budget.'

- 4.6 The Head of Finance (Section 151 Officer) "I note the resource implications set out above and the comments submitted by the Schools Budget Forum. Education and the Transforming Education Strategy are both amongst the highest priorities for the Council and there has been significant work over the last few years to agree an appropriate level of funding in the delegated schools' budget. I acknowledge the Schools Budget Forum's desire to have a guarantee on the savings being reinvested into the schools' delegated budget. However, given that the Council's funding is only confirmed on an annual basis, it is not appropriate to ring-fence in this way. The funding allocated to all services has to be considered collectively and the Council will prioritise its resources in order to deliver its objectives. This approach has seen investment in Education over recent years."

5. Legal implications

- 5.1 Legal: "The proposal can be supported from a legal point of view.
- 5.2 The Head of Legal and Democratic Services (Monitoring Officer) has commented as follows:

6. Comment from local member(s)

- 6.1 County Councillor David Jones: "I am disappointed in the recommendation. The school has been designated as a rural school by Welsh Government. With this designation closure should be the very last option not the first. The SWOT analysis seeks to validate closure not to keep open a rural school. The decision therefor flies in the face of Welsh Government policy and law."

7. Integrated Impact Assessment

- 7.1 An initial impact assessment was considered by Cabinet on the 9th February 2021.

7.2 In addition, a range of draft impact assessments were produced as part of the consultation documentation. These included an Integrated Impact Assessment, an Equalities Impact Assessment, and a Community Impact Assessment.

7.3 These draft impact assessments have been updated to reflect issues raised during the consultation period, and are attached in Appendix D.

8. **Recommendation**

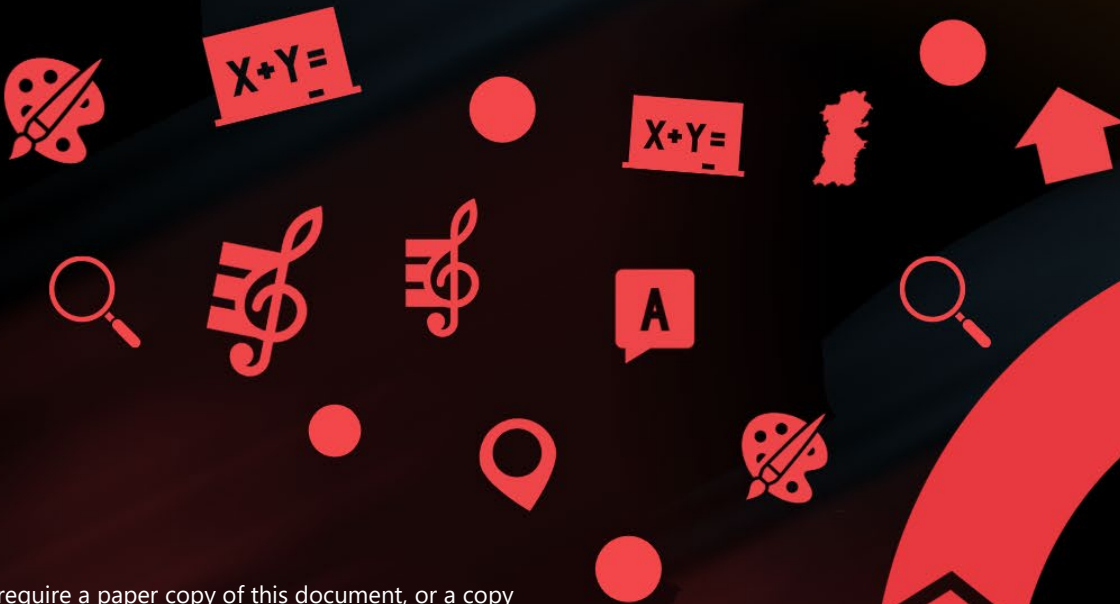
- To receive the Consultation Report in respect of closing Castle Caereinion C. in W. School.
- To approve the publication of a statutory notice to close Castle Caereinion C. in W. School from the 31st August 2022, with pupils to attend their nearest alternative schools.

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Corporate Director:	Dr Caroline Turner

CABINET REPORT TEMPLATE VERSION X



**Proposal to close Castle Caereinion C. in
W. School**
Consultation Document



Consultation on the closure of Castle Caereinion C. in W. School

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If you require a paper copy of this document, or a copy of the document in a different format, please contact the Transforming Education Team on 01597 826277, or e-mail school.organisation@powys.gov.uk.

Consultation on the closure of Castle Caereinion C. in W. School

OVERVIEW

1. The Proposal

Powys County Council is consulting on a proposal to close Castle Caereinion C. in W. School. The proposal is as follows:

- To close Castle Caereinion C. in W. School from the 31st August 2022, with pupils to attend their nearest alternative schools

2. How to respond to the consultation

You can respond to this consultation by completing the online questionnaire which is available on our website:

<https://en.powys.gov.uk/article/10560/Castle-Caereinion-Church-in-Wales-School>

A paper copy of the questionnaire is also available at the back of this document. Alternatively, you can respond in writing using the contact details below.

All responses must be received by the **2nd June 2021**.

3. Contact details

All responses should be sent to the following address:

Transforming Education Team
Powys County Council
County Hall
Llandrindod Wells
Powys
LD1 5LG

E-mail: school.consultation@powys.gov.uk

Phone: 01597 826618

4. What will happen next

Once the consultation period has ended, a consultation report will be produced which will outline the feedback received. The Council's Cabinet will consider the consultation report and will consider whether or not they wish to proceed with the proposal. This is expected to happen in the summer of 2021.

If the Cabinet decide to proceed with the proposals, a statutory notice would be published, and there would be a period of 28 days for people to submit objections. The Cabinet would then need to consider another report summarising any objections received and decide whether or not to proceed with implementation.

PART A – THE CASE FOR CHANGE

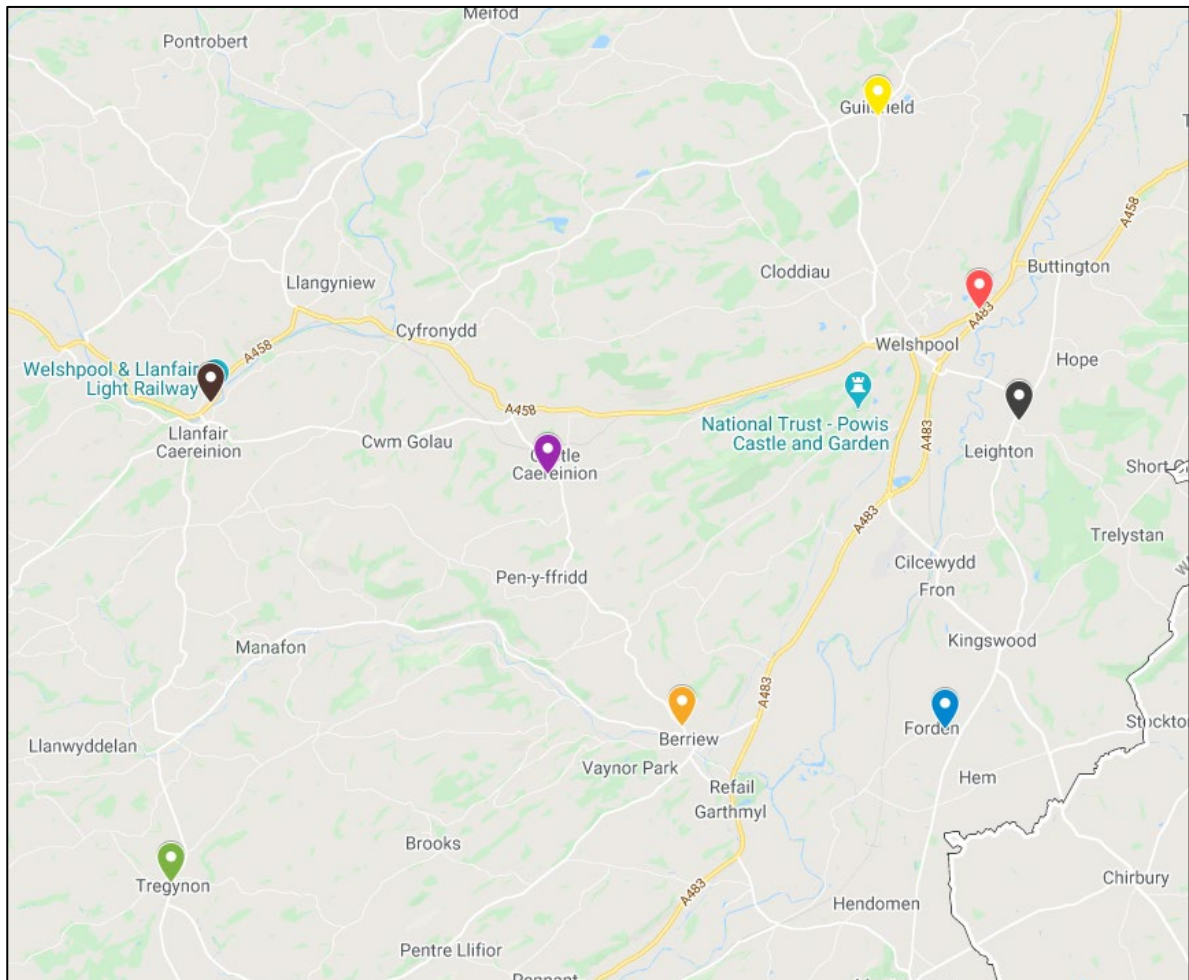
Powys County Council is consulting on the following proposal:

- To close Castle Caereinion C. in W. School from the 31st August 2022, with pupils to transfer to their nearest alternative schools.

1. BACKGROUND

Castle Caereinion Church in Wales School is an English-medium Voluntary Controlled Church in Wales primary school located in the village of Castle Caereinion, in the Llanfair Caereinion catchment area in North Powys.

The following map shows the location of the school, and other schools in the area:



Key: Purple – Castle Caereinion C. in W. School, Orange – Berriew C.P. School, Red – Welshpool C. in W. School, Brown – Llanfair Caereinion C.P. School, Blue – Forden C. in W. School, Grey – Leighton C.P. School, Yellow – Guilsfield C.P. School, Green – Ysgol Rhiw Bechan

The following is a summary of key data relating to the school:

School name and location	School Category	Language Category	Admission Number	Rural School ¹
Castle Caereinion C. in W. School, Castle Caereinion, Welshpool, Powys SY21 9AL	Voluntary Controlled Primary School building owned by the Diocese of St. Asaph	English-medium	8	Yes

Current pupil numbers² at the school are as follows:

	R	1	2	3	4	5	6	Total
Castle Caereinion C. in W. School	4	3	5	4	4	3	0	23

In April 2020, the Council approved a new Strategy for Transforming Education in Powys, which sets out a number of aims and objectives to transform the Powys education system over the next few years, in order to provide the best possible opportunities to Powys learners now and in the future. One of the objectives included in the strategy is to 'improve learner entitlement and experience' and it also includes an objective to 'rationalise primary provision'.

The Council has carried out an options appraisal exercise to identify a preferred option for Castle Caereinion C. in W. School

The following steps have been undertaken:

- Options appraisal exercise
- Recommendation considered and agreed by the Transforming Education Programme Board

On the 9th February 2021, the Council's Cabinet considered a report in respect of Castle Caereinion C. in W. School, and agreed to commence consultation on the following:

'To close Castle Caereinion C. in W. School from the 31st August 2022, with pupils to transfer to their nearest alternative schools.'

¹ Annex F of the Welsh Government's School Organisation Code (2018) (<https://gov.wales/sites/default/files/publications/2018-10/school-organisation-code-second-edition-pdf>)

² Finance NOR – 2020 Pupil Count Day (6th November 2020)

2. WHY CHANGE IS NEEDED IN POWYS

Powys is a large, rural authority. Covering a quarter of the landmass of Wales, it contains only 4.2% of the population, making it the most sparsely populated county in Wales. Delivering services across such a large, sparsely populated area is challenging and expensive.

Whilst there has been some school reorganisation activity in Powys over recent years, the county's schools' infrastructure largely remains similar to that which was in place 20 years ago.

The Council's new Strategy for Transforming Education in Powys outlines a number of challenges facing education in Powys, which were identified following engagement with key stakeholders during the autumn term 2019 and spring term 2020.

The following is a summary of the main challenges facing the Council:

i) High proportion of small schools

Based on PLASC 2019 figures, there were 33 small primary schools in Powys – this is approximately 40% of the primary provision in the county. 21 schools had fewer than 50 pupils, and for those schools the budget share per pupil is generally higher than the Powys average for primary schools.

ii) Decreasing pupil numbers

Pupil numbers have decreased over the past decade, and are expected to decrease further over the next five years. Pupil numbers in the primary sector in Powys are expected to decrease by approximately 4% by 2025.

iii) High number of surplus places

Based on PLASC 2019 figures, there was 18% surplus capacity in Powys primary schools. With pupil numbers across Powys projected to decrease overall over the coming years, the proportion of surplus places across the county will continue to increase.

iv) Building condition

Whilst the Council has invested in its school's estate through the 21st Century Schools Programme and the Asset Management Plan, building condition remains an issue across Powys, with associated maintenance costs.

v) Financial pressures

The Council is currently facing significant financial pressures in general. This is affecting all service areas, including the schools' sector. There are significant variations in the budget share per pupil across Powys schools, ranging from £3,127 to £7,877 in the primary sector.

vi) Inequality in access to Welsh-medium education

In contrast to other areas of Wales, there has been no growth in Welsh-medium pupil numbers in Powys over recent years. Significant changes are needed to the Welsh-medium offer in Powys to reverse the trend of the last few years and ensure that all Powys learners can access comprehensive Welsh-medium provision throughout their educational careers.

vii) Limited post-14 and post-16 offer

In September 2019, the Council's Cabinet considered a report on post-16 provision, which outlined a number of challenges facing the sector, including decreasing learner numbers, financial challenges and sustainability of the curriculum offer, including Welsh-medium provision.

viii) Inequality in access to SEN provision

Within Powys, pupils with special education needs (SEN) attend a range of settings, including special schools, specialist centres, the pupil referral unit (PRU) as well as mainstream schools.

Currently, not all pupils are educated in the setting that meets their needs best, and depending on where pupils live, they have access to a different quality and type of provision.

ix) Historical lack of political decision making

Although there have been some developments in terms of the schools' infrastructure over recent years, the Council's failure to implement a number of high-profile proposals in the last few years has left a legacy in Powys, and there has been a reluctance to embark on large scale reorganisation of education provision since then.

3. THE STRATEGIC CONTEXT

In the summer of 2019, Powys Education Services were inspected by Estyn. The report published by Estyn following the inspection outlined significant concerns regarding the Council's progress on school reorganisation, and includes a recommendation to 'Ensure that the organisation of provision for non-maintained, post-16, Welsh-medium education and secondary education meets the needs of children and young people of Powys.'

Following publication of the inspection report, the Council carried out a strategic review of schools during 2019-20, which led to the development of a new Strategy for Transforming Education in Powys. The strategy, which was developed following engagement with a wide range of stakeholders, was approved in April 2020.

The strategy sets out a Vision Statement and Guiding Principles which will underpin the Council's work to transform the Powys education system over the coming years.

The Vision Statement is as follows:

All children and young people in Powys will experience a high-quality, inspiring education to help develop the knowledge, skills and attributes that will enable them to become healthy, personally fulfilled, economically productive, socially responsible and globally engaged citizens of 21st century Wales.

In order to achieve the vision and guiding principles, the strategy outlines a number of aims and objectives to transform the Powys education system over the next few years, in order to provide the best possible opportunities to Powys learners now and in the future. One of these aims is to 'improve learner entitlement and experience' and this aim includes an objective to 'rationalise primary provision'.

The current proposal in respect of Castle Caereinion C. in W. School is in line with these priorities.

4. WHY CHANGE IS NEEDED IN CASTLE CAEREINION

The following is a summary of the main challenges facing Castle Caereinion C. in W. School:

i) Low pupil numbers

Current pupil numbers³ at Castle Caereinion C. in W. School are as follows:

	R	1	2	3	4	5	6	Total
Caereinion C. in W. School	4	3	5	4	4	3	0	23

The Welsh Government defines a 'small school' as a school with less than 91 pupils. Pupil numbers are significantly lower than this, and are projected to remain below 30 for the foreseeable future.

The school's low pupil numbers have also resulted in a high number of surplus places at the school. Based on current pupil numbers, there is currently 68.9% surplus capacity at the school.

ii) High budget per pupil

Based on the Council's Section 52 Budget Statement for 2020-21, the school's budget share per pupil during 2020-21 was £6,919. This is significantly higher than the Powys average of £4,264. Castle Caereinion is ranked the 5th highest school in Powys by budget share per pupil.⁴

iii) Issues with the building

Whilst the school building was assessed to be in good condition by the Welsh Government's condition survey carried out in 2009, it is an old fashioned building, and there are concerns regarding its suitability to deliver education which meets the requirements of the new curriculum, and which meets the Council's vision statement, as outlined in the Strategy for Transforming Education in Powys.

The Council recently commissioned an updated condition survey of the school building. This was carried out in the autumn term 2020. The survey assessed the condition of all three blocks at the school as condition C.

iv) Combined age classes

The small pupil numbers at the school mean that pupils are taught in whole key stage classes, with Key Stage 2 in one class and Foundation Phase in another

³ Finance NOR – 2020 Pupil Count Day (6th November 2020)

⁴ Section 52 Budget Statement 2020/2021

class. Because pupil numbers in each year group are small, it is more difficult to ensure all pupils are appropriately challenged.

v) Leadership

Following a long period of instability during which leadership arrangements for the school were by other schools in the local area, the school now has its own standalone headteacher. However, the headteacher has a significant teaching commitment, which limits the time available to focus on leadership of the school.

5. OPTIONS CONSIDERED

The following options have been identified for Castle Caereinion C. in W. School:

Option	Description
1	Status quo – continue as a standalone school
2	Federation with Welshpool Church in Wales School
3	Merge with Welshpool Church in Wales School to establish a new school on two sites
4	Close Castle Caereinion, but retain the site as part of Welshpool C. in W. School
5	Merge with Berriew C.P. School to establish a new school on two sites
6	Close Castle Caereinion, but retain the site as part of Berriew C.P. School
7	Merge with Berriew C.P. School to establish a new school on the Berriew site
8	Merge with Berriew C.P. School to establish a new school on the Castle Caereinion site
9	Close Castle Caereinion C. in W. School, pupils to attend nearest alternative schools

SWOT analyses have been carried out for each of these options. In addition, the options have been assessed against a number of Critical Success Factors, and the likely impact of each option on quality and standards, the community and travelling arrangements was also considered. These can be found in Appendix B and Appendix C of this document.

6. PREFERRED OPTION

Based on the SWOT analyses, the assessment against the Critical Success Factors and the consideration of the likely impact of each option on quality and standards, the community and travelling arrangements, the preferred option is as follows:

Option 9: Close Castle Caereinion C. in W. School, pupils to attend nearest alternative schools.

The reasons for this are:

- Would address the issue of low pupil numbers at Castle Caereinion
- Would reduce the Council's overall surplus capacity in primary schools
- Revenue saving to the Council
- Pupils would attend larger schools, which would be better equipped to meet the requirements of the new curriculum
- Pupils would attend larger schools, which could provide a wider range of educational and extra-curricular opportunities
- Pupils would attend schools with more suitable accommodation
- Meets all of the Critical Success Factors

This is the basis for the current proposal on which the Council is consulting. The proposal is further explored in the following section. The reasons why the other options considered have not been taken forward are summarised in Appendix D of this document.

PART B – THE PROPOSAL

7. OVERVIEW

Powys County Council is consulting on a proposal to close Castle Caereinion C. in W. School. The proposal is as follows:

- To close Castle Caereinion C. in W. School from the 31st August 2022, with pupils to transfer to their nearest alternative schools.

8. REASONS FOR THE PROPOSAL

The Council is proposing to close Castle Caereinion C.in W. School for the following reasons:

- To address the issue of low pupil numbers
- To reduce the Council's overall surplus capacity in primary schools
- To realise a financial saving to the Council
- To enable pupils to attend larger schools, which would be better equipped to meet the requirements of the new curriculum
- To enable pupils to attend larger schools, which could provide a wider range of educational and extra-curricular opportunities
- To enable pupils to attend schools with better quality accommodation
- The proposal meets all of the Critical Success Factors

9. ADVANTAGES AND DISADVANTAGES

The advantages and disadvantages of the current proposal to close Castle Caereinion C. in W. School are summarised below:

Advantages	Disadvantages
<ul style="list-style-type: none">- Would address the issue of low pupil numbers at Castle Caereinion- Would reduce the Council's overall surplus capacity in primary schools- Revenue saving to the Council- Pupils would attend larger schools, which would be better equipped to meet the requirements of the new curriculum- Pupils would attend larger schools, which could provide a wider range of educational and extra-curricular opportunities- Pupils would attend schools with more suitable accommodation	<ul style="list-style-type: none">- Additional travel for those pupils for whom Castle Caereinion C. in W. School is currently the closest school- Additional travel costs- Pupils currently attending Castle Caereinion School would have to transfer to alternative provision- Loss of provision from Castle Caereinion- Impact on the current staff of Castle Caereinion C. in W. School- Impact on the Castle Caereinion community- Reduction in C. in W. provision

10. RISKS

As with all school reorganisation proposals, there are some risks associated with the proposal to close Castle Caereinion C.W. School and transfer pupils to alternative schools.

These are outlined below, along with suggested mitigating actions:

	Likelihood	Impact	Mitigating Actions
Period of uncertainty for Castle Caereinion C. in W. School if a statutory process is carried out and implemented which might have a negative effect on standards at the school	Medium	Medium	The Council to provide advice and support to the school and governing body to ensure that standards and performance do not deteriorate during the transition period
Uncertainty for staff during any transition period might result in some staff leaving	Medium	Medium	Engagement with staff to take place throughout the process and staff to be kept informed of developments

11. POTENTIAL IMPLEMENTATION TIMESCALE

Should Cabinet decide to proceed with the proposals, potential implementation timescales are as follows:

Formal Consultation	14 th April 2021 to 2 nd June 2021
Consultation Report to be published, and considered by Cabinet	July 2021

If Cabinet decide to proceed:

Publish Statutory Notice (28 days objection period)	September 2021
Objection Report to be published and considered by Cabinet	November 2021

If Cabinet approves implementation:

School closes	31 st August 2022
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PART C – LIKELY IMPACT OF THE PROPOSAL

12. IMPACT ON PUPILS

i) Pupils currently attending Castle Caereinion C. in W. School

Should the Council proceed with implementation of the proposal, Castle Caereinion C. in W. School would close and pupils would transfer to their nearest alternative schools. It is acknowledged that this would have an impact on pupils currently attending Castle Caereinion C. in W. School, as they would need to transfer to an alternative school. Should the proposal be implemented, the Council would work closely with the current school and the alternative schools to ensure a smooth transition.

As Castle Caereinion C. in W. School would close and pupils would transfer to their nearest alternative provision, additional transport would be required for pupils for whom Castle Caereinion C. in W. School is currently the closest school. Whilst free home to school transport would be provided to eligible pupils in accordance with Council's home to school transport policy, it is acknowledged that there could be an impact on pupils' ability to access after-school activities, and that there could be increased travelling times to school for some pupils.

ii) Pupils attending other nearby primary schools

Should the Council proceed with implementation of the proposal, Castle Caereinion C. in W. School would close and pupils currently attending the school would transfer to their nearest alternative schools. This would mean that pupils would transfer to other schools in the local area.

As pupils would transfer to alternative schools, the proposal could impact on pupils at the schools pupils may choose to transfer to, as those schools would receive additional pupils. However, the total number of pupils at Castle Caereinion C. in W. School is currently small, therefore it is not anticipated that this would have a significant impact on pupils attending other nearby primary schools. The numbers admitted to each school would be in line with the admissions number for each school.

13. IMPACT ON STAFF

Should the proposal be implemented, Castle Caereinion C. in W. School would close. A staff redundancy process would be necessary for staff currently employed at Castle Caereinion C. in W. School. This would be conducted in line with the relevant HR policies for teaching and support staff. All cleaning and catering staff that are currently employed centrally by the Council would be supported by the relevant HR policies for Council employees.

14. IMPACT ON NURSERY / EARLY YEARS PROVISION

In September 2017, the Council changed the age of admission to primary schools in Powys from “at the start of the term in which they attain their fourth birthday” to “at the start of the school year following his/her fourth birthday”. Following this change, there are no nursery aged pupils attending Castle Caereinion C. in W. School.

Funded early years provision is provided for pupils at a number of locations across Powys, however no funded early years education is available at Castle Caereinion.

Funded early years provision is available at a number of providers in the local area. Should the Council proceed with the proposal to close Castle Caereinion C. in W. School, these providers would continue to be available, therefore it is not anticipated that the proposal to close Castle Caereinion C. in W. School would impact on access to nursery / early years provision.

Information about the funded early years providers in the local area is provided below⁵:

Berriew Preschool and Toddler Group

Berriew Preschool and Toddler Group is a non-maintained community run setting which operates from the site of Berriew C.P. School. They also provide the Childcare Offer for Wales. Standards of nursery education and sufficiency of accommodation at this provider are good. The setting is very welcoming and has a popular outdoor area and sensory garden.

There are 16 ten hours early years education places available at this provider which are currently sufficient to meet the need for early years education in the area.

Happitots (Welshpool C. in W. School)

Happitots is a non-maintained school run setting which operates from the site of Welshpool C. in W. School. They also provide the Childcare Offer for Wales. Standards of nursery education and sufficiency of accommodation at this provider are good. The setting operates from within the new school building.

There are 32 ten hours early years education places available at this provider which are currently sufficient to meet the need for early years education in the area.

Park Lane Nursery

Park Lane Nursery is a non-maintained community run setting which operates from a building in the centre of Welshpool. They also provide the

⁵ All information correct as of Summer Term 2021/22

Childcare Offer for Wales. Standards of nursery education and sufficiency of accommodation at this provider are good. The setting has good access to outdoor areas.

There are 16 ten hours early years education places available at this provider which are currently sufficient to meet the need for early years education in the area.

Open Door Family Centre

Open Door Family Centre is a non-maintained community run setting which operates from the site of the former Welshpool C. in W. School. Standards of nursery education and sufficiency of accommodation at this provider are good. The setting provides an extremely welcoming, child centred and rich environment that supports children to play and learn successfully.

There are 16 ten hours early years education places available at this provider which are currently sufficient to meet the need for early years education in the area.

Little Acorns (Formerly Footsteps Day Nursery)

Little Acorns is a non-maintained community run setting which operates from the site of the former Welshpool C. in W. School. They also provide the Childcare Offer for Wales. Standards of nursery education at this provider is good, however the, sufficiency of accommodation at this provider has been rated by Estyn as adequate. The setting provides an outdoor play area providing children with opportunities.

There are 16 ten hours early years education places available at this provider which are currently sufficient to meet the need for early years education in the area.

Ysgol Feithrin Y Trallwng

Ysgol Feithrin Y Trallwng is a non-maintained community run setting which operates from the site of Ysgol Gymraeg y Trallwng. They also provide the Childcare Offer for Wales. Standards of nursery education and sufficiency of accommodation at this provider are good. The setting is welcoming, stimulating and child friendly.

There are 16 ten hours Welsh-medium early years education places available at this provider which are currently sufficient to meet the need for early years education in the area.

Cylch Meithrin Llanfair Caereinion

Cylch Meithrin Llanfair Caereinion is a non-maintained community run setting which operates from a site in Llanfair Caereinion. They also provide the Childcare Offer for Wales. Standards of nursery education and sufficiency of accommodation at this provider are good. The setting is maintained effectively with outdoor resources being used regularly.

There are 16 ten hours Welsh-medium early years education places available at this provider which are currently sufficient to meet the need for early years education in the area.

Brookfield Day Nursery

Brookfield Day Nursery is a non-maintained community run setting which operates from a site in Garthmyl. They also provide the Childcare Offer for Wales. Standards of nursery education and sufficiency of accommodation at this provider are good. The setting provides an extremely welcoming, child centred and rich environment that supports children to play and learn successfully.

There are 16 ten hours early years education places available at this provider which are currently sufficient to meet the need for early years education in the area.

15. IMPACT ON GOVERNANCE ARRANGEMENTS

Implementation of the proposal would result in the closure of Castle Caereinion C. in W. School and the Governing Body of Castle Caereinion C. in W. School would be dissolved.

16. IMPACT ON QUALITY AND STANDARDS IN EDUCATION

i) Standards, wellbeing and attitudes to learning

Standards and progress overall, of specific groups and in skills

Should the Council proceed with implementation of the preferred option, Castle Caereinion C. in W. School would close, and pupils would transfer to alternative schools. For the majority of pupils, the closest alternative school would be Berriew C.P. School. However it is possible that pupils would choose to attend Welshpool C. in W. School as the nearest Church in Wales school, or Llanfair Caereinion C.P. School or Guilsfield C.P. School, as other nearby schools.

The Council's view is that all of these schools would provide education for pupils which is of at least equivalent quality as that provided at Castle Caereinion C. in W. School, therefore it is not anticipated that implementation of the preferred option would have a negative impact on standards and progress overall. Castle Caereinion C. in W. School, Berriew C.P. School

and Llanfair Caereinion C.P. School were categorised as Amber in the latest school categorisations carried out in 2019, whilst Welshpool C. in W. School was categorised as Yellow. Guilsfield C.P. School was classified as a Green school.

This would also apply in respect of pupils belonging to specific groups, such as pupils eligible for Free School Meals, pupils for whom English is an Additional Language, Looked after Children and pupils with Additional Learning Needs. Based on PLASC 2020 information, there are no Looked after Children at Castle Caereinion C. in W. School. There are a small number of pupils for whom English is an Additional Language, a small number of pupils that are eligible for Free School Meals, and a small number of pupils that have Additional Learning Needs. However, it is not anticipated that implementation of the preferred option would have a negative impact on the standards and progress of these pupils.

This is also the case in respect of the impact on the skills of all pupils, including literacy, numeracy and ICT. Pupils would transfer to larger schools, which would provide improved opportunities to share staff expertise and resources, and which have an improved ability to monitor pupil progress in these aspects.

Wellbeing and attitudes to learning

In the short term, it is possible that there would be an impact on pupils' wellbeing, as they would need to transfer from Castle Caereinion C. in W. School to alternative schools. It is possible that pupils could choose to transfer to different schools, which could have a further impact on their wellbeing. However, the receiving school(s) would provide full support to the pupils during the transition period, to minimise any negative impact on them.

For some pupils, implementation of the preferred option could result in additional travel, which could have an impact on pupil well-being. However, alternative primary provision would be available at a number of other schools located within 10 miles of Castle Caereinion C. in W. School. It is not considered that the additional travel time required to alternative provision would be excessive.

In the longer term, the intention is that implementation of the preferred option would have a positive impact on pupil wellbeing and attitudes to learning as they would transfer to larger schools with larger cohorts of pupils, providing improved social and extra-curricular opportunities.

ii) Teaching and learning experiences

Quality of teaching

Should the Council proceed with implementation of the preferred option, Castle Caereinion C. in W. School would close, and pupils would transfer to alternative schools. For the majority of pupils, the closest alternative school would be Berriew C.P. School. However it is possible that pupils would choose to attend Welshpool C. in W. School as the nearest Church in Wales school, or Llanfair Caereinion C.P. School or Guilsfield C.P. School, as other nearby schools.

It is not anticipated that implementation of the preferred option would have a negative impact on the quality of teaching experienced by pupils currently attending Castle Caereinion C. in W. School.

The breadth, balance and appropriateness of the curriculum

Should the Council proceed with implementation of the preferred option, Castle Caereinion C. in W. School would close, and pupils would transfer to alternative schools. For the majority of pupils, the closest alternative school would be Berriew C.P. School. However it is possible that pupils would choose to attend Welshpool C. in W. School as the nearest Church in Wales school, or Llanfair Caereinion C.P. School or Guilsfield C.P. School, as other nearby schools.

The Council's view is that all of these schools would provide a curriculum which is at least equivalent to that currently provided at Castle Caereinion C. in W. School. It is likely that pupils would transfer to larger schools, therefore the expectation would be that there would be an improvement in the breadth, balance and appropriateness of the curriculum provided to pupils, and that the alternative schools would be better placed to develop provision which meets the requirements of the new curriculum.

Castle Caereinion C. in W. School is a Church in Wales school, which impacts on some aspects of the curriculum. Alternative Church in Wales provision is available at Welshpool C. in W. School, ensuring that denominational provision would continue to be available to those pupils who wished to access it.

The provision of skills

Should the Council proceed with implementation of the preferred option, Castle Caereinion C. in W. School would close, and pupils would transfer to alternative schools. For the majority of pupils, the closest alternative school would be Berriew C.P. School. However it is possible that pupils would choose to attend Welshpool C. in W. School as the nearest Church in Wales school, or Llanfair Caereinion C.P. School or Guilsfield C.P. School, as other nearby schools.

The Council has no concerns about the provision of skills at these schools, therefore it is not anticipated that implementation of the preferred option would have a negative impact on the provision of skills for pupils currently attending Castle Caereinion C. in W. School.

iii) Care support and guidance

Tracking, monitoring and the provision of learning support, personal development and safeguarding

Should the Council proceed with implementation of the preferred option, Castle Caereinion C. in W. School would close, and pupils would transfer to alternative schools. For the majority of pupils, the closest alternative school would be Berriew C.P. School. However it is possible that pupils would choose to attend Welshpool C. in W. School as the nearest Church in Wales school, or Llanfair Caereinion C.P. School or Guilsfield C.P. School, as other nearby schools.

It is not anticipated that implementation of the preferred option would have a negative impact on tracking, monitoring and the provision of learning support, personal development and safeguarding for pupils currently attending Castle Caereinion C. in W. School. In respect of Berriew C. P. School, whilst an issue in respect of car parking arrangements at the school was identified previously, this has been addressed. In respect of Welshpool C. in W. School, the school moved into a new building in January 2021. Safeguarding is a key consideration when designing new schools, therefore the expectation is that the safeguarding arrangements here would be improved compared with the current arrangements at Castle Caereinion C. in W. School.

iv) Leadership and management

Quality and effectiveness of leaders and managers, self-evaluation processes and improvement planning

Should the Council proceed with implementation of the preferred option, Castle Caereinion C. in W. School would close, and pupils would transfer to alternative schools. For the majority of pupils, the closest alternative school would be Berriew C.P. School. However it is possible that pupils would choose to attend Welshpool C. in W. School as the nearest Church in Wales school, or Llanfair Caereinion C.P. School or Guilsfield C.P. School, as other nearby schools.

Permanent leadership arrangements are in place at Berriew C.P. School, Welshpool C. in W. School and Guilsfield C.P. School, therefore the Council's view is that leadership and management at the alternative schools would be at least as good as the current arrangements at Castle Caereinion, whilst there are currently temporary leadership arrangements in place at Llanfair Caereinion C.P. School.

The alternative schools which pupils may transfer to are all larger than Castle Caereinion C. in W. School, therefore the headteachers of these schools would have more time available to focus on leadership and management.

Professional learning

It is not anticipated that implementation of the preferred option would impact on professional learning opportunities. Staff currently employed at Castle Caereinion C. in W. School would be subject to a management of change process.

Use of resources

Castle Caereinion C. in W. School is projecting to be in a cumulative surplus budget position over the coming years. Whilst there are no concerns about the use of resources within the school, there are concerns about use of resources overall within the Powys schools infrastructure. As indicated on page 8 above, one of the main challenges facing the Powys schools infrastructure is the high proportion of small schools in the county. Castle Caereinion C. in W. school is among the smallest schools in the county, and the budget share per pupil at the school is higher than the Powys average for primary schools.

Closure of the school would reduce the number of schools in Powys, and would enable the Council to use its resources more effectively for the benefit of all Powys learners.

Should the emerging preferred option be implemented pupils would transfer to larger schools, ensuring more effective use of the Council's resources.

In addition, larger schools often have more resources available in terms of number of staff and educational resources, therefore pupils would benefit from the opportunity to access these resources.

v) Impact on vulnerable groups, including children with Special Educational Needs (SEN)

Implementation of the preferred option would result in the closure of Castle Caereinion C. in W. School. It is acknowledged that there would be an impact on any pupils belonging to vulnerable groups currently attending the school, including any pupils with SEN, and that in the short term, these pupils would need to transfer to alternative schools.

Based on January 2020 PLASC information, 16.7% of pupils at Castle Caereinion C. in W. School were on School Action, and 12.5% of pupils were on School Action Plus. There were no statemented pupils.

Whilst the preferred option would impact on these pupils, as they would be required to move to alternative schools, there is no reason to believe that the schools to which they might transfer would not be able to meet their needs.

Should the option be implemented, the Council would work with Castle Caereinion C. in W. School and the receiving schools to ensure an effective transition for any vulnerable children, including children with SEN, and their families.

vi) Impact on the school's ability to deliver the full curriculum in the foundation stage and each key stage, including the quality of curriculum delivery and the extent to which the structure or size of the school is impacting on this

Should the proposal be implemented, Castle Caereinion C. in W. School would close and pupils would transfer to alternative schools, therefore Castle Caereinion C. in W. School would no longer need to deliver the curriculum to any key stages.

As pupils currently attending Castle Caereinion C. in W. School would transfer to alternative schools, there would be an increase in pupil numbers at the alternative schools. However current pupil numbers at Castle Caereinion school are small, and the number of pupils likely to transfer to each year group is low, therefore the impact on alternative schools is not likely to have a significant impact on their ability to deliver the full curriculum at the foundation phase and in each key stage of education.

In some schools, it is possible that an increase in pupil numbers would improve their ability to deliver the curriculum, however depending on the class structure and current breakdown of pupils, it's possible that some schools would need to make adjustments to their class structure in the short term to accommodate any additional pupils.

vii) Impact on other schools

Should the Council proceed with implementation of the preferred option, Castle Caereinion C. in W. School would close, and pupils would transfer to alternative schools. For the majority of pupils, the closest alternative school would be Berriew C.P. School. However it is possible that pupils would choose to attend Welshpool C. in W. School as the nearest Church in Wales school, or Llanfair Caereinion C.P. School or Guilsfield C.P. School, as other nearby schools.

Whilst it is possible that this could have some impact on the schools pupils may wish to transfer to, particularly in the short term when they receive additional pupils, the total number of pupils at Castle Caereinion C. in W. School is small, therefore it is not anticipated that this would have a negative impact on quality and standards in education (to include standards; wellbeing

and attitudes to learning; teaching and learning experiences; care support and guidance and leadership and management) at each of the schools pupils may transfer to. In some cases, it is possible that implementation of the proposal would have a positive impact on quality and standards in education at the alternative schools, as it would lead to an increase in pupil numbers and the opportunity to provide enhanced opportunities to pupils.

17. NEED FOR PLACES AND IMPACT ON AVAILABILITY OF PLACES AND ACCESSIBILITY OF SCHOOLS

- i) **Will the alternative provision have sufficient capacity and provide accommodation of at least equivalent quality for existing and projected pupil numbers?**

The following table shows the number of spaces available and the building condition of schools providing English-medium education located within 10 miles of Castle Caereinion C. in W. School:

School	Capacity ⁶	Current pupil numbers ⁷	Available spaces	Available capacity	Building Condition	Building Suitability
Berriew C.P. School	106	85	21	19.8%	B	B
Llanfair Caereinion C.P. School ⁸	195	161	34	17.4%	B/C	B
Welshpool C. in W. School	356	254	102	28.7%	A	A
Leighton C.P. School	91	71	20	22.0%	B/C	B
Guilsfield C.P. School	157	137	20	12.7%	B	B
Ysgol Meifod	77	81	-4	-5.2%	B	C
Ysgol Rhiw Bechan	146	135	11	7.5%	B	A

⁶ Welsh Government School Places Return – August 2020

⁷ Finance NOR – 2020 Pupil Count Day (6th November 2020)

⁸ The Council has recently published a Statutory Notice proposing to merge Llanfair Caereinion C.P. School with Caereinion High School to establish a new all-age school in the existing buildings from September 2022.

This suggests that there are sufficient places available within 10 miles of Castle Caereinion C. in W. School to accommodate all current and projected pupils at the school.

The condition of the nearest school, Berriew C.P. School is equivalent to the condition of Castle Caereinion C. in W. School. In addition, Welshpool C. in W. School has recently moved to a brand new building, which provides access to a condition A building.

ii) Is the alternative provision sufficient to meet existing and projected demand for schools of the same language category and designated religious character?

As indicated in the table in section (i) above, there is sufficient English-medium capacity within 10 miles of Castle Caereinion C. in W. School to accommodate the school's current and projected pupil numbers.

Castle Caereinion C. in W. School is a Church in Wales school. As indicated in the table in section (i) above, there are places available at Welshpool C. in W. School, would enable pupils to access a school of the same religious character, should they wish to continue to attend a Church in Wales school.

iii) What will be the nature of journeys to alternative provision and resulting journey times for pupils including SEN pupils?

As indicated in the table in section (i) above, there are alternative primary places available at other schools within 10 miles of Castle Caereinion C. in W. School. Should Castle Caereinion C. in W. School close, it is not considered that the length and nature of journeys for pupils to alternative provision would be excessive. This includes journeys for SEN pupils. One-way journeys to alternative provision would not be in excess of 45 minutes.

iv) Is there evidence of current or future need/demand in the area for additional places?

As indicated in the table in section (i) above, there is sufficient English-medium capacity within 10 miles of Castle Caereinion C. in W. School to accommodate the school's current and projected pupil numbers.

Castle Caereinion C. in W. School is a Church in Wales school. As indicated in the table in section (i) above, there are places available at Welshpool C. in W. School, which would enable pupils to access a school of the same religious character, should they wish to continue to attend a Church in Wales school.

Information about projected pupil numbers for other nearby schools is provided in Appendix A. This suggests that there is unlikely to be a need/demand for additional places in the area in the next few years.

- v) **Will the proposals improve access for disabled pupils in accordance with requirements under the Equality Act 2010?**

Implementation of the proposal would mean that pupil would attend their nearest alternative school.

The latest Welsh Government School Premises Return 2020, indicates that these schools are either compliant, or partially compliant with the Equality Act 2010 with all of the schools having statutory Accessibility Plans in place.

18. RESOURCING OF EDUCATION AND OTHER FINANCIAL IMPLICATIONS

- i) **What effect will the proposals have on surplus places in the area?**

Implementation of the preferred option would lead to an overall reduction in surplus places in the area.

- ii) **Do the proposals form part of the local authority's 21st Century Schools Investment Programme and contribute to the delivery of sustainable schools for the 21st Century and to the better strategic management of the school estate?**

The review of Castle Caereinion C. in W. School does not form part of the local authority's 21st Century Schools Investment Programme.

However, the Council's Strategy for Transforming Education in Powys identifies a number of issues relating to the overall Powys schools' estate, including a high proportion of small schools, a high number of surplus places and issues with building condition. The Strategy includes a strategic objective to 'Reconfigure and rationalise primary provision', which aims to address these issues, to ensure better strategic management of the Powys school estate. The review of Castle Caereinion C. in W. School is being carried out in order to meet this objective.

- iii) **What are the recurrent costs of proposals over a period of at least 3 years and is the necessary recurrent funding available?**

The recurrent costs of this proposal would be the increased transport costs which are currently estimated to be an additional £32,300 per annum as detailed in (iv) below. This has been included in the delegated revenue costing and is funded through savings in other areas of the formula in relation to this proposal.

- iv) **Will additional transport costs be incurred as a result of the proposal?**

It is estimated there would be additional transport costs of £32,300 per annum, this is based on pupil's current location and assuming the pupils would go to the next nearest school.

v) What are the capital costs of the proposal and is the necessary capital funding is available?

It is not anticipated that capital funding would be required in order to implement the emerging preferred option. As indicated in the table in section 17(i) above, there are sufficient places at schools located within 10 miles of Castle Caereinion C. in W. School to accommodate all current and projected pupils.

viii) What is the scale of any projected net savings (taking into account school revenue, transport and capital costs)

It is estimated that this would result in annual revenue savings to the Council of around £58,100. This overall figure comprises a potential saving on Schools' delegated funding of over £90,400 offset by estimated additional transport costs of £32,300.

vii) Without the proposals, would the schools affected face budget deficits?

Castle Caereinion C. in W. School is not currently forecasting a cumulative deficit budget.

viii) Will any savings in recurrent costs be retained in the local authority's local schools budget?

Any savings would be reinvested in the Council's corporate budget and any reinvestment in the schools' system would be agreed as part of the annual budget planning cycle.

ix) Will the proceeds of sales (capital receipts) of redundant sites be made available to meet the costs of the proposal or contribute to the costs of future proposals which will promote effective management of school places?

Castle Caereinion C. in W. School is not owned by the Council, therefore the Council would not receive any capital receipts following any sale of the site.

19. OTHER CONSIDERATIONS

i) Impact on educational attainment among children from economically deprived backgrounds

Implementation of the preferred option would impact on any pupils from economically deprived backgrounds currently attending Castle Caereinion C. in W. School. All pupils currently attending the school, including any from economically deprived backgrounds, would need to transfer to alternative schools. Free home to school transport would be provided to eligible pupils in accordance with Council's home to school transport policy, however it is acknowledged that there would be an impact on families due to the requirement to travel to school events, which could have a greater impact on children from economically deprived backgrounds.

Based on PLASC figures from January 2020, 4.2% of pupils attending Castle Caereinion C. in W. School was eligible for FSM, therefore it is likely that the proportion of children from economically deprived backgrounds is minimal.

x) Land and Buildings

Comparison of the quality of accommodation at the school from which pupils would be transferred

Information about the quality of accommodation at Castle Caereinion C. in W. School and other schools to which pupils may transfer is provided in Appendix A.

Information on any building works necessary to ensure that transferred children can be accommodated

No building works are necessary as there is sufficient capacity at alternative schools for existing Castle Caereinion C. in W. School pupils.

Details of any potential transfer or disposal of land or buildings that may need to occur as a result of the proposals

Castle Caereinion C. in W. School is a Church in Wales school and the building is owned by the Diocese of St Asaph. Should the Council proceed with the proposal to close the school, the buildings / land currently used by the school would be transferred back to the Diocese of St Asaph who would need to determine their future use.

Is the school / schools involved subject to any trust or charitable interests which might be affected by the proposals, for example in relation to the use or disposal of land?

Castle Caereinion C.W. School is not subject to any trust or charitable interest which might be affected in relation to the use or disposal of the land.

xi) Walking routes to school

Should the proposal be implemented, walking routes which are currently established for Castle Caereinion C. in W. School would no longer be required.

For those pupils for whom Castle Caereinion C. in W. School is currently the closest school, additional travel would be required to access alternative provision. For these pupils, it is unlikely that walking or cycling to the alternative school would be possible.

xii) School Admissions

Should the proposal be implemented, admissions to any alternative school in Powys would continue to be administered by the Council in accordance with the Council's Admissions Policy, which is available on-line at:

<https://en.powys.gov.uk/article/1158/Applying-for-a-School-Place>

xiii) Welsh in Education Strategic Plan (WESP)

The proposal is to close an English-medium primary school. The proposal is not linked to the targets in the Council's Welsh in Education Strategic Plan.

The proposal would not expand or reduce the availability of Welsh language provision.

20. SPECIFIC FACTORS IN THE CONSIDERATION OF SCHOOL CLOSURES

i) Whether the establishment of multi-site schools might be considered as a means of retaining buildings, or the reasons for not pursuing this option

A range of options have been considered in respect of Castle Caereinion C. in W. School, these are outlined in section 5 of this document, as well as an assessment of each option which includes a summary of the weaknesses / threats associated with each.

Pupil numbers at Castle Caereinion C. in W. School are very low, and are not projected to increase significantly over the coming years. Establishing a multi-site school would not address this issue.

ii) Whether alternatives to closure, such as clustering, collaboration or federation with other schools, might be considered or the reasons for not pursuing these as an alternative

Federation of Castle Caereinion C. in W. School with Welshpool C. in W. School is one of the options considered in section 5 of this document. An assessment of this option has been carried out, which includes a summary of the weaknesses / threats associated with this option.

Pupil numbers at Castle Caereinion C. in W. School are very low, and are not projected to increase significantly over the coming years. Becoming part of a federation with another school would not address this issue.

iii) Whether the possibility of making fuller use of the existing buildings as a community or educational resource could be explored

The Council's view is that making more use of the existing building as a community or educational resource would not address the issues identified in respect of Castle Caereinion C. in W. School.

Pupil numbers at the school are low, and are not projected to increase significantly over the coming years.

iv) The overall effect of closure on the local community (including the loss of school based facilities which are used by the local community)

Implementation of the preferred option would mean that there would no longer be provision in Castle Caereinion. It is acknowledged that this would have a negative impact on the Castle Caereinion community, including the loss of primary provision from the village of Castle Caereinion, and a possible loss of any community facilities associated with the school from the village.

An initial draft community impact assessment has been carried out, with input from the school, to identify the potential impact on the community. This will be updated throughout the process to reflect any feedback received, and will be considered by the Council's Cabinet as part of the decision making process.

xiv) How parents' and pupils' engagement with the alternative school and any facilities it may offer could be supported

Should the Council proceed with the statutory process and eventually implementation of the preferred option, support would be provided to pupils and their parents as part of the transition process, to ensure full engagement with their new school. The nature of this support would depend on the needs of the parents / pupils, however this could include provision for effective transition to the receiving school by new headteacher and class teachers.

21. EQUALITY AND COMMUNITY IMPACT ASSESSMENTS

Draft impact assessments have been carried out in respect of the proposal. These will be updated following the consultation period to reflect any additional issues raised. The assessments are available on the Council's website:

<https://en.powys.gov.uk/article/10560/Castle-Caereinion-Church-in-Wales-School>

A summary of the assessments are provided below:

i) Equalities impact assessment

Should the proposal be implemented, Castle Caereinion C. in W. School would close, and pupils transfer to their nearest alternative school.

This would have a significant impact on pupils currently attending Castle Caereinion C. in W. School, including any pupils belonging to the protected characteristic groups that attend that school, as some additional travel would be required in order to attend their nearest alternative school.

Whilst it is acknowledged that the proposals would impact on pupils belonging to the protected characteristic groups that attend the school, there is no reason to believe that the nearest alternative schools would be unable to meet the needs of pupils belonging to the protected characteristic groups that would be affected, including pupils with Additional Learning Needs, pupils belonging to Ethnic Groups other than White British, pupils eligible for Free School Meals and Looked After Children.

ii) Impact on the community

It is clear that a wide range of extra curricular activities are available to pupils at Castle Caereinion. Should there be no school in Castle Caereinion, pupils would transfer to alternative schools. These would be larger schools, and the expectation is that at least a similar range of activities would be available for pupils. However, it is acknowledged that pupils would need to travel to the alternative schools, which could impact on their ability to access activities, particularly where these take place after school.

Should the proposal be implemented, this would mean that there would be no school provision in the village of Castle Caereinion. The information provided above indicates that there is currently extensive community use of the Castle Caereinion building, and extensive links between the school and the local community. As a Church in Wales School, the Castle Caereinion School building is owned by the Diocese, therefore the Diocese would need to determine the building's future use, and therefore whether or not facilities would remain in Castle Caereinion. There is a village hall located in Castle Caereinion, therefore should the school no longer be available, community events and activities could take place at the hall.

It is also acknowledged that implementation of the proposal would result in additional travel to school for pupils for whom Castle Caereinion C. in W. is currently their closest school. Whilst free home to school transport would be provided to eligible pupils in accordance with the home to school transport policy which is in operation at that time, it is acknowledged that there could be an impact on some pupils' ability to access after school activities, and could impact on the ability of parents to take part in school events, meetings etc.

PART D – CONSULTATION DETAILS

Who will we consult with?

The Council will consult with a range of stakeholders as required by the School Organisation Code, which include the following:

- Parents, carers and guardians at Castle Caereinion C.W. School and other schools which may be affected by the proposal
- Governors at Castle Caereinion C.W. School and other schools which may be affected by the proposal
- Staff at Castle Caereinion C.W. School and other schools which may be affected by the proposal
- Pupils at Castle Caereinion C.W. School and other schools which may be affected by the proposal
- The Church in Wales and Roman Catholic Diocesan Authorities
- The Welsh Minister for Education
- Local Powys Councillors
- Town and Community Councils in the local area
- The prospective candidates for Member of the Senedd for Montgomeryshire and prospective candidates for Members of the Senedd for the Mid and Wales West region
- The MP for Montgomeryshire
- Estyn
- Teaching and staff trade unions
- ERW
- The Police & Crime Commissioner for Dyfed Powys
- Nursery providers in the local area
- Mudiad Meithrin
- The Powys Children and Young People's Partnership

Consultation with pupils will take place in accordance with the Welsh children and young people's national participation standards⁹.

The consultation period

The consultation period will commence on the 14th April 2021 and end on 2nd June 2021.

The statutory process

Consultation on this proposal will follow the guidelines set out by the Welsh Government in the revised School Organisation Code which became operational on the 1st November 2018. The process is summarised below:

i) Consultation

⁹ <https://gov.wales/children-and-young-peoples-national-participation-standards>

Consultation will start on the 14th April 2021 and end on the 2nd June 2021. Feedback from the consultation will be collated and summarised, and a consultation report will be produced and shared with stakeholders.

It is important to note that responses made to the consultation will not be counted as objections to the proposal, and that only objections can be registered following publication of a statutory notice.

The Council's Cabinet will consider the consultation report and the feedback received during the consultation period, and will decide whether to proceed with the proposal, to make changes to the proposal, or to not proceed with the proposal. If the Cabinet decides not to proceed, that will be the end of this proposal.

It is anticipated that the Consultation Report will be considered by the Cabinet in the summer of 2021.

ii) Statutory notice

If the Cabinet decides to proceed with the proposal, statutory notices would be published after the Cabinet meeting. There would then be a period of 28 days for people to submit written objections.

If there were objections, the Council would publish an objection report providing a summary of the objections and the Council's response to them before the end of 7 days beginning with the day of the local authority's determination. Only written objections submitted during the statutory notice period will be considered as objections and included in this report. Comments submitted as part of the consultation period would not be counted as objections. Should stakeholders wish their consultation responses to be considered as objections, they would need to be re-submitted in writing during the statutory notice period.

A further report would be presented to the Council's Cabinet, which they would consider alongside the objection report, in order to decide whether or not to approve the proposal.

It is anticipated that a final decision would be made by the end of 2021.

iii) Implementation

If the Council's Cabinet were to approve the proposal, it would be implemented in accordance with the date given in the statutory notice or any subsequently modified date.

How to respond to the consultation

A consultation response form is attached to this document. An online version is also available on the Council's website:

<https://en.powys.gov.uk/article/10560/Castle-Caereinion-Church-in-Wales-School>

Alternatively, you can respond in writing.

Completed forms and other written responses should be sent to the following address:

*Transforming Education Team, Powys County Council, County Hall, Llandrindod Wells,
LD1 5LG*

E-mail: school.consultation@powys.gov.uk

All correspondence should be received by the **2nd June 2021**.

If you have any further questions about this proposal, you can contact the Transforming Education Team using the above contact details, or by phoning (01597) 826618.

APPENDIX A – KEY DATA

Key data about the affected schools is provided below:

1. Castle Caereinion C. in W. School

General information

	School Type	Language Category	Admission Number	Rural School? ¹⁰
Castle Caereinion C. in W. School	Voluntary Controlled Church in Wales School building owned by the Diocese of St Asaph	English-medium	8	Yes

Pupil Numbers

i) Current pupil numbers¹¹

	R	1	2	3	4	5	6	Total
Castle Caereinion C. in W. School	4	3	5	4	4	3	0	23

ii) Historical pupil numbers¹²

	Jan. 2014	Jan. 2015	Jan. 2016	Jan. 2017	Jan. 2018	Jan. 2019	Jan. 2020
Castle Caereinion C. in W. School	42	47	44	40	31	30	24

iii) Projected pupil numbers (Birth rate)¹³

	Jan. 2021	Jan. 2022	Jan. 2023	Jan. 2024	Jan. 2025
Castle Caereinion C. in W. School	20	21	19	19	19

¹⁰ Annex F of the Welsh Government's School Organisation Code (2018) (<https://gov.wales/sites/default/files/publications/2018-10/school-organisation-code-second-edition.pdf>) includes a list of 'rural schools', to which the 'Presumption against the closure of rural schools' applies.

¹¹ Finance NOR – 2020 Pupil Count Day (6th November 2020)

¹² PLASC 2020

¹³ Powys Schools Service Projections (R – Yr6) based on PLASC 2020 & Birth Rates. These are the projected figures based on PLASC 2020 information, therefore include a projection for January 2021. PLASC 2021 information and projected pupil numbers based on PLASC 2021 are not yet available.

iv) **Projected pupil numbers (Finance projections)¹⁴**

	Jan. 2021	Jan. 2022	Jan. 2023	Jan. 2024	Jan. 2025
Castle Caereion C. in W. School	23	24	22	N/A	N/A

Building Capacity and Condition

i) **Capacity**

The following table provides information about the current capacities of school and the capacity:

	Current Capacity ¹⁵	Currently Filled	Surplus Capacity
Castle Caereion C. in W. School	74	23 (31.1%)	51 (68.9%)

ii) **Building condition¹⁶**

In 2009, Welsh Government carried out condition and suitability assessments of the school.

	Condition	Suitability	Access to hall on site
Castle Caereion C. in W. School	B Good	B Good	Yes – Community Centre

Quality and Standards of Education

i) **Estyn**

	Castle Caereion C. in W. School
Date of Inspection	November 2016
Standards	Adequate, needs improvement

¹⁴ Powys Finance Projections based on actual pupil numbers – November 2020

¹⁵ Welsh Government School Places Return – August 2020

¹⁶ Premises Data Return to Welsh Government – 2020

Wellbeing and attitudes to learning	Good
Teaching and learning experiences	Adequate, needs improvement
Care, support and guidance	Good
Leadership and management	Adequate, needs improvement
Follow up activity	School to draw up action plan, Estyn to review progress. Update on the 27 th June 2018. The schools is judged to have made sufficient progress in addressing the recommendations from the Section 28 inspection. The school has been removed from requiring Estyn review. There will be no further monitoring activity in relation to this inspection.

ii) School Categorisation

	Standards Group	Improvement Capacity	Support Capacity
Castle Caereinion C. in W. School	N/A	C	Amber

Financial information

i) Cost per pupil (Section 52 Budget Statement, 2020/2021)

	Budget share per school	Budget share per pupil	Notional SEN budget	Non ISB funds devolved to the school
Castle Caereinion C. in W. School	£173,000	£6,919	£9,000	£0
Powys average (Primary)	N/A	£4,264	N/A	N/A

Equalities Information

i) National identity (Pupils aged 5 or over on the 31st August 2019)

	British	English	Irish	Scottish	Welsh	Other	Not supplied	Refused
Castle Caereinion C. in W. School	20.8%	41.7%	0.0%	0.0%	16.7%	8.3%	12.5%	0.0%

ii) **Ethnic Group**
(Pupils aged 5 or over on the 31st August 2019)

	White British	Other known ethnicity	Information not yet obtained
Castle Caereinion C. in W. School	79.2%	8.3%	12.5%

iii) **English as an Additional Language**

	% EAL	% EAL A/B/C
Castle Caereinion C. in W. School	8.3%	4.2%

iv) **Free School Meals¹⁷**

	Number of pupils who had a free school meal on Census day
Castle Caereinion C. in W. School	4.2%

v) **Pupils in care¹⁸**

	Number of pupils in care
Castle Caereinion C. in W. School	0%

vi) **SEN/ALN¹⁹**

¹⁷ PLASC 2020

¹⁸ PLASC 2020

¹⁹ PLASC 2020

	School Action	School Action Plus	Statement
Castle Caereinion C. in W. School	16.7%	12.5%	0%

2. Other schools that could be affected

Should the proposal to close Castle Caereinion C. in W. School be implemented, pupils would transfer to their nearest alternative school.

The expectation is that the number of pupils transferring to each school would be small, and therefore the impact on these schools would not be significant. However, information about schools to which pupils may transfer is provided below:

	School Type	Language Category	Admission Number
Berriew C.P. School	Community Primary	English Medium	15
Welshpool C. in W. School	Church in Wales Voluntary Controlled	English Medium	51
Guilfield C.P. School	Community Primary	English Medium	22
Llanfair Caereinion C.P. School²⁰	Community Primary	Dual Stream	27

Pupil Numbers

i) Current pupil numbers²¹

	R	1	2	3	4	5	6	Total
Berriew C.P. School	13	14	13	6	13	11	15	85
Welshpool C. in W. School	32	32	39	42	31	33	45	254

²⁰ The Council has recently published a Statutory Notice proposing to merge Llanfair Caereinion C.P. School with Caereinion High School to establish a new all-age school in the existing buildings from September 2022.

²¹ Finance NOR – 2020 Pupil Count Day (6th November 2020)

Guilfield C.P. School	24	9	23	24	21	24	12	137
Llanfair Caereinion C.P. School	13	21	17	27	23	31	29	161

ii) **Historical pupil numbers²²**

	Jan. 2014	Jan. 2015	Jan. 2016	Jan. 2017	Jan. 2018	Jan. 2019	Jan. 2020
Berriew C.P. School	84	89	79	83	74	84	88
Welshpool C. in W. School	112	121	137	136	137	130	116
Guilfield C.P. School	164	143	146	145	151	139	147
Llanfair Caereinion C.P. School	202	209	195	185	174	173	166

iii) **Projected pupil numbers (Birth rate)²³**

	Jan. 2021	Jan. 2022	Jan. 2023	Jan. 2024	Jan. 2025
Berriew C.P. School	90	90	93	91	100
Welshpool C. in W. School	256	242	236	240	235
Guilfield C.P. School	133	143	139	142	137
Llanfair Caereinion C.P. School	159	153	144	139	133

iv) **Projected pupil numbers (Finance projections)²⁴**

²² PLASC 2020

²³ Powys Schools Service Projections (R – Yr6) based on PLASC 2020 & Birth Rates

²⁴ Powys Finance Projections based on data provided by the school – November 2020

	Jan. 2021	Jan. 2022	Jan. 2023
Berriew C.P. School	85	84	87
Welshpool C. in W. School	254	248	254
Guilfield C.P. School	137	137	125
Llanfair Caereinion C.P. School	161	147	131

Building Capacity and Condition

i) Capacity

The following table provides information about the school's current capacity:

	Current Capacity	Currently Filled	Surplus Capacity
Berriew C.P. School	106	85 (80.2%)	21 (19.8%)
Welshpool C. in W. School	356	254 (71.3%)	102 (28.7%)
Guilfield C.P. School	157	137 (87.3%)	20 (12.7%)
Llanfair Caereinion C.P. School	195	161 (82.6%)	34 (17.4%)

ii) Building condition

In 2009, Welsh Government carried out condition and suitability assessments of all schools.

	Condition	Suitability	Access to hall on site
Berriew C.P. School	B	B	Yes
Welshpool C. in W. School	A	A	Yes
Guilfield C.P. School	B	B	Yes

Llanfair Caereinion C.P. School	B/C	B	Yes
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Standards of Education

i) Estyn

	Berriew C.P. School
Date of Inspection	September 2019
Standards	Good
Wellbeing and attitudes to learning	Good
Teaching and learning Experiences	Good
Care, Support and Guidance	Adequate and Needs Improvement
Leadership and Management	Adequate and Needs Improvement
Outcome	School to draw up action plan, Estyn to review progress. Update on the 15th February 2021. The schools is judged to have made sufficient progress in addressing the recommendations from the Section 28 inspection. The school has been removed from requiring Estyn review. There will be no further monitoring activity in relation to this inspection.

	Welshpool C.I.W School
Date of Inspection	N/A
	Estyn have not completed an inspection since the school opened.

	Guilsfield C.P School
Date of Inspection	May 2015
Standards	Adequate
Wellbeing	Good

Learning Experiences	Adequate
Teaching	Adequate
Care, Support and Guidance	Good
Learning Environment	Adequate
Leadership	Adequate
Improving Quality	Adequate
Partnership Working	Good
Resource Management	Adequate
Outcome	<p>School to draw up action plan, Estyn to review progress.</p> <p>Update on the 7th October 2017. The schools is judged to have made sufficient progress in addressing the recommendations from the Section 28 inspection. The school has been removed from requiring Estyn review. There will be no further monitoring activity in relation to this inspection.</p>

	Llanfair Caereinion C.P. School
Date of Inspection	January 2018
Standards	Good
Wellbeing and attitudes to learning	Good
Teaching and learning Experiences	Good
Care, Support and Guidance	Good
Leadership and Management	Good
Outcome	The School will produce and action plan to address the recommendations from the inspection.

ii) **School Categorisation²⁵**

²⁵National Categorisation Model 2019

	Standards Group	Support Capacity
Berriew C.P. School	C	Amber
Welshpool C. in W. School	B	Yellow
Guilsfield C.P. School	A	Green
Llanfair Caereinion C.P. School	C	Amber

Financial information

i) Cost per pupil²⁶ (Section 52 Budget Statement, 2020/2021)

	Budget share per school	Budget share per pupil	Notional SEN budget	Non ISB funds devolved to the school
Berriew C.P. School	£335,000	£3,806	£19,000	£8,000
Welshpool C. in W. School	£1,126,000	£4,504	£220,000	£1,000
Guilsfield C.P. School	£523,000	£4,117	£29,000	£12,000
Llanfair Caereinion C.P. School	£629,000	£3,790	£42,000	£22,000
Powys average (Primary)	N/A	£4,264	N/A	N/A

Equalities Information

i) National identity (Pupils aged 5 or over on the 31st August 2019)

	British	English	Irish	Scottish	Welsh	Other	Not supplied / Refused
Berriew C.P. School	47.7%	15.9%	0.0%	0.0%	15.9%	3.4%	17.0%

²⁶ Section 52 Budget Statement 2020/2021

Welshpool C. in W. School	28.7%	28.0%	0.0%	0.0%	7.7%	17.5%	18.2%
Guilsfield C.P. School	28.6%	21.8%	0.7%	0.0%	27.2%	1.4%	20.4%
Llanfair Caereinion C.P. School	23.5%	16.9%	0.0%	0.0%	47.0%	0.6%	12.0%

ii) Ethnic Group

(Pupils aged 5 or over on the 31st August 2019)

	White British	Other known ethnicity	Information not yet obtained
Berriew C.P. School	79.5%	3.4%	17.0%
Welshpool C. in W. School	61.5%	20.3%	18.2%
Guilsfield C.P. School	75.5%	3.4%	21.1%
Llanfair Caereinion C.P. School	84.3%	4.2%	11.4%

iii) English as an Additional Language

	% EAL	% EAL A/B/C
Berriew C.P. School	1.1%	0.0%
Welshpool C. in W. School	21.7%	19.2%
Guilsfield C.P. School	1.4%	0.0%
Llanfair Caereinion C.P. School	0.0%	0.0%

iv) Free School Meals²⁷

²⁷ PLASC 2020

	Number of pupils who had a free school meal on Census day
Berriew C.P. School	10.2%
Welshpool C. in W. School	26.6%
Guilsfield C.P. School	6.1%
Llanfair Caereinion C.P. School	14.5%

v) **Pupils in care²⁸**

	Number of pupils in care
Berriew C.P. School	0.0%
Welshpool C. in W. School	1.4%
Guilsfield C.P. School	0.7%
Llanfair Caereinion C.P. School	0.0%

vi) **SEN/ALN²⁹**

	School Action	School Action Plus	Statement
Berriew C.P. School	18.2%	4.5%	0%
Welshpool C. in W. School	14.7%	19.2%	2.1%
Guilsfield C.P. School	4.1%	4.8%	0%
Llanfair Caereinion C.P. School	15.1%	6.0%	0%

²⁸ PLASC 2020

²⁹ PLASC 2020

APPENDIX B – SWOT AND CRITICAL SUCCESS FACTORS

1. SWOT ANALYSES

SWOT analyses for each of the four options are provided below.

Option 1: Status quo – continue as a standalone school

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Castle Caereinion - There would be no additional transport costs - Would continue to provide access to Church in Wales provision - No requirement for a reorganisation process - No change for staff - No impact on pupils 	<ul style="list-style-type: none"> - Pupil numbers at Castle Caereinion would continue to be low - Would not lead to a rationalisation of primary provision - Would still need to maintain the Castle Caereinion building - Would not reduce surplus places - Would not lead to a financial saving - Would not address issues with the Castle Caereinion school building - Would not address the high budget per pupil
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunities for further collaboration with other neighbouring schools to provide increased opportunities for pupils 	<ul style="list-style-type: none"> - Introduction of the new curriculum – would be difficult to provide educational opportunities which meet the requirements of the new curriculum

Option 2: Federation with Welshpool Church in Wales School

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Castle Caereinion - Would continue to provide access to Church in Wales provision - There would be no additional transport costs - More opportunities could be provided to pupils and staff - Castle Caereinion pupils would continue to attend school in the same location - Pupils would continue to attend school at the same location 	<ul style="list-style-type: none"> - Pupil numbers at Castle Caereinion would continue to be low - Castle Caereinion pupils would still be taught separately - Would not lead to a rationalisation of primary provision - Would still be required to maintain the Castle Caereinion building - Would not reduce surplus places - Would not lead to a financial saving - Would not address issues with the Castle Caereinion school building - Would not address the high budget per pupil

	<ul style="list-style-type: none"> - Significant difference in the size of the two schools
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunity for further collaboration across the sites - More opportunities for networking and sharing good practice - 	<ul style="list-style-type: none"> - Introduction of the new curriculum – would be difficult to provide educational opportunities which meet the requirements of the new curriculum on the Castle Caereinion site - Threat to Welshpool C. in W. School, who have been operating over 3 sites over several years pending the move to their new building

Option 3: Merge with Welshpool Church in Wales School to establish a new school on two sites

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Castle Caereinion - Would continue to provide access to Church in Wales provision - There would be no additional home to school transport costs - More opportunities could be provided to pupils and staff - Could provide a financial saving to the Council - Pupils would continue to attend school at the same location 	<ul style="list-style-type: none"> - Small numbers would remain at Castle Caereinion - Castle Caereinion pupils would still be taught separately - Would still need to maintain the Castle Caereinion building - Would not reduce surplus places - Would not address issues with the Castle Caereinion school building - Both schools would lose their identity - Would impact on staff at Welshpool C. in W. School, who have already been through a reorganisation process in the last few years. - Significant difference in the size of the two schools – would have a disproportionate impact on Welshpool C. in W. School
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunities for further collaboration across the sites - More opportunities for networking and sharing good practice between staff 	<ul style="list-style-type: none"> - Introduction of the new curriculum – would be difficult to provide educational opportunities which meet the requirements of the new curriculum on the Castle Caereinion site

	<ul style="list-style-type: none"> - Threat to Welshpool C. in W. School, who have been operating over 3 sites over several years pending the move to their new building
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Option 4: Close Castle Caereinion, but retain the site as part of Welshpool C. in W. School

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Castle Caereinion - Would continue to provide access to Church in Wales provision - There would be no additional home to school transport costs - Could provide a financial saving to the Council - Minimal impact on staff at Welshpool C. in W. School - Welshpool C. in W. School would retain its identity - Pupils would continue to attend school at the same location 	<ul style="list-style-type: none"> - Small numbers would remain at Castle Caereinion - Castle Caereinion pupils would still be taught separately - Would still need to maintain the Castle Caereinion building - Would not reduce surplus places - Would not address issues with the Castle Caereinion school building - Castle Caereinion school would lose its identity
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunities for further collaboration across the sites - More opportunities for networking and sharing good practice between staff 	<ul style="list-style-type: none"> - Introduction of the new curriculum – would be difficult to provide educational opportunities which meet the requirements of the new curriculum - Threat to Welshpool C. in W. School, who have been operating over 3 sites over several years pending the move to their new building

Option 5: Merge with Berriew C.P. School to establish a new school on two sites

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Castle Caereinion - More opportunities could be provided to pupils 	<ul style="list-style-type: none"> - Small numbers would remain at the Castle Caereinion site - Castle Caereinion pupils would still be taught separately - Would not reduce surplus places

<ul style="list-style-type: none"> - There would be no additional home to school transport costs - Could provide a financial saving to the Council - Opportunity for all staff to secure positions in the new school - Pupils would continue to attend school at the same location 	<ul style="list-style-type: none"> - Would not address issues with the Castle Caereinion school building - Would also impact on the staff of Berriew C.P. School - Both schools would lose their current identities
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunities for further collaboration across the sites - More opportunities for networking and sharing good practice between staff 	<ul style="list-style-type: none"> - Introduction of the new curriculum – would be difficult to provide educational opportunities which meet the requirements of the new curriculum on the Castle Caereinion site - Possible tension between Church in Wales provision and C.P. status - May not be acceptable to the Berriew community due to previous shared headteacher arrangements.

Option 6: Close Castle Caereinion, but retain the site as part of Berriew C.P. School

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Castle Caereinion - More opportunities could be provided to the pupils - There would be no additional home to school transport costs - Could provide a financial saving to the Council - Berriew C.P. School would retain its identity - Potentially would not impact on staff at Berriew C.P. School - Pupils would continue to attend school at the same location 	<ul style="list-style-type: none"> - Small numbers would remain at the Castle Caereinion site - Castle Caereinion pupils would still be taught separately - Would not reduce surplus places - Would not address issues with the Castle Caereinion school building - Castle Caereinion C. in W. School would lose its identity - Would be no access to C. in W. School provision locally
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunities for further collaboration across the sites - More opportunities for networking and sharing good practice between staff 	<ul style="list-style-type: none"> - Introduction of the new curriculum – would be difficult to provide educational opportunities which meet the requirements of the new curriculum

	<ul style="list-style-type: none"> - May not be acceptable to the Berriew community due to previous shared headteacher arrangements.
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Option 7: Merge with Berriew C.P. School to establish a new school on the Berriew site

Strengths	Weaknesses
<ul style="list-style-type: none"> - More opportunities could be provided to the pupils - Could provide a financial saving to the Council - Would reduce surplus places - All staff would have the opportunity to apply for positions at the new school - Improved opportunities for staff from working in a larger school - Pupils would all be taught in one location - Would address the issues with the Castle Caereinion school building 	<ul style="list-style-type: none"> - Additional travel for those pupils for whom Castle Caereinion C. in W. School is currently the closest school - Additional transport costs - Pupils currently attending Castle Caereinion School would have to transfer to a new location - Loss of provision from Castle Caereinion - Impact on the Castle Caereinion community - Would impact on Berriew staff as well as Castle Caereinion staff - Potential reduction in staffing requirements - Current capacity of Berriew school may not be able to accommodate all pupils - Both schools would lose their identities - There would be no access to C. in W. School provision locally should the new school be a C.P. School
Opportunities	Threats
	<ul style="list-style-type: none"> - Would need to review the capacity of the current Berriew C.P. School – additional capacity may be required - Possible tension between C.P. and C. in W. provision

Option 8: Merge with Berriew C.P. School to establish a new school on the Castle Caereinion site

Strengths	Weaknesses
<ul style="list-style-type: none"> - More opportunities could be provided to the pupils - Could provide a financial saving to the Council - Would reduce surplus places - All staff would have the opportunity to apply for positions at the new school - Improved opportunities for staff from working in a larger school - Pupils would all be taught in one location 	<ul style="list-style-type: none"> - Additional travel for those pupils for whom Berriew C.P. School is currently the closest school - Additional transport costs - Pupils currently attending Berriew School would have to transfer to a new location - Less convenient location for the majority of pupils - Current Berriew pupils may live closer to other schools - Loss of provision from Berriew - Impact on the Berriew community - Would not address issues with the Castle Caereinion building - Would impact on Berriew staff as well as Castle Caereinion staff - Potential reduction in staffing requirements - Both schools would lose their identities - Castle Caereinion School is too small to accommodate the merged school - Significant investment would be needed in the Castle Caereinion site to accommodate Berriew pupils.
Opportunities	Threats
	<ul style="list-style-type: none"> - Significant investment would be needed in Castle Caereinion to accommodate Berriew pupils - Unlikely that the Castle Caereinion site would be large enough to accommodate a school of the size required – a new site may be required - Possible tension between C.P. and C. in W. provision

Option 9: Close Castle Caereinion C. in W. School, pupils to attend nearest alternative schools

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would address the issue of low pupil numbers at Castle Caereinion 	<ul style="list-style-type: none"> - Additional travel for those pupils for whom Castle Caereinion C. in W.

<ul style="list-style-type: none"> - Would reduce the Council's overall surplus capacity in primary schools - Revenue saving to the Council - Pupils would attend larger schools, which would be better equipped to meet the requirements of the new curriculum - Pupils would attend larger schools, which could provide a wider range of educational and extra-curricular opportunities - Pupils would attend schools with more suitable accommodation 	<p>School is currently the closest school</p> <ul style="list-style-type: none"> - Pupils currently attending Castle Caereinion School would have to transfer to alternative provision - Loss of provision from Castle Caereinion - Impact on the current staff of Castle Caereinion C. in W. School - Impact on the Castle Caereinion community - Reduction in C. in W. provision
Opportunities	Threats
	<ul style="list-style-type: none"> - Likely to be the least popular option locally - Possibility of referral of the decision to WG by the Diocese

2. CRITICAL SUCCESS FACTORS

The options have also been assessed against the following Critical Success Factors:

Critical Success Factor	Description
1 – Strategic fit and business needs	<ul style="list-style-type: none"> • The option must align with the Council's Strategy for Transforming Education in Powys 2020-2030, to include the following: <ul style="list-style-type: none"> - Address the challenges facing education in Powys, as outlined in the Council's Strategy for Transforming Education in Powys 2020-2030 - Align with the Vision and Guiding Principles outlined in the Council's Strategy for Transforming Education in Powys 2020-2030 - Align with the Strategic Aims and Objectives outlined in the Council's Strategy for Transforming Education in Powys 2020-2030 • The option must optimise the benefits of the Council's Transforming Education Programme
2 – Value for money	<ul style="list-style-type: none"> • The option must optimise the resources available for the delivery of learning • The option must provide value for money in the delivery of learning

3 – Potential achievability	<ul style="list-style-type: none"> • The option must be achievable within current legislation • The option must be operationally achievable • The option must be physically achievable
4 – Potential affordability	<ul style="list-style-type: none"> • The extent to which the option is affordable within the Council’s forecasted revenue • The extent to which the option is affordable within the forecasted capital funding available to the Council

Each option has been assessed against the Critical Success Factors based on the following criteria:

✓ – Meets ? – Could meet x – Does not meet

The assessment for each option is as follows:

	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7	Option 8	Option 9
1 – Strategic fit and business needs	x	x	x	x	x	x	✓	✓	✓
2 – Value for money	x	x	x	x	x	x	✓	✓	✓
3 – Potential achievability	✓	✓	✓	✓	✓	✓	?	x	✓
4 – Potential affordability	x	x	x	x	x	x	?	x	✓
Total ✓	1	1	1	1	1	1	2	2	4
Total x	3	3	3	3	3	3	0	2	0
Outcome	Discount	Discount	Discount	Discount	Discount	Discount	Possible option	Discount	Preferred option

APPENDIX C – IMPACT OF EACH OPTION ON RURAL SCHOOLS CRITERIA

The likely impact of each option on quality and standards, the community and travelling arrangements is considered below:

Option	Likely impact on quality and standards	Likely impact on the community	Likely impact of different travelling arrangements
Option 1: Status Quo – continue as a standalone school	There would be no impact on quality and standards – pupils would continue to attend the current provision at Castle Caereinion.	There would be no impact on the community – provision would continue to be available in Castle Caereinion.	There would be no impact on travel arrangements – pupils would continue to attend Castle Caereinion C. in W. School.
Option 2: Federation with Welshpool C. in W. School	<p>The impact on quality and standards would be minimal. Castle Caereinion C. in W. School would continue to operate as a stand alone school, however the school would be federated with Welshpool C. in W. school, meaning that one joint governing body would be responsible for both schools. There would also be the potential for shared leadership across the two schools.</p> <p>Establishment of the federation could lead to opportunities to share staff / resources across the federation, which would have a positive impact on quality and standards.</p>	<p>The impact on the community would be minimal – provision would continue to be available in Castle Caereinion.</p> <p>However, one joint governing body would be responsible for both schools, therefore there could be a perceived reduction in community involvement in management of the school, depending on the make up of the federated governing body.</p>	There would be no impact on travel arrangements – pupils would continue to attend Castle Caereinion C. in W. School.

<p>Option 3: Merge with Welshpool C. in W. School to establish a new school on two sites</p>	<p>Welshpool C. in W. School was established in 2017 following the amalgamation of 4 nursery and infant schools in Welshpool. The school is currently operating across three sites, pending a move to a new building in 2021.</p> <p>Merging Castle Caereinion C. in W. School and Welshpool C. in W School would mean that Welshpool C. in W School would need to undergo a further management of change process, having already undergone numerous changes over the last few years. The Council's view is that this would threaten the quality of provision at Welshpool C. in W. School.</p>	<p>The impact on the community would be minimal – provision would continue to be available in Castle Caereinion.</p> <p>However, one new governing body would be responsible for both sites, therefore there could be a perceived reduction in community involvement in management of the school, depending on the make up of the new governing body.</p> <p>In addition, it is possible that joint school activities would take place on the Welshpool site as the much larger site, which could lead to a reduction in activity on the Castle Caereinion site.</p>	<p>Pupils would continue to attend school on the current site of Castle Caereinion C. in W. School.</p> <p>However, some additional travel may be required between schools in order to access activities and events.</p>
<p>Option 4: Close Castle Caereinion, but retain the site as part of Welshpool C. in W. School</p>	<p>Welshpool C. in W. School was established in 2017 following the amalgamation of 4 nursery and infant schools in Welshpool. The school is currently operating across three sites, pending a move to a new building in 2021.</p> <p>Retaining the Castle Caereinion site as part of Welshpool C. in W School would lead to further change for the Welshpool C. in W. School community, which has already undergone numerous</p>	<p>Provision would continue to be available in Castle Caereinion. However, the site would be managed by the current governing body of Welshpool C. in W. School, therefore there could be a perceived reduction in community involvement in management of the school.</p> <p>In addition, it is possible that joint school activities would take place on the Welshpool site as the much larger site, which could lead to a</p>	<p>Pupils would continue to attend school on the current site of Castle Caereinion C. in W. School.</p> <p>However, some additional travel may be required between schools in order to access activities and events.</p>

	changes over the last few years. The Council's view is that this would threaten the quality of provision at Welshpool C. in W. School.	reduction in activity on the Castle Caereinion site.	
Option 5: Merge with Berriew C.P. School to establish a new school on two sites	<p>It is anticipated that this option would have a positive impact on quality and standards through the establishment of one larger school, with a larger number of pupils and a larger team of staff.</p> <p>Whilst pupils would continue to attend separate sites, therefore would not benefit from all being taught together, this option would provide additional opportunities for staff expertise and resources to be shared across both sites. Castle Caereinion C. in W. School and Berriew C.P. School are both in the amber support category based on the 2019 categorisations, therefore it is not anticipated that the impact on quality and standards would be negative.</p>	<p>The impact on the community would be minimal – provision would continue to be available in Castle Caereinion.</p> <p>However, one new governing body would be responsible for both sites, therefore there could be a perceived reduction in community involvement in management of the school, depending on the make up of the federated governing body.</p> <p>In addition, it is possible that joint school activities would take place on the Berriew site as the larger site, which could lead to a reduction in activity on the Castle Caereinion site.</p>	<p>Pupils would continue to attend school on the current site of Castle Caereinion C. in W. School.</p> <p>However, some additional travel may be required between schools in order to access activities and events.</p>
Option 6: Close Castle Caereinion, but retain the site as part of Berriew C.P. School	Implementation of this option would result in closure of Castle Caereinion C. in W. School, however provision would continue on the current site. Castle Caereinion C. in W. School and	Provision would continue to be available in Castle Caereinion. However, the site would be managed by the current governing body of Berriew C.P. School, therefore there could be a	<p>Pupils would continue to attend school on the current site of Castle Caereinion C. in W. School.</p> <p>However, some additional travel may be required between schools</p>

	<p>Berriew C.P. School are both in the amber support category based on the 2019 categorisations, therefore it is not anticipated that the impact on quality and standards would be negative.</p> <p>The school would be a larger school, with a larger number of pupils and a larger team of staff, which could have a positive impact on the opportunities available for pupils and staff.</p> <p>Whilst pupils would continue to attend separate sites, therefore would not benefit from all being taught together, this option would provide additional opportunities for staff expertise and resources to be shared across both sites.</p>	<p>perceived reduction in community involvement in management of the school.</p> <p>In addition, it is possible that joint school activities would take place on the Berriew site as the larger site, which could lead to a reduction in activity on the Castle Caereinion site.</p>	<p>in order to access activities and events.</p>
<p>Option 7: Merge with Berriew C.P. School to establish a new school on the Berriew site</p>	<p>It is anticipated that this option would have a positive impact on quality and standards through the establishment of one larger school, with a larger number of pupils and a larger team of staff.</p> <p>All pupils would attend one site, which would provide further benefits to pupils from being part of larger cohorts of pupils, and</p>	<p>There would be a significant impact on the community of Castle Caereinion as there would be no provision in Castle Caereinion.</p> <p>However, merging with Berriew C.P. School to establish a new school would provide opportunities for the Castle Caereinion community to be involved in the process of establishing the new</p>	<p>Additional travel would be required for pupils currently attending Castle Caereinion C. in W. School.</p> <p>Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirement for parents in order to access school activities / events.</p>

	<p>improved opportunities to share staff expertise.</p> <p>Castle Caereinion C. in W. School and Berriew C.P. School are both in the amber support category based on the 2019 categorisations, therefore it is not anticipated that the impact on quality and standards would be negative.</p>	<p>school, would aid community involvement in the new school.</p>	
<p>Option 8: Merge with Berriew C.P. School to establish a new school on the Castle Caereinion site</p>	<p>In general, it is anticipated that this option would have a positive impact on quality and standards through the establishment of one larger school, with a larger number of pupils and a larger team of staff. All pupils would attend one site, which would provide further benefits to pupils from being part of larger cohorts of pupils, and improved opportunities to share staff expertise.</p> <p>However, it is unlikely that the Castle Caereinion site would be able to accommodate all pupils, therefore there would be a negative impact on the quality of provision should all pupils be taught in the current Castle Caereinion building.</p>	<p>There would be a positive impact on the Castle Caereinion community as this option would retain provision in Castle Caereinion and would lead to an increase in pupil numbers, safeguarding provision in the village for the future.</p> <p>However, there would be a negative impact on the Berriew community as there would no longer be provision in Berriew. Whilst merging the two schools to establish a new school would provide opportunities for the Berriew community to be involved in the process of establishing the new school to aid community involvement in the new school, however as Berriew is the larger village with a larger school, it is likely that the Berriew community</p>	<p>Additional travel would be required for pupils currently attending Berriew C.P. School.</p> <p>Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirement for parents in order to access school activities / events.</p>

		would consider this option to be disproportionate.	
Option 9: Close Castle Caereinion C. in W. School, pupils to attend nearest alternative schools	<p>Implementation of this option would mean that pupils currently attending Castle Caereinion C. in W. School would transfer to their nearest alternative schools. For the majority of pupils currently attending Castle Caereinion C. in W. School, the closest alternative schools would be Berriew C.P. School. The nearest alternative Church in Wales provision would be Welshpool C. in W. School. Some pupils may also choose to attend Llanfair Caereinion C.P. School or Guilsfield C.P. School as other nearby schools.</p> <p>The Council's view is that all of these schools would provide education for pupils which is of at least equivalent quality as that provided at Castle Caereinion C. in W. School, therefore it is not anticipated that implementation of the preferred option would have a negative impact on standards and progress overall. The overall aim of the proposal is to improve learning opportunities for pupils. Castle Caereinion C. in W. School, Berriew C.P. School and Llanfair</p>	<p>There would be a significant impact on the community of Castle Caereinion as there would be no provision in Castle Caereinion.</p> <p>As a Church in Wales School, The Castle Caereinion School building is owned by the Diocese, therefore the Diocese would need to determine the building's future use, and therefore whether or not facilities would remain in Castle Caereinion.</p>	<p>Additional travel would be required for pupils currently attending Castle Caereinion C. in W. School.</p> <p>Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirement for parents in order to access school activities / events.</p>

	Caereinion C.P. School were categorised as Amber in the latest school categorisations carried out in 2019, whilst Welshpool C. in W. School was categorised as Yellow. Guilsfield C.P. School was classified as a Green school.		
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APPENDIX D – REASONS WHY ALTERNATIVE OPTIONS HAVE NOT BEEN TAKEN FORWARD

Option	Description	Reason for discounting
1	Status Quo – continue as a standalone school	<ul style="list-style-type: none"> - Pupil numbers at Castle Caereinion would continue to be low - Would not lead to a rationalisation of primary provision - Would still need to maintain the Castle Caereinion building - Would not reduce surplus places - Would not lead to a financial saving - Would not address issues with the Castle Caereinion school building - Would not address the high budget per pupil
2	Federation with Welshpool C. in W. School	<ul style="list-style-type: none"> - Pupil numbers at Castle Caereinion would continue to be low - Castle Caereinion pupils would still be taught separately - Would not lead to a rationalisation of primary provision - Would still be required to maintain the Castle Caereinion building - Would not reduce surplus places - Would not lead to a financial saving - Would not address issues with the Castle Caereinion school building - Would not address the high budget per pupil - Significant difference in the size of the two schools
3	Merge with Welshpool Church in Wales School to establish a new school on two sites	<ul style="list-style-type: none"> - Small numbers would remain at Castle Caereinion - Castle Caereinion pupils would still be taught separately - Would still need to maintain the Castle Caereinion building - Would not reduce surplus places - Would not address issues with the Castle Caereinion school building - Both schools would lose their identity - Would impact on staff at Welshpool C. in W. School, who have already been through a reorganisation process in the last few years. - May not be attractive to Welshpool C. in W. School - Significant difference in the size of the two schools – would have a disproportionate impact on Welshpool C. in W. School

4	Close Castle Caereinion, but retain the site as part of Welshpool C. in W. School	<ul style="list-style-type: none"> - Small numbers would remain at Castle Caereinion - Castle Caereinion pupils would still be taught separately - Would still need to maintain the Castle Caereinion building - Would not reduce surplus places - Would not address issues with the Castle Caereinion school building - Castle Caereinion school would lose its identity - May not be attractive to Welshpool C. in W. School
5	Merge with Berriew C.P. School to establish a new school on two sites	<ul style="list-style-type: none"> - Small numbers would remain at the Castle Caereinion site - Castle Caereinion pupils would still be taught separately - Would not reduce surplus places - Would not address issues with the Castle Caereinion school building - Would also impact on the staff of Berriew C.P. School - Both schools would lose their current identities - May not be attractive to Berriew C.P. School
6	Close Castle Caereinion, but retain the site as part of Berriew C.P. School	<ul style="list-style-type: none"> - Small numbers would remain at the Castle Caereinion site - Castle Caereinion pupils would still be taught separately - Would not reduce surplus places - Would not address issues with the Castle Caereinion school building - Castle Caereinion C. in W. School would lose its identity - Would be no access to C. in W. School provision locally - May not be attractive to Berriew C.P. School
7	Merge with Berriew C.P. School to establish a new school on the Castle Caereinion site	<ul style="list-style-type: none"> - Additional travel for those pupils for whom Castle Caereinion C. in W. School is currently the closest school - Additional transport costs - Pupils currently attending Castle Caereinion School would have to transfer to a new location - Loss of provision from Castle Caereinion - Impact on the Castle Caereinion community - Would impact on Berriew staff as well as Castle Caereinion staff - Potential reduction in staffing requirements - Current capacity of Berriew school may not be able to accommodate all pupils - May not be acceptable to Berriew school

		<ul style="list-style-type: none"> - Both schools would lose their identities
8	Merge with Berriew C.P. School to establish a new school on the Castle Caereinion site	<ul style="list-style-type: none"> - Additional travel for those pupils for whom Berriew C.P. School is currently the closest school - Additional transport costs - Pupils currently attending Berriew School would have to transfer to a new location - Less convenient location for the majority of pupils - Current Berriew pupils may live closer to other schools - Loss of provision from Berriew - Impact on the Berriew community - Would not address issues with the Castle Caereinion building - Significant investment would be needed in Castle Caereinion to accommodate all pupils - Would impact on Berriew staff as well as Castle Caereinion staff - Potential reduction in staffing requirements - May not be acceptable to Berriew school - Both schools would lose their identities

APPENDIX E – RESPONSE FORM

PROPOSAL TO CLOSE CASTLE CAEREINION C. IN W. SCHOOL

Powys County Council is consulting on the following proposal:

- To close Castle Caereinion C. in W. School from the 31st August 2022, with pupils to transfer to their nearest alternative schools.

A consultation document which provides more information about the proposals is available on the Council's website at <http://www.powys.gov.uk/transformingeducation>. This consultation response form gives you the opportunity to let us know your view on the Council's proposal. The response form can also be completed online – a link to the online form is available by following the link above.

The closing date for this consultation is the **2nd June 2021**. All responses must be received by this date.

For information on how the Transforming Education Team protects and uses personal information collected during consultation processes, please see the Transforming Education privacy notice, which is available via the following link:

<https://en.powys.gov.uk/article/9803/Transforming-Education-Privacy-Notice>

Part 1 – About You

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

Parent, carer or guardian

Prospective parent, carer or guardian

Governor

Member of staff

Member of the community

Organisation e.g. Community Council

No association

Other

If you said 'Other' or are responding on behalf of an organisation, please specify:

2. Please specify which school you are associated with:

Castle Caereinion C. in W. School

Another school

No association

If you are associated with another school, please specify which school: _____

3. Please provide your postcode: _____

Part 2 – Consultation Response

- 4. Please provide any comments you have on the proposal to close Castle Caereinion C. in W. School:**

5. Are there any other options you think the Council should be considering for Castle Caereinion C.in W. School?

Please outline any alternative options below, including a description of the option(s) you think the Council should be considering:

Impact on people with protected characteristics

6. Do you have any comments or concerns about the impact of the proposal to close Castle Caereinion C. in W. School have on people with protected characteristics under the Equality Act 2010?

The protected characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.

Impact on the Welsh language

7. In your opinion, what positive or adverse effects would the proposal to close Castle Caereinion C. in W. School have on opportunities for persons to use the Welsh language and treating the Welsh language no less favourably than the English language?

8. How do you think the proposal to close Castle Caereinion C. in W. School could be formulated or revised so that it would have positive / more positive effects, or so that it would not have adverse effects / less adverse effects on opportunities for persons to use the Welsh language and treating the Welsh language no less favourably than the English language?

Copy of Consultation Report

9. At the end of the Consultation Period, the Council will publish a Consultation Report, summarising the issues raised in the consultation responses received and providing the Council's response to these issues.

Would you like to be informed of the publication of the consultation report?

Yes

No

If you answered 'Yes', please provide an e-mail address or postal address:

Part 3 – Equalities Information (Optional)

We want to ensure that we include all sectors of the community in our consultation, and are requesting that you provide this information to enable us to identify whether the consultation has been inclusive. However, these questions are optional.

10. How old are you?

<input type="checkbox"/> Under 16	<input type="checkbox"/> 16-24	<input type="checkbox"/> 25-35
<input type="checkbox"/> 45-54	<input type="checkbox"/> 55-64	<input type="checkbox"/> 65-74
<input type="checkbox"/> 75-84	<input type="checkbox"/> 85+	<input type="checkbox"/> Prefer not to say

11. What is your gender?

<input type="checkbox"/> Male	<input type="checkbox"/> Female	<input type="checkbox"/> Gender Fluid
<input type="checkbox"/> Non-Binary	<input type="checkbox"/> Gender neutral	<input type="checkbox"/> Prefer not to say

12. Can you understand, speak or write Welsh?

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Prefer not to say
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13. If you have school-aged children, are they entitled to receive free school meals?

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Prefer not to say
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14. If you have school-aged children, do they have any additional learning needs?

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Prefer not to say
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15. Do you consider yourself to be disabled?

<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Prefer not to say
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16. What is your ethnic group?

<input type="checkbox"/> White	<input type="checkbox"/> Asian	<input type="checkbox"/> Black, African or Caribbean
<input type="checkbox"/> Mixed	<input type="checkbox"/> Gypsy/Traveller	<input type="checkbox"/> Other
<input type="checkbox"/> Prefer not to say		

Thank you for completing this questionnaire.

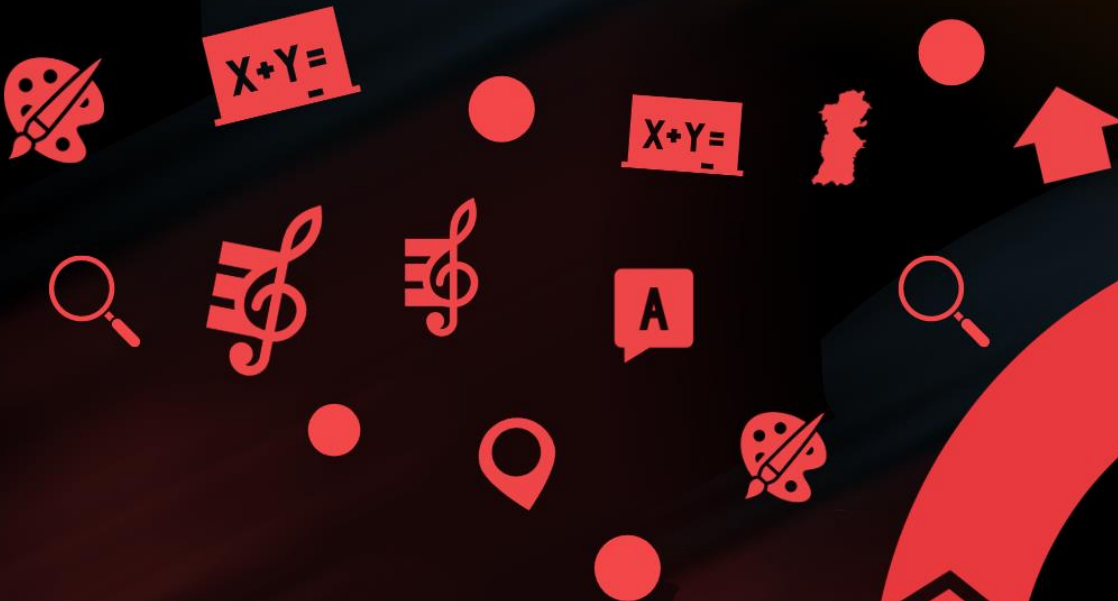
Completed questionnaires should be sent to the following address, to arrive **no later than the 2nd June 2021.**

Transforming Education Team, Powys County Council, County Hall, Llandrindod Wells, LD1 5LG

E-mail: school.consultation@powys.gov.uk



Closure of Castle Caereinion C. in W.
School
Consultation Report



Consultation on the closure of Castle Caereinion C. in W. School

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

Consultation on the closure of Castle Caereinion C. in W. School

1. OVERVIEW OF THE CONSULTATION

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

- To close Castle Caereinion C. in W. School from the 31st August 2022, with pupils to attend their nearest alternative schools

The consultation took place from the 14th April 2021 to the 2nd June 2021.

i) Consultation methods

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

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

Meetings were held virtually with the following:

- Staff of Castle Caereinion C. in W. School – 27th April 2021
- Governors of Castle Caereinion C. in W. School – 27th April 2021
- Castle Caereinion C. in W. School Council – 19th May 2021

ii) Responses received

A total of 68 respondents completed the consultation response form which was included in the consultation document. This included paper copies as well as responses submitted using the online response form.

In addition, 25 written responses were received from respondents, including Estyn. The response received from Estyn is provided on page 22, in-line with the requirements of the School Organisation Code.

The written responses included an online petition to 'Save Castle Caereinion CiW primary school', which was signed by 676 people.

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

- Castle Caereinion Community Council
- The Diocese of St Asaph
- The Bishop of St Asaph
- St Garmon's Church, Castle Caereinion
- Trustees of the Castle Caereinion Recreation Association
- Accessibility Powys

iii) Summary of issues raised

The issues raised in the consultation responses are listed in detail in section 6 on page 22. This includes the Council's response to each issue. The following is a summary of the issues raised:

1. Comments about Castle Caereinion C. in W. School
2. Comments about Church in Wales provision
3. Impact on pupils
4. Travel implications
5. Impact on staff
6. Impact on the community
7. Comments about pupil numbers / surplus places
8. Comments about small/rural schools
9. Comments about other schools pupils might transfer to
10. Impact on Protected Characteristic groups
11. Issues relating to Finance
12. Comments about the Council's Strategies
13. Criticism of Powys County Council
14. Questions about / issues with the process
15. Questions about / issues with the consultation documentation
16. Alternative options
17. Comments about impact on the Welsh language
18. Comments in support of the proposal

2. CONSULTATION RESPONSE FORM

63 respondents completed the English language consultation response form, which was available online, and 0 respondents completed the Welsh language consultation response form which was available online. 5 respondents sent the consultation response form by email in English, and 0 respondent sent the consultation response form by email in Welsh.

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

Part 1 – About you

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

Response	No.	%
Parent, carer or guardian	11	16.2%
Prospective parent, carer or guardian	3	4.4%
Governor	0	0.0%
Member of staff	4	5.9%
Member of the community	17	25.0%
Organisation	1	1.5%
Pupil	24	35.3%
No association	5	7.4%
Other	3	4.4%
Not Answered	0	0.0%
Total responses	68	100.0%

2. Please specify which school you are associated with:

Response	No.	%
Castle Caereinion C. in W. School	58	85.3%
Another school	7	10.3%
No association with any school	3	4.4%
Not Answered	0	0.0%
Total responses	68	100.0%

3. Please provide your postcode:

Response	No.	%
Llanfair Caereinion / Welshpool	61	89.7%
Llandrindod Wells	2	2.9%
Shropshire / Minsterly	2	2.9%
Montgomery	2	2.9%

Llanfyllin	1	1.5%
Not answered	0	0.0%
Total responses	68	100.0%

Part 3 – About you

12. How old are you?

Response	No.	%
Under 16	24	35.3%
16-23	2	2.9%
25-34	5	7.4%
35-44	18	26.5%
45-54	7	10.3%
55-64	0	0.0%
65-74	8	11.8%
75-84	0	0.0%
85+	0	0.0%
Prefer not to say	4	5.9%
Not answered	0	0.0%
Total responses	68	100.0%

13. What is your gender?

Response	No.	%
Male	27	39.7%
Female	39	57.4%
Gender Fluid	0	0.0%
Non-Binary	0	0.0%
Gender neutral	0	0.0%
Prefer not to say	1	1.5%
Not answered	1	1.5%
Total responses	68	100.0%

14. Can you understand, speak or write Welsh?

Response	No.	%
Yes	18	26.5%
No	28	41.2%
Prefer not to say	10	14.7%
Not answered	12	17.6%
Total responses	68	100.0%

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

Response	No.	%
Yes	4	5.9%

No	32	47.1%
Prefer not to say	5	7.4%
Not answered	27	39.7%
Total responses	68	100.0%

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

Response	No.	%
Yes	6	8.8%
No	31	45.6%
Prefer not to say	4	5.9%
Not answered	27	39.7%
Total responses	68	100.0%

17. Do you consider yourself to be disabled?

Response	No.	%
Yes	3	4.4%
No	61	89.7%
Prefer not to say	1	1.5%
Not answered	3	4.4%
Total responses	68	100.0%

18. What is your ethnic group?

Response	No.	%
White	64	94.1%
Asian	0	0.0%
Black, African or Caribbean	0	0.0%
Mixed	2	2.9%
Gypsy/Traveller	0	0.0%
Other	0	0.0%
Prefer not to say	2	2.9%
Not Answered	0	0.0%
Total	68	100.0%

3. CONSULTATION WITH PUPILS

Comments received from pupils are outlined below. This includes the notes of a meeting held with pupils at Castle Caereinion C. in W. School, as well as a summary of the written responses received from pupils to the consultation exercise.

i) Meeting with the School Council of Castle Caereinion C. in W. School

19th May 2021 – Held virtually on Microsoft Teams

Present: Marianne Evans, Sarah Astley, Huw Rowlands – Powys County Council

Sarah Brian, Headteacher – Castle Caereinion Church in Wales School

Officers from Powys County Council met virtually via Microsoft Teams with representatives from the School Council of Castle Caereinion Church in Wales school to discuss the consultation to close Castle Caereinion Church in Wales school from 31 August 2022 with pupils to attend their nearest alternative schools.

The School Council group consisted of 8 pupils.

Pupils gave a short presentation about Castle Caereinion School, which is transcribed below:

'We would like you to save our school because we are happy here. The lessons that we do are fun, we are learning new things all of the time! We have large classrooms that have lots of space to move around and to do lots of team work! We are excited about the new curriculum and think our school is going to be a great place to learn in this fun new learning style, with the four purposes.

As part of our new curriculum learning we are doing a whole school topic of green which is great as we get to chose what we want to learn about! We are also learning to speak a new language, Polish! We can say words like, Tak, Nie, Czesc, Dovidenia and Dziękuję Ci. We don't mind practising and getting it a bit wrong because we are all friends and no body laughs at you. We all help each other to learn and to get better.

We are like a family in Castle Caereinion CiW School. Everybody knows each other really well and we all look after each other. We are all friends but if we have to move to different schools we will lose our friendships as we will all be split up.

We have great outdoor areas that allow us to take our learning outdoors! We have our own pond to do pond dipping, seated areas and an outdoor classroom. We have raised beds where we can plant lots of different things. All of the garden areas are kept locked so that we can be kept safe inside them! We also have Forest Schools starting here and we are really excited about it!

When Covid goes away we will be able to go back to having lots of after school clubs, like craft club, coding club and sports club. We always do Christmas crafts too but couldn't last year because of Covid. If we go to another school we might not be able to stay to do after school clubs because our mummies and daddies would have to pick us up as we would miss the bus. This wouldn't be fair, because we would never get to do the fun clubs that we can here in Castle school.

We will also be able to do school trips again, they are always great fun. We have been to the Senedd in Cardiff to learn about our capital city. We also went to the zoo!

Our school is great because we have so many great resources. We have our very own ICT suite with PCs. We also have laptops, ipads and chrome books that we can use in class! Each classroom has an interactive whiteboard and these have been great at helping us to join in live assemblies with Google, a range of famous authors on World Book Day and more recently with Keep Wales Tidy for our Climate Change week.

Our school is special because we have nice teachers who care about us and know us all really well.

Its better being taught in a smaller school because there are less children so we get to have more help from the teachers. The children are all really friendly too, in bigger schools not everyone is nice to you all of the time.

Our school is close to our Church which is really good because we can walk to our Church for services. We go there to learn about God and for special events like Christingle, Harvest and Easter. We also go there for RE lessons where we have role play sessions and act out Baptisms and weddings. Our vicar, Rev. Steve is able to come to our school lots and is able to teach us all about Jesus and God. He might not be able to come to us if we go to another school.

We also have the Impact teams come to visit us with their big bus. This won't happen if we don't go to a Church school. We all love it when the Impact bus comes! The people from the Church link in with us a lot, they hold messy Church clubs where we all get to do lots of really fun craft activities with the people from the community and the church.

Most of us live in the village so at the moment we can walk to our school. If our school closes we may not be able to walk to our school and that will mean putting more cars on the roads. That causes more pollution and that is not good for the environment.

Our village is growing too, we have more houses being built and people might not move here if there is no school. If you leave our school open then the new families will be able to send their children here and we can make even more friends. It's really good living in the same village as our school because we are able to meet up after school and play in the park. If we go to other schools our friends might live in different places so we would need to have lifts to go and meet them. This would be bad for the environment.

Our school is next door to the community centre. This is great because we get to have cake stalls, Christmas and Summer Fayres, school plays and tea mornings. All of the people from the village can get to come to these, so it helps us to work together as a Community. It is also a great chance for the older members of the community to get out of the house and to do something fun with us, the youngest members of the community.

In school we have Committees, like the School Council, Healthy Schools, Eco Schools and Criw Cymraeg. Because we are a small school we get to be in more than one of these clubs which is great! We work in our committees to make positive changes. The School Council organise fundraising events for things like Young Minds, Red Nose Day and World Book Day. We have a Healthy Schools Week coming up where we will learn all about being healthy and we will have a healthy tuck shop! Our Criw Cymraeg are really good and they are teaching us new words and phrases all of the time. We have got our Bronze Award and we meet with Mrs Andrew a lot as she is helping us to work towards our Silver Award for the Siarter Iaith.

We have lots of great sports equipment and we have fun in our PE lessons using it! We are really looking forward to Covid going away so we can compete against other schools in sporting competitions!

Thank you for listening!

Following the presentation, the pupils were asked several questions and their responses are summarised below.

It was explained that the first question would have been **'What do you like about Castle Caereinion school'**, however pupils have already answered that question in their presentation. Officers moved on to the second question:

Is there anything you don't like about the school? Is there anything that could be better?

- No

It was explained that from time-to-time Powys County Council had to look at the schools in Powys, and sometimes some changes have to be made to some of the school. The Council has been reviewing Castle Caereinion School, and is wondering whether the school should close.

The consultation process was explained and the fact that no final decision had been made yet, it was still an idea and there was now an opportunity for people to say what they think. It was explained that the Council especially wants to hear what pupils think about this idea.

Do you all understand what we are here to speak to you about?

- Yes

If there was no school in Castle Caereinion, what would change for you as pupils?

- We would lose friends as they would be moving to a different school, so we would have to split from some of them.
- We wouldn't be able to meet together after school.
- We couldn't walk to school and we would have to drive to a different school and cause more pollution.

How many of you live in the village and walk to school now?

- 5 pupils put their hands up
- Many of us live in the village.

If the school was to close which other school would you go to?

- Llanfair, Welshpool, Welshpool, Llanfair, Llanfair, Llanfair, Llanfair, Guilsfield

So a lot of you think you would go to Llanfair, but nobody would go to Berriew? Does nobody live closer to Berriew?

- Some live closer to Berriew but parental choice means that they would go elsewhere.

Is there anything else you can think of that would be different, or worse for you if there was no school in Castle Caereinion?

- If there was no school here, people would not want to move to this village
- You wouldn't be able to meet up with people in the village.

I'm getting the feeling that Castle Caereinion school is very important to you as a community, it's wider than just the school. Do you think you would feel part of the community if you move to a different school?

- No.

Why would that be?

- You would have to meet new children in a new school. Some could be mean to you. Here everyone is kind.
- If we don't go to the school we're not supporting the community.

A lot of you have mentioned going to Llanfair school if Castle Caereinion school closes. It's much bigger than Castle Caereinion school. Is there anything you think would be good about being in a bigger school?

- I would see my cousin
- More friends
- A wider group of friends
- Lots of friends

Is there anything that would be worse about going to a bigger school?

- We could get lost
- Difficult to make friends as other children will already have their friends
- More people could/might bully you
- You might get lost
- Being shy
- Feel like the odd one out

At the moment you're in 2 classes in Castle Caereinion school and there are a number of year group in each class. In a bigger school there would be less year groups in each class, maybe Reception and year 1 together, years 1 and 2 together, years 2 and 3 together, 4 and 5 together. Would that be a good or bad thing?

- It would be bad because I would be separated from my friend
- You wouldn't be able to see your friends

How would you feel things would change for your teachers if Castle Caereinion school closes?

- It would be hard for them to find a job
- People would lose their jobs
- Sad
- I would like them to try for work at Llanfair school

Do you have any other questions? Is there anything else you would like to add? Is there anything worrying you about the plans?

- Why do you need to close our school?

Officers explained that the Council has to look at all its schools. At the moment there are lots of schools across the whole of Powys. Some schools are very small and it's difficult to keep them going if they are small. We think pupils would have more friends and opportunities in larger schools.

- Why does it have to be our school? I've been to bigger schools and children were not kind to me, but they are here.

Officers explained that the Council is looking at other schools in Powys as well as Castle Caereinion – it's not only Castle Caereinion.

- What would you do with the school – sell it, knock it down, it wouldn't be suitable for houses as it's close to the community centre?

The school is owned by the Church in Wales, so they would decide what to do with the building.

- Are you closing the school just to save money?

No, the Council feels that there are more opportunities for pupils in larger schools as they have more opportunities to make more friends.

- I do have a friend who's in Welshpool and we don't talk and she is mean to me sometimes so I'm a bit concerned about that
- Would you be able to see year 1 and Reception kids at playtime at bigger schools?

Yes, you would see them at breaktime.

Officers asked the pupils how they feel about what the Council is doing? Are they happy, sad, worried?

- Worried and sad

- Sad

Officers explained what happens next, which is that this is a consultation period where everyone's views are being asked. Pupils were encouraged to send any further comments or views to the Council by 2 June 2021, when the consultation closes, and to ask their teachers if they need any help to do this.

After the 2nd June, a report summarising everything people and pupils have said during the consultation period will be prepared. It was explained that this would include all of the things pupils have said in today's meeting, as well as what governors and staff have said in meetings held with them, and what other people have said.

The report will then be considered by the Council's Cabinet. It was explained that they are the people who make the decisions in the Council, and they will look at all the comments made and decide if they want to close the school or not. If they decide not to carry on then that would be the end of this plan. If they decide to carry on, then what's known as a Statutory Notice would be published, formally saying that the Council wants to close the school, and then there would be a 28-day period for people to respond, and to say if they don't agree. Another report would then need to be prepared and considered by the Cabinet.

There's still quite a way to go in the process, and no decision has been made yet, and if the process proceeds, no final decision will be made until just before Christmas. If Cabinet does decide in the end to close the school, that would be in September 2022.

Pupils were reminded once again of the opportunity to send in any further comments and were thanked for attending the meeting and giving their views.

ii) **Summary of other comments made by pupils**

In addition to the meeting with the School Council, 24 online responses and 1 written response was received from pupils.

The comments raised in these responses are included in the 'issues raised' in section 6 of this report. However, they are also summarised below:

1. Positive comments about Castle Caereinion School

- All the pupils at the school are friends
- The teachers know all the pupils
- There is a lot of ICT equipment at the school
- The school has a good outdoor area, including Forest Schools, a large playground, a pond

- There are good indoor facilities, including a library, big classrooms
- There is a community hall on the site
- There are a lot of committees and clubs at the school
- 'Wellbeing Wednesdays'
- Before Covid, the pupils went on lots of school trips
- The school holds community events
- There are close links between the school and the church
- The school is suitable for people with disabilities
- Pupils can have breakfast at the school
- There isn't a lot of noise at the school
- The pupils are in small classes which means that they can have more help from the teachers

2. Impact on pupils

- Pupils enjoy going to the school, they feel safe there
- Concern that pupils will be split up from their friends
- Concern that pupils in other schools won't be as kind
- Concern about bullying in other schools
- Pupils won't be able to walk/cycle to school
- Pupils would have to travel further to school, and would have to travel on a bus

3. Comments about the community

- New houses are being built in Castle Caereinion but no one will want to live in the village if there's no school

4. Other options

- The Council should delay to give time for new houses to be built.
- They could posters up to try to get more pupils to come to the school.

4. CONSULTATION MEETINGS WITH STAFF AND GOVERNORS

Consultation meetings were held with the staff and governors of the school.

The issues raised at these meetings are summarised below:

i) Consultation meeting with Staff of Castle Caereinion C. in W. School

- In terms of the timings, obviously we have up until the 2nd of June to respond to the consultation, and then are we right in thinking there is a 28-day period for it to be discussed in Cabinet, does that take us to the 8th of July?
- If they decide initially to proceed, and there are no objections, when can we expect to have a decision? There is anxiety from staff with regards to different time scales, and when exactly they will know.
- With it being fluid around the dates, it is difficult then to advise parents as some parents are thinking that if the school is going to close, they might move their children earlier.
- If we cannot make parents aware until the end of the year, does that then affect the actual closing date if we were to close? Is it 12 months from the notice?

ii) Consultation meeting with Governors of Castle Caereinion C. in W. School

- I was under the impression that because Castle Caereinion is a church school, that the final decision would not necessarily rest with the Powys Cabinet, but with Welsh Government?
- What are the circumstances in which the decision would get taken out of Powys' hands?
- Is there a reason why this was just dropped on us only yesterday, and we haven't under the circumstances had a lot of time to prepare?
- We have spotted errors in the consultation report, is that still then a fair consultation and would it still go forward?
- In your initial comments, you spoke about the nearest suitable school. The nearest council-maintained school is in Berriew, but this is in a different catchment area to Castle Caereinion school. Will the fact that it is in a different catchment, affect its suitability as a receiving school?
- I have a difficulty here because traditionally the children from Castle Caereinion School went to Llanfair High School, but of late there has been a quite a move going to Welshpool High School. What will happen with that, will children still be able to go to Welshpool High School, and will they still get free home to school transport to Welshpool?
- So they would get free transport to Berriew school, presuming that Castle Caereinion closed, and from Berriew they would get free school

transport to Welshpool School, even though they still live in Castle Caereinion?

- Have you looked at the area that children come from to Castle school?
- How many schools do we have the opportunity to go to and will pupils be guaranteed free transport to those schools?
- Will they still be able to go to Llanfair High School like the normal catchment they have now?
- You are talking about the transport, is there going to be a big additional cost to the education department to transport these children to other schools rather than Castle?
- Just going back to the numbers and transport, are there going to be enough places in our nearest school if there are lots of schools facing closure?
- Are you splitting the school up at all? For example, if the nearest school only has 21 places, how are we going to then fit in?
- What about those pupils that don't want to go to Berriew, are there places for everybody anywhere else? Have people been asked where they would like to go? Would transport be provided to the alternative school of their choice?
- Have you done a survey to find the numbers available across the schools for children? Meifod, Guilsfield and Llanfair primary?
- It was always the policy, that look at schools on a catchment basis, you look at all the primary schools within a given catchment. Why did the policy change to a policy of opportunism, or cherry picking, as now, as obviously there was a change. When did that come in and why?
- There is now a presumption that the very last thing you do with a rural school, is to close it. Can you tell us the options that you have considered in Castle Caereinion, which is a rural school, and why you have decided that the only option is to close it?
- You mentioned federation, were there others?
- I would like you to go through them and explain to me why you rejected each one of them.
- Following on from that, in the assessment for each option, you've got option 7 and you have 2 question marks, "could be met", and option 9 is obviously 4. If those question marks, "could be met", then surely they should be ticked and that would be 4 and 4? Yet the only option seems to be to close and therefore option 7 should still be available to us.

5. ESTYN

Estyn's response to the consultation is provided below:

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

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

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

Summary/Conclusion

The proposal seems to include a balanced and proportionate range of options, nine in total, which look in detail at a wide range of possibilities. It is Estyn's opinion that the proposal is likely to at least maintain the standard of education provision in the area.

Description and benefits

The consultation document provides all stakeholders and interested parties with a clear rationale for the proposal to close Castle Caereinion Church in Wales School. The document sets out clearly the local authority's plans and rationale for change, based on their 'strategy for transforming education in Powys.' A key element of this vision is to 'improve learner entitlement and experience', and to 'rationalise primary provision.' The proposal gives detailed background of why the local authority consider change to be needed in Powys. The challenges include a high proportion of small schools, decreasing pupil numbers and high surplus places.

The proposal sets out a wide range of options, outlining their expected benefits and disadvantages when compared with the status quo. There are a number of options which include merging or federating with other schools within the area, with a range of possible management structures. The options considered within the consultation document relate to establishing federations or merging with Berriew CP school or Welshpool CIW school.

The advantages and potential risks for each option are given clear consideration within the consultation document and provide clear information

for all interested parties and stakeholders who may wish to respond during the consultation process. The document outlines a clear rationale as to why closing Castle Caereinion Church in Wales school is the local authority's preferred option, and that the 23 pupils currently on roll are accommodated in other local primary schools in the area.

The proposal, outlining the preferred option was agreed based on the strengths, weaknesses, opportunities and threats analysis, assessing the nine options against the impact of each option on quality and standards, the community and travel arrangements. The local authority have also assessed the options according to critical success factors. These include strategic and business needs, value for money, potential achievability and potential affordability. This information provides stakeholders with a wide range of useful information when taking part in the consultation process.

The proposer notes the following to support their preferred option:

- Option addresses the issue of low pupil numbers at Castle Caereinion CIW primary.
- Option would reduce the council's overall surplus capacity in primary schools. Option saves revenue for the council.
- Pupils would attend schools with more suitable accommodation.
- Pupils would attend larger schools, which they feel are better equipped to meet the requirements of the curriculum for Wales.
- Pupils would attend larger schools which the proposer feels could a wider range of academic and extra-curricular activities.

The proposal clearly sets out the financial impact of the closure of Castle Caereinion Church in Wales school. There is a potential saving per annum of £90,000. When likely travel costs are included, the annual saving is projected as £58,000.

Educational aspects of the proposal

The proposal gives due consideration to the standard of education provision within schools in this part of Montgomeryshire. The proposal provides summary information about standards in local schools likely to be affected by the closure of Castle Caereinion CIW school. It considers information about pupils' wellbeing and attitudes to learning, and the quality of teaching and the breadth, balance and appropriateness of the curriculum, and the provision for skills. It considers the quality of care, support and guidance within local schools, and also the quality of leadership and management within schools which may be affected by Castle Caereinion's closure.

The local authority has given due consideration to the most recent Estyn inspection reports for the schools in the vicinity which are likely to be impacted

by the closure of Castle Caereinion. They have also given appropriate consideration to the impact of the closure of Castle Caereinion on the standard of provision at foundation phase and key stage 2 across the other schools in the area to which pupils may transfer. The local authority has also provided information about church schools within the area which provide similar provision.

The proposal provides summary information about provision for pupils with special educational needs within the schools to which the pupils may transfer. Other vulnerable groups, such as pupils entitled to free school meals, have also received appropriate consideration within the proposals. The local authority has acknowledged the potential disruptive impact of closing a school in a rural community but has also noted elements designed to mitigate the risks.

Presumption against the closure of rural schools:

The 'school reorganisation code' notes that the proposer must consider additional factors if the school, as in the case of Castle Caereinion CIW school, meets the criteria for rural schools. The proposal appears to give due consideration to the three criteria which relate to rural schools as outlined in the code (likely impact on quality and standards, likely impact on the community, likely impact of different travel arrangements). The proposer has paid appropriate consideration to these criteria and how they relate to, and impact upon the nine options, including the preferred option of closing Castle Caereinion CIW school.

The proposal provides detail as to how each option was assessed according to the three criteria in the presumption against the closure of rural schools. For example, in relation to the likely impact on quality and standards, the proposer concludes that the impact is likely to be limited as provision is 'of at least equivalent quality,' in the other schools affected.

The proposal acknowledges the likely impact on the community as there would be no school in the community. The Castle Caereinion CIW school building is owned by the Diocese of St Asaph, and it would be their decision whether a community facility would remain.

The proposal acknowledges a range of travelling implications for pupils and parents. It identifies that there could be increased travelling times to school for some pupils, that there could be an impact on pupils' ability to access after-school activities, and the proposal could affect the ability of parents to take part in school events. It further identifies that this may have an impact on pupil wellbeing. When considering the impact on children from vulnerable groups, the local authority notes that there would be an impact on families due to the requirement to travel to school events, which could have a greater impact on

children from economically deprived backgrounds. In mitigation, the proposal does set out that there would be free travel to and from school for pupils in accordance with the local authority's home/school transport policy. However, the proposal does not identify how the local authority will deal with wider issues.

6. ISSUES RAISED DURING THE CONSULTATION PERIOD

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

1. Comments about Castle Caereinion C. in W. School

1.1 Positive comments about the provision at Castle Caereinion C. in W. School

Ref.	Issue raised	Local authority response
1.1.1	Castle Caereinion is an excellent school, and very much at the heart of the village.	The Council notes these positive comments regarding the current provision at Castle Caereinion C. in W. School.
1.1.2	I recently joined a Zoom presentation of what the school is doing and achieving, also the resources available. I was impressed with what I saw.	As above.
1.1.3	This school has always been a happy place where children have had a good education preparing them for high school.	As above.
1.1.4	Just very happy children... and as the Head has already described a tangible improvement in writing, reading, IT and other essential skills.	As above.
1.1.5	Castle is a friendly school.	As above.
1.1.6	This school is a gem in our small community.	As above.
1.1.7	I think our school should stay open because it is a wonderful place.	As above.

1.1.8	The school is an excellent school and part of the village community.	As above.
1.1.9	The school has a fine reputation.	As above.
1.1.10	Castle Caereinion School is a wonderful village school in a beautiful rural setting which supports local families and children in the community.	As above.
1.1.11	The school provides an essential local educational service within a rural setting, supporting local families.	As above.
1.1.12	Teaching is catered to the needs of individual pupils.	As above.
1.1.13	My school is super fun and I like to learn.	As above.
1.1.14	They are doing a jolly good job in teaching the Welsh language as your recent report has shown.	As above.
1.1.15	I think it's a bad idea to close this school. Pupils have moved here as their previous school could not meet their needs, this school has helped them no end, has met every requirement needed and more even through this pandemic they teachers have been amazing.	As above.
1.1.16	We would like you to save our school because we are happy here. The lessons that we do are fun, we are learning new things all of the time! We have large classrooms that have lots of space to move around and to do lots of team work! We are excited about the new curriculum and think our school is going to be a great place to learn in this fun new learning style, with the four	As above.

	<p>purposes. As part of our new curriculum learning we are doing a whole school topic of green which is great as we get to choose what we want to learn about! We are also learning to speak a new language, Polish! We can say words like, Tak, Nie, Czesc, Dovidenia and Dziękuję Ci. We don't mind practising and getting it a bit wrong because we are all friends, and no body laughs at you. We all help each other to learn and to get better.</p>	
1.1.17	<p>The pupils who attend the school are a happy, confident and polite group. They look out for each other and realise how lucky they are to attend the village school where they live.</p>	As above.
1.1.18	<p>Our school is much more than a school it's my family. Please don't break my family up.</p>	As above.
1.1.19	<p>I love Castle Caereinion School because I have lots of friends here.</p>	As above.
1.1.20	<p>I don't believe the education that is being taught in Castle CIW primary is none less than any other school in Powys.</p>	<p>Comment noted. The quality of provision at Castle Caereinion C. in W. School is not one of the reasons why the Council is proposing to close the school.</p>

1.2 Positive comments regarding the size of the school

1.2.1	<p>Our school is small so we don't have to share things around</p>	<p>The Council notes these comments about the size of the school. However, the Council has a duty to manage the whole education system across the whole of the county. The Strategy for Transforming Education outlines the challenges facing education in Powys, which was developed following extensive stakeholder engagement in 2019/2020. These</p>
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		challenges are outlined in the Consultation Document and include concerns about the number of small schools in the county, which comes with a higher cost per pupil, and therefore there is a need to reorganise schools to provide equity across the whole system.
1.2.2	It's much better having a smaller school because you get to have lots of friends. I am friends with everyone in my school and it's great. We also get to have more help with our schoolwork because the teachers have more time for us and understand exactly how to help us.	All schools, regardless of size, enable pupils to make friendship groups. All schools, regardless of size, need to ensure that all pupils are supported and challenged to achieve their full potential.
1.2.3	Small class sizes enable the children to have quality time and support from the teachers and teaching assistants.	As above.
1.2.4	Because we are a small school the teachers can help each and every one of us the second we get stuck.	As above.
1.2.5	We have small class sizes, thus benefitting the pupils accessibility to teacher support.	As above.
1.2.6	Castle Caereinion CiW School may be small but this does not mean that it needs to close.	Comment noted.
1.2.7	Our school is like a family, where everyone knows each other and understands each other's interests and needs. This allows the teachers to have excellent relationships with the children and therefore a reduction in poor behaviour incidents as seen in larger schools.	Teachers in all schools, regardless of size of the school, nurture good relationships with children – there is no evidence that larger schools experience poor behaviour more so than smaller schools.

1.2.8	The dedication of the staff and small class numbers provides a key to each child's needs. with individuals supported one to one. Children are better able to help one another.	All schools, regardless of size, are able to provide for the needs of their pupils. Smaller class sizes would not necessarily mean that pupils receive a more individual education as there are a number of year groups and a wider age range of pupils in the class.
1.2.9	Whilst it is a little school, it is still a nice school.	Comment noted.
1.2.10	Outside we can ride on the bikes, scooters and tractors and if I went to a bigger school they won't have these and I will be really sad.	Larger schools also have external teaching and recreational spaces and equipment.
1.2.11	There are not many students so the teachers can help more	All schools, regardless of size, are able to provide for the needs of their pupils. Smaller class sizes would not necessarily mean that pupils receive a more individual education as there are a number of year groups and a wider age range of pupils in the class.
1.2.12	Please don't close our school. Please give us a chance. Just because we are small doesn't mean we aren't good. I get teased because I'm small, does that mean I should give up too?	Comment noted.
1.2.13	It's good that there aren't many children here because in a bigger school there will be more children falling out.	There is no evidence that larger schools experience poor behaviour more so than smaller schools.
1.2.14	It's really good to come here because it's smaller than my old school, so we get more chance to do things. Here everyone knows me and we have lots of fun when doing our work.	Comment noted.

	In school we have Committees, like the School Council, Healthy Schools, Eco Schools and Criw Cymraeg. Because we are a small school we get to be in more than one of these clubs which is great!	It is acknowledged that there would be more opportunity for pupils in a smaller school to participate in different activities due to the pupil ratio within the school. However, all schools, regardless of size, have a range of committees and schools are expected to ensure that pupils can participate fully with these.
1.2.15	It is easy to assume that because we are a small school that the children are not having the same learning experiences as those in a bigger school, this is true. Our children are having BETTER experiences because they have greater access to technology, larger classrooms to aid collaborative learning and a greater individual opportunity to participate in activities. In Castle Caereinion CiW School each child is a member of at least one school committee, in larger schools this is not the case; only a handful of children are selected. To close our school would reduce their opportunity to participate in pupil voice activities.	As above.
1.2.16	The small class sizes can be a real positive for learning Welsh at Castle Caereinion. You could teach them in small groups each day and you have the time to help the children who might need extra support.	All schools regardless of size are expected to teach Welsh and groupwork in larger schools is also effective.
1.2.17	Although this is a small school it is better for the children the teachers know them individually and can meet there needs much better this is from a parent who has had her children go through the bigger schools and watched them fail her children if you close this school you're failing the children that go to this school.	Whilst the Council acknowledges this person's experience in a larger school, it is not possible to comment without knowing further detail. However, all schools, regardless of size, are expected to nurture, support and challenge all pupils to achieve their full potential.

	The reason I do not want this school to close is because I'm in a small class and there are only 12 of us, so that means I can have more help from the teachers.	The Council's view is that a class of 12 pupils is neither cost-effective nor sustainable.
1.2.18	The size of the school means that each child is treated as an individual with their own needs met rather than being treated as a number within a larger school setting.	All schools, regardless of size, are expected to treat each pupil as an individual and provide a pupil-centred teaching and learning experience.
1.2.19	Castle Caereinion Primary School is a brilliant little school and large schools aren't always for everyone. I've seen myself the transformation from a large school to a child coming here to Castle. The large schools don't always work for the timid child or the shy ones who need one to one emotional support or the disabled child who wants to go to a mainstream school. It's also the same for low class numbers. I appreciate they may be seen as a negative for you but they are honestly good for the children that need the additional help and time.	The Council expects all schools, regardless of size, to ensure that all pupils are nurtured, supported and challenged, and that their needs are met.
1.2.20	It's a lovely small village school where smaller classes benefit the children. They are able to get the attention of their teachers and support staff that most students wouldn't get in a bigger village or town school. Children thrive here!	As above.
1.2.21	Not only is it a small school so students get a better chance of getting more one on one but some students need that in order to go on through mainstream high school. If it wasn't for Castle some past pupils wouldn't have been able to get through high school because they wouldn't have been ready. Being a small school helped them to be able to achieve.	All high schools have a transition plan for pupils transferring into their school from primary schools. This would mean that all children will have the same experiences when transition from their primary school to their secondary school.

1.2.22	Because it's a little school, pupils who are autistic and struggle with things like reading and writing can get the help they need – they wouldn't have the same help in a bigger primary as there would have been too many other students.	All schools, regardless of size, are expected to provide support for all pupils including those with Additional Learning Needs (ALN).
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1.3 Comments regarding extra-curricular provision at the school

1.3.1	With a small school we get to choose more than one committee. When Covid is over we will go to tournaments for sports.	<p>The Council notes these comments regarding the extra-curricular provision available at Castle Caereinion C. in W. School, and the opportunities for pupils to take part in a range of clubs, committees and other activities.</p> <p>All schools offer a range of extra-curricular opportunities for pupils, and should Castle Caereinion C. in W. School close, the alternative schools pupils could choose to transfer to would also offer a wide range of extra-curricular opportunities, and there would be opportunities for pupils to take part in activities, committees and trips.</p> <p>The alternative schools would be larger schools, and in many cases, larger schools are able to offer wider range of activities, as there are larger groups of pupils who would be able to take part in activities such as sports teams, choirs etc, as well as a larger team of staff to offer such activities.</p>
1.3.2	We are really looking forward to Covid going away so we can compete against other schools in sporting competitions!	As above.

	KS2 pupils take part in any sporting events and all children are part of a committee which will allow their voices to be heard regarding school decisions.	As above.
1.3.3	The school currently has four committees: The School Council; Criw Cymraeg; Healthy/Eco Schools and Digi Wizards. Every pupil in the school is a member of at least one of these committees, allowing their voices to be heard. In a larger school the children may not get this opportunity as there will be too many pupils to allow each to be on a committee. This will also be the same for sporting events, when competing against other schools. Our children have the benefit from being able to participate in a wide range of activities, whereas in a larger school this opportunity may not be available as the teams are smaller than the pupil numbers allow for.	As above.
1.3.4	We work in our committees to make positive changes. The School Council organise fundraising events for things like Young Minds, Red Nose Day and World Book Day. We have a Healthy Schools Week coming up where we will learn all about being healthy and we will have a healthy tuck shop! Our Criw Cymraeg are really good and they are teaching us new words and phrases all of the time. We have got our Bronze Award and we meet with Mrs Andrew a lot as she is helping us to work towards our Silver Award for the Siartr Iait.	As above.
1.3.5	We also have Committees like Digi-wizards, Criw Cymraeg, School Council and Healthy Schools. Before Covid-19 we did Summer Fayres, clubs like craft club, sports club, messy church, coding club. We also went on school trips to zoos, Cardiff and other fun things too! We have had cake stalls in the community centre for all of the villagers to come and buy cakes. This is great	As above.

	as I love baking. We have been to Condover two times, that's another of the good things of a small school. We get to go to Condover more than once! If we go to another school we won't be able to have these same opportunities.	
1.3.6	We also get to go on lots of awesome school trips, before Covid-19, Class Two got to go to Cardiff!	As above.
1.3.7	We will also be able to do school trips again, they are always great fun. We have been to the Senedd in Cardiff to learn about our capital city. We also went to the zoo!	As above.
1.3.8	We have wellbeing Wednesdays, where we get to play games. We go on lots of school trips.	As above.
1.3.9	When Covid goes away we will be able to go back to having lots of after school clubs, like craft club, coding club and sports club. We always do Christmas crafts too but couldn't last year because of Covid.	As above.
1.3.10	We have our own clothes day, red nose day, after school clubs, an amazing reading corner, lots of art and crafts things.	As above.
1.3.11	We have after school clubs, pre-Covid, including messy church and PE club. We have committees and we get to be in more than one of them.	As above.
1.3.12	They are all able to take part in school activities and both their Christmas concert and leavers assembly are whole school affairs supported by good audiences. If the school was closed and the children sent to another school that would be lost.	As above.

1.3.13	I have my breakfast here too.	Many Powys schools offer the opportunity for pupils to attend Breakfast Club.
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1.4 Comments about the staff at Castle Caereinion C. in W. School

1.4.1	The teachers here are amazing.	<p>The Council is pleased to note these comments regarding the staff at Castle Caereinion C. in W. School.</p> <p>However, the Council would expect staff at all schools to provide the best possible educational opportunities to pupils, therefore there is no reason to believe that these statements would not also apply to staff at alternative schools which pupils may choose to transfer to.</p>
1.4.2	We have the best staff.	As above.
1.4.3	Our school is special because we have nice teachers who care about us and know us all really well.	As above.
1.4.4	The headteacher and staff are working with the children to achieve their full potential.	As above.
1.4.5	I cannot speak more highly of the staff who have already had to educate the children in the most awful of situations while also putting themselves at risk to teach those with key worker and essential parents. We have had all the support and more from all the teachers especially during a difficult time for our family. During the period after, the staff made extra contact with us to offer us as a family any help or support that we needed.	As above.

1.4.6	Our teachers make us work really hard and are always letting us have a say in what we want to learn.	As above.
1.4.7	We have amazing teachers here who are teaching us the new curriculum, which is lots of fun.	As above.
1.4.8	This school has the best teachers in the world in it. My teachers are special because they give us fun tasks and work to do.	As above.
1.4.9	The teachers are very nice and kind.	As above.
1.4.10	I like it that my teachers know lots about me and they help us to learn and to write and with our spellings. They help us to be whatever job we want to do like fire officers, headteachers, police officers. They are kind and they know us very well. They protect us.	As above.

1.5 Comments about leadership at Castle Caereinion C. in W. School

1.5.1	The current Leadership is proving the right basis on which the school can now develop and encourage new pupils.	The Council is pleased to note these positive comments regarding Leadership at the school. Whilst the Council has no concerns about the quality of Leadership at Castle Caereinion C. in W. School, it remains the case that Headteachers in smaller schools have a higher teaching commitment, and therefore have less time available to focus on leadership. In addition, as there are less staff in the school, there are less opportunities to develop leadership across the school.
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		There are permanent leadership arrangements in place in most other schools pupils may wish to transfer to should Castle Caereinion C. in W. School close, and the Council is satisfied that pupils would continue to benefit from good quality leadership in the alternative schools.
1.5.2	This school is going in leaps and strengths since getting a full-time head teacher and I fell you are giving up on us before you can see what we are really capable of.	As above.
1.5.3	There is strong leadership there now and it would be entirely wrong if the council decided to close this vital school.	As above.
1.5.4	The school is in a much-improved position, having recently returned to having a Teaching Head and we have seen great improvement in the learning and standards for our children and overall behaviour and morale.	As above.
1.5.5	The current Head Teacher has worked extremely hard, no doubt with Council support, to improve the whole learning experience. We have noticed these efforts in the behaviour of the students outside school hours, increased politeness and sociability, no noticeable bad behaviour.	As above.
1.5.6	The school undertook a period of restructuring in 2019 when it was found the current shared headship arrangement was not effective and we took the step to return to a Teaching Head model, a process which was fully supported and facilitated by the management at PCC Education. The return to this model and introduction of a New Headteacher has rejuvenated the school and considerably improved standards, behaviour and morale.	As above.

	Unfortunately, it has been difficult to fully develop and demonstrate these benefits due to the constraints of the pandemic, with the school being closed for nearly 8 months of this period and further time should be afforded to the school to embed and build on this.	
1.5.7	The current Head has laid the foundations for a very successful school moving forward, working hard to implement the changes that needed to be made. Recent review reports from the school's challenge adviser have confirmed that the school is making good progress. Both teacher and pupil expectations have improved over the past 18 months. Whilst the existing Head is moving to a new post, there is no reason why a successor Head could not continue to strengthen and develop the school even further, building on what has already been achieved.	As above.
1.5.8	Evidence shows that the new leadership structure, that was only implemented in September 2019, has had a huge impact on expectations, standards and attitudes to learning. The children are thriving. However, having only had 18 months since this new leadership model has been put in place there has not been sufficient time to grow the school. Particularly as we have been amidst a pandemic for the past 12 months.	As above.
1.5.9	The Headteacher has built up strong collaborative networks with other schools within the Llanfair, Welshpool and Newtown clusters. The new model of leadership needs longer to demonstrate the improvements it has made.	As above.
1.5.10	Whilst the current Headteacher is moving on to a new position in the Autumn term, we have already appointed a replacement acting Headteacher who will continue with the good work that has	The Council is pleased to note that the school has appointed a replacement acting Headteacher for the school and will continue to work with the new acting

	been done. Her teaching commitment will be in line with the current head and she will continue to lead forward with the stand-alone head teacher model that has proved so successful for the school.	Headteacher to ensure that the provision at Castle Caereinion continues to improve.
1.5.11	The Headteacher of Castle Caereinion CiW School is also the Chairperson of the Caereinion ALN Cluster. This is a position that she was put forward for by the Challenge Advisor. If there were concerns over the Headteacher being unable to fulfil her leadership role she would not have been asked to carry out this additional role by the Local Authority.	The Council has no concerns about the quality of leadership at Castle Caereinion C. in W. School, and if pleased that the school's Headteacher was able to take on the role of Chair of the Caereinion ALN Cluster.

1.6 Comments about the school buildings

1.6.1 General comments about the buildings / facilities

1.6.1.1	Whilst the building is not modern, it has good facilities.	<p>The Council notes these comments about the facilities available at Castle Caereinion C. in W. School. However, issues with the building is one factor why change is required:</p> <p>Whilst the school building was assessed to be in good condition by the Welsh Government's condition survey carried out in 2009, it is an old-fashioned building, and there are concerns regarding its suitability to deliver education which meets the requirements of the new curriculum, and which meets the Council's vision statement, as outlined in the Strategy for Transforming Education in Powys.</p>
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		<p>The Council recently commissioned an updated condition survey of the school building. This was carried out in the autumn term 2020. The survey assessed the condition of all three blocks at the school as condition C.</p> <p>There are also significant number of surplus places at the school.</p>
1.6.1.2	We have our own hall to do assemblies and our own library.	As above.
1.6.1.3	We have lots of space my classroom is massive and I love it.	As above.
1.6.1.4	Whilst the building is old, this offers a rich historical element to the school and the facilities available to our children are on par with other school buildings I have visited in the area.	As above.
1.6.1.5	The school has the benefit of recent adaptations to accommodate children with disabilities including full disabled bathroom and treatment facilities and disabled access to all parts of the building, which I understand is not available in all schools in the area.	As above.
1.6.1.6	The school also has the benefit of breakfast club facilities, a designated fully equipped IT suite, use of a large hall provision.	As above.
1.6.1.7	Inside the building we have large spacious classrooms that are more than suitable and equipped to deliver the new curriculum. The fixtures and fittings of the building are all deemed to be in reasonable condition and in Category B. This is the same status as the alternative provision in the nearest local school of Berriew.	As above.

1.6.1.8	We have a big community centre so we can have assemblies, cake stalls and school plays on the vast stage.	As above.
1.6.1.9	Within the building itself, the pupils benefit from large classrooms that are ideal for collaborative learning.	As above.
1.6.1.10	We have big classrooms that are not cramped.	As above.
1.6.1.11	The school boasts large classroom areas that will be more than able to encompass the new curriculum.	As above.
1.6.1.12	With the shared use of the adjacent Community Hall (and nearby church) the school is sufficiently well managed and facilitates excellent learning for all abilities, up to Year 6 (some of whom need the one-to-one attention that our school can offer). Money spent here will benefit students and community alike and will be much better suited to encouraging a "green" life with no increase in official or parental transport costs.	As above.
1.6.1.13	We have good PE equipment to do PE lessons with the equipment and we have a big cupboard to store it in.	As above.
1.6.1.14	We have lots of great sports equipment and we have fun in our PE lessons using it!	As above.
1.6.1.15	The school is fortunate to have strong support from the parent group and local community to help with the upkeep of the school and grounds and if the school were given the opportunity to explore some of the points raised in the building report, many of which were cosmetic, there may be more low-cost solutions available, including utilising this community support.	As above.

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1.6.2 Comments about building condition

1.6.2.1	The Local Authority conducted a building survey on a rainy day in October half term. The subsequent survey report, which resulted in the building being labelled Condition C is riddled with factual inaccuracies and also includes elements that were weather dependent and can easily be rectified.	The condition survey carried out in the autumn term 2020 was carried out by external professional building surveyors and the condition grading was their professional judgment. As this was an external, impartial report, the Council had not control over the content of the report. It is acknowledged that many of the issues identified could be rectified and this would come with an associated cost.
1.6.2.2	Page 11 of the survey: <i>'There doesn't appear to be a designated car park area for staff within the grounds of the school.'</i> There is a staff carpark right in front of the school, with ample parking for 7 cars. In addition to this there is a carpark to the rear of the school (less than a 1-minute walk) that can be accessed by staff, parents and members of the Community Centre.	As above.
1.6.2.3	Page 13 of the survey: <i>'The gutter were noted to be blocked.'</i> It was late October on a rainy day. This is an issue that can easily be remedied and as such should not feature in the survey.	As above.
1.6.2.4	Page 13 of the survey: <i>'Some slates were missing or cracked.'</i> In comparison to the whole roof the number of slates that need to be repaired/replaced is minimal. It is not causing leaks nor any damage to the internal property. Again, we feel this is a situation that is easily remedied.	As above.

1.6.2.5	Page 13 of the survey: <i>'Some of the carpet 'are beginning to show signs of age and display evidence of general wear and tear.'</i> This is an internal matter and does not affect nor impact on the condition of the 'building'. The carpets can be cleaned or replaced.	As above.
1.6.2.6	Page 13 of the survey: <i>'A combination of plasterboard and skim, and vaulted plasterboard with exposed timber joists. <u>It is unclear if the timber joists are painted with an intumescent paint.</u> Paint timbers and make good. The majority of ceiling finishes appear to be in reasonable condition with isolated areas of outstanding repair.'</i> Ire the highlighted section - if this is unclear, surely further investigation should be undertaken before downgrading this section to a C category purely based on this. The rest of this section highlights that the majority of the ceiling is in reasonable condition.	As above.
1.6.2.7	Page 13 of the survey: <i>'In relation to the doors: They are unlikely to meet current fire safety standards and need to be replaced. Replace all fire door sets throughout the block.'</i> This is a hyperbolic statement. We have had a recent fire safety inspection where all fire doors were deemed to be safe and met fire safety standards.	Comment noted.
1.6.2.8	Page 13 of the survey: <i>'Cyclical redecoration required.'</i> Redecoration has taken place in both demountable classrooms within the past two years.	As above.
1.6.2.9	Page 21 of the survey: <i>'Undertake fire risk assessment (with a quote attached of £1500).'</i> All of our fire risk assessments have been carried out with the fire safety inspectorate and our building has passed. Reports can be provided on request.	As above.

1.6.2.10	Page 21 of the survey: ' <i>Undertake an asbestos survey (with a quote attached of £1000).</i> ' We have had an asbestos inspection within the last two years, and all is deemed to be well. Reports can be provided on request.	As above.
1.6.2.11	Based on the contents of this Condition Survey and for the above reasons we do not agree with the downgrading from the previous B condition to the current C condition. We do not feel that a categorisation of C can be used as a reason for closure when we believe it is clear to see from the above that many of the reasons that have attributed to the report are either factually inaccurate or minor remedial works that can be easily rectified. We are not the only school that would have had drains blocked with leaves on a rainy and windy autumnal day.	Comment noted. Issues with the building is only one of the challenges facing Castle Caereinion school, as outlined in the Consultation Document.
1.6.2.12	Building inspection was carried out in Autumn 2020 which has not been addressed due to the current pandemic, the diocese owns the building so would be of interest to understand the issues and when they will be addressed. PCC doesn't own the building so have no extra costing to correct the building work that needs to be carried out, to bring it to a grade B which I believe we are at grade C currently with minor issues.	Whilst the Diocese owns the building, the responsibility for maintenance of the school lies with the Council. The Council prioritises maintenance/remedial works for schools by using a prioritisation methodology as part of the Schools Major Improvements Programme.

1.6.3 Reference to disabled facilities

1.6.3.1	The building had been adapted to suit the needs of our people with physical difficulties to allow access to the site independently and confidently.	Comment noted.
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1.6.3.2	My friend needs a ramp to help him get outside and we have a ramp and it makes him happy.	Comment noted.
1.6.3.3	Within FP we have a pupil with physical difficulties and therefore require additional equipment such as a K Walker, standing frame and corner seat to enable participation with the rest of the children. Even though these pieces of equipment are extremely large, we can accommodate them with no issues as we have plenty of space.	Comment noted.
1.6.3.4	As I also live in the village I have watched the school change and develop with many new resources and most importantly disabled resources to make it a very diverse school which cannot be said for all schools in Powys. The decision to on this school needs to be made wisely and I would say it has far more positives than negatives to keep it open.	Comment noted.
1.6.3.5	It has a dedicated body of staff and a school building with numerous adaptations for those pupils with additional learning needs, all of which will be lost if the school is allowed to close.	Comment noted.
1.6.3.6	We have ramped access to each external door and wide corridors to allow ease of access. We also have a large disabled toilet with hoists, changing facilities and drop arm rests for the disabled toilet. We currently have a year two pupil with significant physical needs and despite not living in the village his parents sent him to Castle because of the adaptations we have in place. This pupil needs to use a large standing frame to complete aspects of his work, as well as walking with a frame and using a straight-backed seat for carpet time. In our large classrooms it is easy to facilitate his use of this large equipment.	Comment noted.

1.6.3.7	The school has received considerable investment in terms of the specialised facilities it can now provide to meet the needs of a disabled child. This includes a dedicated disabled toilet area, with changing facilities, a hoist and drop-down toilet support rails. One of the school's pupils with physical disabilities chose this school specifically because of these facilities. The school was also specially adapted to ensure that each entry to the building has a ramp that is wheelchair and walking frame friendly and the school has wide corridors and door frames that allow the pupil to move around the building freely in his frame. To require this child to move to a larger school and at a greater distance, will be disruptive emotionally and physically. The question must also be asked whether the alternative schools will be able to match the quality of the facilities available at Castle Caereinion school.	The Council has a duty to ensure that school buildings are compliant with DDA legislation. It is acknowledged that the school has received investment to make adaptations. Should the school close, the Council would ensure that the requirements for pupils with additional needs are met at whichever school they may choose to attend.
1.6.3.8	We have ramps in our school and wider corridors and bathrooms suitable for people with disabilities	Comment noted.
1.6.3.9	This school is good for people who are disabled because it has ramps to help them.	Comment noted.
1.6.3.10	There are lots of ramps to help the disabled.	Comment noted.
1.6.3.11	We have ramps and a big toilet for people with wheelchairs.	Comment noted.
1.6.3.12	Castle Caereinion CiW School is specially adapted to meet the needs of children with physical disabilities. We have ramp access to every entry point to the building. We have a large disabled toilet area, with hoists, changing facilities, disabled toilet with lowering arms. The building corridors are wide to allow ease of movement for wheelchair users and children with walking frames.	Comment noted.

1.6.3.13	It has many disabled resources and this is a big plus for a village school.	Comment noted.
1.6.3.14	The school has recently undergone infrastructure improvements for disabled access. The potential closure of the school will add to the anxiety of students that require use of such facilities.	Comment noted. Should the school close, the Council would ensure that the requirements for pupils with additional needs are met at whichever school they may choose to attend.
1.6.3.15	We have no stairs because it is good for people in wheelchairs.	Comment noted.
1.6.3.16	The school has got a specially adapted changing toilet for anyone with disabilities as well as ramped access into the building. The school is also wheelchair friendly inside.	Comment noted.

1.7 Comments about the school's outdoor facilities

1.7.1	Our extensive outdoor grounds are perfect for outdoor learning. To the rear of the building we have our own pond for pond dipping, a willow tunnel, a covered outdoor classroom area for the Foundation Phase. We have a Forest Schools area where the children take part in outdoor activities to promote collaborative learning in line with the principles of the four core purposes. We have a large area with raised beds where the children do planting. We have large, grassed areas for both Foundation Phase and Key Stage Two pupils to play and learn within a safe fenced area. To the front of the school, we have a large paved playground along with a grassed area with climbing play equipment. This is all securely fenced in.	The Council notes these comments about the outdoor facilities available at Castle Caereinion C. in W. School.
1.7.2	Lots of safe outdoor learning space. Hands on gardening, nature study and outdoor activities. Two big sports fields, a playground, a garden, fenced pond and wild area. Safe local nature walks.	As above.

1.7.3	We have a fun outdoor area with fun equipment to play on.	As above.
1.7.4	We have a large play area and even our own pond.	As above.
1.7.5	We have an outdoor seating area where we can sit down and do fun things like colouring and talking on the benches.	As above.
1.7.6	The school has well-developed gardens and grounds.	As above.
1.7.7	We have a great outdoors area for increased learning and forest learning, which is maintained by the parents.	As above.
1.7.8	In the school grounds there are random park equipment that are for the students to play on.	As above.
1.7.9	Our school has lots of space. In the back portion of the school there is a garden for class one to grow plants such as strawberries. Near to the garden there is a pond which is used to catch animals such as newts or unborn animals like frog spawn to show the life cycle of a frog. So the animals would be put in a fishbowl if the school were closed. We sometimes go on school trips and have an amazing time there.	As above.
1.7.10	We have a big playground. We make dens for action figures.	As above.
1.7.11	We have a nice outdoor area with seating, sheds, flowerbeds and a pond to do pond dipping. We have Forest Schools starting here and we are really excited for it.	As above.

1.7.12	I've been in this school since playgroup and I loved being in the outdoor are a, we've got bikes, a mud kitchen, bug houses, a pond, and outdoor classrooms for our forest schools now that I am older.	As above.
1.7.13	We also have a garden with a pond and seated parts and out the front we have the yard with equipment on the grass.	As above.
1.7.14	In our school we have big outdoor areas, a pond, forest schools, playing equipment and flowerbeds.	As above.
1.7.15	We have extensive outdoor grounds that are ideal for the new curriculum learning. We have our own Forest Schools area, outdoor learning space and pond to enable real-life authentic learning experiences.	As above.
1.7.16	We have great outdoor areas that allow us to take our learning outdoors! We have our own pond to do pond dipping, seated areas and an outdoor classroom. We have raised beds where we can plant lots of different things. All of the garden areas are kept locked so that we can be kept safe inside them! We also have Forest Schools starting here and we are really excited about it!	As above.
1.7.17	The school enjoys a peaceful setting with stimulating outdoor learning areas including a pond and forest area to develop interests in nature and the environment.	As above
1.7.18	The school benefits from large outdoor areas with a pond, forest school area, and two outdoor learning environments for each classroom.	As above.
1.7.19	We have substantial outdoor space, including a pond for pond dipping, forest school area, large outdoor classrooms for FP and	As above.

	KS2, large playground and access to an additional 'top pitch' where the children enjoy practising sports and participating on sports day. We have three raised beds for planting vegetables which we then cook with. Within short walking distance of the school is the church, a play park, a brook and many country paths for wonderful seasonal walks. Inside the building we have large spacious rooms. In FP we have two large classrooms linked to an adjoining door outdoor which allows for challenge areas and encourages independent learning. The classroom leads straight onto the outdoor learning area to the back of the classroom and the playground from the front.	
1.7.20	I like riding the bikes with my friends outside on the playground because I feel safe there. I like to help water the sunflowers that we are growing. We have lots of toys and fun activities to do when we have finished our work too.	As above.
1.7.21	In the back of class one we have a planting area. We have slides and a mud kitchen.	As above.
1.7.22	I really love coming to this school because we have lots of outside space to do climbing on our Adventure playground, a lovely field to run around in and outside our classroom we can get to our school pond and ride our tractors.	As above.

1.8 Reference to ICT equipment

1.8.1	We have many tablets and updated white boards that provides equivalent education for the new curriculum.	Comment noted
1.8.2	We have a big ICT suite and laptops. The teachers have their own laptops	Comment noted

1.8.3	We have a large ICT room full of computers, and there are also laptops and chrome books.	Comment noted
1.8.4	We have a vast range of 21st Century technology to enable our pupils to not only be 21st century learners, but lifelong learners. We have an ICT suite which houses 12 PCs, we have 8 laptops and 5 Chrome books along with 16 iPads. This technology enables our pupils to have excellent access to apps, websites, virtual learning experiences that enrich their learning experiences. They have participated in live assemblies with a range of famous authors, Keep Wales tidy and Google.	Comment noted
1.8.5	We have our very own Computer suite, laptops and chrome books. We have enough equipment for everyone!	Comment noted
1.8.6	In the classrooms we have laptops, chrome books, electronic spellers, an ICT room, a mini library, iPads, clevertouch boards and lots of amazing really helpful learning equipment.	Comment noted
1.8.7	Each classroom has an interactive whiteboard which use clever touch technology, allowing children to be involved in hands on learning experiences. This year despite lockdown the whole school have taken part in live lessons with organisers such as Google for internet smart sessions, where the children were joined with Craig Williams, MP. They also took part in a 'meet the author' experience where they listened to three famous authors and could ask them questions, this was alongside 500 other schools in the UK. More recently as part of Climate Change Week the children were joined by the Keep Wales Tidy team for daily live lessons where they were faced with a series of challenges around improving our planet. These experiences were in real time, they were current and the technologies within our school	The Council is pleased that ICT provision has enabled children at the school to successfully continue with their education and extra-curricular activities during the pandemic.

	were more than adequate to support them. As well as the interactive whiteboard the children benefit from having our very own computer suite with 12 PCs as well as a large number of laptops, chrome books and iPads. This wealth of technology allows children to complete their tasks on Hwb seamlessly with access for enough technology for one per pupil. The children would not have this 1:1 access to ICT in a larger school.	
1.8.8	Our school is great because we have so many great resources. We have our very own ICT suite with PCs. We also have laptops, iPads and chrome books that we can use in class! Each classroom has an interactive whiteboard and these have been great at helping us to join in live assemblies with Google, a range of famous authors on World Book Day and more recently with Keep Wales Tidy for our Climate Change week.	Comment noted
1.8.9	There are interactive whiteboards in each classroom, enabling collaboration and virtual learning experiences. The school has its own computer suite, enabling each pupil access to a computer for their work. There are also sufficient iPads in school to allow pupils to carry out tasks with the use of this technology too. This provision is, in our opinion, significantly better than many other schools in Powys.	There has been significant investment in digital equipment in all schools over the last two years as part of the Welsh Government Education Technology Programme. Most Powys primary schools now have a better ratio of devices than one device per pair of children.

2. Comments about Church in Wales provision

2.1 Links between the Church and the school

2.1.1	This school has strong links to the local church, St Carmon Church, and I understand that the Christian ethos is important to the school.	The Council notes these comments regarding the links between Castle Caereinion C. in W. School and the local church.
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2.1.2	Our village school has strong links with St Garmon Church, Castle Caereinion and we are proud that the Church is at the heart of the school and its Christian Ethos.	As above.
2.1.3	As the local vicar I greatly value St Garmon's church's close links with Castle Caereinion Church in Wales school.	As above.
2.1.4	The school is a safe, two-minute walk from our Church and we are delighted to welcome the children to the church on a regular basis.	As above.
2.1.5	Being a CIW school we also spend time celebrating religious festivals within the church which is a stone's throw away from the school and again the community enjoy seeing the children in this environment.	As above.
2.1.6	We have also periodically provided a Messy-Church after-school club which has been extremely popular with nearly all the children (approximately 90% take up rate amongst the pupils).	As above.
2.1.7	The school is a two-minute walk from the local church, enabling pupils to have a hands-on learning experience about their Faith and the importance of both the church and the school in this village.	As above.
2.1.8	This allows pupils to have hands on learning experiences of their faith and enables them to see faith in action through various services too. The children not only participate in, but also lead important liturgical events such as Harvest, Easter and Christingle. This provides them with authentic real-life learning	As above

	experiences of engaging with an audience and delivering readings to the parishioners.	
2.1.9	We can walk to our Church, it's only 45 seconds away.	As above.
2.1.10	We get to go to the Church to do weddings and baptisms and Harvest and Easter, they are fun.	As above.
2.1.11	Our school is close to our Church which is really good because we can walk to our Church for services. We go there to learn about God and for special events like Christingle, Harvest and Easter. We also go there for RE lessons where we have role play sessions and act out Baptisms and weddings. Our vicar, Rev. Steve is able to come to our school lots and is able to teach us all about Jesus and God. He might not be able to come to us if we go to another school.	As above.
2.1.12	Castle Caereinion school is a Church in Wales school not just in name but in ethos too. The children are taught to behave in a Christian way. They learn to treat others as they wish to be treated. They are taught the meaning of the symbols they can see displayed in school. Rev. Steve Willson is a regular attender at school, is a member of the governing body and takes the pupils in church for "Messy Church".	As above.
2.1.13	As a Church in Wales school, the school is actively involved with the local church for key services such as Harvest, Easter, Christingle etc. where the children take a leading role in delivering the service and singing hymns with the parishioners. The Church is also used for some RE lessons and other related activities. This close relationship and involvement with the church will be denied	The Council notes these comments regarding the links between Castle Caereinion C. in W. School and the local church, and the potential impact on pupils' involvement with the church should they transfer to alternative provision.

	to many pupils if they are required to attend their next nearest school, which in this case is Berriew.	
2.1.14	We are really close to our Church here and we get to do Collective Worship and our vicar comes into school to lead us in this too. We love getting to go to Church to do Harvest, Christingle and also doing role-plays for R E like weddings and christenings. We do Zoom meetings with the vicar now which are really fun! If we go to another school they may not teach us about religion or the Church as much and the parishioners will miss us.	The Council notes these comments regarding the links between Castle Caereinion C. in W. School and the local church, and the concerns regarding the potential impact on the community should there be no school in Castle Caereinion. All schools are required to teach religious education, therefore should the Council proceed with the proposal to close Castle Caereinion C. in W. School, pupils would continue to be taught about religion at the alternative schools they transfer to, whether they transfer to alternative C. in W. provision or an alternative C.P. school.
2.1.15	Despite Covid and lockdown restrictions we have continued to participate in half-termly assemblies which I have led via zoom when I have been unable to come into the school in person. The school assures me that this is something that the children always very much look forward to and this is evident from their excited reaction whenever I come into the building. To remove this Church school provision would result in the loss of some of the children's links with their faith.	As above.
2.1.16	Castle Caereinion is a Church in Wales school and therefore the church is the heart of the school. The vicar does assemblies at the school, whilst the children do harvests, plays and messy church at the church. The concern is that the school keeps the church going and the church stays at the centre of the school especially for those parents who want their children to go to a Church in Wales	The Council notes these comments regarding the links between Castle Caereinion C. in W. School and the local church, and the concerns regarding the potential impact on the church should there be no school in Castle Caereinion.

	<p>school. Without the school the church would struggle to get the numbers it does I know this from our vicar.</p>	<p>As indicated in the Consultation Document published in respect of the proposal to close Castle Caereinion C. in W. School, there is alternative Church in Wales provision within a few miles of Castle Caereinion at Welshpool C. in W. School. Any pupils wishing to continue to access Church in Wales provision would be able to apply for a place at this school.</p>
2.1.17	<p>For many years the school has taken pride in being the only English stream Church in Wales school within the Llanfair Cluster. The school has strong links with the local church, working closely with Reverend Willson and the Diocese and embedding the values of a Christian education and ethos throughout the school and developing strong links with the local community around the Church, all of which would be lost and have a detrimental effect on the Church community of Castle Caereinion should the school close.</p>	<p>The Council notes these comments regarding the links between Castle Caereinion C. in W. School and the local church, and the concerns regarding the potential impact on the church community should there be no school in Castle Caereinion.</p> <p>The Council also notes the comments regarding Castle Caereinion C. in W. School being the only English-medium Church in Wales school within the Llanfair Cluster. Whilst this is the case, Welsh-medium Church in Wales provision is available at Ysgol Cwm Banwy which is within the Llanfair Caereinion cluster, and alternative English-medium Church in Wales provision is available a few miles away from Castle Caereinion at Welshpool C. in W. School.</p>
2.1.18	<p>I am also one of the Churchwardens at St Garmon's Church in Wales (CiW), the centre of Anglican worship within the village, and have personally witnessed the working links between the school and church. Restrictions with Covid19 have currently removed that physical activity from within the church premises but work to continue the link has continued from clergy, church</p>	<p>The Council notes these comments regarding the links between Castle Caereinion C. in W. School and the local church, and the concerns regarding the potential impact on the church, the community and the pupils should there be no school in Castle Caereinion.</p>

<p>members, teachers, and governors. One of the strengths of the link between church and school has been the ongoing support from parents, neighbours, and other community members in attending various school events in the church; Christmas Carol Concerts, Christingle services, Harvest, Easter, Leavers services and the like.</p> <p>Additionally, the school regularly visits the church to learn about the history of the building and the graveyard, the types of service and how the church is vital to small communities. Interaction between church and school provides a wider cultural, social and community “belonging”. Experience shows the value of this to the community.</p> <p>Due to the close proximity of church and school, there have been regular Messy Church activities at St Garmon’s as part of after school activities. These have included, making the Advent Wreath, building a “Prayer Tree”, constructing insect hotels in both the school garden and churchyard, craft and other handiwork, much of which is normally on display within the church. Given that the church is normally open to visitors daily, this work has been seen by others and enabled friends and neighbours to visit and admire their children’s efforts. St Garmon’s church has a small regular senior congregation which is regularly bolstered by the community for special services, including Remembrance. Many of those who support the congregation at these times are past pupils and parents, their families and neighbours. Closing the school will remove these vital links between much of the community and the church which is needed for its survival. Should the closure proceed, pupils who no longer attend the school in Castle Caereinion will find their link to the local church non-existent, will no longer find the impetus and regular opportunity to enter the</p>	
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	building and will not be inviting family and others along to support them and their school. There is a grave risk that removing this essential and important aspect of community life will in the longer term be responsible for causing the closure and loss of the church in this community.	
2.1.19	We are the only Church in Wales School that is just a 2 minute walk from the local Church. This not only allows the children to embrace their Faith but also in a meaningful and real-life manner. They learn about their Faith and it's importance in their life, by actually attending the Church, meeting the Parishioners, leading services. In a small school these opportunities are open for ALL pupils. In a larger school this is not the case. Welshpool Church in Wales School has too many pupils to fit in the Church in one Service, resulting in a loss of authenticity of the Community that is Church and Christianity. To close Castle Caereinion CiW School would most certainly see a reduction in Faith children in the County, and in my opinion this would be truly awful.	The Council notes the comment about the proximity of the local Church to the school and how this benefits the children.
2.1.20	We also have the Impact teams come to visit us with their big bus. This won't happen if we don't go to a Church school. We all love it when the Impact bus comes! The people from the Church link in with us a lot, they hold messy Church clubs.	The Impact team visit schools across Powys, including Church in Wales schools and Community Primary Schools.

2.2 Concern that pupils would not be able to access alternative Church in Wales provision

2.2.1	Castle Caereinion is a Church school. Powys is offering students/parents alternative spaces based on geography (and presumably subscription) over and above religion.	Should Castle Caereinion C. in W. School close, the Council is proposing that pupils transfer to their nearest alternative school. Should the Council proceed with the proposal, parents would be able to choose which alternative school they would prefer
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		their child to attend and could choose for their child to attend alternative Church in Wales provision should that be their choice.
2.2.2	This is a Church in Wales school, they must be represented in this village. In addition to this the Schools Organisation Code 2018 states that 'where school provision is being reduced or removed, alternative school provision of the same nature (language category or, if relevant, religious character), wherever possible, should remain available and accessible to pupils in the local area'.	Should Castle Caereinion C. in W. School close, the Council is proposing that pupils transfer to their nearest alternative school. Should the Council proceed with the proposal, parents would be able to choose which alternative school they would prefer their child to attend and could choose for their child to attend alternative Church in Wales provision should that be their choice. Alternative Church in Wales provision is available approximately 7 miles away from Castle Caereinion C. in W. School at Welshpool C. in W. School. There are sufficient places available to accommodate all pupils currently attending Castle Caereinion C. in W. School.
2.2.3	The failure to designate an alternative CIW school as a first choice for parents is very disappointing and does, I believe, contravene the intention of the school organisation code which states that in considering alternative proposals, the local authority should be mindful of the need to consider issues of language and faith...." Where school provision is being reduced or removed, alternative school provision of the same nature (language category or, if relevant, religious character), wherever possible, should remain available an accessible to the pupils in the local area". It is difficult to see that any, or any sufficient regard, has been given to the issue of faith or religious character in these proposals.	As above.
2.2.4	We have nearly 6000 children in the diocese who attend Church in Wales schools. These are the disciples of tomorrow who will take	As above.

	with them their values and beliefs they have acquired through their early education. Hope you consider the points that I have made and at least afford the children attending castle Caereinion the opportunity to continue their primary education at a Church in Wales school.	
2.2.5	The document makes reference to accessing the Church in Wales provision in Welshpool, however I would strongly object to this point in consultation, as PCC are not meeting the obligation to provide an alternative Church in Wales English stream education setting within our cluster area.	As above.
2.2.6	The Schools Organisation Code states that children should be provided with the same if not better experiences if being made to transfer to another school. I fail to see how their closest Church in Wales School is able to offer the same religious aspects as we do, when the sheer volume of children in that school automatically reduces pupils access to the opportunities that each and every one of our children have in relation to their Faith and taking part in Services. Please do not underestimate the Faith that is so important to all that we are and do in Castle Caereinion CiW School when making this decision.	As above.
2.2.7	The school and its pupils have forged very strong links with their local church and its community, something which cannot be replaced if your proposal proceeds as presented. The next nearest school is not a Church in Wales school and children will be denied that continuity in their Christian education and less parents are able to transport their child at their own costs to Welshpool CIW primary school. This is a cost that some parents will be able to afford, and they will be obliged to abandon a faith-based education	As above.

	and send their children to a non-faith school purely through economic necessity.	
2.2.8	In the most recent Church school to be closed by Powys the receiving school was also closed and a new school opened on site as a Church in Wales school. This is not on offer to the children of Castle Caereinion.	<p>Comment noted. The most recent change to a Church school involved two Welsh-medium primary schools. There is no other Welsh-medium Church in Wales primary school in Powys, therefore the decision in that case was to merge the two existing schools, one of which was a community primary school and one of which was a Church in Wales school, to establish a new Church in Wales school, to ensure continued access to a Welsh-medium Church in Wales school.</p> <p>In the case of Castle Caereinion C. in W. School, alternative English-medium Church in Wales provision is available a few miles away at Welshpool C. in W. School.</p>

2.3 Transport to alternative Church in Wales provision

2.3.1	Powys have said they will only pay for the closest school but our village is a church in Wales school and pupils should have the opportunity to attend a faith school without it causing additional expense or hardship to their parents.	Parents are able to choose any school for their child(ren), and if there's a place at the school, then they can be offered a place. However, the Council's Home-to-School Transport Policy provides transport to a pupil's nearest or catchment school and does not provide transport to denominational schools specifically. If a parent chose a school that is not their nearest school, then they would be responsible for ensuring their child(ren) are transported to that school. It is
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		<p>recognised that if a parent didn't drive, or have access to a car, then they would have to make alternative arrangements which could include private taxi/shared transport with other parents. The Council recognises that this may potentially have an economic impact on the parent.</p>
2.3.2	<p>There is a concern that should this proposal be approved by Powys Council's Cabinet, that there will not be provision made available to provide pupils with free transport to the nearest faith school of choice.</p>	<p>As above.</p>
2.3.3	<p>As a Church in Wales School, I have concerns that children who would normally attend Castle Caereinion School will have to travel to Welshpool, should their families wish them to attend a faith school as both Berriew and Llanfair Caereinion schools are not faith schools.</p>	<p>Comment noted. It is true that Berriew and Llanfair Caereinion are both C.P. schools. As indicated in the Consultation Document published in respect of this proposal, the nearest alternative Church in Wales school would be Welshpool C. in W. School.</p>
2.3.4	<p>If parents are required to choose the next nearest school on the grounds of eligibility for free transport, Berriew is a County Primary and not a CiW school. This, in effect, removes parental choice for a Church in Wales school place on economic grounds.</p>	<p>The Council disagrees with this comment. Parents are able to choose any school for their child(ren), and if there's a place at the school, then they can be offered a place. However, the Council's Home-to-School Transport Policy provides transport to a pupil's nearest or catchment school and does not provide transport to denominational schools specifically. If a parent chose a school that is not their nearest school, then they would be responsible for ensuring their child(ren) are transported to that school. It is recognised that if a parent didn't drive, or have access to a car, then they would have to make alternative arrangements which could include</p>

		private taxi/shared transport with other parents. The Council recognises that this may potentially have an economic impact on the parent.
2.3.5	It is important that pupils are given the opportunity to continue to be educated at their choice of faith school and that this should be a reasonable and affordable choice, taking into consideration transport costs.	Welshpool C. in W. School is the nearest C. in W. school for pupils currently attending Castle Caereinion C. in W. School. This is 4.5 miles away from Castle Caereinion therefore the Council believes that this provides a reasonable choice of a faith school. However, if this is not the child's nearest school, then transport arrangements would be the responsibility of the parent – the Council acknowledges that this may potentially have an economic impact on the parent.
2.3.6	We would want to ensure children are given the opportunity to continue with their faith school of choice, and this should not be denied on the basis of affordability of transport.	As above.
2.3.7	According to the School Organisation Code “where school provision is being reduced or removed, alternative school provision of the same nature (language category or, if relevant, religious character), wherever possible, should remain available and accessible to pupils in the local area”. Provision has not been made to provide pupils with free transport to the nearest faith school as a first option, if that is the parent's preference.	Welshpool C. in W. School is the nearest C. in W. school for pupils currently attending Castle Caereinion C. in W. School. This is 4.5 miles away from Castle Caereinion therefore the Council believes that this provides a reasonable choice of a faith school. However, if this is not the child's nearest school, then transport arrangements would be the responsibility of the parent – the Council acknowledges that this may potentially have an economic impact on the parent.
2.3.8	If the Local Authority is to follow the School Organisation Code it would be wrong to only provide transport to the children's closest	As above.

	<p>school, Berriew CP School, as this does not offer the same Church in Wales provision that Castle Caereinion CiW School does. Therefore, to avoid removing Faith education from parental choice, the LA should provide free transport to the pupil's closest Church in Wales School which is in Welshpool.</p>	
2.3.9	<p>The Local Authority have proposed free transport to the children's closest school, however this is not a Church school. Therefore unless the council is prepared to pay the transport costs to the closest Church in Wales school then the Council is in breach of the School Organisation Code as on an economic level (transport costs for parents) you will be removing parental choice in sending children to a religious provision.</p>	As above.
2.3.10	<p>Our immediate concern as a Diocese, is that in presenting the options, there is no reference to a designated alternative Church in Wales school. This would be Welshpool Church in Wales Primary, and as such, parents should have the option to choose this school without having to meet the costs of that transport.</p> <p>According to the School Organisation Code "where school provision is being reduced or removed, alternative school provision of the same nature (language category or, if relevant, religious character), wherever possible, should remain available and accessible to pupils in the local area". Provision has not been made to provide pupils with free transport to the nearest faith school as a first option, if that is the parent's preference.</p>	<p>The options considered included federation and merger with Welshpool C. in W. Primary School.</p> <p>Parents are able to choose any school for their child(ren), and if there's a place at the school, then they can be offered a place. However, the Council's Home-to-School Transport Policy provides transport to a pupil's nearest or catchment school and does not provide transport to denominational schools specifically.</p>
2.3.11	<p>If the Council does proceed with closure however, we would remind the Council that parents have positively elected for a Church in Wales school and this will be denied to them on the basis of the proposals as currently set out in the Consultation</p>	<p>Welshpool C. in W. School is the nearest C. in W. school for pupils currently attending Castle Caereinion C. in W. School. This is 4.5 miles away from Castle Caereinion therefore the Council</p>

	<p>Document. As a minimum, we would expect parents to be offered places at Welshpool Church in Wales School as a designated alternative school with free transport. If this was not offered, then the Diocese would be of the opinion that the Council have not met the provisions of the School Organisation Code 2018 which state that “where school provision is being reduced or removed, alternative school provision of the same nature (language category or, if relevant, religious character), wherever possible, should remain available and accessible to pupils in the local area”. If free transport is not provided, then the nearest Church in Wales School cannot be considered as “accessible to pupils”.</p>	<p>believes that this provides a reasonable choice of a faith school. However, if this is not the child’s nearest school, then transport arrangements would be the responsibility of the parent – the Council acknowledges that this may potentially be an additional cost for the parent. However, the provision would still be ‘accessible’.</p>
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2.4 Other

2.4.1	<p>The Christian faith is historically the foundation for many of the building blocks of our society today. Many charities and organisations were founded by Christians. Christianity teaches that we should love one another and that love is patient, love is kind. It does not envy, it does not boast, it is not proud. It does not dishonour others, it is not self-seeking, it is not easily angered, it keeps no record of wrongs. Love does not delight in evil but rejoices with the truth. It always protects, always trusts, always hopes, always perseveres.</p> <p>Whilst in the past there is no doubt that Christianity has caused great harm to many people, that has been reform within the church so that there is very little likelihood of that now being the case. There is an increase in spirituality of all kinds in modern society and ‘mindfulness’ is helping people to cope with their mental health. Faith schools are really important in giving children a spiritual base without forcing a particular faith upon them, provided</p>	<p>Comment noted.</p>
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	there is good governance, which is the case in Church of Wales Schools.	
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3. Impact on pupils

3.1 Concern about the impact of closing the school on pupil well-being

3.1.1 Reference to the Covid pandemic

3.1.1.1	The children have had disruption due to Covid and I think further disruption will not be good for their overall wellbeing.	<p>The Council accepts that any school reorganisation proposal creates a period of uncertainty for the pupils involved, and that this is exacerbated this year due to the Covid pandemic.</p> <p>However, the Council would expect that pupils are fully supported by their teachers and other staff at the school during any periods of uncertainty to minimise the impact on their wellbeing.</p> <p>Should the school close, the receiving school or any other school pupils would transfer to would provide support to pupils to aid their transition, ensuring a successful transition to their new school to ensure that all pupils can achieve their potential.</p>
3.1.1.2	In addition, our children are currently in a very vulnerable position, living through unprecedented times of Covid and the fragmented education they have received as a consequence of this over the last 12 months. The further uncertainty over the future of their school and the prospect of having to leave their	As above.

	friends and move to unknown schools is causing considerable anxiety and worry, which is having a huge impact on their wellbeing.	
3.1.1.3	All the children have struggled greatly since Covid hit, particularly with the uncertainty of periods in and out of school and we have great concerns on the impact on his mental wellbeing of having to move him to a new school.	As above.
3.1.1.4	Like all children across Wales, our pupils have had an extraordinary year in terms of the impact of the pandemic on their education, routine, mental health, wellbeing and social interaction. Powys County Council should be doing everything it can to provide stability and reassurance to learners and should not be providing further uncertainty and increased anxiety with a proposed closure at this time. The subsequent upheaval of having to move schools for children will cause stress and anxiety and affect our children's health and wellbeing and provide 12 months of worry and uncertainty.	As above.
3.1.1.5	Since the start of the pandemic the majority of the children have missed a considerable amount of time from school, due to school closure and blended learning. This has resulted in time away from their friends, living their lives completely different to what they have always known, and several children have become increasingly anxious. It has been incredibly heart-warming to see them back in school, smiling and adapting to the new way of living. They are fortunate to be in small numbers, allowing our most anxious children to feel more at ease. Move them now would be detrimental to their wellbeing and of their parents.	As above.

3.1.1.6	Children are already struggling after this last year they need to be around the people they know and numbers in class being at a smaller a number.	As above.
3.1.1.7	I think after this year it would have a massive impact on children at the school and it's the wrong time to be closing it.	As above.
3.1.1.8	You are proposing to take away all of this from our children, at a particularly vulnerable time during the Covid pandemic, when you as an authority have been emphasising the health and wellbeing of our children as your top priority, yet you are letting our children down badly on this by going forward with this proposal at this time.	As above.
3.1.1.9	This would also prevent the emotional damage that will be done to the children in closing their school during the Covid pandemic, when so many have already suffered loss already. Allow the children time to adapt to the changes that the pandemic has made, whilst allowing the school time to show the growth it can make in this time.	Comment noted.
3.1.1.10	Pupils have had a traumatic time during 2020 / 2021 in dealing with all the uncertainty with the pandemic. They have done their best to cope with the circumstances, knowing there was light at the end of the tunnel, however, closing the school is pulling the rug from under their feet. The schoolchildren will be hoping they will begin to return to some normality over the next 18 months, instead Powys have taken the brutal decision to close their school and throw them into further turmoil and uncertainty. This decision is immoral and the timing is devoid of empathy.	<p>The Council accepts that any school reorganisation proposal creates a period of uncertainty for the pupils involved, and that this is exacerbated this year due to the Covid pandemic.</p> <p>However, the Council would expect that pupils are fully supported by their teachers and other staff at the school during any periods of uncertainty to minimise their wellbeing.</p>

3.1.1.11	We have just gone through a global pandemic and children have missed out on so much routine and learning, to take away a place they know and love would be forgivable and children thrive and learn in places they feel most comfortable.	As above.
3.1.1.12	The children currently in the school don't need more disruption in their school lives, after the disruption caused by the covid pandemic.	As above.
3.1.1.13	Children have been through enough upset and emotional stress over the last year with schools being closed during the pandemic. They do not need any more upheaval in their lives right now.	As above.
3.1.1.14	During lockdown I spent all year at home, doing schoolwork and being with my mum and dad as I don't have any brothers and sisters. Sometimes I felt very lonely, and I was very sad and bored as I didn't have anyone my own age to play with. The only thing I liked was a Thursday in the summer where I could go to school and see my friends and my teacher. I enjoy going to school. I feel safe there.	Comment noted.

3.1.2 General concern about pupil well-being

3.1.2.1	Don't close this school, unless you have attended or live in this community you have no idea the impact that closing will have on pupils' lives.	<p>The Council accepts that any school reorganisation proposal creates a period of uncertainty for the pupils involved, and that this is exacerbated this year due to the Covid pandemic.</p> <p>Should the school close, the receiving school or any other school pupils would transfer to would provide</p>
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		support to pupils to aid their transition, ensuring a successful transition to their new school to ensure that all pupils can achieve their potential.
3.1.2.2	Don't close our school down please because it is OUR school. I feel sad when I think about it because I will miss my school, my friends and all my teachers. I want to stay here because I love it here.	As above.
3.1.2.3	If the school closed I would be super sad and would cry because we would never ever be in here again	As above.
3.1.2.4	Please don't close any more schools because I don't want any other children to be sad.	As above.
3.1.2.5	Should this closure plan be accepted, the children will be required to learn while adjusting to new environments and will face anxiety about change; the anxiety will create difficult amounts of stress that will affect learning.	As above.
3.1.2.6	The welfare of the community and the children should be top of the council's priorities. The uncertainty of where the council propose for the children to be schooled and the manner of transportation is causing a great deal of anxiety for the children and is at best described as cruel. Instead of taking the easy option and closing the school it should instead be supported and it's strengths built upon.	As above.
3.1.2.7	The wellbeing of the children and their families seriously needs to be considered in all of this.	As above.

3.2 Concern that pupils would be separated from their friends

3.2.1	If I had to go to a bigger school I could be split from my friends and I would miss them.	<p>The Council recognises that having friendship groups is very important to pupils, but there is no evidence that pupils wouldn't be able to make friends in a larger school.</p> <p>Should the school close, the receiving school or any other school pupils would transfer to would provide support to pupils to aid their transition, ensuring that they make new friends in their new school.</p>
3.2.2	I don't want the school to close because I have a lot of friends here and if the school closes we will all be split up.	As above.
3.2.3	We are like a family in Castle Caereinion CiW School. Everybody knows each other really well and we all look after each other. We are all friends but if we have to move to different schools we will lose our friendships as we will all be split up.	As above.
3.2.4	You are forcing people to separate friendships splitting children up as they will not all be able to go to the same school any longer.	As above.
3.2.5	All my friends from school live in the village. Because of Coronavirus the only way I'm allowed to see my friends is at school. My school is where I learn things and I can be with my friends, I don't want to lose my friends that I have now.	As above.
3.2.6	When I was told that you were going to close the school I started to get worried that you are going to split me and my friends up. I hear parents talking outside school asking each other "which school are	As above.

	you going to send him too?”, no one knows, and everyone is saying different schools! That means you are going to split us all up. I am going to lose 20 friends.	
3.2.7	I have lots of friends here and I will miss them if I have to go to another school.	As above.
3.2.8	It’s really good living in the same village as our school because we are able to meet up after school and play in the park.	Comment noted.

3.3 Other

3.3.1	For those who walk to school it is good for their mental wellbeing to look and see what is around them in the village.	The Council fully acknowledges that should the proposal to close Castle Caereinion C. in W. School, any pupils living in the village that currently walk to school are likely to be unable to walk to their alternative school.
3.3.2	If you choose to close the school the children will be missing out on learning from very good teaching and support staff.	Should the Council proceed with implementation of the proposal, pupils would continue to benefit from very good teaching and support staff at the alternative schools they transfer to.

4. Travel implications

4.1 The proposal would lead to additional travel

4.1.1	We live right by the school and see the children happily walking in each morning. What a shame it would be for them to have to travel miles to another school each day, twice a day!	The Council recognises that many pupils attending Castle Caereinion school are able to walk to school. However, as stated in the Consultation Document, there are alternative primary places available at other schools within 10 miles of Castle Caereinion C. in W. School. Should Castle Caereinion C. in W. School close, it is not considered that the length and nature of journeys for pupils to alternative provision would be excessive.
4.1.2	Children are going to spend more time travelling to different schools.	As above.
4.1.3	Children and families will be required to travel to the next nearest school, affecting family routines and creating a longer school day for children.	As above.
4.1.4	Bussing children to a larger school is a retrograde step in my opinion will be of no benefit to the children.	As above.
4.1.5	Your "vision" will lead to increased travel time for some parents.	As above. Should the school close, free home-to-school transport would be provided to the nearest alternative school, in accordance with the Transport Policy.
4.1.6	I think it's very wrong to transport children out of a village school to a different environment all together. These children have lost so much already due to covid and will lose so much more if this goes ahead	As above.

4.1.7	Many of our pupils in the school live in the village and one concern I have is that if you close the school they will obviously have to travel further.	As above.
4.1.8	The expectation of additional travel will further add to the children's anxiety.	As above.
4.1.9	Closing this school will mean our village's children will have to be transported to another area, what will that cost if transport is provided by the authority? If transport is not provided this will mean an increase in traffic on narrow rural roads with all the inherent risks this will entail.	Should the school close, free home-to-school transport would be provided to the nearest alternative school, in accordance with the Transport Policy. The estimated cost of this transport is £32,300 per annum. A risk assessment of all school transport routes is undertaken.
4.1.10	You are talking about the transport, is there going to be a big additional cost to the education department to transport these children to other schools rather than Castle?	The estimated additional cost of transport is £32,300 per annum, as indicated in the Consultation Document.
4.1.11	I want you to keep our school open because it is really close to my house. I can get to my school on bike if I have to go to another school then I won't be able to do that. I will have to go in my car or on a bus. I don't want to go on a bus I am only 6 years old.	Comment noted. However, many children in Powys go to school on a bus from the start of their schooling, with no detrimental impact.
4.1.12	The school was one of the reasons why my husband and I chose this area to live in, as it is "on our doorstep" and will limit things like travel. I would not be happy with a young child travelling by bus everyday to and from school.	Comment noted. However, many children in Powys go to school on a bus from the start of their schooling, with no detrimental impact.
4.1.13	I can walk to school since I live in the village and the school is in that village.	Comment noted.

4.2 Concern about the impact on the environment

4.2.1	Having to put on buses to transport children to schools, forcing people into taking their cars as there is nothing left for them in their local communities, surely this is not helping the environment.	<p>In the draft Impact Assessment published with the consultation documentation, the Council states the following:</p> <p>Implementation of the proposal would require additional travel for pupils currently attending Castle Caereinion C. in W. School for whom this is their closest school. This would have a negative environmental impact as more home to school transport would need to be provided to transport pupils to their nearest alternative school. However, the number of pupils requiring additional transport would be relatively small, and it is possible that they could be accommodated on transport which is already operating.</p>
4.2.2	With all the new houses being built they're going to want a local school and will have to use more fuel if Castle isn't there.	The Council understands that there are housing developments in the area, however, should the school close, there are primary school places available within a 10-mile radius of Castle Caereinion.
4.2.3	Pupils having to travel to a distant school is environmentally unacceptable.	As above.
4.2.4	Busing children is not green or kind.	As above. Many pupils in Powys travel to school on buses from the start of their education, with no

		detrimental impact to pupils. As stated above, the Council has recognised the negative environmental impact of the proposal due to additional transport/travel.
4.2.5	The increased carbon consumption resulting from taking our students to other schools some miles away cannot be a sound concept and must be discouraged.	As above.
4.2.6	Surely at a time when government are trying to encourage a reduction in road traffic as part of the drive towards carbon neutrality this is contradictory.	As above.
4.2.7	Issues of the environment are currently of high importance and we are all aware of the need for all decision making globally to first consider the potential for environmental damage and harm. Travelling short distances, locally, is surely preferable to asking pupils and their parents to make more numerous car journeys to get to school. When we are encouraged to walk more or use bicycles, how is it consistent to remove local services?	As above.
4.2.8	I find it duplicitous that the council talk about environmental responsibility but are happy to ignore the pollution caused by transportation of children out of the area by road transport.	As above.
4.2.9	If we go to other schools our friends might live in different places so we would need to have lifts to go and meet them. This would be bad for the environment.	Comment noted.
4.2.10	Currently 50% of our pupils live in Castle Caereinion and walk to school each day. If Castle Caereinion CiW School were to close 100% of our pupils would need to use transport to get to their new school. Data taken from www.transportdirectinfo states that a bus	As above.

	generates 1.7kg of CO2 per traveller per daily journey taken. This equates to 16150kg of CO2 emissions per year going into the atmosphere. This is considerably higher than if Castle Caereinion CiW School were to remain open.	
4.2.11	Almost all of the children here can walk to school and home, but if you close our school we will have to drive to school. That is not good for the environment.	As above.
4.2.12	Most of us live in the village so at the moment we can walk to our school. If our school closes we may not be able to walk to our school and that will mean putting more cars on the roads. That causes more pollution and that is not good for the environment.	As above.
4.2.13	We have a very high rate of local attendance with very few children coming from further away and as a result many of the pupils are within walking distance which surely suits the need for the councils plan to reduce the carbon footprint?	As above.
4.2.14	If you close our school everyone will have to drive and it's bad for the environment.	As above.
4.2.15	My school is a mile away and next year I was looking forward to riding my bike to school. I won't be able to do this if my new school is further away. The roads are too busy and my mum and dad won't let me ride all that way. They will have to drive me to my new school, all of the other kids will have to be driven too and that's not very good for the environment! I have been told that you might send a bus to take some of us to school, but I don't want to go on a bus on my own. I am only 8.	<p>The Council recognises that, should the school close, it would be more difficult for a pupil to cycle to school.</p> <p>Many pupils in Powys travel on buses to school from the start of their education, with no detrimental impact.</p>

4.2.16	What a shame to further contribute to emissions by popping yet another diesel driven bus on the road to cart our little children to a 'super school' where they will not be offered the great education a small village school can.	As above. The Council is not proposing to send children to a 'superschool' – it is proposed that children attend their nearest alternative schools.
4.2.17	It is also illogical and perverse at the very time when, in light of the climate emergency, the authority should be making every effort to reduce the carbon footprint of its residents and to limit non-essential car use.	As above.
4.2.18	NRW stated in its latest report "A systemic change is needed to how and why people travel and what is transported." It promotes the concept of a 20-minute neighbourhood - pioneered by Melbourne in Australia - where urban society is designed so residents can meet virtually all their needs a short walk from home. This is supported by Future Generations Commissioner Sophie Howe who said this was "not just about carbon emission targets - these solutions have wider benefits". "We have an obesity crisis so the last thing we want is people sitting in their cars.	As above.
4.2.19	Environmentally it is also a poor decision – clashing with the report from NRW that time was running out to "avoid a catastrophic situation for Wales and the world". The report highlighted " the concept of a 20-minute neighbourhood – pioneered by Melbourne in Australia – where urban society is designed so residents can meet virtually all their needs a short walk from home." The report also says that "A systemic change is needed to how and why people travel". Future Generations Commissioner Sophie Howe said "the last thing we want is people sitting in their cars."	As above.

4.3 Concern about impact on pupils' access to after schools activities

4.3.1	<p>If children in the future have to travel further afield for their education, they would inevitably end up losing out on some extra-curricular activities due to transport issues. This would greatly harm the education and development of the village.</p>	<p>One of the advantages of the proposal, outlined within the Consultation Document, is:</p> <ul style="list-style-type: none"> - <i>Pupils would attend larger schools, which could provide a wider range of educational and extra-curricular opportunities</i> <p>However, the Council has also recognised within the draft Impact Assessment that <i>'it is acknowledged that there could be an impact on some pupils' ability to access after school activities, and could impact on the ability of parents to take part in school events, meetings etc.'</i></p> <p>The majority of schools in Powys rely on some level of home-to-school transport for their pupils, and schools are usually able to work with families to provide an appropriate level of extra-curricular activities for pupils, including clubs within the school day, shared transport with other parents etc.</p>
4.3.2	<p>I am deeply concerned that if children have to be transported to school by bus, that they will miss out on very important cross curricular opportunities.</p>	<p>As above.</p>
4.3.3	<p>If pupils wish to engage in after school activities, this will be determined on the basis of whether their parents are able to collect them from school given the distances they will live from their nearest school. This assumes that parents' working hours and ownership of</p>	<p>As above.</p>

	a car makes that possible. It is likely then, that for some children, they will not be able to enjoy the same opportunities as their peers.	
4.3.4	The biggest impact on children will be the greater distances they will have to travel to and from school, and whilst they may qualify for free transport at the beginning and end of the school day, their ability to participate in extra-curricular activities may be significantly affected by parents working patterns and ownership of private vehicles. Children at Castle Caereinion currently enjoy a breadth of activities and are able to actively participate because the majority live within or very near to Castle Caereinion.	As above.
4.3.5	Every child in school would be entitled to free home to school transport. They would not get free transport from after school activities. It is pie in the sky for the consultation to suggest that there might already be Home to School transport travelling through Castle Caereinion to Berriew. Nobody goes that way.	Comment noted.
4.3.6	I know that there will be a bus to the nearest local schools. However what happens if the parents aren't happy with those schools? and they don't drive. Or if they are happy with those schools, they go on the bus and then there is childrens' after school clubs, meetings, etc. additional charges might be hard.	Parents are able to choose any school for their child(ren), and if there's a place at the school, then they can be offered a place. However, the Council's Home-to-School Transport Policy provides transport to a pupil's nearest or catchment school. If a parent chose a school that is not their nearest school, then they would be responsible for ensuring their child(ren) are transported to that school. It is recognised that if a parent didn't drive, or have access to a car, then they would have to make alternative arrangements which could include private taxi/shared transport with other parents. The Council recognises that this may potentially have an economic impact on the parent.

		In terms of after-school clubs, meetings etc, the previous comments in this section apply.
4.3.7	If we go to another school we might not be able to stay to do after school clubs because our mummies and daddies would have to pick us up as we would miss the bus. This wouldn't be fair, because we would never get to do the fun clubs that we can here in Castle school.	In terms of after-school clubs, the previous comments in this section apply.

4.4 Concern about the impact on low income families

4.4.1	We understand Powys only intends to supply transport to the nearest alternative school, therefore financial support is based on geography, and this will deny choice to families on lower incomes.	Parents are able to choose any school for their child(ren), and if there's a place at the school, then they can be offered a place. However, the Council's Home-to-School Transport Policy provides transport to a pupil's nearest or catchment school. If a parent chose a school that is not their nearest school, then they would be responsible for ensuring their child(ren) are transported to that school. It is recognised that if a parent didn't drive, or have access to a car, then they would have to make alternative arrangements which could include private taxi/shared transport with other parents. The Council recognises that this may potentially have an economic impact on the parent.
4.4.2	A number of families in the village are on lower incomes. They generally find it better and easier taking their children to the primary school because they can walk, which is not only better for the environment, but good for physical health and it saves money	Comment noted. The Council recognises that, should the school close, pupils living in the village of Castle Caereinion who are currently able to walk / cycle to school would no longer be able to do so.

	too. They would be forced to travel to other schools should the school be closed, and a mini-bus or some other provided school transport may need to be implemented if the school closes, so these families on lower incomes don't suffer. If not, then parents will not have a way to take their children to school elsewhere.	Should the school close, free home-to-school transport would be provided for eligible pupils to their nearest alternative school, in accordance with the Council's Home-to-School Transport Policy.
4.4.3	Public transport to and from Castle Caereinion is not an alternative option to support students travel to and from school. Any child from a low-income family will be disproportionately penalised which in contra to the 2018-2023 vision for Powys to be "established as an innovation base for learning, research and skills."	As above.

4.5 Other

4.5.1	Parents who are concerned about the distance younger children may need to travel, may decide to Home School. Whilst this may be satisfactory in many cases, there have been instances where Home Schooling has not been adequate and in one case was tragic. Integration of Home Schooled children into main stream can be challenging and costly. There may be a requirement in the future for inspection of Home Schooled children and that would also be costly compared to teaching children in a smaller primary school.	Comment noted. Elective Home Education for a child in a mainstream school is a choice any parent can make at any time. Electively Home Educated children are at no greater risk of harm from their parents than those that attend school: Welsh Government guidance clearly states that being Electively Home Educated is not a safeguarding risk in and of itself. Integrating children who have been Home Educated into school may be no different to integrating into school any child who has moved into the area. The Local Authority's understanding is that Welsh Government is considering a requirement for all families who Electively Home Educate to be visited once per year: this is not the same as inspecting. Welsh Government have indicated that there will be funding provided to reflect this new duty (if and when it is implemented). The cost of this duty
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		is projected to run to no more than £50 000 per annum, which is considerably less than the budget for a school.
4.5.2	Also parents will be forced into making difficult decisions as regards to where to send their children as transport to a preferred school may not be funded. They may also have other children in secondary schools which will create pick up and drop off issues and will not necessarily allow for children to attend the after-school activities that the council are saying will be more available.	The Council recognises that a number of factors affect a parents' choice of school for their child(ren), and that the availability of free home-to-school transport is an important factor. However, most parents have to manage the complications of school opening times, transport and after-school clubs, especially if they have children in different schools – the Council does not think this is an insurmountable matter, and it would be for the parent to manage these arrangements.
4.5.3	All I see is more stress on the children and parents within the week. Parents may also have to rely more on childcare or asking employers to be more flexible with hours which could mean extra costs on top of already having to pay more to transport their children to a school further away.	Comment noted.
4.5.4	I know numerous residents who don't drive and would make there live extremely difficult to the point they would probably have to leave the village in order to get their children to school.	Should the school close, free home-to-school transport would be provided to the child's nearest school, in accordance with the Home-to-School Transport Policy.
4.5.5	Transport has always traditionally been provided within the 'Llanfair Cluster' area. This has been funded transport into Castle school at Primary age and Llanfair school at Secondary age. In addition, children accessing the Welsh stream of Primary education have been transported to Llanfair primary school. Can PCC please clarify how these arrangements will now change – if	The Council recognises that should Castle Caereinion C. in W. School close, pupils would transfer to alternative primary schools, and that some of these would be in a different secondary cluster i.e. Welshpool High School. The Council also

the cluster routing for Castle Caereinion is changing, will transport now be provided to Welshpool High School from the village and funding to Llanfair High School stopped. I currently have a child in Welshpool High school who does not receive transporting funding, I would be looking to appeal this position if this closure and changes went ahead. I am aware this applies to a number of children in the village. In addition, there are also children in the village accessing Welsh language primary education in Welshpool schools who are not funded. I would again be encouraging these families to appeal their position should the cluster change take effect

agrees that this would have transport implications as outlined below:

The Council's Home-to-School Transport Policy for learners transferring or being admitted to a Powys schools in the 2021 / 2022 academic year states the following:

'Home to school transport will be provided for learners who ordinarily reside in Powys to attend their nearest suitable school or catchment school. A 'catchment' school means the nearest school within a geographic area. To be eligible for free home to school transport, the learners' nearest school or catchment school must be:

- The nearest to the learners' home address and if so,*
- They are more than 2 miles from their home address for primary school (aged 4 -11) or more than 3 miles for secondary school (age 11 to 16)'*

Pupils who attend Castle Caereinion CiW School normally transfer to Caereinion High School and free home-to-school transport is normally provided for those pupils attending Castle Caereinion CiW School to Caereinion High School.

Should Castle Caereinion CiW Primary School close, pupils living in the Castle Caereinion area would be provided with free home-to-school transport to their nearest or catchment secondary school. In the case of pupils choosing to attend Berriew CP School,

		<p>Welshpool CiW Primary School or Guilsfield CP School, they would ordinarily transfer to Welshpool High School.</p> <p>Pupils currently accessing free home-to-school transport to Caereinion High School from the Castle Caereinion area would continue to receive this service until they finish their education. However, this would not be available to pupils from Castle Caereinion if they have transferred to Berriew C.P. School, Guilsfield C. P. School or Welshpool C. in W. School unless Caereinion High School is their nearest secondary school. This would have an implication for families who may already have elder siblings being transported to Caereinion High School.</p> <p>There may also be a potential impact on transport costs as there may be additional routes required to provide transport from the Castle Caereinion area to Welshpool High School. However, it would be expected that the existing transport routes would be adjusted. The estimated range of costs for this is dependent on which school parents choose for their pupils, should Castle Caereinion close. The following outlines the range of costs, depending on how many pupils require transport:</p> <p>Minimal costs – all pupils can be accommodated within existing transport provision for secondary, albeit some routes may need to be extended – £10 - £20 per school day - £1,900 - £3,800 per annum</p>
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		<p>Need to increase size of bus – approx. £50 per day - £9,500 per annum</p> <p>Additional Taxi required – approx. £60 - £75 per day - £11,400 - £14,250 per annum</p> <p>New bus required - £170 - £230 per day - £32,300 - £43,700</p> <p>Free home-to-school transport would continue to be available for pupils wishing to access Welsh-medium provision to their nearest Welsh provision.</p> <p>The Council has an appeals process for transport applications.</p>
4.5.6	<p>Very young children having to travel on school buses with older students may see ‘role models’ whose behaviour could be less than satisfactory and could lead to a deterioration in behaviour overall. This may lead to a greater number of exclusions and a requirement for the provision of increased hubs for excluded pupils and extra counselling costs to improve behaviour which was set at a young age.</p>	<p>Primary and secondary aged pupils already share transport elsewhere in the county, and, in many cases, are siblings.</p> <p>The Council and bus operators do not tolerate bad behaviour on school transport.</p>

5. Impact on staff

5.1	Many other people will be affected by the changes than just the school children and their families. Teachers, administrators, and support staff will all be affected with potential losses of careers.	Should the school close, Staff currently employed at Castle Caereinion C. in W. School would be subject to a management of change process and be supported fully throughout the process.
5.2	As well as the children losing friendships so will the staff. The staff enjoy coming to work, and are concerned about losing their income.	As above.
5.3	Right now with the global pandemic money worries are on everyone's mind and if the school closes it will add to the stress and worry even more.	As above.

6. Impact on the community

6.1 General concern about the impact on the community/village

6.1.1	Please don't close the school and kill our community!	The draft Community Impact Assessment included with the consultation documentation has identified the potential impact of the proposed closure of the school on the community. It notes the extensive community use of the Castle Caereinion school building, and extensive links between the school and the local community. This will be updated to reflect information gathered during the consultation.
6.1.2	The closure of Castle Caereinion school will have a detrimental effect on the whole community.	As above.
6.1.3	The school is a massive part of our village that brings all the community and surrounds together.	As above.

6.1.4	This school is an important part of this community.	As above.
6.1.5	The school should remain open. It is a vital part of the community.	As above.
6.1.6	Keep this small school open heart of a small community.	As above.
6.1.7	The village will lose the “heart” of this close knit community. The school plays a major role in the fabric of this beautiful village.	As above.
6.1.8	The closure will have a massive impact on our local community and this has not been properly considered.	As above.
6.1.9	We have all suffered enough, as closing our school will tear the heart out of our lovely village.	As above.
6.1.10	Losing in such a wonderful village school would be damaging for the close-knit community, it truly is the heart of the village.	As above.
6.1.11	It will be a huge loss to the community and I strongly believe that children will lose out as a result.	As above.
6.1.12	Put simply the closure of the school would have a massive negative effect on the children and the community.	As above.
6.1.13	To lose the school at this stage would lose the heart of the community and have a significant negative impact on the future of the village.	As above.
6.1.14	Very difficult to imagine how the life of our community will be without the vibrancy and involvement of our youngsters in their home school and church.	As above

6.1.15	The school is a valuable part of the community for the children, families and wider parish area and closing it would be of a great detriment to all involved.	As above.
6.1.16	It would be a massive shame for the community of Castle Caereinion to lose its beloved school.	As above.
6.1.17	I believe that closing this school would have a detrimental effect not only to the pupils of the school, but to the wider community.	As above.
6.1.18	It will be difficult for the community as a whole to adjust.	As above.
6.1.19	I believe the school is so important for the village it is the heart of the village.	As above.
6.1.20	Small schools like this are invaluable to the local communities.	As above.
6.1.21	The school is a lovely church school and is the hub of the community. It would be like ripping the heart out of it if it was closed.	As above.
6.1.22	It is my view that the proposal to close Castle Caereinion school will have a detrimental effect on our children and the wider community.	As above.
6.1.23	The school is a special place in all our hearts and to close it would be unthinkable, ripping the heart out of the community.	As above.
6.1.24	Obviously if the school closes it will massively effect everyone involved with the school but it will also hit the community hard especially the people that live in the village.	As above.

6.1.25	'Devastated' is a word often used too lightly but we genuinely believe it is entirely appropriate to say that the closure of our school would have a devastating effect on the community on the community of Castle Caereinion.	As above.
6.1.26	If you close the school we are basically just a cluster of houses with a pub that is struggling to survive.	As above.
6.1.27	School is not just a building, it's the heart of a village, it's where social bonds are formed helping the community thrive. Without it the village dies and turns into a corridor for cars speeding through.	As above.
6.1.28	It is a poor plan that proposes throwing away good working schools, hollowing our valuable communities in an already sparsely populated countryside.	As above.
6.1.29	This will also devastate our community as not only losing our local shop last year but to lose the school when we have so much potential to grow our community.	As above.
6.1.30	The whole community will suffer at the loss of our little school. Not just the pupils and parents who attend. It would be a very regrettable decision indeed and will be yet another valuable community service taken away from our little village.	As above.
6.1.31	I feel strongly that the impacts from the closure of this to the community will be devastating and that these have not been given enough weight when coming to this decision.	As above.
6.1.32	I realise that saving money is the outcome desired but what about saving our community?	A revenue saving to the Council is only one of a number of reasons for the proposal.

		<p>The proposal is intended to address the main challenges outlined in the Consultation Document:</p> <ul style="list-style-type: none"> i) Low pupils numbers ii) High budget per pupil iii) Issues with the building iv) Combined age classes v) Leadership <p>Following consideration of a number of options, the preferred option is to close Castle Caereinion CiW School, pupils to attend nearest alternative schools.</p> <p>The reasons for this are:</p> <ul style="list-style-type: none"> - Would address the issue of low pupil numbers at Castle Caereinion - Would reduce the Council's overall surplus capacity in primary schools - Revenue saving to the Council - Pupils would attend larger schools, which would be better equipped to meet the requirements of the new curriculum - Pupils would attend larger schools, which could provide a wider range of educational and extra-curricular opportunities - Pupils would attend schools with more suitable accommodation - Meets all of the Critical Success Factors
6.1.33	Whilst I recognise the financial challenges that Powys County Council face and the need to review the education provision in	As above.

	Powys in line with the 21st Century Schools Programme, I do not feel that closing Castle Caereinion Church in Wales School would be a wise decision as any financial benefits are outweighed by the negative impacts on this community.	
6.1.34	I would propose that the wider impact of closure of the school needs to be explored more carefully and the whole community engaged in the consultation process by PCC, which has not been undertaken to date.	All stakeholders have had the opportunity to participate in this consultation. Information received during the consultation about the impact of the proposal on the community will be included within the final Community Impact Assessment.
6.1.35	In a questionnaire, conducted December 2018 by the Community Council, the school was ranked of significant importance to the community. Closure of the school and potentially the resultant closure of the Recreation Centre could add to the demise of the Castle Caereinion community	Comment noted.
6.1.36	The proposed closure of Castle Caereinion C in W Primary School would totally destroy the epicentre of the local community in Castle Caereinion. The school currently plays a vital role in the functioning and vitality of the local community. It's closure would leave the village without a vital service, and would leave a gaping hole within the community. It is vital that Large Villages such as Castle Caereinion (as per Policy S P5 of the adopted Powys Local Development Plan (2011-2026) retain their key services such as primary schools to serve both the current and future children of the community.	Comment noted.

6.2 Concern about impact on the community centre

6.2.1	If the school is gone what will happen to the Community centre?	According to information supplied by the school and included within the draft Community Impact
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		Assessment, the school is the main financial contributor to the Community Centre. Should the school close, the management committee of the Centre would need to consider how best to utilise the Centre so that it remains viable.
6.2.2	Community Centre has strong links to the school and is unlikely going to be financially viable on its own.	As above.
6.2.3	Losing the school will also mean losing the community centre too.	As above.
6.2.4	What happens to our community centre when you close the school? I cannot imagine without the school on the doorstep this will be something we retain.	As above.
6.2.5	The school is closely tied to the Community Centre which is an important part of the community. There is a concern that closing the school would affect the ability of the community centre to remain open and so consideration should be given to the impact of this.	As above.
6.2.6	Our school is next door to the community centre. This is great because we get to have cake stalls, Christmas and Summer Fayres, school plays and tea mornings. All of the people from the village can get to come to these, so it helps us to work together as a Community. It is also a great chance for the older members of the community to get out of the house and to do something fun with us, the youngest members of the community.	As above.
6.2.7	If the school closes this puts into question the future of our community centre. The school is a huge financial contributor to the community centre and without the school where would the	As above.

	extra money come from? The residents of the village also get involved with our fetes and school plays as well.	
6.2.8	As I live in the village I am very concerned that we might lose our village hall if the school closes. Without the funding that the school provides I know that it will be a very hard time to keep the community hall going. If it went this could have a terrible effect on the people in the village as a lot of people in the village go to the activities that are held in the hall such as yoga, singing, bowls, and painting. Some of these people that go these activities only do this and this is there social activity once a week so we have to think about the detrimental affect it might have on them.	As above.
6.2.8	The Recreation Hall is reliant on the school as it is the primary source of income.	As above.
6.2.9	The school is the primary income generator for the Recreation Committee and without the school's support would leave a significant gap in income which will be very difficult to bridge with other income sources in relation to the required outgoings.	As above.
6.2.10	Inevitably, because the school is the primary user (and therefore provides a high proportion of the Recreation Association's income) the closure of the school would likely lead to the closure of the community hall as well.	As above.
6.2.11	If the school goes the village hall will be under real threat. It relies on part of its income for the school use of the hall during the school day. Take that income away and the hall will be under threat.	As above.

6.2.12	There is a Community Centre used by a few small local organisations but without some of the school income this may suffer financially and be forced to close.	As above.
6.2.13	The school is the largest financial provider for the Community Centre and without this investment the Community Centre could be at risk of closure. This would then provide another huge loss to the Community of Castle Caereinion. For many members of the community this acts as a lifeline for them, allowing them the opportunity to meet up with other people and to have an opportunity to participate in a wide range of activities. The school also use the Community Hall to hold events, such as bake sales, Summer and Winter Fayres, Messy Church Activity Clubs, School Performances. These events are always a great chance for the pupils and members of the Community to join. We feel very strongly that the Cabinet should examine the definite impact to the village if the Community Centre were to close, but without the school funding it is a highly likely scenario.	As above.
6.2.14	As outlined in the consultation, the school building sits adjacent to the Community Hall and this facility is utilised daily by the school during school week/term time. The school are currently the principal user of this facility and should the school close, this would be hugely detrimental to the future of the hall, as it relies on the revenue from the school to operate. It is very likely that the hall would not be able to continue to run and would be yet another facility lost to the community of Castle Caereinion, which has already lost its shop in the last 12 months. The Community Hall is a key part of the community which a number of groups meeting in it each week and provides the focal point for events within the village, losing these facilities will have a significant impact on the	<p>As above.</p> <p>The draft Community Impact Assessment also acknowledges the following:</p> <p><i>Information received from the school suggests that the school provides a number of facilities which could be attractive to families, and which increase the attractiveness of the community to potential young families.</i></p>

	village as a whole to attract new people and consequently have a negative impact on house prices within the area.	<p><i>Should there be no school in Castle Caereinion, it is possible that families would leave the village in order to live in the community of any alternative school, and that young families would be discouraged from moving to the village.</i></p> <p>The Council notes the comment about negative impact on house prices but it is not clear whether implementation of the proposal would have a negative impact on house prices in the area.</p>
6.2.15	The school works closely with the community centre which helps to keep it open by having use of the hall during the day, also by holding various fundraising functions – coffee mornings, school concerts, fete’s, etc. all of which are always well attended by residents of the village and surrounding area.	As above.
6.2.16	Additionally, if PCC were to re-assess the relief offered to community centers, this could force closure without the school’s financial support.	The Council recognises that the school contributes financially to the Community Centre, and that there may be an impact on its viability should the school closed.
6.2.17	Our community centre is at the heart of our village. Our community centre is linked to the school and there is a danger the proposed school closure would lead to the closure of the community centre. We can see no thorough and comprehensive investigation on the evidence of the impact of the proposed closure on the community centre within the consultation document. The community centre is the heart of our village and is important for the health and wellbeing of everyone. There is no other alternative option for our community.	Information about the potential impact on the Community Centre should the school close will be included in the final Community Impact Assessment.

6.2.18	The Local development plan adopted by Powys County Council states the following: "...Powys citizens will be supported and empowered to lead active and healthy lives..." and "Powys' towns and larger villages will be vibrant and accessible service centres. They will be the focus for integrating housing, economic and service development to meet their own needs and those of their surrounding communities." Our community relies on our community centre for a number of activities most of which are linked to improving health and wellbeing. The closure of the school will lead to the closure of our community centre and impact on the health and wellbeing of every single member of our community	Comment noted.
6.2.19	The school also has access to many outside areas with the attachment to the community centre. These green areas are also used by many of the families who live in the village as it means their children do not have to cross the road in the middle of the village to access the other playground.	Comment noted.

6.3 Reference to housing developments in Castle Caereinion

6.3.1	We have a lot of new homes been build what about the children from these homes will family move in with no school.	Information received from the Council's housing department suggests there are approximately 40 housing developments already completed, underway or planned in the area. Some of these are affordable housing.
6.3.2	The village is growing steadily with new housing in progress or planning sought, a proportion social housing with young families in mind.	As above.

6.3.3	Houses are being built or have been built.	As above.
6.3.4	A lovely country school that needs to stay open with all the new houses being built.	As above.
6.3.5	New houses are now being built, bringing more young families to the village.	As above.
6.3.6	The village is growing, more and more new families are choosing to move into Castle Caereinion, your plans fail to take that into consideration.	As above.
6.3.7	There are a large number of houses currently being built on old farm land which will hopefully attract young families to the village, so school numbers are likely to grow.	As above. The Council's department uses a pupil-yield ratio of .45 children per new house built. This is an estimate and does not necessarily lead to an increase in pupil numbers.
6.3.8	Many new houses are being built in the village. Where will the support for these children come from?	As above. The Council's department uses a pupil-yield ratio of .45 children per new house built. This is an estimate and does not necessarily lead to an increase in pupil numbers.
6.3.9	Our village is growing too, we have more houses being built and people might not move here if there is no school. If you leave our school open then the new families will be able to send their children here and we can make even more friends.	<p>Comment noted.</p> <p>The draft Community Impact Assessment also acknowledges the following:</p> <p><i>Information received from the school suggests that the school provides a number of facilities which could be attractive to families, and which increase the attractiveness of the community to potential young families.</i></p>

		<i>Should there be no school in Castle Caereinion, it is possible that families would leave the village in order to live in the community of any alternative school, and that young families would be discouraged from moving to the village.</i>
6.3.10	It is also important to note the significant housing development which is both on-going and proposed within the village. The additional housing being development will largely be occupied by families who would provide increased numbers of children to attend the school, thus improving the viability of the school going into the future. It makes no sense for the school to close and for future children of the village to have to attend other schools located several miles away from Castle.	As above.
6.3.11	<p>There are builders building big new houses next to the school and I don't know where those kids are going to go to school? I am sure that if they knew that there was a school across the road that they would all go there. How are the builders going to sell houses if they don't have a school or a shop or anything?</p> <p>The village has planning permission for 31 three and four bedroom houses. School is at the heart of the community and will play a big part in attracting families to the area to access the wonderful education we offer.</p>	As above.
6.3.12	Future housing developments within the village may depend on a good local village school as I know personally someone who has decided not to purchase in that community, due to the questions hanging over the availability of that school. Parents should have the choice of where to send their children.	Comment noted.

6.3.13	The house prices will drop and I am sure building contractors will be reconsidering plans for housing developments as what do we have to offer prospective buyers.	Comment noted.
6.3.14	The decision seems to make no provision for the future of the families already in the village OR the development of housing already in the pipe-line, not to mention planning longer term.	Comment noted.

6.4 Closure of the school would mean that people would not want to live in Castle Caereinion

6.4.1	There are new people moving into the village and they would not want to move here if there is no school.	The Council notes these comments about people not wanting to live in Castle Caereinion, as outlined in the draft Community Impact Assessment that was published with the consultation documentation.
6.4.2	Why would anyone want to live in Castle Caereinion anymore?	As above.
6.4.3	No one will move to the village if there is no school.	As above.
6.4.4	How can you expect people to want to live in CC when their children can't go to a village school?	As above.
6.4.5	People may not consider moving into Castle Caereinion if there is no school, which will mean that other local amenities such as the pub, and the shop if a new one is opened, which is looking extremely likely.	As above.
6.4.6	Moving these children and closing the school will take the children out of the community and I fear will force People to move from the area also. This affects the surrounding areas as well as Castle Caereinion.	As above.

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6.5 Reference to the loss of other community facilities

6.5.1	We as a village have lost so much, the shop, a regular bus service, and now the school may close.	This information will be included in the final Community Impact Assessment, which has already identified the negative impact of the proposal on the community.
6.5.2	The village lost its post office and now has lost its shop. Only the church, school and pub remain as social focal points. there can be little doubt that the loss of the school would be a severe blow and destine Castle to become a commuter village. Every effort should be directed towards preserving active and healthy village communities.	As above.
6.5.3	Village schools are important to keep villages alive. Castle Caereinion has already lost its shop because of the sad demise of Mike Rogers, to be a village with no shop and no school is the kiss of death. Are all the villages to become dormitories for local towns?	As above.
6.5.4	We have lost the shop during the pandemic which was a major village hub, if the school were to close that's the heart of the village gone.	As above.
6.5.5	We have lost our shop, now this, what next?	As above.
6.5.6	Castle Caereinion, as a small community, has been fortunate to retain, until recently, a shop, a pub, a school, a community facility and a church. Having sadly already lost its only shop since the	As above.

	sad passing of the shopkeeper last year, the community can ill afford to lose its school as well.	
6.5.7	Castle Caereinion now has no shop, a church at risk and a pub which needs community life to support it.	As above.
6.5.8	The community recently lost its only shop due to the death of its long-term owner; the pub is working hard to keep going, the church as previously implied is attempting to gain the involvement of younger families. Losing the school will result in half of the necessary components of a thriving village becoming non-existent.	As above.
6.5.9	The village has been able to sustain a school, a village hall, a church, a pub and until the untimely death of the shopkeeper a village shop.	As above.
6.5.10	There are no shops in the village, there is only one school.	As above.
6.5.11	There isn't much left. Shops and facilities close Post offices shut down. except wealthy pensioners buying the new houses on housing projects that only benefit prospectors.	As above.
6.5.12	Closure of the school will hasten the demise of our last community assets and leave Castle Caereinion as a dormant suburb of Welshpool with nothing to give it the vibrancy and life that we hear now echoing around during the school day.	As above.
6.5.13	Even the future of the church would be impacted as, currently, the school gives us a key opportunity for engagement with the wider community which is what leads to church growth. Therefore, in a	The strong links between the Church and the school are acknowledged. However, the Council has a duty to review its school estate, to ensure that the infrastructure will enable the provision of the highest

	short space of time the community could lose nearer all its facilities.	quality education to learners across Powys in the future.
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6.6 The school brings the community together / is a focus for community activity

6.6.1	The school brings the community together, through events such as school plays, etc.	Information received from the school and included within the draft Community Impact Assessment that was published with the consultation documentation highlighted the strong links between the school and the community. The Impact Assessment will be updated to include any additional information received during the consultation.
6.6.2	Any events that happen at the school bring the community together and usually thats together in the village hall.	As above.
6.6.3	The school has acted as a vital 'keystone' in the life of the village for over 100 years. It's not only a place of education, it has also been, and continues to be, the focus for virtually every community event and celebration. Its closure would reduce Castle Caereinion to being yet one more dormitory community.	As above.
6.6.4	Villagers played a part in the school's after school activities i.e. Messy church – craft based activity. Also gardening with the children. The children welcome the villagers into their school throughout the year. The villagers have contributed a lot of money for equipment.	As above.
6.6.5	Small schools allow a community that by geographic location means that everyone and everything is spread out over a wide range to come together.	As above.

6.6.6	Castle Caereinion is a Church in Wales school and has for a very long time been the link between the younger and older generation of the village which is essential for social cohesion. It promotes understanding and tolerance between the two groups, without the school this will be lost	The strong links between the Church and the school are acknowledged.
6.6.7	This school has a great setting in a lovely rural area with great community spirit. All the community is held together by the school with its strong Church ethos.	The strong links between the Church and the school are acknowledged.
6.6.8	The school is a focal point within the village and it can be a force for community building and unity. In a rural area such as this, the local community takes on a significant role and this is undermined when an institution is removed. Centralisation of any organisation often leads to an unbalance of resource allocation. Those areas with greater population will attract the greater resources and conversely, small areas of population will receive less attention.	Comment noted.
6.6.9	Villages, like Castle Caereinion, will only thrive if all the major constituent parts of the community are enabled to come together to share, build, support and work together for the future life of all residents, young and old. The school is an important part of the community. Please do not close it.	Comment noted.

6.7 Concern that pupils would no longer feel part of the community

6.7.1	The closure of the school would lead to the children of our community being scattered to various neighbouring schools – Berriew (being the closest), Llanfair (for those with older siblings already in that high school) and Welshpool Church ion Wales Primary (for those wanting faith-based provision). This scattering of	Comment noted. This information will be included within the final Community Impact Assessment.
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	our children would have an extremely damaging effect on community cohesion.	
6.7.2	Castle school is at the heart of our community and is much more than 'just a school' for our children, it is a place of security and stability, a place to enjoy all year round and to the children it is 'their school and their community'.	As above.
6.7.3	Attending the local primary school within their own village gives the children a far superior grasp of their local community and that community's identity. It also allows children to access more services within the school and helps them to make the most out of their education.	Comment noted.
6.7.4	It takes a village to raise a child. Looking to the future, self-reliant and sustainable villages will only flourish where essential services like Castle Caereinion School are retained and cherished. The relationships made at the school between children and families from the early years represents a store of social capital, which encourages volunteering and community self-help and ultimately makes lesser demands on the public purse and the health service. Closure of the school will be a dilution and loss to the quality of life in Castle Caereinion.	Comment noted.
6.7.5	The school is a very important part of our village. The children are able to join in with village fetes and events and also attend the church. The children get to meet and see people who live in the village and we get to meet and see them. Being part of the community gives the children a sense of belonging.	Comment noted.
6.7.6	Teaching independence and to value your own community, also keeps villages together and growing. Encourages children to return	Comment noted.

	as an adult. Gives young life at the centre of the community. Creates a web of connections with local people. A statement of where we place our values. Local friendships for life give a foundation that honours and respects the village. Less distance for children to travel. Sends a message Yes you can succeed on the local scale. A microcosm of the world. It can work from tiny beginnings.	
6.7.7	Children growing up in a village and going to their local school is an important part of their lives. One of the nicest sights in Castle Caereinion is to see children of all ages playing together in the play park.	Comment noted.
6.7.8	Through its engagement with the community is fostered a sense of belonging and resilience in the children that have been fortunate to have benefited from an education at this wonderful school.	Comment noted.
6.7.9	It has long been recognised that younger children ie 5-11 year olds benefit more from the type of locally provided rounded education that a village school can provide. It is not a matter of equipment and resources, but quality of education provided at a village level.	Comment noted.

6.8 Comments relating to community well-being

6.8.1	Castle Caereinion has over 50 farms and small holdings operational in the parish. With well-being of community residents being of high significance, the decision to close the school jeopardises the viability of the hall and would conceivably cause higher expense to PCC manage social welfare.	The Council recognises that Castle Caereinion is located in a rural area with many agricultural holdings. According to information supplied by the school and included within the draft Community Impact Assessment, the school is the main financial contributor to the Community Centre. Should the school close, the management committee of the
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		Centre would need to consider how best to utilise the Centre so that it remains viable.
6.8.2	Castle Caereinion is a rural community and is built on its agricultural foundations with over 50 farms and small holdings currently operational in the ward. Agriculture has a particularly high focus on well-being due to its solitary environment and this is of paramount importance within the community of Castle Caereinion which has the school and Community Centre at its heart.	As above.

6.9 Reference to previous generations of families that have attended the school

6.9.1	The school has been part of our community for years and I attended it as a pupil 25 years ago where I grew and developed in a loving and caring environment.	<p>The Council notes these comments regarding previous generations of families that have attended Castle Caereinion C. in W. School. Whilst the Council is pleased to note that the school is well regarded within the community and by pupils that have previously attended the school, the Council's priority is to ensure that provision of the highest quality continues to be available to pupils across Powys in the future.</p> <p>The Council's Strategy for Transforming Education in Powys outlines a number of challenges facing education in Powys, one of which is a high proportion of small schools. A number of proposals are being taken forward in order to implement the Strategy, to ensure that all pupils across Powys can</p>
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		benefit from the best possible opportunities in the future.
6.9.2	Both my children attended Castle School, where we were able to walk every day, through the churchyard, often stopping at Mike the Shop's for a pint of milk and 20pence worth of sweets. You are actively suggesting we further remove a wonderful feeling of community by closing the school.	As above.
6.9.3	I am proud to say that our children are third generation to attend the school over a period of 60 years, we have all benefited from the small village school education experience, one we have been pleased our children have had the opportunity to also experience.	As above.
6.9.4	My family has been part of the school for over 30 years. Myself and my husband both helped the school, and our 3 children went to Castle school.	As above.
6.9.5	I have had seven children go through and two grandchildren in the school, I believe in the school and what it offers.	As above.
6.9.6	This school is the heart of the community! It has been used by several members of my family - going back generations! My maternal great Grandfather, his daughter, my husband and his brothers, and our own two children!	As above.
6.9.7	My son is now the 4 th generation to attend Castle CIW primary school after my Grandfather, father and myself our have attended the school and have lived in the village all our lives, my daughter has also attended the school, who is now flourishing in Caereinion high school and doing very well,	As above.

6.9.8	I have lived in Castle Caereinion for 20 years and all my 3 children have attended the school before going on to University. The spark and enthusiasm for learning was ignited at Castle primary school where they could learn and develop in a happy and safe environment which carried them successfully through Llanfair High school and beyond. I still see the very same ethos in the school today.	As above.
6.9.9	Both myself and my daughter went to Castle Caereinion School and the education we received was second to none	As above.
6.9.10	I myself have many happy memories from going to this primary school, as I am sure many other villagers do as well.	As above.
6.9.11	I myself also attended the school as a child and loved the experience of a smaller school.	As above.
6.9.12	I myself attended the school, as did both of my children (whom thrived in a small school environment).	As above.

6.10 General comments about the closure of rural / village schools

6.10.1	These schools are often the beating heart of these rural communities and by closing them the council is having the effect of damaging the economy of the county.	<p>The Council note these comments regarding the role of rural / village schools within their communities.</p> <p>The Council has prepared an initial draft community impact assessment which was considered by Cabinet when deciding to proceed to consultation and was published as part of the consultation documentation. This assessment will be updated to</p>
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		reflect information received during the consultation period, and the updated version will be considered by Cabinet when determining whether or not to proceed with the proposal to close Castle Caereinion C. in W. School.
6.10.2	No village should lose its school. Small schools are the heart of their communities.	As above.
6.10.3	Too many small community schools are closing. Leave them alone as they are the hub of any small community.	As above.
6.10.4	During these times, it has never been more important than to look after and to save our rural communities and amenities such as Castle Caereinion primary school.	As above.
6.10.5	I accept that the village like so many rural communities is fragile because there has not been enough opportunity for people to live and work in the rural communities and the local school being under threat makes the situation more difficult.	As above.
6.10.6	Since the lockdowns the benefits of rural life have been evident and becoming even more valued. Supporting and encouraging rural life is now being recognised as a key component to lower our carbon footprint. It's time to value our rural life and build upon it at this time of hopeful regeneration from the pandemic. Please don't destroy these essential parts of our communities.	As above.

6.10.7	Now more than ever people need to feel the benefits of being a community, of being together and supporting each other and Powys should be fighting to keep rural communities in one piece.	As above.
6.10.8	Are these small Welsh villages being left to die?	The Council disagrees that small Welsh villages are being left to die. However, the Council has a duty to review its school estate, to ensure that the infrastructure will enable the provision of the highest quality education to learners across Powys in the future.

6.11 Queries about what would happen to the school building

6.11.1	I would also be interested to know what the plans are for the building and grounds if this closure goes ahead. How will that affect our community?	The Castle Caereinion C. in W. School building is owned by the Diocese of St Asaph. Should the Council proceed with the proposal to close the school, the Diocese would need to determine the building's future use.
6.11.2	What are you going to do with the school building, sell it, knock it down. It wouldn't be suitable for houses because it's so close to the community centre.	As above.
6.11.3	Without the school it's doubtful that the buildings future and use of facilities would remain in Castle Caereinion which would be a real upset to both the school and the community.	As above.
6.11.4	Finally, I would very much like to understand your plan for our deserted schools if you have your way. What's your strategy to	As above.

	undo the damage you are planning as you pursue financial efficiency?	
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6.12 Other

6.12.1	Could you use your powers to boost these communities, really help with some positive ideas for small poorer village schools?	The Council recognises the negative impact on the community as outlined within the draft Community Impact Assessment published with the consultation documentation. However, the Council has a duty to review its school estate, to ensure that the infrastructure will enable the provision of the highest quality education to learners across Powys in the future.
6.12.2	Your consultation team is called Transforming Education, is there also a team for Transforming Villages?	No there is no team for Transforming Villages, although the Council does have an Economic Regeneration team.
6.13.3	Children who live in a rural location should not be treated the same as children whose parents live in a town.	The Council has a duty to review its school estate, to ensure that the infrastructure will enable the provision of the highest quality education to learners across Powys in the future.

7. Comments about pupil numbers / surplus places

7.1 General comments about pupil numbers at the school

7.1.1	I fully acknowledge the school is currently running on small numbers, however as outlined above, a new school model was implemented from September 2019 and this has not had sufficient	The Council acknowledges that a new school leadership has been in place since 2019, and that additional pupils have joined the school. However,
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	time to embed and develop, however there have already been additional pupils joining the school.	pupil numbers continue to be very low and are not projected to increase significantly.
7.1.2	The consultation document gives the current pupil numbers at the school as 23 and states they are projected to remain below 30 for the foreseeable future. This information is 6 months old. The current number is 25 which demonstrates that this is a growing school, even despite the challenges of the pandemic and the fact that some children seem to have left the school because of uncertainty over its future.	<p>The source of the pupil numbers included within the consultation document are clearly referenced. Current pupil numbers based on Teachers Centre data 21/06/21 are as follows:</p> <p>Reception: 4 Year 1: 3 Year 2: 4 Year 3: 4 Year 4: 4 Year 5: 3 Year 6: 1</p> <p>Total pupils: 23</p> <p>Information from the Council's Admissions Team indicates that 1 pupil is due to join the school's Reception class in September 2021.</p>
7.1.3	I understand that the school has low pupils and is expensive to run.	Comment noted.
7.1.4	Even though we are under the 30 pupils threshold we have had an additional two children attend despite the school closure and blended learning during Covid-19.	Comment noted.
7.1.5	We fought off closure in the 1960s with far fewer pupils.	Comment noted.

7.1.6	People are going to get scared that the school will close and take their children out of the school which is such a shame.	Comment noted.
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7.2 Pupil numbers will increase in the future

7.2.1	Additional children will join the school in September and there are a further 9 children under the age of 4 years old living in the village, who are likely to start at the school over the coming years.	Information received from the Council's Admissions Team indicates that only 1 pupil is due to join the school in September 2021.
7.2.2	With all the new build houses built in the village of the past few years and all the ones that will be going up in the next couple of years the amount of children attending the school will go up for sure and hence still the demand for the school.	As stated previously, even with potential housing developments, it is not anticipated that pupil numbers will increase significantly.
7.2.3	Post pandemic, working practices are changing which is leading to families seeking to move into more rural areas. This could impact positively on the numbers of children attending smaller schools and may impact on larger primaries requiring them to increase their capacity should numbers increase significantly.	Comment noted. The Council continually monitors the capacity of its schools and makes the necessary adjustments, if additional capacity is required.
7.2.4	The number of children to attend the school will no doubt increase over the next 4-5 years with new buildings being made and the more in the future taking the school numbers to over 50, which in turn decreasing the budget share per pupil. There are more houses being built and possibly more that can be built on nearby land bringing more and more young families to our village and increasing the school numbers.	Information received from the Council's housing department suggests there are approximately 40 housing developments already completed, underway or planned in the area. Some of these are affordable housing.
7.2.5	The numbers may be low at the moment but there is planning permission for further building of houses in the village and the numbers could change significantly.	As above.

7.2.6	More family houses are being built here, so surely the school numbers will increase?	As above.
7.2.7	One reason why I think the school should not close is because there will be more pupils attending the school in the near future. This is because of the number of proposed developments of housing in the village. These houses are mostly affordable houses, which means young families with children are likely to come into the village and therefore use the school. This will boost the numbers enormously.	As above.
7.2.8	I believe that if the school were allowed another two years then the pupil numbers would most certainly increase, thus reducing the high pupil finances, the surplus capacity at the school and the need for closure. Planning permission for 31 houses has already been agreed for the area, this is in addition to the new houses currently being completed. These houses will be three and four bedroom dwellings that will most certainly bring families into the village. With a thriving school as the hub of the community it is certain that pupil numbers will increase from these housing units	As above.
7.2.9	Planning permission has been given for an additional thirty-one 3 or 4-bedroom houses likely to attract young families to the village – with a local school in the village an attractive proposition for them.	As above.
7.2.10	The school website has been developed with a view to promote our school within both the local and wider community to raise pupil numbers. This Government funded piece of work was completed in March 2020. Therefore, whilst current numbers may be below 30, there is no justification for stating that pupil numbers are likely	Even if pupil numbers increased over 30 in future, the school will continue to be a very small school.

	to stay below 30 for the foreseeable future. In fact, given the current growth, the excellent work of the new Headteacher and the increasing size of the community growth above 30 is far more foreseeable.	
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8. Comments about small/rural schools

8.1 General comments about small schools

8.1.1	The smaller schools help those thrive who may struggle in bigger classes.	All schools, regardless of size, would be able to provide for the needs of their pupils.
8.1.2	Because we are a small school we have more help from the teachers.	All schools, regardless of size, would be able to provide for the needs of their pupils. Smaller class sizes would not necessarily mean that pupils receive a more individual education as there are a number of year groups and a wider age range of pupils in the class.
8.1.3	I believe that small local schools are better for young children particularly in reception and year one classes. Teachers are able to form better relationships with both children and parents in these smaller environments.	As above.
8.1.4	Small schools have huge benefits, getting to know each and every child and nurturing them, helping them to grow as strong individuals.	All schools, regardless of size, are expected to nurture, support and challenge all pupils in accordance with their ability.
8.1.5	Smaller schools can provide more intimate and one to one education where it is needed.	As above.

8.1.6	Its better being taught in a smaller school because there are less children so we get to have more help from the teachers. The children are all really friendly too, in bigger schools not everyone is nice to you all of the time.	As above. There is no evidence that children are less friendly in larger schools than in smaller schools.
8.1.7	Smaller schools are better able to support the needs of individual children regardless of their first language.	All schools, regardless of size, would be able to provide for the needs of their pupils.
8.1.8	What are the children who require a smaller school so they get more one on one supposed to do because without the support a smaller primary can give them I don't think they're going to make it through mainstream.	As above.
8.1.9	Pupils of smaller schools are generally kinder and better behaved, and as I have already mentioned, do better academically and have better connections with their teachers, which I believe is paramount.	<p>There is no evidence that pupils in smaller schools are better behaved or achieve better academically.</p> <p>As stated in the Consultation Document in reference to alternative schools, including Welshpool C. in W. Primary School:</p> <p><i>The Council's view is that all of these schools would provide education for pupils which is of at least equivalent quality as that provided at Castle Caereinion C. in W. School, therefore it is not anticipated that implementation of the preferred option would have a negative impact on standards and progress overall.</i></p> <p>All schools, regardless of size, are expected to nurture, support and challenge all pupils in accordance with their ability.</p>

8.1.10	It should also be recognised that small schools bring benefits to children. They have a high level of quality first teaching, with teachers who understand and cater for their individual needs. The benefit of being in a small school is the great opportunities it brings in terms of pupil voice and sports activities.	As above. All schools are expected to provide opportunities in terms of pupils voice and sporting activities.
8.1.11	The benefits children receive at a small village school is second to none and my children have been to both village and a superschool.	As above.
8.1.12	People like villages with schools because they are generally smaller, and parents prefer sending them to a smaller school because the atmosphere there is different to that of a larger school.	As above.
8.1.13	These smaller Community Schools are worth their weight in gold and should be kept open at all costs. They are building something special and should be encouraged, not closed.	As above.
8.1.14	It costs money to have these schools but they are jolly well worth it. You have to be here to know it is true. There are millions of points need making in favour of little schools and it is too easy to knock them.	As above.
8.1.15	Whilst you state that small schools are expensive to maintain and higher costs per pupil, they provide alternatives to the large schools which is extremely essential for all children. Keeping the small schools provides a choice, which provides the best option for all children which should be a consideration. One type does not fit all.	As above.
8.1.16	Small schools are every bit as important as larger schools.	As above.

8.1.17	In a covered world, small class size and ample space should be something to celebrate.	As above.
8.1.18	As a person within the rural community I feel discriminated against with the decisions you have been making as regards to saving money by closing rural schools. They may be small however the children that attend are entitled to be educated within a rural setting without being forced into large settings which is not what a lot of parents want for their children, hence the choice of a smaller local school within the community. The school setting with mixed class ages allows the children that are thriving to excel and the children that struggle get the help and support they need to advance how they need.	As above.
8.1.19	The aim of education now is changing. Whilst in the past children could have been seen as entering the school system to be educated according to a formal pattern and then emerging prepared for a set type of adulthood of some kind, the world has changed. The aim of education now is to enable individuals to flourish as resourceful, independent and self-reliant adults who are able to make the best use of their talents. Small schools like Castle Caereinion are the best place for many children to start out on their journey to achieve this aim. The old education model of a sausage machine where children enter the education system and emerge at the end of the process in some kind of expected model and are rejected if they do not conform, is not appropriate for the future needs of Wales.	Education in Wales is certainly changing with the introduction of the new Curriculum for Wales. All schools focus on developing their learners as individuals regardless of the size of their school.

8.2 Concern about pupils having to transfer to larger schools

8.2.1	Bigger is not always better and normally means that problems are not spotted soon enough and bullying happens unnoticed due to the amount of children staff are expected to manage.	The Council disagrees with this statement. All schools, regardless of size, are expected to treat each pupil as an individual and provide a pupil-centred teaching and learning experience. All schools are required to implement an Anti- Bullying Policy.
8.2.2	Bigger schools have more children and it is scary.	Comment noted.
8.2.3	In a bigger school it will be harder to get help from the teachers and there are bullies in bigger schools.	The Council disagrees with this statement. All schools, regardless of size, are expected to treat each pupil as an individual and provide a pupil-centred teaching and learning experience. All schools are required to implement an Anti- Bullying Policy.
8.2.4	Bigger is not always better!	Comment noted.
8.2.5	I don't want to go to a bigger school because I know I won't get the same opportunities when there are so many more children.	All schools, regardless of size, are expected to treat each pupil as an individual and provide a pupil-centred teaching and learning experience.
8.2.6	If we go to a big school we may not even be able to be in one committee or club.	It is acknowledged that there would be more opportunity for pupils in a smaller school to be part of all activities due the pupil ratio within the school. However, all schools, regardless of size, have a range of committees and activities and schools are expected to ensure that all pupils can participate fully with these.
8.2.7	I've been to a bigger school and the children weren't kind to me. It's much better here.	Comment noted.

8.2.8	I go to gymnastics with other boys and girls and they go to different schools around Newtown and Welshpool. Some of them are bullies, and some are bullied, some are in classes that are massive, bigger than our whole school, and they don't have nice teachers that care about them. I don't want to get bullied I can run fast, but I am small and I am worried that people will pick on me. None of the teachers will look after me as they will have hundreds of other kids to look after too. My mum says that I am special, and I won't be anymore. My teachers know when I can't do my work and they help me. A new teacher won't do that if there's 30 other kids to teach.	All schools, regardless of size, are expected to treat each pupil as an individual and provide a pupil-centred teaching and learning experience. All schools are required to implement an Anti - Bullying Policy.
8.2.9	Moving to larger schools which means less interaction with teachers causing pupils to miss key parts of the lessons and fall behind.	As above.
8.2.10	It is a very important school for children of all abilities, who might find it immensely difficult to fit into a larger school.	As above.
8.2.11	Some children simply do not thrive in the larger schools. They might find the sheer numbers of pupils intimidating and this will not help their already fragile self-confidence. It is also the case that many of children who struggle to keep up will try to remain 'out of sight'. The small school with consistent staff may be better placed to see those who try to retreat into the background and allow them the time and encouragement to face challenges rather than avoid them.	As above.
8.2.12	To cart our little children to a 'super school' where they will not be offered the great education a small village school can. I certainly would not be choosing to send my children to such a school.	The Council is not proposing to 'cart children to a super school'. Should Castle Caereinion CiW

		Primary School close, then pupils would transfer to their nearest alternative schools.
8.2.13	In a big school there will be lot of noise from the people, cars and traffic.	The Council disagrees with this comment. All schools, regardless of size, are required to ensure that the learning environment is comfortable and safe for pupils.
8.2.14	The pupils are used to a quiet school, forcing them to go to bigger schools will be a big step for them.	Comment noted.
8.2.15	One thing we should of learned from covid is big is not always best.	Comment noted.

8.3 Reference to 'Presumption against closure of rural schools'

8.3.1	Small rural schools are protected by the Schools Organisation Code. It should not be seen as a paper exercise to reflect how the LA have met each of the criteria in there, but instead it should be genuinely looking at all possible options to prevent from closure based purely on finances and school size. What we should be looking at here is what Castle Caereinion CiW School can offer to pupils within the county that other local schools cannot.	<p>As stated in the School Organisation Code 2018:</p> <p><i>The second edition of the Code makes special arrangements in regard to rural schools establishing a procedural presumption against their closure. This requires proposers to follow a more detailed set of procedures and requirements in formulating a rural school closure proposal and in consulting on and reaching a decision as to whether to implement a rural school closure proposal.</i></p> <p><i>This does not mean that a rural school will never close but the case for closure must be strong and all viable alternatives to closure must have been</i></p>
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		<p><i>conscientiously considered by the proposer, including federation.</i></p> <p>The Council has followed these requirements in formulating this proposal. A number of options have been considered and are outlined within the consultation document.</p>
8.3.2	Welsh Government has put in place extra support for small rural schools and has placed a requirement on all Councils that closure should be the last option considered. This the authority has not done.	As above.
8.3.3	Whilst there are only 25 pupils currently in the school, and this falls within the Welsh Government definition of a 'small school', it is also listed as a 'Rural School' by Welsh Government in Annex F of the School Organisation Code. In such circumstances, "the case for closure must be strong and all viable alternatives to closure must have been conscientiously considered by the proposer". Small numbers on their own are not necessarily sufficient to justify closure.	As above. Low pupil numbers is only one factor considered in the proposal for Castle Caereinion.
8.3.4	There is now a presumption that the very last thing you do with a rural school, is to close it. Can you tell us the options that you have considered in Castle Caereinion, which is a rural school, and why you have decided that the only option is to close it? What options have you considered and why did you reject them?	As above. The Council has followed these requirements in formulating this proposal. A number of options have been considered and are outlined within the consultation document. The reasons why each option was rejected are outlined in Appendix D of the Consultation Document.

8.4 Reference to 'Small and Rural Schools Grant'

8.4.1	<p>The school received a grant this year from the Small Rural Schools Welsh Government Grant Scheme to develop the school's website. This is part of the school's vision to increase pupil numbers at the school and the school has seen some small increase in numbers since January. New affordable housing developments (31 housing commitment units in the LDP) currently taking place in Castle Caereinion, are likely to draw in young families who will be looking for a local school.</p>	<p>The Council acknowledges that the school has received funding from the Welsh Government's Small and Rural Schools Grant.</p> <p>As stated previously, even with potential housing developments, it is not anticipated that pupil numbers will increase significantly.</p>
8.4.2	<p>To close the school now would counteract the purpose of the Small and Rural Schools Grant and would thus be seen as a waste of the public purse. Kirsty Williams, the education Minister, said about the dedication of this funding:</p> <ul style="list-style-type: none"> • 'Small and rural schools play an important role in our national mission to raise standards and extend opportunities for all our young people.' • 'We are taking action and providing new funding to help small and rural schools deal with the unique challenges they face, such as small pupil numbers and issues in recruiting head teachers and staff.' • 'This financial support will benefit pupils, teachers, and the wider community. I want to see rural schools working more formally together and across the country, forming federations and looking into the possibility of sharing buildings with other services to ensure school buildings remain viable.' 	<p>The Small and Rural Schools Grant has been made available to support the school. Should the school close, this would not be seen as a waste of the public purse as it has been utilised to support current pupils at Castle Caereinion.</p>
8.4.3	<p>The Schools Organisation Code was strengthened in light of the Small and Rural Schools Grant – to close the school before the benefits of this funding have had chance to materialise goes against the principles of the Schools Organisation Code and the purpose of the Small and Rural Schools Grant funding.</p>	<p>The Small and Rural Schools Grant has been made available since 2018. However, the availability of this grant does not mean that the Council cannot formulate proposals for closure of schools.</p>

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9. Comments about other schools pupils might transfer to

9.1 Comments about Welshpool C. in W. School

9.1.1	The new school in Welshpool resembles a cattle market of children in my opinion.	Comment noted.																						
9.1.2	I do not wish for the school to be closed. Class sizes are already big enough at Welshpool CIW Primary which is where the majority of the children already attending these schools will go.	<p>Comment noted. Class sizes at Welshpool CiW Primary School are currently as follows:</p> <table border="1" data-bbox="1279 655 1832 1358"> <thead> <tr> <th data-bbox="1288 662 1727 719">Reg</th> <th data-bbox="1738 662 1823 719">Total</th> </tr> </thead> <tbody> <tr> <td data-bbox="1288 727 1727 785">Year 1/2 B</td> <td data-bbox="1738 727 1823 785">22</td> </tr> <tr> <td data-bbox="1288 793 1727 850">Year 1/2 G</td> <td data-bbox="1738 793 1823 850">23</td> </tr> <tr> <td data-bbox="1288 858 1727 916">Year 1/2 J</td> <td data-bbox="1738 858 1823 916">21</td> </tr> <tr> <td data-bbox="1288 924 1727 981">Year 3/4 B</td> <td data-bbox="1738 924 1823 981">21</td> </tr> <tr> <td data-bbox="1288 989 1727 1046">Year 3/4 G</td> <td data-bbox="1738 989 1823 1046">21</td> </tr> <tr> <td data-bbox="1288 1054 1727 1112">Year 3/4 TL</td> <td data-bbox="1738 1054 1823 1112">1</td> </tr> <tr> <td data-bbox="1288 1120 1727 1177">Year 3/4 TP</td> <td data-bbox="1738 1120 1823 1177">21</td> </tr> <tr> <td data-bbox="1288 1185 1727 1243">Year 5/6 M</td> <td data-bbox="1738 1185 1823 1243">25</td> </tr> <tr> <td data-bbox="1288 1251 1727 1308">Year 5/6 P</td> <td data-bbox="1738 1251 1823 1308">24</td> </tr> <tr> <td data-bbox="1288 1316 1727 1358">Year 5/6 TJ</td> <td data-bbox="1738 1316 1823 1358">24</td> </tr> </tbody> </table>	Reg	Total	Year 1/2 B	22	Year 1/2 G	23	Year 1/2 J	21	Year 3/4 B	21	Year 3/4 G	21	Year 3/4 TL	1	Year 3/4 TP	21	Year 5/6 M	25	Year 5/6 P	24	Year 5/6 TJ	24
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9.1.3	If I have to go to another school like Welshpool I might not get much help from the teachers because they might not be able to help me.	All schools, regardless of size, are expected to nurture, support and challenge all pupils in accordance with their ability.												
9.1.4	You would be failing my son by shutting this school his previous school was Welshpool and they could not meet his needs. Castle has helped my son no end with his learning.	Comment noted.												
9.1.5	Making the children commute to Welshpool to a much larger school has no advantages. The standard of education in our school is high, will it be the same if they have to move to a larger, more impersonal school? Or will they become children whose principal vocabulary appears to consist of "eff off!".	<p>As stated in the Consultation Document in reference to alternative schools, including Welshpool C. in W. Primary School:</p> <p><i>The Council's view is that all of these schools would provide education for pupils which is of at least equivalent quality as that provided at Castle Caereinion C. in W. School, therefore it is not anticipated that implementation of the preferred option would have a negative impact on standards and progress overall.</i></p>												

		All schools, regardless of size, are expected to nurture, support and challenge all pupils in accordance with their ability.
9.1.6	We are also a faith school so where do we send our children of faith that do not want to send their children to a school the size of your Welshpool super school?	<p>The following schools are C. in W. schools: in North Powys:</p> <ul style="list-style-type: none"> • Ysgol Cwm Banwy • Llandysilio C. in W. School • Montgomery C. in W. School • Forden C. in W. School • St.Michael's C. in W. School, Kerry • Llansanffraid C. in W. School • Llangedwyn C. in W. School • Llanfechain C. in W. School

9.2 Comments about Berriew C.P. School

9.2.1	Are you splitting the school up at all? For example, if the nearest school only has 21 places, how are we going to then fit in?	Should the Council proceed with the proposal, it is unlikely that all pupils would choose to transfer to the same school. There are sufficient places in the schools located within 10 miles of Castle Caereinion C. in W. School to accommodate all pupils currently attending the school.
9.2.2	The Council are recommending closing Castle Caereinion for pupils to go to their closest alternative school, Berriew CP School. Yet, Berriew have mixed age classes. They have three classes, Reception and Year One: Year Two-Year Four and Year Five and	All schools consider their class structure on a year-by-year basis, according to the numbers of pupils in each cohort. The current structure at Berriew is not

	<p>Six. It could be argued that this cross-phase learning is detrimental to pupils in the Year two to four class. Whereas at least in Castle School there is a clear differentiation between Foundation Phase and Key Stage Two.</p>	<p>necessarily a permanent one. An increased intake could result in a completely different class structure.</p>
9.2.3	<p>I believe Berriew CP school where the council's is suggesting as the nearest alternative school that also has three mixed age classes consisting of:</p> <ol style="list-style-type: none"> 1. Reception and Year 1 2. Year 2, Year 3 and half of year 4 3. Half of Year 4, year 5 and year 6. 	<p>See above.</p>
9.2.4	<p>Interestingly the school that the Council are proposing as an alternative for our pupils is Berriew CP school, which is also an Amber school. However, this school is Amber based on standards not on having an Acting Headteacher in place. This suggests that the standard of education provision at Berriew is not equal nor better than the provision at Castle Caereinion CiW School, therefore under the school organisation code cannot be considered a viable option. The Schools Organisational Code states that, 'the alternative would deliver outcomes and offer provision at least equivalent to that which is currently available to those learners.' Whilst both Castle and Berriew schools have both been removed from Estyn monitoring, we believe it an oversight to not taken into account the colour coding of each of the schools and the reasoning for the coding. As in our view, this highlights an education provision difference that is not supported by the code.</p>	<p>The National Categorisation has not taken place since 2019. As stated in the Consultation Document, it is the Council's view is that all of these schools would provide education for pupils which is of at least equivalent quality as that provided at Castle Caereinion C. in W. School, therefore, it is not anticipated that implementation of the preferred option would have a negative impact on standards and progress overall. During the last categorisation in 2019, Castle Caereinion C. in W. School, Berriew C.P. School and Llanfair Caereinion C.P. School was categorised as Amber whilst Welshpool C. in W. School was categorised as Yellow. Guilsfield C.P. School was classified as a Green school.</p> <p>Estyn's response to the consultation states:</p> <p>'</p>

		It is Estyn's opinion that the proposal is likely to at least maintain the standard of education provision in the area.'
9.2.5	<p>Castle Caereinion school has always sat within the Llanfair Caereinion cluster of schools. It has been raised and considered a number of times with PCC whether there were options to change cluster (and most recently in 2019). PCC have always maintained it is not possible to change cluster due to school transport. However, the consultation indicates the children would be routed to Berriew as their nearest school, this sits within Welshpool cluster and a different school transport route and will potentially change our children's whole future education route.</p>	<p>The Council recognises that should Castle Caereinion C. in W. School close, pupils would transfer to alternative primary schools, and that some of these would be in a different secondary cluster i.e., Welshpool High School. The Council also agrees that this would have transport implications as outlined below:</p> <p>The Council's Home-to-School Transport Policy for learners transferring or being admitted to a Powys schools in the 2021 / 2022 academic year states the following:</p> <p><i>'Home to school transport will be provided for learners who ordinarily reside in Powys to attend their nearest suitable school or catchment school. A 'catchment' school means the nearest school within a geographic area. To be eligible for free home to school transport, the learners' nearest school or catchment school must be:</i></p> <ul style="list-style-type: none"> <i>• The nearest to the learners' home address and if so,</i> <i>• They are more than 2 miles from their home address for primary school (aged 4 -11) or more than 3 miles for secondary school (age 11 to 16)'</i> <p>Pupils who attend Castle Caereinion CiW School normally transfer to Caereinion High School and free home-to-school transport is normally provided for</p>

		<p>those pupils attending Castle Caereinion CiW School to Caereinion High School.</p> <p>Should Castle Caereinion CiW Primary School close, pupils living in the Castle Caereinion area would be provided with free home-to-school transport to their nearest or catchment secondary school. In the case of pupils choosing to attend Berriew CP School, Welshpool CiW Primary School or Guilsfield CP School, they would ordinarily transfer to Welshpool High School.</p> <p>Pupils currently accessing free home-to-school transport to Caereinion High School as their catchment secondary school would continue to receive this service until they finish their education. However, this would not be available to pupils from Castle Caereinion if they have transferred to Berriew C.P. School, Guilsfield C. P. School or Welshpool C. in W. School unless Caereinion High School is their nearest secondary school. This would have an implication for families who may already have elder siblings being transported to Caereinion High School.</p> <p>There may also be a potential impact on transport costs as there may be additional routes required to provide transport from the Castle Caereinion area to Welshpool High School. However, it would be expected that the existing transport routes would be adjusted. The estimated range of costs for this is dependent on which school parents choose for their</p>
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		<p>pupils, should Castle Caereinion close. The following outlines the range of costs, depending on how many pupils require transport:</p> <p>Minimal costs – all pupils can be accommodated within existing transport provision for secondary, albeit some routes may need to be extended – £10 - £20 per school day - £1,900 - £3,800 per annum</p> <p>Need to increase size of bus – approx. £50 per day - £9,500 per annum</p> <p>Additional Taxi required – approx. £60 - £75 per day - £11,400 - £14,250 per annum</p> <p>New bus required - £170 - £230 per day - £32,300 - £43,700</p> <p>Free home-to-school transport would continue to be available for pupils wishing to access Welsh-medium provision to their nearest Welsh provision.</p> <p>The Council has an appeals process for transport applications.</p>
9.2.6	The nearest council-maintained school is in Berriew, but this is in a different catchment area to Castle Caereinion school. Will the fact that it is in a different catchment, affect its suitability as a receiving school?	As above

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9.3 Comments about other schools

9.3.1	Prove to me that Llanfair will provide my son better education than Castle Caereinion, what grounds do you have to state this.	<p>As stated in the Consultation Document, <i>‘The Council’s view is that all of these schools (including Llanfair Caereinion CP School) would provide education for pupils which is of at least equivalent quality as that provided at Castle Caereinion C. in W. School, therefore, it is not anticipated that implementation of the preferred option would have a negative impact on standards and progress overall.’</i></p> <p>This has been reiterated by Estyn in its response to the consultation: <i>‘It is Estyn’s opinion that the proposal is likely to at least maintain the standard of education provision in the area.’</i></p>
9.3.2	I also do not think that with all the other schools proposed to close the nearest schools Berriew or Llanfair do not and will not have enough space to transfer the children from Castle Caereinion school.	The Council acknowledges that there are not enough places for the whole of Castle Caereinion C. in W. pupils at Berriew C. P. School or Guilsfield C. P School. However, there are enough places for all Castle Caereinion pupils at Welshpool C. in W. School and Llanfair Caereinion C. P. School, and there are enough places available across the four closest schools.
9.3.3	As a parent I can see the classrooms at Guilsfield seem full so I wonder about space at Guilsfield for any more children. I would think most children would go to Berriew?	Most of the pupils currently attending Castle Caereinion C. in W. School live closer to Berriew C. P School. There are not enough places in Guilsfield C. P School for all the children in Castle Caereinion school.

9.3.4	Have you done a survey to find the numbers available across the schools for children? Meifod, Guilsfield and Llanfair primary?	Information about the places available in each of these three schools and other schools located within 10 miles of Castle Caereinion C. in W. School was provided on page 23 of the Consultation Document.
9.3.5	What about those pupils that don't want to go to Berriew, are there places for everybody anywhere else? Have people been asked where they would like to go? Would transport be provided to the alternative school of their choice?	As above. The Council has not asked people where they would like to go, as no decision has yet been made to proceed with the proposal to close Castle Caereinion C. in W. School. Should the Council proceed with the proposal, transport would be provided to eligible pupils in accordance with the home to school transport policy.
9.3.6	How many schools do we have the opportunity to go to and will pupils be guaranteed free transport to those schools?	Should the Council proceed with the proposal, parents could express a preference for their child to transfer to any school of their choice. Transport would be provided to eligible pupils in accordance with the home to school transport policy.
9.3.7	Just going back to the numbers and transport, are there going to be enough places in our nearest school if there are lots of schools facing closure?	There are no other proposals currently underway which would affect any other schools in the area around Castle Caereinion.
9.3.8	I know how this feels. We do have new houses going up in our village but our school Clyro Church in Wales primary, faces redundancy and closure by stealth. I wish you the best of luck.	Comment noted.
9.3.9	The two schools (Castle C and Berriew) are 2.5 miles apart but in the south of Powys a new school was built in Hay and Clyro school	Comment noted.

	was completely re-vamped and they are only 1.5 miles apart. Within walking distance.	
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9.4 Comments about secondary provision

9.4.1	<p>There is no information in the consultation regarding our children's future Secondary school options or change of cluster route and I would seek clarity on this. If the children are to attend Berriew, will they then be routed to Welshpool High School? Or will they revert to Llanfair High school as is the current situation?</p>	<p>The Council recognises that should Castle Caereinion C. in W. School close, pupils would transfer to alternative primary schools, and that some of these would be in a different secondary cluster i.e., Welshpool High School. The Council also agrees that this would have transport implications as outlined below:</p> <p>The Council's Home-to-School Transport Policy for learners transferring or being admitted to a Powys schools in the 2021 / 2022 academic year states the following:</p> <p><i>'Home to school transport will be provided for learners who ordinarily reside in Powys to attend their nearest suitable school or catchment school. A 'catchment' school means the nearest school within a geographic area. To be eligible for free home to school transport, the learners' nearest school or catchment school must be:</i></p> <ul style="list-style-type: none"> <i>• The nearest to the learners' home address and if so,</i> <i>• They are more than 2 miles from their home address for primary school (aged 4 -11) or more than 3 miles for secondary school (age 11 to 16)'</i>
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		<p>Pupils who attend Castle Caereinion CiW School normally transfer to Caereinion High School and free home-to-school transport is normally provided for those pupils attending Castle Caereinion CiW School to Caereinion High School.</p> <p>Should Castle Caereinion CiW Primary School close, pupils living in the Castle Caereinion area would be provided with free home-to-school transport to their nearest or catchment secondary school. In the case of pupils choosing to attend Berriew CP School, Welshpool CiW Primary School or Guilsfield CP School, they would ordinarily transfer to Welshpool High School.</p> <p>Pupils currently accessing free home-to-school transport to Caereinion High School as their catchment secondary school would continue to receive this service until they finish their education. However, this would not be available to pupils from Castle Caereinion if they have transferred to Berriew C.P. School, Guilsfield C. P. School or Welshpool C. in W. School unless Caereinion High School is their nearest secondary school. This would have an implication for families who may already have elder siblings being transported to Caereinion High School.</p>
9.4.2	Traditionally the children from Castle Caereinion School went to Llanfair High School, but of late there has been a quite a move going to Welshpool High School. What will happen with that, will	As above.

	children still be able to go to Welshpool High School, and will they still get free home to school transport to Welshpool?	
9.4.3	So they would get free transport to Berriew school, presuming that Castle Caereinion closed, and from Berriew they would get free school transport to Welshpool School, even though they still live in Castle Caereinion?	As above.
9.4.4	Will they still be able to go to Llanfair High School like the normal catchment they have now?	As above. Parents from the Castle Caereinion area could still choose for their child(ren) to go Caereinion High School, but free home-to-school transport would only be available if Caereinion is this is their nearest secondary school.
9.4.5	Furthermore, I have seen statements from PCC that there are accelerated conversations being undertaken regarding the language category at Llanfair Caereinion and therefore I strongly object that the consultation is taking place without this information in place as we cannot make a fair and educated decision about our children's future education without the language category being confirmed and propose that the Castle Caereinion consultation should be paused until this is resolved.	On 18 th May 2021, Cabinet approved a recommendation to establish an all-age school in Llanfair Caereinion, by merging Caereinion CP School and Ysgol Uwchradd Caereinion. The Cabinet report also included the following statement: <i>'dialogue will continue at pace with the temporary governing body and leadership of the new school, in order to move the school along the language continuum...If the outcome of this is the need to change the school's language category, a further statutory process would be required to implement this – this will be reviewed following the establishment of the all-age school in September 2022.'</i>
9.4.6	The proposal to make the nearest school a Welsh school is very worrying.	For the majority of pupils currently attending Castle Caereinion C. in W. School, Berriew CP School is the

		nearest alternative school, and the Council has no plans to change the language category of Berriew CP School.
9.4.7	Castle is the only English-speaking Church in Wales provision within the Caereinion Cluster. Whilst we understand the desire to increase Welsh medium provision, we must acknowledge that a vast number of our pupils choose to attend English medium schools. Our feeder Secondary school is Caereinion High School, as such our pupils' network with other pupils from the Caereinion Cluster in readiness for their transition. This does not just happen in Year 6, but throughout their time in primary through sports tournaments, young ambassador sessions etc. If children were to attend either their closest school or their closest Church in Wales school this would result in a change of secondary education provision for our pupils.	The Council recognises that should Castle Caereinion C. in W. School close, pupils would transfer to alternative primary schools which would be in a different secondary cluster i.e., Welshpool High School's catchment. However, it would be expected that Welshpool High School would have a close relationship with the primary schools in its cluster and that opportunities would be available for primary pupils to take part in activities with the High School.

9.5 Other comments

9.5.1	It will also result in larger classes in other schools, I don't think it would be good for the class sizes to increase, as the children are already struggling after impacts of covid 19.	<p>It is likely that, should the school close, pupils would attend schools where the class sizes would be bigger. However, smaller class sizes would not necessarily mean that pupils receive a more individual education as there are a number of year groups and a wider age range of pupils in the class.</p> <p>Schools cannot set class sizes above 30 in the Foundation Phase at the start of an academic year.</p>
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		<p>The size of the class does not determine how well pupils learn. The standard of teaching impacts directly on the standards of pupils' education.</p> <p>However, the Council would expect that pupils are fully supported by their teachers and other staff at the school during any periods of uncertainty to minimise the impact on their wellbeing.</p>
9.5.2	I mean, school classrooms are rather big at the moment. Shutting smaller schools will only encourage larger classrooms elsewhere and the need to employ extra teachers or ta's which seem to be more than enough!	<p>All schools receive delegated funding through the Council's funding formula, which is based largely on the number of pupils at the school. If a school's roll increases, the formula funding could change to take account of the need for additional classes.</p> <p>The financial modelling undertaken on the proposal takes the movement of Castle Caereinion pupils to other schools into account and estimates that there would be an annual revenue saving of around £58,000.</p>
9.5.3	That all the other little schools will then have to except more pupils and the numbers in class will be higher.	As above.
9.5.4	If you close Castle other schools may not have ramps and wide corridors or disabled pupils.	The Council ensures that all schools are adapted to meet the needs of any child with disabilities.
9.5.5	Wasn't one of Estyn's criticisms that the Council have not got children in schools that best meet their needs. To close this school would create a huge problem of having to adapt another school building to have the same facilities as ours (to provide for a pupil with Cerebral Palsy).	As above.

9.5.6	My fear is that if we move the children now to different schools how safe would those schools be from your cull list or are we just to expect another move in a year because they no longer suit your requirements as they are not big and shiny.	One of the Strategic Aims of the Council's Transforming Education Strategy is to improve learner entitlement and experience. In order to do this, it is necessary to continually review all schools in the county.
9.5.7	Castle Caereinion School provides the children with a safe, warm and loving environment to learn and flourish to their full potential, something that cannot at all be provided by any of the alternative schools being proposed as the 'replacements'.	The Council disagrees that the other alternative schools named within the Consultation Document will not provide a safe, warm and loving environment to learn and flourish to their full potential'. All schools, regardless of their size, are required to provide safe and appropriate learning environments, and are required to nurture, support and challenge all pupils to achieve their potential.

10. Impact on Protected Characteristic groups

10.1 Impact on pupils with additional learning needs

10.1.1	The school supports children with special needs extremely effectively. In a larger school I have little doubt that the children would be so well cared for.	The Powys SEN/ALN strategy, agreed by Cabinet in November 2021, is committed to improving the provision for all pupils with SEN/ALN. This includes pupils who can be educated in mainstream classes as well as pupils who require specialist provision. Pupils with ALN at all schools, regardless of size, would have the appropriate support to meet their needs.
10.1.2	I have seen the care with which certain youngsters from our community who have special needs have been nurtured and	Comment noted.

	encouraged. I believe that our school is adequately capable of looking after these youngsters in a much better atmosphere and caring environment than can be expected at schools with larger student numbers.	
10.1.3	The school has an excellent reputation for the service provided to ALSN children.	Comment noted.
10.1.4	Our school caters very well for children with ALN and disabilities. If you were to close us what happens to the children who rely on the facilities we can provide?	As above. Should the school close, the Council would ensure that the requirements for pupils with additional needs are met at whichever school they may choose to attend.
10.1.5	Our child is accessing the specific support he needs in his area of ALN and is thriving in his areas of strength, helped by the opportunity to learn with a mix of abilities.	Comment noted.
10.1.6	Castle School is a great fit for our son, who excels in some areas and requires SEN support in others, which through the small school and mixed aged model has been recognised and the appropriate intervention is being given.	Comment noted.
10.1.7	As a small school it provides a nurturing environment particularly for children with SEN, for which the school is particularly strong in supporting.	Comment noted.
10.1.8	Children on the ALN register can access interventions daily and all children know all members of staff well enough that they can turn to if they have any worries or concerns.	Comment noted.
10.1.9	As a parent I have an ALN child in this school that is flourishing being in small school setting. He has a few different needs but	Comment noted.

	one that he is currently being assessed on is autism. As he came from a bigger school before I know that this did not suit his needs, and was not given the time that he needs to assess things and I feel if he has to go back into a large school he will be lost and no longer get help that he so greatly needs.	
10.1.10	As you are aware we have quite a high percentage of ALN children, all who are accepted by the other children within the setting where as in a larger setting they would potentially be more targeted for bullying by other students.	There is no evidence that children with ALN are subject to bullying in larger schools.
10.1.11	Our school caters for a high proportion of ALN pupils, whose parents elect to send them here as they know that we can best meet their needs.	Comment noted.
10.1.12	We have a large number of ALN children and forcing them into large schools will greatly affect their learning. They are thriving as it is a quiet small school which is able to meet their needs.	Comment noted.
10.1.13	It is worrying to see that the Council have used 'inequality to access SEN provision' as point 8 of their rational for needing change in Powys. Stating that 'currently not all pupils are educated in the setting that meets their needs best'. Yet they are proposing to remove a school that is specially adapted to meet ALN pupils with specific disabilities needs where larger schools are unable to.	<p>The Transforming Education Strategy, approved in April 2020, includes the following Strategic Aim: 'We will improve provision for learners with SEN/ALN'. The statement on page 8 of the Consultation Document refers to one of the issues raised about education in Powys during the development of the Strategy, which included extensive engagement with schools and other stakeholders.</p> <p>Following that, the Powys SEN/ALN Strategy, agreed by Cabinet in November 2021, is committed to improving the provision for all pupils with</p>

		<p>SEN/ALN. This includes pupils who can be educated in mainstream classes as well as pupils who require specialist provision. Pupils with ALN at all schools, regardless of size, would have the appropriate support to meet their needs.</p> <p>Should the school close, the Council would ensure that the requirements for pupils with additional needs are met at whichever school they may choose to attend.</p>
10.1.14	Section 1.3 of The Schools Organisation Code states that, 'Relevant Bodies should pay particular attention to the impact of the proposals on vulnerable groups, including children with Special Educational Needs (SEN)'. None of the other schools in the ten-mile radius have the same facilities as we do in order to support this pupil's needs, so this child will be significantly disadvantaged by the closure proposal.	Should the school close, the Council would ensure that the requirements for pupils with additional needs are met at whichever school they may choose to attend.
10.1.15	Castle Caereinion CIW provides adequate ALN learning for children do other schools?	As above.

10.2 Impact on disabled pupils

10.2.1	In a bigger school there might not be any ramps or any disabled toilets, we have those things here.	Should the school close, the Council would ensure that the requirements for pupils with additional needs are met at whichever school they may choose to attend.
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10.2.2	If disabled children go to a new school they might not have the ramps like we do.	As above.
10.2.3	Small schools are very important for the disabled community.	As above.
10.2.4	A big concern for losing Castle school is your losing disabled facilities for anyone who wants to go to a mainstream school.	As above.
10.2.5	By closing small rural schools you might find that it disadvantages children with certain disabilities, like for example a slight delay in development. Quite a lot of such disabled children would do well in small rural schools, but poor in mega schools.	There is no evidence that pupils with disabilities achieve better in small rural schools.
10.2.6	We currently have a pupil with Cerebral Palsy in school who uses the disabled facilities. If the school were to close you would be removing a provision that best suits his needs.	Should the school close, the Council would ensure that the requirements for pupils with additional needs are met at whichever school they may choose to attend.
10.2.7	The school has numerous adaptations for learners with additional needs which will not be replicated if they are moved to other schools.	As above.

10.3 Other

10.3.1	A concern I have is some children can't cope in a large school or large class. They find it over bearing then come to a smaller school like Castle and it's a complete change for them in a positive way. Our existing school abides by the 2010 Equality Act. I am happy that they are continuing to in future because they are good honest hardworking staff. The children respond with an alert concern for each others well being.	Comment noted.
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10.3.2	Gender, Race, Marriage has no impact.	Comment noted.
10.3.3	Impact on no school meals and extra costing to transport would have a massive impact on my income to provide for my children if the school were to close if they are not eligible for school meals and transport.	Free School Meals are available at any school in Powys for eligible pupils. Free Home-to-School Transport would be available for eligible pupils to their nearest school.
10.3.4	I think you will be stripping lower income families of a vital lifeline.	Comment noted.
10.3.5	Closures if school always affect women as it means that mothers have to travel further to take children to school and this affects work opportunities for women.	There is no evidence that closure of a school affects women specifically. Free Home-to-School Transport would be available for eligible pupils to their nearest school.

11. Issues relating to Finance

11.1	<p>The School Forum wishes to comment on the financial implications of these proposals for the overall schools' delegated budget. At our last meeting we agreed on the importance of making sure that any savings accruing from transformation proposals are retained within the overall schools' delegated budget. This is fundamental to the overall transformation programme being taken forward by the Council. One of the main tenets of the overall programme is to reduce the overall number of schools so that the existing level of funding could be shared more equitably and resolve the existing problem of some schools having insufficient resources.</p> <p>There is a common sentence in each of the reports which says "Any savings would be reinvested in the Council's corporate budget and any reinvestment in the schools' system would be</p>	The Council notes the comment of the School Forum.
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	<p>agreed as part of the annual budget planning cycle". This falls a long way short of guaranteeing that the savings will be retained within the overall schools' delegated budget. Essentially this means that it will be up to the Council each year to decide on whether the funding should be retained for schools or not. This approach is very worrying as it could lead to the overall schools' delegated budget being reduced as a result of the Council deciding that savings should be reinvested elsewhere. That runs very much against the overall plan to share the existing resources amongst a smaller number of schools and could result in the same problem we have now – not enough funding to run all the schools.</p> <p>Against this background can you please, when reporting back to the Cabinet on the results of the consultations for each of these schools, report the concerns of the Schools' Forum as set out above and change the approach to how savings are to be treated, i.e. that they are ring fenced for use within the schools' delegated budget. We have no comments to make on the transformation proposals themselves as the Forum only deals with financial matters.</p>	
11.2	<p>It was noted at the last meeting of the Schools Forum that in previous change projects calculations of overall savings in individual schools have not always turned out to be accurate. This is, of course, easy to say with the benefit of hindsight and is no reflection on the professionalism of the officers making these calculations. To help stress test these calculations can they be shared with the Forum at the next meeting please?</p>	<p>Comment noted.</p>
11.3	<p>It goes without saying that in schools where there are low pupil numbers the budget per pupil is going to be higher. However, for all of the reasons stated above we believe this to be a short-term</p>	<p>The cost per pupil is from the S52 budget statement which does not take account of transport costs.</p>

	<p>issue that, if the school is allowed to remain open, will be addressed not only by the positive promotion of the school through the website and the networking with other schools that has increased over the past 18 months but also through the new affordable housing that is happening in the village in the very near future. The council has outlined a per pupil budget overspend of £2,655 in Castle Caereinion in comparison to the Powys average of £4,264. However, when offset against the additional transport costs that Powys will need to make to send the pupils to their nearest school, this per pupil overspend reduces significantly.</p>	<p>However, estimated transport costs have been taken into account in the financial modelling undertaken on the proposal and this suggests that there would be an annual revenue saving of around £58,000. This is a different calculation to the cost per pupil, which is based solely on the school's budget divided by the number of pupils.</p>
11.4	<p>High budget per pupil – again I acknowledge this fact however, the school has been running in a well-managed positive budget position despite low numbers. I would ask for clarification of how are the transport costs are built in/reflected in the budget per pupil across schools, as the consultation document acknowledges there will be an approximate £32,000 transport implication if the school is closed and this may change the position of cost per pupil stated for the receiving schools, hence effecting the budgetary argument of the consultation.</p>	<p>As above.</p>
11.5	<p>High budget per pupil. Inevitably, smaller schools do generate a greater per pupil share of the budget because of the fixed costs they are unable to control (staffing, premises etc). Whilst funding for schools must be spent judiciously, the cost of maintaining existing places at Castle Caereinion is not a huge amount of money given that additional transport costs need to be factored into the final solution. Based on the Council's Section 52 Budget Statement for 2020-21, the school's budget share per pupil during 2020-21 was £6,919 compared to the Powys average of £4,264. This gives an additional cost of £61,065 for 23 pupils. However, the Council would also be obliged to meet additional transport</p>	<p>The cost per pupil is from the S52 budget statement which does not take account of transport costs.</p>

	costs of £32,300 per annum if all pupils attended their next nearest school and approximately £43,067 per annum if pupils were to access a Church in Wales school place (at Welshpool). If pupil numbers do increase at Castle Caereinion as a result of housing developments, the margin of difference will be further reduced.	
11.6	I know the funding of small schools is always going to be an issue, but they should give the school a chance.	Comment noted.
11.7	We don't spend a lot of money, our families give money for any extras that the school needs and the council probably spend more on the internet than we cost. Who are we hurting? All you'll do is hurt us.	The Council recognises the contribution that families make to raise funds for the school. However, the aim of the proposal is to improve learner entitlement and experience.
11.8	Providing transport to Church in Wales provision would then have increased transport costs from those proposed in section 18 of the Consultation document. This further increase would likely negate the proposed budget per pupil saving that the Council are using as a rationale for school closure.	<p>The Council recognises that, should the school close, there would be additional transport costs to this proposal estimated at approximately £32,000. These have been based on the nearest alternative school for pupils currently attending Castle Caereinion C. in W. School. As the Council does not provide free home-to-school transport to denominational schools, then the cost of transport to Welshpool C. in W. School (other than for those children for whom this school is their nearest alternative school) have not been costed.</p> <p>It should be noted that the cost per pupil figure does not include transport costs.</p>

11.9	The cost saving for closing the school is minimal, but the impact on our community and school children is huge, the proposed closure should be stopped.	Comment noted.
11.10	Why do you need to close the school is it just to save money?	<p>The proposal is intended to address the main challenges outlined in the Consultation Document:</p> <ul style="list-style-type: none"> vi) Low pupil numbers vii) High budget per pupil viii) Issues with the building ix) Combined age classes x) Leadership <p>Following consideration of a number of options, the preferred option is to close Castle Caereinion CiW School, pupils to attend nearest alternative schools.</p> <p>The reasons for this are:</p> <ul style="list-style-type: none"> - Would address the issue of low pupil numbers at Castle Caereinion - Would reduce the Council's overall surplus capacity in primary schools - Revenue saving to the Council - Pupils would attend larger schools, which would be better equipped to meet the requirements of the new curriculum - Pupils would attend larger schools, which could provide a wider range of educational and extra-curricular opportunities - Pupils would attend schools with more suitable accommodation - Meets all of the Critical Success Factors

11.11	Whilst this suits the 'Pocket of Powys' you are forgetting those that really matter - the children. And they are children and not sheep and should not be 'herded' into one pen.	<p>A revenue saving to the Council is only one of a number of reasons for the proposal, as outlined above.</p> <p>The aim of the proposal is to improve learner entitlement and experience.</p>
11.12	The Council has to prioritise the well-being of the pupils over financial expediency - 'relevant bodies should place the interests of learners above all other needs' (Schools Organisational Code). That includes the financial benefits that seem to be prioritised by the closure proposal.	As above.
11.13	Please do not close our school for economic reasons – that is the least important reason. Other considerations such as quality of education, quality of life and saving villages rate much higher.	As above.
11.14	For our children and the community we need to try and keep us cool, it may cost more to keep open but it's so important to help it open.	Comment noted
11.15	With small class sizes and high staff ratios we offer pupils an excellent value for money education. Whilst the per pupil spend is higher than the Powys average, the standards are also ever increasing.	The Council acknowledges that standards at Castle Caereinion are improving. However, all schools, regardless of size, would be able to provide for the needs of their pupils. The size of the class does not

		determine how well pupils learn. The standard of teaching impacts directly on the standards of pupils' education.
11.16	I wonder whether decisions with regard to closing smaller primary schools are taking into account some factors which could in fact increase costs for the council in the longer term.	The Consultation Document considers the recurrent costs of the proposal over a period of at least three years and include estimated transport costs.

12. Comments about the Council's Strategies

12.1 Comments about the Council's Transforming Education Strategy

12.1.1	My reading of the ESTYN report tells me that the big problem facing schools in Powys is in the secondary sector not the primary. It is in the secondary sector that there is a need for transformation, modernisation and rationalisation. Picking off a few isolated primary schools will not solve the underlying problems.	The section entitled 'How well has the local authority addressed school reorganisation issues including the provision for post-16?' outlines Estyn's views around this topic and is a general reflection on the authority's progress and approach in recent years. In response to the Estyn recommendation, the Council carried out extensive engagement with schools and other stakeholders in 2019/20. One of the issues raised during this engagement exercise was the fact that Powys has too many small schools and the need to ensure a more equitable education system.
12.1.2	By undertaking a "transforming education" strategy which seeks to centralise education you are decimating communities in this county by closing their schools.	The Transforming Education Strategy is not seeking to centralise education across the county. However, the Council has a duty to manage its schools' estate to ensure equity across the system.

12.1.3	You need to understand not everyone wants your "super schools".	The Council is not proposing a 'super school'. The proposal is to close Castle Caereinion CiW Primary Schools with pupils transferring to their nearest alternative schools.
12.1.4	Stop spending money on new schools which in turn shut these smaller village schools. It is not on.	The Council has a duty to ensure that children and young people are able to attend schools that are fit-for-purpose and provide the best learning environments. Building condition was recognised as an issue during the engagement that led to the development of the Transforming Education Strategy: <i>'Whilst the Council has invested in its schools' estate through the 21st Century Schools Programme and the Asset Management Plan, building condition remains an issue across Powys, with associated maintenance costs'</i>
12.1.5	I think that schools should not be closed one by one, year by year. There needs to be a definitive plan moving forward.	The Transforming Education Strategy sets out a ten-year programme with specific targets.
12.1.6	Whilst I fully appreciate the need to review the education provision in Powys in line with the 21st century schools programme, I do not feel that closing castle Caereinion Church in Wales school is in the best interests and wellbeing of the children, parents and staff.	Comment noted.
12.1.7	It was always the policy, that look at schools on a catchment basis, you look at all the primary schools within a given catchment. Why did the policy change to a policy of opportunism, or cherry picking, as now, as obviously there was a change. When did that come in and why?	The Strategy for Transforming Education in Powys was approved in April 2021 and includes a Strategic Aim to 'reconfigure and rationalise primary provision'. Whilst some catchment reviews have already taken place, it is recognised that the outcome of area reviews can take some time to be implemented. The Strategy states that a key challenge for the Council is that it has too many primary schools, therefore the Council is reviewing

		some small schools on a standalone basis alongside area reviews.
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12.2 Comments about other Council strategies

12.2.1	<p>The proposed closure is contra to the 2018-2023 vision for Powys sets out that PCC will provide effective learning interventions to support schools to improve and produce well-qualified individuals. Placing a school into the consultation process adds psychological stress to the teaching staff which may detract from the teaching standards being set as the school has already received commitment to increasing student numbers.</p>	<p>The Council has recognised this as a risk within the Consultation Document:</p> <p><i>'Period of uncertainty for Castle Caereinion C. in W. School if a statutory process is carried out and implemented which might have a negative effect on standards at the school'</i></p> <p>The mitigation action is stated:</p> <p><i>'The Council to provide advice and support to the school and governing body to ensure that standards and performance do not deteriorate during the transition period'</i>.</p> <p>The Challenge Advisor for the school has continued to support the school during this period. The Council recognises that all school reorganisation proposals create a period of uncertainty for staff.</p>
12.2.2	<p>Without the recreation center, well-being in the community would most likely decline and drain the resources available with health across PCC. This is counter to the 2018-2023 vision where PCC sets out:</p>	<p>According to information supplied by the school and included within the draft Community Impact Assessment, the school is the main financial contributor to the Community Centre. Should the school close, the management committee of the</p>

	<ul style="list-style-type: none"> ➤ Providing effective learning interventions will support schools to improve and produce well-qualified individuals ➤ Committed to modernizing our schools to provide sustainable, low-carbon buildings with high quality educational environment ➤ Support improvement of good quality, targeted education which will allow individuals to make more informed healthy life choices ➤ Committed to ensuring our learners have equitable access to education provision regardless of their background or where they live 	<p>Centre would need to consider how best to utilise the Centre so that it remains viable.</p>
12.2.3	<p>PCC set out in its 2018-2023 vision for Powys to be “established as an innovation base for learning, research and skills” and it is with great disappointment that mid term with the vision PCC defined an “objective to rationalize primary provision”. The vision clearly sets out a priority to work in partnership with schools, colleges, universities and businesses to improve career opportunities and commitment and “greater focus on working in partnership with schools and the communities they serve”.</p>	<p>Since the publication of the Council’s Vision 2025 document, Estyn carried out an inspection of the education services in 2019 and identified weaknesses in the Council’s approach to school reorgansiation. The section entitled ‘How well has the local authority addressed school reorganisation issues including the provision for post-16?’ outlines Estyn’s views around this topic and is a general reflection on the authority’s progress and approach in recent years. In response to the Estyn recommendation, the Council carried out extensive engagement with schools and other stakeholders in 2019/20. One of the issues raised during this engagement exercise was the fact that Powys has too many small schools and the need to ensure a more equitable education system.</p>

13. Criticism of Powys County Council

13.1	Throughout Powys and further afield our rural communities are under threat. Only now it seems that here they are under threat from their own county council as well.	As part of the school reorganisation process, the Council is required to carry out a Community Impact Assessment. This was published in draft form as part of the consultation and will be updated to reflect issues raised during the consultation. The Cabinet will need to consider this before making a decision to proceed, or not to proceed, with the proposal.
13.2	The county council needs to realise and tell the education department that we should now be in the business of supporting sustainable communities not stripping them out of community activities. The Covid 19 pandemic has changed the world we live in. We now need to think and act local as we change to the new normal.	<p>The decision to proceed to consultation on this proposal was made by the Cabinet of the Council and not by the education department.</p> <p>As part of the school reorganisation process, the Council is required to carry out a Community Impact Assessment. This was published in draft form as part of the consultation and will be updated to reflect issues raised during the consultation. The Cabinet will need to consider this before making a decision to proceed, or not to proceed, with the proposal.</p>
13.3	The council over the past few years have cut more and more budget, making it extremely difficult to fight your plans, and I suspect that this has been the strategy since your last attempt to close the school. You have made the decision for some of our local families to choose their local school impossible, where they see a school that might shut, versus one that has a future. You have made the playing field really very unfair.	The Council is operating in a challenging financial and economic climate, whilst delivering key services within the county, and has to manage its budget within this climate. However, Estyn carried out an inspection of the education services in 2019 and identified weaknesses in the Council's approach to school reorganisation. The section entitled 'How well has the local authority addressed school reorganisation issues including the provision for post-16?' outlines Estyn's views around this topic and is a general reflection on the authority's

		progress and approach in recent years. In response to the Estyn recommendation, the Council carried out extensive engagement with schools and other stakeholders in 2019/20. One of the issues raised during this engagement exercise was the fact that Powys has too many small schools and the need to ensure a more equitable education system.
13.4	I am very disappointed at the proposals your department is pushing forward to close small rural schools. The whole affect is gutting these communities. They are quietly dying, too modest to complain as they are made to feel that you are all superior in intelligence.	<p>The decision to proceed to consultation on this proposal was made by the Cabinet of the Council and not by the education department.</p> <p>As part of the school reorganisation process, the Council is required to carry out a Community Impact Assessment. This was published in draft form as part of the consultation and will be updated to reflect issues raised during the consultation. The Cabinet will need to consider this before making a decision to proceed, or not to proceed, with the proposal.</p>
13.5	The council recognises that the county is rural yet are trying to centralise education with no regard or understanding of what a rural community is about.	The Council disagrees with this statement. The Transforming Education Strategy is not seeking to centralise education across the county. However, the Council has a duty to manage its schools' estate to ensure equity across the system.
13.6	The decision to close the school is nothing more than an accountant looking at numbers on a spreadsheet with no regard for emotional understanding of how those numbers reflect on a community and the children of the community.	<p>A revenue saving to the Council is only one of a number of reasons for the proposal.</p> <p>The proposal is intended to address the main challenges outlined in the Consultation Document:</p> <p>xi) Low pupil numbers</p>

		<ul style="list-style-type: none"> xii) High budget per pupil xiii) Issues with the building xiv) Combined age classes xv) Leadership <p>Following consideration of a number of options, the preferred option is to close Castle Caereinion CiW School, pupils to attend nearest alternative schools.</p> <p>The reasons for this are:</p> <ul style="list-style-type: none"> - Would address the issue of low pupil numbers at Castle Caereinion - Would reduce the Council's overall surplus capacity in primary schools - Revenue saving to the Council - Pupils would attend larger schools, which would be better equipped to meet the requirements of the new curriculum - Pupils would attend larger schools, which could provide a wider range of educational and extra-curricular opportunities - Pupils would attend schools with more suitable accommodation - Meets all of the Critical Success Factors
13.7	I feel that you have not recognised in the slightest that closure of the school undermines the viability of the community. You have most certainly forgotten your remit in serving your community and putting our interests first.	As part of the school reorganisation process, the Council is required to carry out a Community Impact Assessment. This was published in draft form as part of the consultation and will be updated to reflect issues raised during the consultation. The Cabinet

		will need to consider this before making a decision to proceed, or not to proceed, with the proposal.
13.8	Closure of the school would be an admission of failure on the part of Powys County Council's responsibility to protect and sustain its rural communities.	As above.
13.9	For a county council that is meant to serve your community for the better, your plans do nothing but to rip the heart out of our village, serving only to save money.	As above.
13.10	Shame on Powys County Council for putting their interests before children yet again. These kids have had the worst years of their lives and now you cause more disruption for them. If I could have had my time again I would have schooled my children in Shropshire Powys County Council - putting pennies before pupils yet again.	<p>The proposal is not putting the interest of Powys County Council before children. It is recognised that children's education has been disrupted during the pandemic.</p> <p>A revenue saving is only one reason for the proposal as outlined above.</p>

14. Questions about / issues with the process

14.1 Comments about consulting during the Covid pandemic

14.1.1	Already you have taken the cowards way out by announcing the decision during a lockdown where we could not physically fight to protect the one thing tat means so much to many of our community.	The Council has been developing its Strategy for Transforming Education since Estyn's inspection of Powys Education Services in 2019. Whilst acknowledging that it would have been preferable for the consultation process to have taken place at a time when there wasn't a global pandemic, the consultation has been carried out in line with Welsh Government requirements.
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		The Council does not condone physical violence as part of any consultation process.
14.1.2	I feel that it is a very poor show by the council to be putting children and their families through a threat of closure whilst they are trying to fight through a pandemic!!	As above.
14.1.3	Also, the timing you have chosen to start the consultation period during a global pandemic knowing full well door to door petitions cannot be carried out and considered.	As above.
14.1.4	I am fully aware of the need for change and that there will never be a right time for the council to consider the closure of a school, however, I do feel that with the current global pandemic this really is not the time to consider the closure of the school.	As above.
14.1.5	Announcing a proposed closure during a lockdown. The timing of the consultation of the proposed closure is poorly judged. To undertake the consultation part way through a lockdown is an inappropriate way of engaging a community. Our local discussions have taken place virtually as we have not been permitted to have community gatherings or meetings. Not all residents have access to online facilities or are not confident in using them, therefore a number of residents have been excluded from participating in the consultation process due to lack of technology. Powys County Council's decision to choose to launch the consultation during a lockdown has led to an unfair bias towards closure.	As above.
14.1.6	I feel it is morally wrong to undertake this consultation at this time. The reasons for this include: We are currently in the middle	As above.

	<p>of an unprecedented pandemic, which is having a huge effect on our children and they have suffered considerably over the past year both mentally and in terms of schooling. Their current school setting has provided a point of stability for our children – and this has been particularly true for Castle Caereinion, where an excellent standard of education was offered even through lockdown and a high level of emotional support has been given to the children. It is obvious that a return to ‘normal life’ is unlikely to happen for some time yet and this is having an ongoing impact of our children, yet in the midst of this you propose to take away this stability and displace them to unknown schools, which will have a further detrimental effect on their mental health and wellbeing.</p>	
14.1.7	<p>As I have highlighted before, I am concerned that consultations are taking place during the pandemic when public face-to-face meetings can’t take place and some people are unable to use the internet and so may not have been able to feed into this consultation.</p>	As above.
14.1.8	<p>Powys County Council are acting in an unfair and low handed way putting forward these proposals during the current Covid pandemic. The present pandemic does not allow the opportunity for the school community and wider community to meet in a conventional manner and consider the proposals fully to understand the full impact.</p>	As above.
14.1.9	<p>The consultation process can’t possibly be done thoroughly and fairly when our country is going through and dealing with a pandemic. Childrens’ education has been severely disrupted over the last 12 months and what is needed now is stability and not more uncertainty.</p>	As above.

14.1.10	I also believe that the timing of this consultation was ill considered. The prevailing restrictions relating to covid limited the opportunity for full community consultation and prevented open meetings occurring. With many people in the community unable to access digital media, this has meant that the community has not been fully consulted as they should have been.	As above.
14.1.11	It is very bad timing anyway during a pandemic – a stressful time for everyone as it is!	As above.
14.1.12	The formal consultation process should not take place during a pandemic.	As above.
14.1.13	I spoke to an elderly gentlemen last weekend who hadn't heard about the closure at all. Many elderly and vulnerable people have only just started to venture out of their homes after Covid. Surely it can't be right to exclude a whole group of society when such important local decisions are being made?	As above.

14.2 Comments about public meetings

14.2.1	I am also highly disappointed that the council or Cllr Phyl Davies as not approached the community in a public meeting, for something that is so important not only to Powys but also our Children's education and have taken the easy option to close our school which could be thriving soon.	<p>The consultation has been carried out in accordance with the requirements of the School Organisation Code, which does not require public meetings to take place.</p> <p>As indicated on page 26 of the School Organisation Code, <i>'there is no requirement for proposers to hold consultation meetings although there will be circumstances where proposers will consider that meeting with certain groups of consultees will assist</i></p>
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		<p><i>greatly in the dissemination of information and provide a suitable platform for the consultees to make their views known.'</i></p> <p>During the consultation period, on-line meetings were held with staff, governors and pupils at Castle Caereinion C. in W. School.</p>
14.2.2	A wide section of the community is unlikely to access technology needed to respond to view and without the opportunity for public meetings, their voice cannot be heard.	As above.
14.2.3	We can't have a face to face meeting with the council to discuss the situation.	As above.
14.2.4	Allow us to publicly ask questions and speak to councillors to fully understand the decisions that are being made without properly speaking to the staff, students and community.	As above.
14.2.5	I was vice chair when the Powys last tried to close the school and a lot of the discussions/consultations happened in public meetings and face to face. This meant that everybody could have their say, not just people with access to internet and social media.	As above.

14.3 Other comments about the process

14.3.1	As clerk to Castle Caereinion Community Council – I can confirm I have received no such correspondence from Powys.	Information about the consultation was sent to the clerk of Castle Caereinion Community Council by e-mail on the first day of the consultation period. A consultation response has subsequently been
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		received from Castle Caereinion Community Council.
14.3.2	In order to ensure Powys has carried out a full consultation, it is vital that the council take into consideration the community view on this and in particular the views of the community council as they represent the area.	The Council has carried out a full consultation in accordance with the requirements of the School Organisation Code. All issues raised during the consultation period will be taken into consideration when determining how to proceed.
14.3.3	The whole community needs to be engaged in the consultation process by PCC, this has not been undertaken to date.	The Council has carried out a full consultation in accordance with the requirements of the School Organisation Code.
14.3.4	I believe the council needs to accept the opinions of all the people who do not wish it to be closed	The Cabinet will consider all issues raised during the consultation period when determining how to proceed in respect of this proposal.
14.3.5	Let's hope that financial considerations are just part of the equation and that the consultation process is not, as many fear, just a box ticking exercise.	The consultation process is not 'just a box ticking exercise'. The Cabinet will consider all issues raised during the consultation period when determining how to proceed in respect of this proposal. Whilst financial considerations are one aspect, this is not the sole consideration.
14.3.6	The consultation process should not be based on factual inaccuracies.	The consultation is not based on factual inaccuracies. The information is provided in the consultation document is the most up-to-date information that was available to the Council at the time, and all data provided is clearly referenced.
14.3.7	The Recreation Hall is reliant on the school as it is the primary source of income. PCC are legally bound to conduct an impact	

	assessment under guidelines provided by the village hall trust. Without the impact assessment being completed and made available for review within the consultation process, the validity of the consultation process is questionable.	The Council is not proposing to close the Community Centre and therefore is not required to carry out an impact assessment specifically on this issue. However, information supplied by the school and included within the draft Community Impact Assessment indicate that the school is the main financial contributor to the Community Centre. The Community Impact Assessment will be updated to include information gathered during the consultation.
14.3.8	In terms of the timings, we have up until the 2nd of June to respond to the consultation, and then are we right in thinking there is a 28-day period for it to be discussed in Cabinet, does that take us to the 8th of July?	Once the consultation period has ended, the Council will produce a consultation report, which will be considered by Cabinet. Cabinet will then decide to proceed whether or not to proceed with the process, through the publication of a statutory notice. Should the Cabinet agree to proceed with the process, a Statutory Notice would be published in the autumn term, and the 28-day objection period would start on the day the Statutory Notice was published.
14.3.9	If they decide initially to proceed, and there are no objections, when can we expect to have a decision? There is anxiety from staff with regards to different time scales, and when exactly they will know.	It is expected that Cabinet will consider the consultation report in July 2021. If they decide to proceed with the proposal, it is expected that a final decision would be made before the end of 2021.
14.3.10	With it being fluid around the dates, it is difficult then to advise parents as some parents are thinking that if the school is going to close, they might move their children earlier.	Comment noted.

14.3.11	If we cannot make parents aware until the end of the year, does that then affect the actual closing date if we were to close? Is it 12 months from the notice?	The proposed closing date would be included in any statutory notice published. Should a statutory notice be published in the autumn term 2021, it is likely that the proposed closure date would continue to be August 2022.
14.3.12	I was under the impression that because Castle Caereinion is a church school, that the final decision would not necessarily rest with the Powys Cabinet, but with Welsh Government?	<p>As indicated on page 49 of the School Organisation Code:</p> <p>‘Under section 54 of the 2013 Act where proposals have been approved or rejected by a local authority the following bodies may, before the end of 28 days beginning with the day of the decision, refer the proposals to the Welsh Minister for consideration:</p> <ul style="list-style-type: none"> i. Another local authority affected by the proposals; ii. The appropriate religious body for any school affected; iii. The governing body of a voluntary or foundation school subject to the proposals; iv. A trust holding property on behalf of a voluntary or foundation school subject to the proposals; and v. A further education institution affected by the proposals.’
14.3.13	What are the circumstances in which the decision would get taken out of Powys’ hands?	As indicated above, the School Organisation Code includes provision for some bodies to refer proposals to the Welsh Ministers for consideration.

		As explained on page 49 of the School Organisation Code: 'The body making the referral will need to set out in a letter why they believe that the decision reached by the local authority is wrong.'
14.3.14	Is there a reason why this (the consultation meeting) was just dropped on us only yesterday, and we haven't under the circumstances had a lot of time to prepare?	The date and time of the consultation meeting was provided to staff and governors on the first day of the consultation.

15. Questions about / issues with the consultation documentation

15.1 Comments about the consultation document

15.1.1 Data/costings

15.1.1.1	The decisions being taken are ill thought out and based on erroneous figures, with no consideration of the additional housing being constructed within the village in the next few years.	The proposal is based on an assessment of options that may address the challenges faced by Castle Caereinion CiW Primary School. Information received from the Council's housing department suggests there are approximately 40 housing developments already completed, underway or planned in the area. Some of these are affordable housing.
15.1.1.2	Turning to the case being put forward to review the future of the school in Castle Caereinion you point out the number on roll wrongly as 23. It is in fact 25. Perhaps more importantly there	The number on roll stated within the Consultation Document is 23 and the data source is stated as 'Finance NOR – 2020 Pupil Count Day (6 th

	<p>have been a number of successful planning applications in the village with some 30 permissions granted for affordable dwellings with more in the pipeline. The first tranche of new dwellings are now being advertised for sale. If the threat of closure is lifted from the school there is a good chance children in those dwellings would attend the village school.</p>	<p>November 2020) and was correct at the time of writing.</p> <p>According to Teachers Centre 21/06/21, pupil numbers are as follows;</p> <p>Reception: 4 Year 1: 3 Year 2: 4 Year 3: 4 Year 4: 4 Year 5: 3 Year 6: 1</p> <p>Total pupils: 23</p> <p>Information from the Council's Admissions Team indicates that 1 pupil is due to join the school's Reception class in September 2021.</p> <p>Whilst the Council recognises the housing developments in the area, it is not expected that pupil numbers would increase significantly, and the school would continue to be a small school.</p>
15.1.1.3	<p>Documentation assessed and presented by PCC for the consultation process is in areas inaccurate and out of date. Specifically, this relates to the pupil numbers.</p>	<p>The pupil numbers provided in the document are the most up-to-date pupil numbers which were available to the Council at the time.</p>
15.1.1.4	<p>Current pupil numbers are incorrect and does not consider pupils committed to start schooling on moving into the area.</p>	<p>As above.</p>

15.1.1.5	Future pupil numbers have been estimated, how this was done has not been explained. Certainly PCC are not aware that I have a child who will be attending school in two years time. Have they carried out a door to door survey to obtain actual numbers of pre-school age children?	<p>The School Organisation Code requires authorities to publish five-year forecasts of pupil rolls, which we base on the PLASC Jan data. The forecast calculations are based on postcode-linked live birth data and historical cohort survival rates for individual schools.</p> <p>We also include a second set of projections which provide data for the next three years – this is based on information received from schools during the annual budget setting exercise.</p>
15.1.1.6	Transport costings also where do the figures come from as I think are underestimated and the costing for transport are nearly double the figure given, would like to see a detailed estimate on transport for Berriew and Llanfair.	The transport costings are modelled with input from school transport colleagues. Based on the pupils currently attending Castle Caereinion C in W School, additional transport would be required for 16 pupils is estimated at £170 per school day, totalling £32,300.
15.1.1.7	Point 4.iii). The consultation document does not make it clear what the updated survey condition refers to or the three blocks and whether this includes the community center where the hall is owned by the community to which the school contributes to annual fees.	The updated condition survey did not include the community centre.
15.1.1.8	The information provided in the consultation relates to an Estyn inspection made nearly 5 years ago and is in no way reflective of the school now and the proposals should not be progressed on this basis.	The School Organisation Code requires Councils to include 'information from the most recent Estyn reports for each school likely to be affected' in consultation documents.
15.1.1.9	I am completely against the closure of the school firstly considering mis-guided and misinformed information using out of date Estyn report.	As above.

15.1.1.10	A very poorly developed and factually wrong consultation document, containing old information such as outdated school ratings which are not a fair reflection and cannot be accurately demonstrated at the present time, as reporting was suspended due to the pandemic.	The information provided in the Consultation Document is the most up-to-date information which was available to the Council at the time. The data and information used in the document is clearly referenced to show the source and date of the data.
15.1.1.11	In addition, there are many factual inaccuracies in the Consultation document and a lack of current data due to the limitations of covid-era education.	As above.
15.1.1.12	In response to the consultation document there are a number of points which have been reported incorrectly and leads to question the validity of the consultation when out of date and/or incorrect information has been presented.	As above.

15.1.2 Reasons for the proposal

15.1.2.1	Issues with the building: The supposed issues with the school building have been identified as a weakness in the options. However, whilst the school building is not a modern building, its ability to meet the needs of the new curriculum are not a concern for us.	Comment noted.
15.1.2.2	The document seeks to put a negative spin on the state of the building. It was assessed in 2009 as being in good condition by Welsh Government. It has been assessed by Powys for this exercise and is now graded as condition C. If the building has deteriorated in the last ten years that is down to Powys. It is not clear whether the assessment is wrong or the maintenance. The	The document does not seek to put a negative spin on the condition of the school. The 2009 condition grading was B whilst a condition survey carried out in 2021 has judged the grade to be C.

	<p>staff room has recently had a complete re-vamp to make it a space that the staff could be proud of as a result of a donation from an American benefactor the father of Rev. Alexis, who was a volunteer in the school.</p>	<p>The condition survey carried out in the autumn term 2020 was carried out by external professional building surveyors and the condition grading was their professional judgment. As this was an external, impartial report, the Council had not control over the content of the report.</p>
15.1.2.3	<p>Combined Age Classes: I have two in combined age classes during university teaching placement and in all schools I've worked in prior to joining Castle Caereinion Church in Wales school and do not feel this is a justifiable reason.</p>	<p>Effective leadership and teaching impacts positively on standards across all schools. The Council recognises that there are many schools with combined age classes in Powys. This provides a challenge to teachers of mixed-age classes where they must constantly adapt their approach. As a result, a high level of flexibility and organisation in lesson planning is required to ensure that teaching caters to both age groups and all abilities within the class. This is an additional workload on teachers and leaders who have a range of other key responsibilities and roles in a small school.</p>
15.1.2.4	<p>Combined Age Classes: This is stated as a negative in the consultation, however I would strongly argue this is a positive for the school offering – as the children have the opportunity to learn by ability rather than age and to learn and develop from and be challenged by their peers in years within the class. This has certainly been true for our son, who is showing a talent in Maths and is able to be taught higher age level work and yet struggles in spelling and again is able to be taught with an appropriate cohort based on ability. I am not confident he would not be 'lost' within a bigger school.</p>	<p>As above.</p>

15.1.2.5	Having combined age classes allows for differentiation across the class, allowing children to work in their ability groups and not just age groups. Children access and education which is catered to all of their needs an even allows for children from FP to complete tasks like I did reading within the key KS two class if necessary. This can give the children such a boost with self-esteem which may not always be possible within larger school.	As above.
15.1.2.6	The Governing Body strongly contests 'combined age classes' as a reason for school closure. There are a large number of schools within Powys that are two or three class schools thus resulting in mixed age classes. Even in larger schools in Powys, many are dual year entry. This does not put the pupils at a disadvantage and does not make challenging pupils more difficult. If anything, it enriches the children's experiences as they learn and develop with and from each other. Using mantle of the expert learning, in line with the new curriculum there is a cascading of knowledge being passed throughout the classrooms. The New Curriculum is full of collaboration and shared learning experiences, what better way to do this than in mixed age classes where everyone's personal experiences and stages of learning are different. It allows for shared viewpoint learning which is learning rich. The Cabinet only need to look at names like Lynette Lovell, Glynn Davies and Russell George, who all come from small rural primary schools, to see that mixed age classes do not hold pupils back nor prevent them from doing well in life. In fact it could be readily argued that mixed age classes make it <i>easier</i> for children to be appropriately challenged, because there is a focus within that classroom on every part of the key stage, rather than it being limited to one age group.	As above.

15.1.3 SWOTs

15.1.3.1	SWOT analysis is qualitative and there is no qualitative assessment to demonstrate financial benefit including the wider community assessment on well-being and community impact with hall closure.	The financial information relating to the proposal is included within the Consultation Document and the impact on the community, including impact on the Community Centre, is included within the draft Community Impact Assessment which will be updated to reflect information gathered during consultation.
15.1.3.2	SWOT analysis does not consider a socio-economic impact to the community not implications to community center with the primary revenue stream being removed.	<p>The SWOT analysis includes the following weaknesses:</p> <ul style="list-style-type: none"> • Impact on the Castle Caereion community <p>According to information supplied by the school and included within the draft Community Impact Assessment, the school is the main financial contributor to the Community Centre. This will be updated to reflect information gathered during the consultation.</p>
15.1.3.3	SWOT analysis does not consider opportunities to leverage technology and on-line learning capabilities that have been implemented during the covid-19 pandemic.	Comment noted.
15.1.3.4	SWOT analysis does not stipulate that that PCC under the transport for school policy will only provide transport to one elected school in the area.	Free home-to-school transport would be provided to eligible pupils to their nearest school.
15.1.3.5	SWOT analysis does not consider creating learning specialties in specific schools to provide learning areas of excellence for	Comment noted.

	pupils to participate with. This does not necessarily mean all learning is limited to one location to create a center of excellence.	
15.1.3.6	SWOT analysis incorrectly states community hall using refuse provision at school.	This was information received directly from the school.
15.1.3.7	SWOT analysis does not consider the financial viability of the hall should the school close and impact on community.	According to information supplied by the school and included within the draft Community Impact Assessment, the school is the main financial contributor to the Community Centre. This will be updated to reflect information gathered during the consultation.
15.1.3.8	SWOT analysis acknowledges of the impact of the community and the potential loss of community facilities - but there is no specific mention here of the community hall.	As above.
15.1.3.9	The SWOT analysis is subjective and not supported by qualitative data to make a balanced assessment.	It is recognised that SWOT analysis are usually subjective. The SWOT analysis was carried out by a number of officers including Challenge Advisors, officers from Finance and HR, as well as the Schools Transformation Team.
15.1.3.10	Nowhere in your SWOT analysis does it mention that even the talk of a review of the school has a detrimental effect on school numbers.	Comment noted.
15.1.3.11	PCC has not considered through the SWOT analysis that rural schools can develop an intimate knowledge of their children and their backgrounds, inspire enhanced teacher commitments, and	Comment noted.

	take advantage of strong community participation and responsibility.	
15.1.3.12	PCC has not considered in the SWOT analysis that smaller class have a supportive 'family' atmosphere that fostered a strong sense of belonging, helped teachers build a rapport with students over many years and respond to their individual needs, and encouraged students to take responsibility for younger students.	Comment noted.
15.1.3.13	Other options considered for the school, have not been made public from what I can gather but a SWOT analysis has been carried out by whom, and obviously decided to close the school is the best option, for who not our community or our children, who if the school closes needing to travel to school rather than walking and increasing transport which goes against the SWOT report, which the main reason is the council's financial position to save money, but in the long run will not due to extra transport that will need providing.	All the options considered are included within the Consultation Document, and all the SWOT analyses are also included.

15.1.4 Omissions from the consultation documentation

15.1.4.1	Further points which PCC have not made clear through the consultation process which would benefit on clarification: 1. Socio-economical impact to the community with the community hall primary revenue being removed.	According to information supplied by the school and included within the draft Community Impact Assessment, the school is the main financial contributor to the Community Centre. This will be updated to reflect information gathered during the consultation.
15.1.4.2	PCC does not make it clear in their consultation that transport will only be provided to a single school nominated by parents	The Consultation Document states that ' <i>Free home to school transport would be provided to</i>

	which is detailed within the prevailing PCC school transport policy.	<i>eligible pupils in accordance with the Council's Home to School Transport Policy,</i> which states that transport is provided to the nearest or catchment school.
15.1.4.3	PCC do not assess impact on student well-being with increased travel nor how transport is to be managed for students from lower income families can join extra curriculum activities when the family only has access to public transport.	The Consultation Document includes the following: 'However it is acknowledged that there would be an impact on families due to the requirement to travel to school events, which could have a greater impact on children from economically deprived backgrounds.'
15.1.4.4	The document does not take into true consideration the fact that the children will miss out on extra-curricular activities.	The Consultation Document states the following: 'Whilst free home to school transport would be provided to eligible pupils in accordance with Council's home to school transport policy, it is acknowledged that there could an impact on pupils' ability to access after-school activities.' This issue is also recognised in the draft impact assessment.
15.1.4.5	PCC has not evaluated the effects of additional travel and the extended hours of the students. The effects of travel in rural areas have not been fully evaluated and made clear in the consultation process in consideration of bus routes, travel times.	The Council has included the impact of additional travel time within the impact assessments.
15.1.4.6	PCC has not considered the implications of pupil safety travelling longer distances.	There are many pupils on home-to-school transport across the county and their safety during these journeys is paramount.

15.1.4.7	PCC has not considered pupil fatigue through the consultation process with longer days.	It is not clear as to why pupils would have longer days due to the consultation process – this would not be an expectation of the Council.
15.1.4.8	Appendix A 12.3 where it states no other trusts or charitable interests are affected by the closure. Specifically to this second point, this is incorrect and the Recreation Hall which is adjoining the school and under the village hall trust must be taken into consideration. The documentation states that no trusts are affected which is incorrect and therefore miss leading information within the consultation process. The Recreation Hall is reliant on the school as it is the primary source of income. PCC are legally bound to conduct an impact assessment under guidelines provided by the village hall trust. Without the impact assessment being completed and made available for review within the consultation process, the validity of the consultation process is questionable.	<p>The Consultation Document states the following:</p> <p>Is the school / schools involved subject to any trust or charitable interests which might be affected by the proposals, for example in relation to the use or disposal of land?</p> <p>The question relates specifically to the school and not the Community Centre. Castle Caereinion C.W. School is not subject to any trust or charitable interest which might be affected in relation to the use or disposal of the land.</p>
15.1.4.9	Appendix A 12.3 states that no other trusts or charitable interests are affected by the closure. As the community hall is under a village hall trust this should be taken into account.	As above.
15.1.4.10	In Appendix A 12.3 – in the current document it says that no trusts are affected as the community centre is a trust this should be listed in the impact assessment.	As above.
15.1.4.11	Impact of community hall is not mentioned in Appendix A.	According to information supplied by the school and included within the draft Community Impact Assessment, the school is the main financial contributor to the Community Centre. This is included within the draft Community Impact

		Assessment which will be updated to reflect information gathered during the consultation.
15.1.4.12	There is no mention of the community hall in Appendix C.	As above.
15.1.4.13	There is proposed housing development in the village which could bring in more families to sustain the school, and even more development could be likely in the next ten to twenty years. However this has not taken into consideration.	Information received from the Council's housing department suggests there are approximately 40 housing developments already completed, underway or planned in the area. Some of these are affordable housing. However, even with potential housing developments, it is not anticipated that pupil numbers will increase significantly.
15.1.4.14	The consultation document does not also take into account the local development plan and large number of proposed new builds, in particular affordable housing, in the county.	As above.
15.1.4.15	I am concerned that the proposal document, in relation to the impact on the schools the pupils would transfer to, does not take into account the influx from the proposed closures of all of the other primary schools currently under threat from PCC.	The Council has been consulting on proposal related to Llanbedr CiW Primary School, Churchstoke CP School, Llanfihangel Rhydithon CP School – these areas are not close to Castle Caereinion. Cabinet has also approved consultation on proposals to close schools in the Llanfyllin area, however these are not close to Castle Caereinion either.
15.1.4.16	It is also worth noting that the Consultation Document does not reference or account for the fact the school is in the Llanfair Cluster (as both Berriew and Welshpool are in the Welshpool cluster) and the subsequent implication this would have on transport requirements. There are currently former Castle pupils	The Council recognises that should Castle Caereinion C. in W. School close, pupils would transfer to alternative primary schools, and that some of these would be in a different secondary cluster i.e., Welshpool High School. The Council

	<p>who attend Welshpool High School who do not receive transportation as it is not a feeder school, and conversely, there are former pupils attending Llanfair High School who do receive transport. There clearly will be implications for future (and potentially current) transport arrangements in both directions.</p>	<p>also agrees that this would have transport implications as outlined below:</p> <p>The Council's Home-to-School Transport Policy for learners transferring or being admitted to a Powys schools in the 2021 / 2022 academic year states the following:</p> <p><i>'Home to school transport will be provided for learners who ordinarily reside in Powys to attend their nearest suitable school or catchment school. A 'catchment' school means the nearest school within a geographic area. To be eligible for free home to school transport, the learners' nearest school or catchment school must be:</i></p> <ul style="list-style-type: none"> <i>• The nearest to the learners' home address and if so,</i> <i>• They are more than 2 miles from their home address for primary school (aged 4 -11) or more than 3 miles for secondary school (age 11 to 16)'</i> <p>Pupils who attend Castle Caereinion CiW School normally transfer to Caereinion High School and free home-to-school transport is normally provided for those pupils attending Castle Caereinion CiW School to Caereinion High School.</p> <p>Should Castle Caereinion CiW Primary School close, pupils living in the Castle Caereinion area would be provided with free home-to-school transport to their nearest or catchment secondary school. In the case of pupils choosing to attend</p>
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		<p>Berriew CP School, Welshpool CiW Primary School or Guilsfield CP School, they would ordinarily transfer to Welshpool High School.</p> <p>Pupils currently accessing free home-to-school transport to Caereinion High School as their catchment secondary school would continue to receive this service until they finish their education. However, this would not be available to pupils from Castle Caereinion if they have transferred to Berriew C.P. School, Guilsfield C. P. School or Welshpool C. in W. School unless Caereinion High School is their nearest secondary school. This would have an implication for families who may already have elder siblings being transported to Caereinion High School.</p> <p>There may also be a potential impact on transport costs as there may be additional routes required to provide transport from the Castle Caereinion area to Welshpool High School. However, it would be expected that the existing transport routes would be adjusted. The estimated range of costs for this is dependent on which school parents choose for their pupils, should Castle Caereinion close. The following outlines the range of costs, depending on how many pupils require transport:</p> <p>Minimal costs – all pupils can be accommodated within existing transport provision for secondary, albeit some routes may need to be extended – £10 - £20 per school day - £1,900 - £3,800 per annum</p>
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		<p>Need to increase size of bus – approx. £50 per day - £9,500 per annum</p> <p>Additional Taxi required – approx. £60 - £75 per day - £11,400 - £14,250 per annum</p> <p>New bus required - £170 - £230 per day - £32,300 - £43,700</p>
15.1.4.17	The consultation that has been put forward does not sufficiently offer a valid detailed business case to close Castle Caereinion Church in Wales school and does not give complete information to allow us as parents to make a fair, informed decision on our child's future schooling options.	<p>The Consultation Document complies with the requirements of the Welsh Government's School Organisation Code.</p> <p>A detailed business case is not a requirement.</p>
15.1.4.18	PCC has not explored creating centres of excellence with rural schools and utilising on-line / remote teaching methods for other community schools to benefit from individuals area of excellence.	Comment noted.
15.1.4.19	The document does not take into true consideration the faith element of our education provision.	The Consultation Document reflects the fact that Castle Caereinion is a Church-in-Wales School.
15.1.4.20	The document does not consider the devastating impact that closure of the school would have on the community of Castle Caereinion.	The impact on the community has been included within the Consultation Document and within the draft Community Impact Assessment, which will be updated to reflect information gathered during consultation.

15.1.4.21	The Consultation document seems to have failed to consider is the school's adapted provision for pupils with ALN and physical disabilities.	<p>The Consultation Document includes a section on the potential impact on pupils with additional learning needs.</p> <p>During the consultation, many comments have been received about the fact that the school has had adaptations to support pupils with physical disabilities.</p>
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15.1.5 Other comments / queries

15.1.5.1	The schools you are proposing our children to go to are sporadic and is the council wishing to pay for travel to all school's or just One?	The Consultation Document notes the schools available within a ten-mile radius of Castle Caereinion. Free home-to-school transport would be provided to eligible pupils to their nearest or catchment school, in accordance with the Council's Home-to-School Transport Policy.
15.1.5.2	School Places – you refer in the consultation to the nearest school of Berriew having 21 places to accommodate the Castle children, however there are currently 23 children and it is not stated in the consultation year group availability to match to that of the children to be moved. Can this please be clarified, further if there are not sufficient places in the relevant year groups to accommodate our children, will transport then be funded to alternative schools with relevant places?	<p>Current pupil numbers broken down by year group are as follows:</p> <p><u>Berriew C.P School</u>¹</p> <p>Reception – 13 pupils Year 1 – 14 pupils Year 2 – 13 pupils Year 3 – 7 pupils Year 4 – 13 pupils Year 5 – 11 pupils Year 6 – 15 pupils</p>

¹ Teacher Centre – 24th June 2021

		If there is no space available at a school, then free home-to-school transport would be provided to eligible pupils to their next nearest alternative school.
15.1.5.3	The Council has identified a range of options and has put forward a number of reasons as to why it makes sense to close Castle Caereinion school. It is important to note that although the Council appears to have considered nine different options, only six of these are potentially viable options. Options 5, 7 and 9 cannot be considered as it is not legally possible to merge a VC school with a CP school.	Options 5,7 and 9 – it is possible to merge VC schools and CP schools by closing both schools, and opening as a new school, which could either be a Church in Wales school or a CP school. Recent examples of this include the establishment of Welshpool CiW Primary School from the closure of Gungrog CiW Primary School, Oldford CiW School, Ardwyn CiW School and Ysgol Maesydre (a CP School). Also, the establishment of Ysgol Cwm Banwy CiW Primary School (VA) following the closure of Ysgol Llanerfyl and Ysgol Dyffryn Banw.
15.1.5.4	<p>The consultation document states:</p> <p><i>“Free home to school transport would be provided to eligible pupils in accordance with Council’s home to school transport policy. However, it is acknowledged that there would be an impact on families due to the requirement to travel to school events, which could have a greater impact on children from economically deprived backgrounds.....of pupils attending Castle Caereinion C. in W. School it is likely that the proportion of children from economically deprived backgrounds is minimal.”</i></p> <p>However, this does not acknowledge that families could be just over the threshold for FSM and therefore not identified as being economically deprived. The parental transport costs</p>	Parents are able to choose any school for their child(ren), and if there’s a place at the school, then they can be offered a place. However, the Council’s Home-to-School Transport Policy provides transport to a pupil’s nearest or catchment school and does not provide transport to denominational schools specifically. If a parent chose a school that is not their nearest school, then they would be responsible for ensuring their child(ren) are transported to that school. It is recognised that if a parent didn’t drive, or have access to a car, then they would have to make alternative arrangements which could include private taxi/shared transport with other parents. The Council recognises that this may potentially have an economic impact on the parent.

	<p>that would need to be incurred to attend a Church in Wales school (given transport is only provided to the nearest alternative school) or indeed, to access extra-curricular activities at the “nearest alternative school”, could place undue hardship on these parents.</p>	<p>The Consultation Document includes the following: ‘However it is acknowledged that there would be an impact on families due to the requirement to travel to school events, which could have a greater impact on children from economically deprived backgrounds.’</p>
15.1.5.5	<p>After reading through the consultation document on the closure of this school, I feel that the reasons given lack serious consideration on the effects to the local community. The two key reasons that I read are to 1) reduce the Council's overall surplus capacity in primary school and 2) to realise a financial savings to the council. Powys is in its very nature a rural county and only thrives if its communities thrive.</p>	<p>The proposal is intended to address the main challenges outlined in the Consultation Document:</p> <ul style="list-style-type: none"> xvi) Low pupils numbers xvii) High budget per pupil xviii) Issues with the building xix) Combined age classes xx) Leadership <p>Following consideration of a number of options, the preferred option is to close Castle Caereinion CiW School, pupils to attend nearest alternative schools.</p> <p>The reasons for this are:</p> <ul style="list-style-type: none"> - Would address the issue of low pupil numbers at Castle Caereinion - Would reduce the Council's overall surplus capacity in primary schools - Revenue saving to the Council - Pupils would attend larger schools, which would be better equipped to meet the requirements of the new curriculum - Pupils would attend larger schools, which could provide a wider range of educational and extra-curricular opportunities

		<ul style="list-style-type: none"> - Pupils would attend schools with more suitable accommodation - Meets all of the Critical Success Factors <p>The impact on the community is included within the draft Community Impact Assessment that will be updated to reflect information received during consultation.</p>
15.1.5.6	The Local Authority has continually referred to our school building as not being suitable to deliver the New Curriculum. We strongly contest this, as parts of the new curriculum are already being delivered in Castle Caereinion CiW School and very successfully too. This has been clearly demonstrated by Appendix A in the school's own response to the consultation.	<p>Castle Caereinion School has multiple entry points, with shared access to the village hall. The foundation phase class is a large space. There is access to the outdoors but with only one door, that is the only viewpoint for staff, combining indoor/outdoor activities is more difficult.</p> <p>The key stage 2 class is a portacabin-type extension.</p>
15.1.5.7	You claim the school is not able to provide the new curriculum when it has such great spaces indoors and outside which can be used for forest schools so I'm not sure where that idea has come from! It all seems to come down to saving money and not children's wellbeing and happiness which in these strange times is very sad.	See point 15.1.5.8
15.1.5.8	New curriculum – there are various references in the document that the school is not equipped to meet the needs of the new curriculum. I would strongly dispute this claim – the school has been working over the last two years to prepare for introduction of the new curriculum and is already well placed to deliver the principles with all the facilities as	With a two-teacher school it is more difficult to deliver the new curriculum. There are a limited number of teachers and support staff, the expertise for all areas of learning and experience is not as strong as a team of teachers each of whom can lead on one area. The

	outlined above including well developed outdoor spaces and a dedicated IT suite. The mixed age model also lends itself well to the principles of the curriculum, therefore I propose this is not a valid argument for closure of the school.	breadth of staff brings a larger skill set so that pupils have more opportunities. Within mixed age classes, the age range and ability range would be greater than in a smaller age range class. In a larger school, could enhance pupil wellbeing and development, for example there would be greater opportunities for friendship groups with children of the same age and greater opportunities to work collaboratively with pupils of the same age and ability.
15.1.5.9	I believe that the school and the outdoor classroom area as well as the big green fields together with a dedicated team of teachers/support staff are more than capable of providing a full and comprehensive education as outlined in the Early Years Curriculum. I do not recognise the description that speaks of inadequate IT facilities and outdoor classroom provisions.	Comment noted. In a larger school, there would be a wider range of resources available, which could include dedicated IT equipment. Within a small school, it becomes increasingly difficult to manage resources effectively.
15.1.5.10	The document fails to recognise that Castle Caereinion CiW School is more than capable of delivering the new curriculum.	See 15.1.5.8
15.1.5.11	The consultation document, whilst noting the previous long period of instability, suggest that the school finally having its own standalone headteacher limits (because of their significant teaching commitment) the time available to focus on leadership of the school. However, since this appointment the school has gone from strength to strength as evidenced in the school Support Visits from the Local Authority (fully detailed in Appendix C of the school GB's consultation response).	The Council recognises the work of the current headteacher in leading the school. It is very difficult for a headteacher, without any other senior leaders, to conduct all of the leadership and management roles whilst having a large teaching commitment. In a small teacher school, all of the responsibility for leadership rests with the headteacher. Within a larger school, distributed leadership amongst the senior leaders would support the management of the school.

15.1.5.12	<p>The Governing Body are concerned that this statement acknowledging the loss of extra-curricular provision is contradictory to part of the Council's own rationale for closure, as stated in section 16(i) Wellbeing and attitudes to learning section on page 11, 'In the longer term, the intention is that implementation of the preferred option would have a positive impact on pupil wellbeing and attitudes to learning as they would transfer to larger schools with larger cohorts of pupils, providing improved social and extra-curricular opportunities'. Whilst these schools may be able to provide the extra-curricular activities, the council itself has acknowledged that the children will not be able to access them. Therefore, this does not address the wellbeing and attitudes to learning section of the Schools Organisation Code which states that 'relevant bodies should place the interests of the learners above all others'. We fail to see how removing the children's access to extra-curricular activities is placing their interests first.</p>	<p>The Council is not removing access to extra-curricular activities for the children. It is acknowledged that, for some pupils, it may be more difficult to access after-school activities due to reliance on home-to-school transport. However, lots of pupils across the county rely on home-to-school transport and schools are able to ensure that they have the opportunities that they need.</p>
15.1.5.13	<p>The Consultation Document states that headteacher has significant teaching commitment. See the below table to see how the leadership commitment compares to other local schools within a ten-mile radius:</p> <p>Castle Caereinion CiW NOR = 25; Leadership (days) = 2; Teaching (days) = 3</p> <p>Berriew CP School NOR = 85; Leadership (days) = 2; Teaching (days) = 3</p> <p>Ysgol Meifod NOR = 81; Leadership (days) = 1.5; Teaching (days) = 3.5</p>	<p>As part of the funding formula for schools, all schools under 90 receive funding for up to 2 days management time. Under delegation of budgets to Governing Bodies, schools may decide to how much management time to allocate to their headteacher.</p> <p>Many of the larger schools have a deputy headteacher who is able to share the leadership responsibilities with the headteacher.</p>

	<p>Leighton NOR = 91;</p> <p>Rhiw Bechan NOR = 135;</p> <p>Guilsfield NOR = 137; Leadership (days) = 2.5; Teaching (days) = 2.5</p> <p>Llanfair Caereinion CP NOR = 161; Leadership (days) = 5; Teaching (days) = 0</p> <p>Welshpool CiW NOR = 356; Leadership (days) = 5; Teaching (days) = 0</p> <p>As you can see the leadership commitment at Castle Caereinion CiW School is no greater than the other schools and in some cases it is greater. It is also identical to Berriew – the school to which many pupils are expected to go if Castle school closes!</p>	
15.1.5.14	<p>The Governing body would like to point out that whilst the school was previously graded an Amber in the Schools Categorisation system, this was due to having an Acting Headteacher in place at the time and was not due to the standards. As seen in the Support Visits (Appendix C) standards and attitudes across the school have been improving. It is worth noting that under the Schools Categorisation system any school with an Acting Headteacher cannot be graded higher than an Amber category, regardless of standards.</p>	<p>The point raised is noted. There has been no school categorisation since the autumn term 2019.</p>

15.1.5.15	The Estyn inspection referred to in the Consultation document took place in 2016 when the previous shared headship model was in place. Subsequent to this, Estyn conducted a review in 2018 rated the school as 'good'. The previous amber school categorisation support capacity rating was applied because the school had an Acting Headteacher in place. Having supported the change to permanent leadership arrangements just 18 months ago, we do not feel that the Council has given the school a reasonable timescale to demonstrate improvement and grow pupil numbers, particularly with the disruption caused by Covid over the last year.	See point 15.1.5.14
15.1.5.16	I would like to challenge the comment that transferring pupils to a larger school would provide improved opportunities, when here at Castle Caereinion Church in Wales School the school provides an excellent broad-based education, not only do the children benefit from this they also become happy, engaged, confident and independent individuals who grow up with good communication skills, are resilient and mature well with their experiences gained at the school.	See point 15.1.5.8
15.1.5.17	Public transport to and from Castle Caereinion is not an alternative option to support students travel to and from school. Any child from a low income family will be disproportionately penalised which in contra to the 2018-2023 vision for Powys to be "established as an innovation base for learning, research and skills".	Should the school close, free home-to-school transport would be provided for eligible pupils to their nearest or catchment school, in accordance with the Council's Home-to-School Policy. If a parent chose a school that is not their nearest school, then they would be responsible for ensuring their child(ren) are transported to that school. It is recognised that if a parent didn't drive, or have access to a car, then they would have to make alternative arrangements which could include private taxi/shared transport with other

		parents. The Council recognises that this may potentially have an economic impact on the parent.
15.1.5.18	I have read through your document "Proposal to close Castle Caereinion Church in Wales School" and I must say I am a bit underwhelmed by the document.	The Consultation Document is aligned with the requirements of the Welsh Government's School Organisation Code.
15.1.5.19	As with the other primary schools going through this process at the moment it would appear that in order to appease ESTYN only evidence that suits your argument is being used.	The Council is required to comply with the requirements of the Welsh Government's School Organisation Code in terms of the information required.
15.1.5.20	Appendix D – certain inaccuracies which have been rectified by PCC including safeguarding where there was an issue of open access to the school to which the Diocese of St Asaph have clearly stated there is separate access to the community hall and that the school has sole use of it during the day.	Comment noted.
15.1.5.21	I disagree with the statements of the lack of equipment to educate in Castle Caereinion.	Comment noted.
15.1.5.22	I would propose that the wider impact of closure of the school needs to be explored more carefully.	The Council has published draft Impact Assessments as part of the consultation documentation, and these will be updated to reflect information gathered during the consultation.
15.1.5.23	Steps were taken, fully supported by Powys County Council school's management team to reintroduce a Teaching Head model, which has been a huge positive for the school. It suggests in the consultation document that this is negative as the large teaching commitment does not allow to sufficient leadership focus. I would strongly dispute this statement. The	The role of a teaching headteacher is extremely demanding on their time to lead and manage the school while taking on a large teaching commitment. The very small staff in a two-class school means that there are very limited opportunities for shared leadership, no senior management team, and limited

	<p>teaching head is allocated leadership time, which is again fully costed in a currently positive budget and is again on par with the teaching commitment of heads in other schools in the area who are not being subjected to this process. I feel it is important to acknowledge there have been considerable increased demands on the Headteacher during the pandemic to implement the everchanging Covid requirements, which is not a true reflection of leadership requirements in a 'normal' time. However, the fact that the headteacher has been able to meet all these requirements and still deliver a high standard of education and wellbeing support is a credit to the individual and the school model.</p>	<p>resources to develop key roles, such as that of the ALNCo, in readiness for the new ALN Act.</p>
15.1.5.24	<p>We have spotted errors in the consultation report, is that still then a fair consultation and would it still go forward?</p>	<p>Comments / queries about the consultation document have been responded to in this report.</p>
15.1.5.25	<p>Following on from that, in the assessment for each option, you've got option 7 and you have 2 question marks, "could be met", and option 9 is obviously 4. If those question marks, "could be met", then surely they should be ticked and that would be 4 and 4? Yet the only option seems to be to close and therefore option 7 should still be available to us.</p>	

15.2 Comments about the consultation response form

15.2.1	<p>You ask for my gender in the next section but I don't have a "gender" I have a sex. There are only two sexes and by asking gender which can mean anything these days it is impossible to look at the data you have collected to accurately gauge whether sex based rights under the equality act have been protected. I suggest you use sex in future surveys and look at #sexmatters</p>	<p>Comment noted.</p>
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	The Safe Schools Alliance and Transgender Trend to look at supporting equality in education in Powys fairly to all protected characteristics.	
15.2.2	Look at some questions on this form, they are baffling to people and could be simpler.	Comment noted.

15.3 Comments about the impact assessments

15.3.1	It is the assessment of the Recreation Committee that PCC have not completed a thorough analysis leading to the release of the consultation document and without conducting a detailed impact assessment on potential implications to fund the community hall the consultation process should rescind the proposal and continue status quo. Without a formal impact assessment, the school closure could lead to the closure of the community hall which would bring significant bearing on the community and well-being on members of the agriculture community which has the highest suicide rates as a profession in the UK.	The Council is not proposing to close the Community Centre and therefore is not required to carry out an impact assessment specifically on this issue. However, information supplied by the school and included within the draft Community Impact Assessment indicate that the school is the main financial contributor to the Community Centre. The Community Impact Assessment will be updated to include information gathered during the consultation.
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16. Alternative options

16.1 Retain the status quo

16.1.1	It is our view that there is a case to retain this school given its location, the community it serves (which is growing), and the greater distances children will need to travel to a new school.	Maintaining the Status Quo is considered as an option within the Consultation Document in respect of the current proposal to close Castle Caereinion C. in W. School, however the Council's view is that this would not address the challenges facing the
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		school as identified in the Consultation Document, nor would it address the challenges facing education in Powys as outlined in the Strategy for Transforming Education in Powys.
16.1.2	I think the only option is to keep the school open.	As above.
16.1.3	Remain open and continue to review	As above.
16.1.4	Instead of closing the school they could keep us open and let more children come here.	As above.
16.1.5	The only option that fits the brief of serving others, rather than yourselves, is to remain open; not just our school but all rural schools.	As above.
16.1.6	Powys County Council should be helping to keep these schools open and offering opportunities for them to thrive more and more.	As above.
16.1.7	I won't apologise for having only the option of keeping the existing school open.	As above.
16.1.8	I think that Castle Caereinion School should stay open, maybe we could do more to get more children to come to our school!	As above.
16.1.9	Keep the school open as a school and appreciate how important it is for the village.	As above.
16.1.10	I feel that Powys County Council needs to keep this school open.	As above.

16.1.11	The school needs to be kept open in order to provide an education for our children and allow them to form an integral part of the village and wider community.	As above.
16.1.12	I think they should let us stay open.	As above.
16.1.13	Yes, keep the school open. It has been a functioning school for 130 years. What will our future generation have to be proud of?	As above.
16.1.14	Keeping it open is the only option I think you should be thinking about. Trying to make bigger schools isn't going to be helpful to those who need more one to one.	As above.
16.1.15	So let's keep Castle Caereinion School OPEN for future generations	As above.
16.1.16	First and foremost, to keep the school open. If that requires greater resource-sharing and co-operation with other nearby schools (as already happens with Berriew Primary school) then so be it. It is pivotal that the school remains open within the village.	The Council encourages all schools to work in collaboration. However, this would not fully address the challenges faced by Castle Caereinion C.in W. school.
16.1.17	Stop closing our school because I like my school. You could close a different school instead.	Maintaining the Status Quo is considered as an option within the Consultation Document in respect of the current proposal to close Castle Caereinion C. in W. School, however the Council's view is that this would not address the challenges facing the school as identified in the Consultation Document, nor would it address the challenges facing education in Powys as outlined in the Strategy for Transforming Education in Powys.

		The Council is currently reviewing a number of other schools as well as Castle Caereinion C. in W. School and has carried out consultation on a number of proposals relating to a number of other schools.
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16.2 Pause the consultation process

16.2.1	The school should be given further time to build on and embed the new teaching structure implemented in Autumn 2019.	Whilst the Council is pleased that the school has made good progress since establishing new leadership in 2019, the Council's view is that keeping the school open to allow time for the new teaching structure to embed won't address the challenges facing the school as outlined in the Consultation Document. In particular, pupil numbers remain very low and aren't expected to increase significantly.
16.2.2	I really hope that you can give us a few more years to show you what Castle Caereinion is capable of.	As above.
16.2.3	I do not believe that closing Castle Caereinion CiW School is the right thing to do at the current time. Allow the school an additional two years to demonstrate growth from the new leadership model. This would also prevent the emotional damage that will be done to the children in closing their school during the Covid pandemic, when so many have already suffered loss already.	As above.
16.2.4	Give them time, to plan, to fund, to educate how small schools benefit children rather than super schools.	As above.

16.2.5	Allow the school an additional two years to demonstrate growth from the new leadership model. This will allow more pupils to come to the school and more to transfer into the Caereinion Cluster high school, which is dual stream language.	As above.
16.2.6	I really hope that you can give us a few more years to show you what Castle Caereinion is capable of.	As above
16.2.7	Wait until the proposed buildings and developments are built, as then more pupils will use the school and the numbers will increase.	Whilst the Council recognises the housing developments in the area, it is not expected that pupil numbers would increase significantly, and the school would continue to be a small school.
16.2.8	Give us more time because there are more houses being built in the village so there could be more children to come yet. We are slowly growing our community but because of Covid we just need a little bit more time to help us to do this!	As above.
16.2.9	If you could wait until the new houses are built we might get new students and if we can get the school to be known more then more people will come.	As above.
16.2.10	Maybe you could give a bit more time so if when the new houses are built then they can bring their children here. That means there will be more people to come to our school and that means more friends for us.	As above
16.2.11	Please give us more time for the new houses which are being built. We will have more pupils then.	As above.
16.2.12	Please let us stay at our school. With Coronavirus shutting the school last year we want something stable, safe and secure for a	As above. The Council recognises that children's education has been disrupted due to the pandemic

	bit. The council say that this is a 10 year transformation programme. Why not leave it a few years for the houses to be built and sold to families and then go over it again.	but the challenges facing Castle Caereinion C. in W. School need to be addressed.
16.2.13	Wait for the houses to be built and to increase the pupil numbers, building work to be carried out that has been reported.	As above.
16.2.14	Give us more time for the new houses to be built because more children might come to this school.	As above.
16.2.15	Promote the school until there are more pupils.	Even with more promotion, it is not expected that pupil numbers would increase significantly. The school would continue to be a small school.
16.2.16	If we have more time we could make signs for more children to come to our school.	As above.
16.2.17	Can you give us more time and we can try to get more pupils into the school. We can put fliers up to get more pupils in. Why does this school need to shut? We can cope with less pupils.	As above. The reasons for the proposal are outlined within the Consultation Document.
16.2.18	I feel the council should withdraw the consultation, at the earliest until the Covid pandemic allows the relevant stakeholders and wider community involved in the school to meet in the conventional manner, i.e., not virtually.	All stakeholders have had the opportunity to be involved in the consultation.
16.2.19	Keep the school open, I would like to see another up-to-date Estyn report to be conducted once we are over the pandemic.	Estyn is currently not undertaking school inspections due to the pandemic.

16.2.20	Allow the children time to adapt to the changes that the pandemic has made, whilst allowing the school time to show the growth it can make in this time.	The Council recognises that children's education has been disrupted due to the pandemic but the challenges facing Castle Caereinion C. in W. School need to be addressed.
16.2.21	Maybe PCC needs to look at increasing housing in Powys and increasing the population in Wales.	The Council has an ambitious target to increase social housing throughout the county.
16.2.22	Delaying the process by a year would have allowed the Council to put together an accurate, fact-based proposal; have access to up-to-date statistics on pupil numbers, educational standards etc; give greater opportunity for the measures introduced by the new school leadership team to bear fruit; allow for proper community consultation.	<p>The Consultation Document is based on detailed consideration of a number of options and the most recent data at the time of writing. All stakeholders have had an opportunity to be involved in the consultation.</p> <p>The Council's view is that keeping the school open to allow time for the new teaching structure to embed won't address the challenges facing the school as outlined in the Consultation Document. In particular, pupil numbers remain very low and aren't expected to increase significantly.</p>

16.3 More use of technology

16.3.1	The best use should be made of digital technology to enable cost-effective delivery of distance learning in specialist and technical subjects, to share resources and reduce costs.	All schools are already expected to use technology to enhance teaching and learning. It is the Council's view that this alone won't address the challenges faced by Castle Caereinion C. in W. School.
16.3.2	The increased use of technology has been shown in recent months to enable children to develop educationally. Smaller	As above.

	schools can use technology to enable children to participate in a wider curriculum in a supportive environment.	
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16.4 Other suggestions

16.4.1	Putting in a training head or a headship of lower grade would save money.	The Council's view is that this won't address the challenges faced by Castle Caereinion C. in W. School.
16.4.2	Instead of shutting the school down, I believe it would be better practise to investigate why the school is costing more than the average and other schools.	There is a minimum level of spend required to run a school in terms of staffing and premises costs. The smaller the number of pupils, the greater the cost per pupil.
16.4.3	Joining us with another school and have a shared head.	Options for federation and merger with other schools have been considered and discounted.
16.4.4	The Council should use long-term, low interest finance to install measures making the school carbon neutral.	The Council's view is that this won't address the challenges faced by Castle Caereinion C. in W. School.
16.4.5	We should be encouraging small village schools. Let's boost money within the school systems with pta and fundraising etc.	As above.
16.4.6	Ask for more local support, we are here and willing to help, we can find raise and volunteer.	As above.
16.4.7	Do not close the school but give it as much support as possible.	As above.
16.4.8	Ask the Minister for Education for more support, while she supports rural schools to stay open.	As above.

16.4.9	Continued support for the Headteacher, staff and governors in support of their work to educate young students from our community.	The Council continue to support the headteacher, staff and governors at the school.
16.4.10	Using Castle Caereinion as a feeder school for Caereinion high school for the English-speaking as when that goes as a through school it won't be able to accommodate all pupils.	The Council's view is that this won't address the challenges faced by Castle Caereinion C. in W. School.
16.4.11	I think a school is an important part of the community so if it closes it should become an activity centre or a day centre or provide work opportunities for people or office space.	Comment noted.
16.4.12	Contact all your own meetings on zoom no more petrol expensive. Find ways cut cost at PCC not at children's expense.	The Council is operating a work from home policy currently.
16.4.13	Don't pay overtime on some services. Cut paperwork to minimum must be loads ways cut cost not our school or village hall it will not be much of saving anyway with transport and people will not want homes with zero in village. But careful thought should be given after Covid to how we live and how children should have to manage.	Comment noted.
16.4.14	The viability of the school should be linked to plan for the sustainable growth of the village's population. The planning department could allow small- scale developments of affordable housing of up to ten homes on rural exception sites adjoining its development boundary.	Comment noted.

17. Comments about impact on the Welsh language

17.1 Comments about Welsh at Castle Caereinion School

17.1.1	I myself attended the school and then went onto attend Caereinion high school. Due to the foundation of Welsh that I learned in primary school, I was taught bilingually in Llanfair.	Comment noted.
17.1.2	We do a good job of speaking Welsh here.	Comment noted.
17.1.3	They probably get taught more Welsh as there are less children and they can focus on one subject.	Comment noted.
17.1.4	We speak Welsh really well in school.	Comment noted.
17.1.5	In my opinion, smaller learning groups are a positive influence on learning languages and therefore believe that closure would have a NEGATIVE impact.	Comment noted.
17.1.6	I think we are doing well at learning Welsh!	Comment noted.
17.1.7	My son although he is English loves the Welsh language other schools do not teach it as well as this school dose it would be a shame not to carry on the Welsh language.	Comment noted. Should the Council proceed with the proposal to close Castle Caereinion C. in W. School, pupils would continue to learn Welsh at the alternative schools.
17.1.8	We learn how to speak Welsh everyday. Mrs Andrew also helps us with our Welsh.	As above.
17.1.9	We learn lots of Welsh in Castle Caereinion CiW School - it is great fun! It might not be the same at another school.	As above.

17.1.10	I understand from my son that the children are encouraged to speak and use Welsh as much as they wish during the school day and I am not sure how much other schools encourage it.	As above.
17.1.11	Whilst Castle School is English stream, there are various opportunities within the school for the children to learn and be exposed to the Welsh language. Incidental Welsh is used daily within the school along with regular lessons from a peripatetic teacher. The children are also encouraged to practice their Welsh and awarded half termly Welsh Awards. If the children are moved, there is no guarantee this level of teaching and Welsh use will continue in a different school and therefore could be adversely affected.	As above.
17.1.12	The children do a lot of learning in the Welsh language which I'm not confident would be replicated in another setting.	As above.

17.2 Negative impact on the Welsh language

17.2.1	It would have a negative affect. Closing our school implies we are not good enough when the staff do a marvellous job. Teaching the Welsh language and its culture is a natural important part of that.	Comment noted. Should the Council proceed with the proposal to close Castle Caereinion C. in W. School, pupils would continue to learn Welsh at the alternative schools.
17.2.2	If you close our school most of the Welsh language will be gone out of our village.	As above.
17.2.3	Welsh will go out of the community if we don't learn it at school.	As above.
17.2.4	If you close the school the Welsh will go from the village.	As above.

17.2.5	If you close our school, less people in the village will speak Welsh.	As above.
17.2.6	You would be losing Welsh from Castle.	As above.
17.2.7	If there was no school people would not know how to speak Welsh.	As above.
17.2.8	People might forget Welsh (and Polish).	As above.
17.2.9	However the positives of keeping Castle Caereinion school open and keeping the children here is not every parent wants there children in a fluent Welsh school. They do learn Welsh in the school and they do have Welsh lessons. Also when it's time to look for high schools they do have schools with Welsh and English so you don't need to be fluent Welsh to go to high school but you will still learn Welsh in high school with is obviously a positive.	As above.
17.2.10	I believe that closing Castle Caereinion CiW School would result in a loss of children's access to Welsh language provision. Currently the pupils from Castle tend to feed into Caereinion High School. This is a dual stream school, thus provides children the option to move to the Welsh stream or to complete some subjects through the medium of Welsh. If Castle were to close the children would be moved to schools in the Welshpool cluster, thus meaning that pupils will likely feed into Welshpool High School instead, Welshpool High School is an English medium secondary school. Therefore to close Castle Caereinion CiW School, would result in a loss of pupils assimilation with the Welsh language and their Welsh heritage.	Should the school close, pupils would transfer to their nearest alternative schools. For some, these could be Berriew C. P School, Guilsfield C. P. School or Welshpool C. in W. School. These schools are feeder schools to Welshpool High School. It is correct that Welshpool High School is an English-medium school. The Council acknowledges that pupils transferring to Welshpool High School would not have the same experience of the Welsh Language compared to

		Caereinion High School as that is a dual-stream school.
17.2.11	Traditionally the school has had the relationship with Caereinion high school with a higher importance placed on the Welsh language in this secondary school on comparison with Welshpool. The closure of Castle Caereinion will result in more children having to attend numerous other schools that won't have the same affiliation with a Welsh language school which will have a large impact on where they attend secondary school.	As above.
17.2.12	If you close the school 60% of Welsh users in Castle would disappear.	Comment noted.
17.2.13	Both languages should be taught equal which in a smaller school this must be easier. Give the kids a chance after Covid, I'm pretty sure it's easier to teach and stamp out bullying in smaller schools so languages must be easier.	<p>Castle Caereinion is an English-medium school, with Welsh taught as a second language.</p> <p>The Council recognises that children's education has been disrupted due to the pandemic, but the challenges faced by Castle Caereinion C. in W. school need to be addressed.</p> <p>There is no evidence of more bullying taking place in larger schools compared to smaller schools.</p>
17.2.14	As we are near the border and other primary schools locally are also under threat, and those that aren't are fully subscribed, some students may have to go into England – they will not have the option to learn Welsh.	Given the location of Castle Caereinion, it is unlikely that the alternative provision for any current pupils would be located in England.
17.2.15	It is not possible for the school to be closed without adverse effects (on the Welsh language).	Comment noted.

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17.3 No impact on the Welsh language

17.3.1	In my opinion there is no positive or negative effects for persons to use the Welsh language less favourably than the English language Castle Caereinion is an English medium school which I believe is the fault of PCC education board for not making the school in favour of a Welsh medium.	Comment noted.
17.3.2	I am Welsh but do not speak Welsh I have gone through primary school, high school college and Welsh language has not helped or hindered my life at all.	Comment noted.
17.3.3	Given that the current school is not Welsh language or bilingual, I do not see that the proposal would have any impact on the use of the Welsh language.	Comment noted.

17.4 Other comments

17.4.1	I wish I could speak Welsh but doesn't make me less of a Welsh person.	Comment noted.
17.4.2	I am not an educationist nor a Welsh speaker, but if the Welsh language is seen as such an important part of this country's heritage then investment in ensuring all paid staff and helpers are fluent in Welsh is extremely essential and will promote the regular use of Welsh as an alternative to English in outside school environments. I would strongly support this stance but along with great support for the remainder of the curriculum.	Comment noted.

17.4.3	The viability of the school should be linked to plan for the sustainable growth of the village's population. The planning department could allow small- scale developments of affordable housing of up to ten homes on rural exception sites adjoining its development boundary.	Comment noted.
17.4.4	If the school was to close and all pupils went to a Welsh language school the positives would be that they would be learning Welsh a lot more and could go on to speak fluent Welsh if that's what was wanted.	Comment noted.

18. Comments in support of the proposal

18.1	I agree with the proposal. The consultation report states that the school's budget share per pupil during 2020-21 was £6,919. This is significantly higher than the Powys average of £4,264. This level of disparity cannot be justified and is unfair to all other learners in Powys.	Comment noted.
18.2	I feel it should close as it is too small of a school now. Myself and my husband went to the school 30 years ago and the school was double the size it is now. Children need a bigger school and more opportunities than Castle currently is.	Comment noted.
18.3	We live in Castle Caereinion but chose to send our child who started school in 2020 to Berriew instead of Castle as we felt the school was too small and would benefit from a larger school. Our child is really enjoying it and feel glad we didn't send our child to a small school.	Comment noted.

7. FURTHER ASESMENT AND CONCLUSION

The School Organisation Code includes some additional steps to be undertaken in respect of the consultation report for proposals relating to the closure of rural schools. This section addresses these requirements.

7.1 Further assessment of the proposal and alternatives

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

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

Option	Likely impact on quality and standards	Likely impact on the community	Likely impact of different travelling arrangements
Option 1: Status Quo – continue as a standalone school	There would be no impact on quality and standards – pupils would continue to attend the current provision at Castle Caereinion.	There would be no impact on the community – provision would continue to be available in Castle Caereinion.	There would be no impact on travel arrangements – pupils would continue to attend Castle Caereinion C. in W. School.
Option 2: Federation with Welshpool C. in W. School	The impact on quality and standards would be minimal. Castle Caereinion C. in W. School would continue to operate as a standalone school; however, the school would be federated with Welshpool C. in W. school, meaning that one joint governing body would be	The impact on the community would be minimal – provision would continue to be available in Castle Caereinion. However, one joint governing body would be responsible for both schools, therefore there could be a	There would be no impact on travel arrangements – pupils would continue to attend Castle Caereinion C. in W. School.

	<p>responsible for both schools. There would also be the potential for shared leadership across the two schools.</p> <p>Establishment of the federation could lead to opportunities to share staff / resources across the federation, which would have a positive impact on quality and standards.</p>	<p>perceived reduction in community involvement in management of the school, depending on the makeup of the federated governing body.</p>	
<p>Option 3: Merge with Welshpool C. in W. School to establish a new school on two sites</p>	<p>Welshpool C. in W. School was established in 2017 following the amalgamation of 4 nursery and infant schools in Welshpool. The school is currently operating across three sites, pending a move to a new building in 2021.</p> <p>Merging Castle Caereinion C. in W. School and Welshpool C. in W. School would mean that Welshpool C. in W. School would need to undergo a further management of change process, having already undergone numerous changes over the last few years. The Council's view is that this would threaten the quality of provision at Welshpool C. in W. School.</p>	<p>The impact on the community would be minimal – provision would continue to be available in Castle Caereinion.</p> <p>However, one new governing body would be responsible for both sites, therefore there could be a perceived reduction in community involvement in management of the school, depending on the make up of the new governing body.</p> <p>In addition, it is possible that joint school activities would take place on the Welshpool site as the much larger site, which could lead to a reduction in activity on the Castle Caereinion site.</p>	<p>Pupils would continue to attend school on the current site of Castle Caereinion C. in W. School.</p> <p>However, some additional travel may be required between schools in order to access activities and events.</p>

<p>Option 4: Close Castle Caereinion, but retain the site as part of Welshpool C. in W. School</p>	<p>Welshpool C. in W. School was established in 2017 following the amalgamation of 4 nursery and infant schools in Welshpool. The school is currently operating across three sites, pending a move to a new building in 2021.</p> <p>Retaining the Castle Caereinion site as part of Welshpool C. in W School would lead to further change for the Welshpool C. in W. School community, which has already undergone numerous changes over the last few years. The Council's view is that this would threaten the quality of provision at Welshpool C. in W. School.</p>	<p>Provision would continue to be available in Castle Caereinion. However, the site would be managed by the current governing body of Welshpool C. in W. School, therefore there could be a perceived reduction in community involvement in management of the school.</p> <p>In addition, it is possible that joint school activities would take place on the Welshpool site as the much larger site, which could lead to a reduction in activity on the Castle Caereinion site.</p>	<p>Pupils would continue to attend school on the current site of Castle Caereinion C. in W. School.</p> <p>However, some additional travel may be required between schools in order to access activities and events.</p>
<p>Option 5: Merge with Berriew C.P. School to establish a new school on two sites</p>	<p>It is anticipated that this option would have a positive impact on quality and standards through the establishment of one larger school, with a larger number of pupils and a larger team of staff.</p> <p>Whilst pupils would continue to attend separate sites, therefore would not benefit from all being taught together, this option would provide additional opportunities for staff expertise and resources to be</p>	<p>The impact on the community would be minimal – provision would continue to be available in Castle Caereinion.</p> <p>However, one new governing body would be responsible for both sites, therefore there could be a perceived reduction in community involvement in management of the school, depending on the make up of the federated governing body.</p>	<p>Pupils would continue to attend school on the current site of Castle Caereinion C. in W. School.</p> <p>However, some additional travel may be required between schools in order to access activities and events.</p>

	<p>shared across both sites. Castle Caereinion C. in W. School and Berriew C.P. School are both in the amber support category based on the 2019 categorisations, therefore it is not anticipated that the impact on quality and standards would be negative.</p>	<p>In addition, it is possible that joint school activities would take place on the Berriew site as the larger site, which could lead to a reduction in activity on the Castle Caereinion site.</p>	
<p>Option 6: Close Castle Caereinion, but retain the site as part of Berriew C.P. School</p>	<p>Implementation of this option would result in closure of Castle Caereinion C. in W. School; however, provision would continue on the current site. Castle Caereinion C. in W. School and Berriew C.P. School are both in the amber support category based on the 2019 categorisations, therefore it is not anticipated that the impact on quality and standards would be negative.</p> <p>The school would be a larger school, with a larger number of pupils and a larger team of staff, which could have a positive impact on the opportunities available for pupils and staff.</p> <p>Whilst pupils would continue to attend separate sites, therefore would not benefit from all being taught together, this option would</p>	<p>Provision would continue to be available in Castle Caereinion. However, the site would be managed by the current governing body of Berriew C.P. School, therefore there could be a perceived reduction in community involvement in management of the school.</p> <p>In addition, it is possible that joint school activities would take place on the Berriew site as the larger site, which could lead to a reduction in activity on the Castle Caereinion site.</p>	<p>Pupils would continue to attend school on the current site of Castle Caereinion C. in W. School.</p> <p>However, some additional travel may be required between schools in order to access activities and events.</p>

	provide additional opportunities for staff expertise and resources to be shared across both sites.		
Option 7: Merge with Berriew C.P. School to establish a new school on the Berriew site	<p>It is anticipated that this option would have a positive impact on quality and standards through the establishment of one larger school, with a larger number of pupils and a larger team of staff.</p> <p>All pupils would attend one site, which would provide further benefits to pupils from being part of larger cohorts of pupils, and improved opportunities to share staff expertise.</p> <p>Castle Caereinion C. in W. School and Berriew C.P. School are both in the amber support category based on the 2019 categorisations, therefore it is not anticipated that the impact on quality and standards would be negative.</p>	<p>There would be a significant impact on the community of Castle Caereinion as there would be no provision in Castle Caereinion. Many comments received emphasise the importance of the school within the local community and the benefits of being part of a close community on the development of pupils. It is also recognised that there are strong links between the school, being a C. in W. school and the local church, and how this contributes to pupils' development, and that this would be lost should the school close.</p> <p>In particular, there could be an impact on the financial viability of the community centre and closure of the school could mean that people would not want to live in Castle Caereinion in the future and could lead to a reduction in community activity in the village. In addition, the village has already suffered a loss of community facilities, and there is concern that closure of the school</p>	<p>Additional travel would be required for pupils currently attending Castle Caereinion C. in W. School.</p> <p>This would mean that pupils would need to spend more time travelling. The additional travel required would also have an environmental impact and would mean that it would be more difficult for pupils to access some extra-curricular activities where these are held before or after school.</p> <p>Pupils living in the village of Castle Caereinion who are currently able to walk / cycle to school would no longer be able to do so.</p> <p>Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirement for parents in order to access school activities / events, which is likely to have a greater impact on low-income</p>

		<p>could lead to closure of other facilities in the village.</p> <p>As a Church in Wales School, the Castle Caereinion School building is owned by the Diocese, therefore the Diocese would need to determine the building's future use, and therefore whether or not facilities would remain in Castle Caereinion.</p> <p>Merging with Berriew C.P. School to establish a new school would provide opportunities for the Castle Caereinion community to be involved in the process of establishing the new school, would aid community involvement in the new school.</p>	<p>families and/or families who do not have access to their own transport.</p> <p>The Council recognises that should Castle Caereinion C. in W. School close, pupils would transfer to alternative primary schools, and that some of these would be in a different secondary cluster i.e., Welshpool High School. The Council also agrees that this would have transport implications as outlined below:</p> <p>Pupils who attend Castle Caereinion CiW School normally transfer to Caereinion High School and free home-to-school transport is normally provided for those pupils attending Castle Caereinion CiW School to Caereinion High School.</p> <p>Should Castle Caereinion CiW Primary School close, pupils living in the Castle Caereinion area would be provided with free home-to-school transport to their nearest or catchment secondary school. In the case of pupils choosing to attend Berriew CP School, Welshpool CiW Primary School or Guilsfield CP</p>
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			<p>School, they would ordinarily transfer to Welshpool High School.</p> <p>Pupils currently accessing free home-to-school transport from the Castle Caereinion area to Caereinion High School would continue to receive this service until they finish their education. However, this would not be available to pupils from Castle Caereinion if they have transferred to Berriew C.P. School, Guilsfield C. P. School or Welshpool C. in W. School unless Caereinion High School is their nearest secondary school. This would have an implication for families who may already have elder siblings being transported to Caereinion High School.</p> <p>There may also be a potential impact on transport costs as there may be additional routes required to provide transport from the Castle Caereinion area to Welshpool High School. However, it would be expected that the existing transport routes would be adjusted. The estimated range of costs for this is dependent on which school parents choose for their pupils, should Castle Caereinion</p>
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			<p>close. The following outlines the range of costs, depending on how many pupils require transport:</p> <p>Minimal costs – all pupils can be accommodated within existing transport provision for secondary, albeit some routes may need to be extended – £10 - £20 per school day - £1,900 - £3,800 per annum</p> <p>Need to increase size of bus – approx. £50 per day - £9,500 per annum</p> <p>Additional Taxi required – approx. £60 - £75 per day - £11,400 - £14,250 per annum</p> <p>New bus required - £170 - £230 per day - £32,300 - £43,700</p>
<p>Option 8: Merge with Berriew C.P. School to establish a new school on the Castle Caereinion site</p>	<p>In general, it is anticipated that this option would have a positive impact on quality and standards through the establishment of one larger school, with a larger number of pupils and a larger team of staff. All pupils would attend one site, which would provide further benefits to pupils from being part of larger cohorts of pupils, and</p>	<p>There would be a positive impact on the Castle Caereinion community as this option would retain provision in Castle Caereinion and would lead to an increase in pupil numbers, safeguarding provision in the village for the future.</p> <p>However, there would be a negative impact on the Berriew community as</p>	<p>Additional travel would be required for pupils currently attending Berriew C.P. School.</p> <p>This would mean that pupils would need to spend more time travelling. The additional travel required would also have an environmental impact and would mean that it would be more difficult for pupils to access</p>

	<p>improved opportunities to share staff expertise.</p> <p>However, it is unlikely that the Castle Caereinion site would be able to accommodate all pupils, therefore there would be a negative impact on the quality of provision should all pupils be taught in the current Castle Caereinion building.</p>	<p>there would no longer be provision in Berriew. Whilst merging the two schools to establish a new school would provide opportunities for the Berriew community to be involved in the process of establishing the new school to aid community involvement in the new school, however as Berriew is the larger village with a larger school, it is likely that the Berriew community would consider this option to be disproportionate.</p>	<p>some extra-curricular activities where these are held before or after school.</p> <p>Pupils living in the village of Berriew who are currently able to walk / cycle to school would no longer be able to do so.</p> <p>Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirement for parents in order to access school activities / events, which is likely to have a greater impact on low-income families and/or families who do not have access to their own transport.</p>
<p>Option 9: Close Castle Caereinion C. in W. School, pupils to attend nearest alternative schools</p>	<p>Implementation of this option would mean that pupils currently attending Castle Caereinion C. in W. School would transfer to their nearest alternative schools. For the majority of pupils currently attending Castle Caereinion C. in W, School, the closest alternative schools would be Berriew C.P. School. The nearest alternative Church in Wales provision would be Welshpool C. in</p>	<p>There would be a significant impact on the community of Castle Caereinion as there would be no provision in Castle Caereinion. Many comments received emphasise the importance of the school within the local community and the benefits of being part of a close community on the development of pupils. It is also recognised that there are strong links between the school, being a C.</p>	<p>There may also be a potential impact on transport costs as there may be additional routes required to provide transport from the Castle Caereinion area to Welshpool High School. However, it would be expected that the existing transport routes would be adjusted. The estimated range of costs for this is dependent on which school parents choose for their pupils, should Castle Caereinion</p>

	<p>W. School. Some pupils may also choose to attend Llanfair Caereinion C.P. School or Guilsfield C.P. School as other nearby schools.</p> <p>The Council's view is that all of these schools would provide education for pupils which is of at least equivalent quality as that provided at Castle Caereinion C. in W. School, therefore it is not anticipated that implementation of the preferred option would have a negative impact on standards and progress overall. The overall aim of the proposal is to improve learning opportunities for pupils. Castle Caereinion C. in W. School, Berriew C.P. School and Llanfair Caereinion C.P. School were categorised as Amber in the latest school categorisations carried out in 2019, whilst Welshpool C. in W. School was categorised as Yellow. Guilsfield C.P. School was classified as a Green school.</p>	<p>in W. school and the local church, and how this contributes to pupils' development, and that this would be lost should the school close.</p> <p>In particular, there could be an impact on the financial viability of the community centre and closure of the school could mean that people would not want to live in Castle Caereinion in the future and could lead to a reduction in community activity in the village. In addition, the village has already suffered a loss of community facilities, and there is concern that closure of the school could lead to closure of other facilities in the village.</p> <p>As a Church in Wales School, the Castle Caereinion School building is owned by the Diocese, therefore the Diocese would need to determine the building's future use, and therefore whether or not facilities would remain in Castle Caereinion.</p> <p>A Community Impact Assessment has been prepared as part of the proposal which considers the impact of the possible closure of the school on the community. This has been</p>	<p>close. The following outlines the range of costs, depending on how many pupils require transport:</p> <p>Minimal costs – all pupils can be accommodated within existing transport provision for secondary, albeit some routes may need to be extended – £10 - £20 per school day - £1,900 - £3,800 per annum</p> <p>Need to increase size of bus – approx. £50 per day - £9,500 per annum</p> <p>Additional Taxi required – approx. £60 - £75 per day - £11,400 - £14,250 per annum</p> <p>New bus required - £170 - £230 per day - £32,300 - £43,700</p>
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		<p>updated to reflect the comments received during the consultation period.</p> <p>There is also a strong link between the school and the local church</p>	
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7.2 Further reasonable alternatives

The other alternatives which were suggested in the consultation responses received are outlined in section 16 of the 'issues raised in the consultation period' section of this report, including the Council's response to these alternatives. These are as follows:

- 16.1 Retain the status quo
- 16.2 Pause the consultation process
- 16.3 More use of technology

The assessment of 16.1 and 16.2 is as per the assessment of 'Option 1 – Status Quo' in the table in section 7.1 above.

All schools are expected to make use of technology to provide enhanced learning experiences to pupils, therefore the Council's view is that 16.3 – More use of technology is not a 'reasonable alternative' in order to address the issues relating to Castle Caereinion C. in W. School.

7.3 Conclusion

It is confirmed that implementation of the proposal is the most appropriate response to the reasons identified for the proposal.

The Consultation Document published in respect of the proposal to close Castle Caereinion C. in W. School outlined the reasons why change is needed in Powys, as well as why change is needed in Castle Caereinion are as follows.

The reasons why change is needed in Powys, as outlined in the Council's Strategy for Transforming Education, are as follows:

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

The reasons why change is needed in Castle Caereinion are as follows:

- Low pupil numbers
- High budget per pupil
- Issues with the building
- Combined age classes
- Leadership

Having considered the issues raised in the consultation report, having carried out a further assessment of the proposal and alternative options on the likely impact on quality and standards in education, the likely impact on the community and the likely effect of different travelling arrangements, and having considered any further reasonable alternatives suggested during the consultation period, the Council's view is that the current proposal continues to be the most appropriate response to these reasons, to ensure improved management of the Powys schools estate, and to ensure that the best possible educational opportunities can be provided to pupils living in Castle Caereinion and across Powys in the future.

As outlined in the Consultation Document, the reasons for the proposal are as follows:

- To address the issue of low pupil numbers
- To reduce the Council's overall surplus capacity in primary schools

- To realise a financial saving to the Council
- To enable pupils to attend larger schools, which would be better equipped to meet the requirements of the new curriculum
- To enable pupils to attend larger schools, which could provide a wider range of educational and extra-curricular opportunities
- To enable pupils to attend schools with better quality accommodation
- The proposal meets all of the Critical Success Factors

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Appendix C – Minutes of meetings with Staff, Governors and School Council

Contents

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1. Consultation meeting with Staff of Castle Caereinion C. in W. School

27th April 2021

Present

Staff:

Sarah Brian, Headteacher
Molly Evans, Teacher
Olga Pugh, School Administrator
Julie Taylor, Cleaner
Eirlys Jones, Breakfast Club and Midday Supervisor
Christine Williams, Breakfast Club Supervisor
Helen Elaine Savage, Teaching Assistant

Officers:

Emma Palmer, Head of Transformation and Communications
Lynette Lovell, Interim Chief Education Officer
Marianne Evans, Service Manager for Schools Transformation
Eurig Towns, Service Manager for School Improvement
Mari Thomas, Interim Schools Finance Manager
Sarah Christoforou, HR Business Manager (Schools)
Sarah Astley, Strategic Programme Manager, Transforming Education

Others:

Sheridan Goodey, Schools Business Support Officer, St Asaph Diocese

Emma Palmer welcomed all to the meeting and introduced Powys County Council officers attending the meeting. The Staff of Castle Caereinion C. in W. School were also in the meeting, and Headteacher Sarah Brian introduced them.

It was explained that there would be a brief presentation with an opportunity for discussion, comments, and questions to the officers afterwards. Emma Palmer explained that the meeting would be recorded, for minuting purposes but the recording would be deleted once the minutes had been completed.

Marianne Evans gave a Powerpoint presentation and explained that in February 2021, Powys Cabinet gave approval to proceed with a proposal to close Castle Caereinion C. in W. School. The consultation commenced on 14th April 2021 and will finish on 2 June 2021.

The importance of the consultation process as a way for people to make their views known was emphasised.

The specific proposal is:

- To close Castle Caereinion C. in W. School from 31st August 2022, with pupils to attend their nearest alternative schools.

Emma Palmer explained that responses received during the consultation period would be summarised and a response given to them, and they would form the substance of a report to Cabinet who would consider the responses before making a decision whether to proceed with the proposal or not. Staff were then given the opportunity to ask any questions or to make any comments in relation to the matter.

Staff: In terms of the timings, obviously we have up until the 2nd of June to respond to the consultation, and then are we right in thinking there is a 28-day period for it to be discussed in Cabinet, does that take us to the 8th of July?

Marianne Evans: The consultation period will finish on the 2nd of June, then we start analysing the responses and creating the consultation report, and then the intention is that a report goes back to cabinet in July. Cabinet at that point have a choice, to proceed with the proposal or decide not to proceed with the proposal. If they decide to proceed, we will publish a statutory notice for 28 days and during that time people can write to us with their objections. At the end of that, those objections are analysed and put into a report which goes back to Cabinet again for the final decision, and even at that stage Cabinet can decide either way.

Staff: If they decide initially to proceed, and there are no objections, when can we expect to have a decision? There is anxiety from staff with regards to different time scales, and when exactly they will know.

Marianne Evans: Without checking, I think it will be late autumn term. It all depends on the level of responses as they will dictate which Cabinet meeting we can get to. For example, a consultation we carried out recently gave us 500 responses, which took a lot of time to analyse. If there are less responses, it takes less time, and we could get to an earlier Cabinet.

Staff: With it being fluid around the dates, it is difficult then to advise parents as some parents are thinking that if the school is going to close, they might move their children earlier.

Emma Palmer: It is certainly challenging, and I think the main thing from our point is that we follow the correct process, and that we take the time that is needed to consider the consultation responses fully. We give an indicative date when we plan this programme out, but we cannot just cement those timelines as we want to do things right and give that time. I do appreciate those challenges that this then presents.

Staff: If we cannot make parents aware until the end of the year, does that then affect the actual closing date if we were to close? Is it 12 months from the notice?

Marianne Evans: There is no change to the closing date, it would still be September 2022.

Emma Palmer then gave Sheridan Goodey form the Diocese of St Asaph, the chance to share any information regarding the process as the Council have been working alongside with her.

Sheridan Goodey: Just to reiterate, I have been working with the school with regards to responding to the consultation to try and help and support as much as possible. We have been working together to understand the process, and how it can be run as smoothly as possible and to ensure that we minimise as much stress as possible. Inevitably, this is going to be very stressful either way and I think we have acknowledged that this needs to be handled carefully.

Emma Palmer: Thank you Sheridan. It is certainly never an easy time, and it is a difficult period. Certainly, with a Code that we must follow, it feels very elongated, but we must give everyone the opportunity.

Sarah Christoforou: Even though the timeline is very long, if staff have questions they want to raise in the meantime, please ask, it does not mean you are accepting a decision either way. Please contact me yourselves or through the Headteacher if you do have any questions that come up in that time. I do not want you to sit and worry about that until a final decision has been made.

Emma Palmer: I think sometimes we attend meetings, and after you wish you had asked XYZ. The door is open for questions and the support arrangements are there, so thank you for reiterating that.

Lynette Lovell: I would just like to reiterate everything everybody has been saying there. We do appreciate how difficult situations are, and the situation we are in and the year we have had. We want to reassure you that well-being and working together is at the four fronts of everything we do and working through this process, recognising the stress it can cause but working through it together. We are here to work with you, and work through this in the right way going forward.

Emma Palmer: Thank you very much Lynette, absolutely.

There were no further questions and Emma Palmer brought the meeting to an end and thanked everyone very much for their thoughtfulness and comments and reminded staff once again to respond to the consultation documents, and how to do so.

2. Consultation meeting with Governors of Castle Caereinion C. in W. School

27th April 2021

Present

Governors:

Sian Owen (Chair)
Sue Oke
Cllr David Jones
C Jones
D Roberts
Gareth Davies
H Savage
L Mason

Officers:

Emma Palmer, Head of Transformation & Communications
Lynette Lovell, Interim Chief Education Officer
Marianne Evans, Service Manager for Schools Transformation
Eurig Towns, Service Manager for School Improvement
Mari Thomas, Interim Schools Finance Manager
Sarah Christoforou, HR Business Manager (Schools)
Sarah Astley, Strategic Programme Manager, Transforming Education

Others:

Sheridan Goodey, Business Support Officer, St Asaph Diocese
Cllr Phyl Davies (observing)

Emma Palmer welcomed all to the meeting and introduced Powys County Council officers attending the meeting. The Governors of Castle Caereinion C. in W. School present in the meeting introduced themselves. It was explained that there would be a brief presentation with an opportunity for discussion, comments, and questions for the officers. Emma Palmer explained that there had been a meeting with staff earlier in the afternoon, that this meeting would be recorded for minuting purposes, but the recording will be deleted once minutes were completed.

Marianne Evans gave a Powerpoint presentation and explained that in February 2021, Powys Cabinet gave approval to proceed with a proposal to close Castle Caereinion C. in W. School. The consultation commenced on 14th April 2021 and will finish on 2 June 2021.

The importance of the consultation process as a way for people to make their views known was emphasised.

The specific proposal is:

- To close Castle Caereinion C. in W. School from 31st August 2022, with pupils to attend their nearest alternative schools.

Emma Palmer then gave governors the opportunity to ask any questions or to make any comments in relation to the matter.

Governor: I was under the impression that because Castle Caereinion is a church school, that the final decision would not necessarily rest with the Powys Cabinet, but with Welsh Government?

Sheridan Goodey: No, it would only go to Welsh Government if it reaches that stage. Generally, it will follow the same process as for any other school. As Marianne gave you the timeline there, that is exactly what would happen, it would only go to Welsh Government in specific circumstances beyond that.

Governor: What are the circumstances in which the decision would get taken out of Powys' hands?

Sheridan Goodey: That is at another later stage. Normally it would just follow the same process.

Governor: Can you not give us the details of that procedure now then please?

Marianne Evans: There is an opportunity for the Governing Body and the Diocese to refer the final decision to the Welsh Government, and that is an option that church schools have right at the end of the process. If that happens, the Governing Body must state why they think the proposal is wrong, and Welsh Government will consider that. That process would then be in the hands of the Welsh Government.

Emma Palmer: Does that answer your question?

Governor: Well, under pressure yes from Marianne, but I didn't get an honest answer from Sheridan I felt, sorry about that.

Sheridan: My apologies, I didn't want to misquote, so I was going onto the Code to try and find you the specifics. In the cases where it does go to Welsh Government, it must be where there is a very very specific reason for objection at that point, that hasn't already been covered as part of the process. It is not something that would happen automatically, is what I was trying to say.

Governor: Is there a reason why this was just dropped on us only yesterday, and we haven't under the circumstances had a lot of time to prepare?

Headteacher: Just to clarify, the invites to join online came out yesterday, but we were notified of the meeting beforehand.

Governor: We have spotted errors in the consultation report, is that still then a fair consultation and would it still go forward?

Marianne Evans: Any issues raised, including if there are errors, can be put forward as consultation responses, and we can respond to them in the consultation report.

Emma Palmer: As Marianne has said, you don't have to wait until the end of the consultation period, you can raise things throughout the consultation period via email, or you can respond in writing. The team will start to work through the responses, as the authority has a duty to respond in relation to every contribution that is made under the consultation. That response is in the form of a formal consultation report, as Marianne set out. The formal report goes to Cabinet, before they make their decision on whether to proceed with the process and moving to a statutory notice period. It is important for you to know that the consultation report is published and is therefore available in the public domain.

Governor: In your initial comments, you spoke about the nearest suitable school. The nearest council-maintained school is in Berriew, but this is in a different catchment area to Castle Caereinion school. Will the fact that it is in a different catchment, affect its suitability as a receiving school?

Marianne Evans: What we have to do is to look at the whole area, and because Castle Caereinion is a Church in Wales School, the code requires us to ensure there are available Church in Wales places for those parents who wish a Church education for their child. Within the area, 4 miles away, Welshpool C. in W. School have surplus places, therefore if parents wanted Church education, they would be able to go there. In terms of the catchment, should there not be a school in Castle Caereinion, the admissions team would have to redefine the catchment areas for the remaining schools. This would then mean it is quite likely that if children went to Berriew, Berriew being in the Welshpool catchment, it would affect the transport as transport is available to your follow-on secondary school from the Primary School that you go to. There might be a time for a while when transportation would be slightly challenging for some parents because some pupils might have been refused transport to Welshpool High School, but parents could appeal as well if refused transport.

Governor: I have a difficulty here because traditionally the children from Castle Caereinion School went to Llanfair High School, but of late there has been a quite a move going to Welshpool High School. What will happen with that, will children still

be able to go to Welshpool High School, and will they still get free home to school transport to Welshpool?

Marianne Evans: They get free school transport to their closest or catchment school, so in terms of Secondary provision, if they have free transport to Welshpool that would continue.

Governor: So they would get free transport to Berriew school, presuming that Castle Caereinion closed, and from Berriew they would get free school transport to Welshpool School, even though they still live in Castle Caereinion?

Marianne Evans: Yes, according to the new admission policy that will come through next year, they would get transport to the secondary school for that catchment.

Governor: Have you looked at the area that children come from to Castle school?

Marianne Evans: Yes, we have looked at where all the children currently live, and we know which school is their closest school.

Governor: Yes, how many schools do we have the opportunity to go to?

Marianne Evans: There is a significant number of schools within a 10-mile radius of Castle Caereinion, so should the parents choose any one of those schools and there is a place in that school, then they will get a place. In terms of the transport policy, it is free transport to your closest or catchment school.

Governor: And they will be guaranteed free transport to those schools?

Marianne Evans: Yes, to the closest or catchment school you will have free transport, if they are eligible for that transport.

Governor: Will they still be able to go to Llanfair High School like the normal catchment they have now?

Marianne Evans: We would have to redefine the catchments as I said earlier, so if there wasn't a school in Castle we would be looking at the catchment areas for the remaining schools.

Governor: You are talking about the transport, is there going to be a big additional cost to the education department to transport these children to other schools rather than Castle?

Marianne Evans: Yes, the costs have been calculated and are in the consultation document. The estimated transport costs are around £32,300.

Emma Palmer: Just to confirm that as we move forward with the transformation programme, the transport policy will continually be reviewed. We reviewed it last year and there were a few decisions made by the Cabinet, and we have said it will continue to be reviewed, which we will do.

Governor: Just going back to the numbers and transport, are there going to be enough places in our nearest school if there are lots of schools facing closure?

Marianne Evans: Currently, we are only looking at Castle Caereinion in this catchment area. We know that there are enough places within other schools in this area for the pupils of this school.

Governor: Are you splitting the school up at all? For example, if the nearest school only has 21 places, how are we going to then fit in?

Marianne Evans: We know that the majority of pupils are closest to Berriew, and there are also some pupils that are closer to other schools. At this point in time, we expect there will be enough spaces Berriew for those closer to Berriew should they want to go there.

Governor: Yes, but what about those pupils that don't want to go to Berriew, are there places for everybody anywhere else? Have people been asked where they would like to go?

Marianne Evans: Nobody has been asked where they want to go yet, as we have to go through this process first before any decisions are made, but there are sufficient places in all of the other schools that would be closest.

Governor: And if not, transport would be provided to the alternative school of their choice?

Marianne Evans: Yes, if there is no room in their nearest alternative school then we will provide transport to the next nearest school. All schools have places in them.

Governor: They do not at the moment.

Marianne Evans: According to our data, there are enough places, but we will respond to that once we get to the consultation report.

Governor: Have you done a survey to find the numbers available across the schools for children? Meifod, Guilsfield and Llanfair primary?

Marianne Evans: Information on the number of places available in schools is on page 23 of the consultation document, and it is based on our PLASC 2020 data. We haven't had 2021 data yet, but we will be updating that as we take the process forward.

Governor: It was always the policy, that look at schools on a catchment basis, you look at all the primary schools within a given catchment. Why did the policy change to a policy of opportunism, or cherry picking, as now, as obviously there was a change. When did that come in and why?

Emma Palmer: I do not think it is a policy change, it is a change of approach. In terms of the transformation programme in the County when we look at things, we split it into 13 localities, and there won't be a locality untouched when we move through the transformation programme. What we found, is when you work on purely a catchment area basis, sometimes it can take a significant number of years before you see the change. With the requirements that we have in place to meet the recommendations that were set out by Estyn, we do not have the opportunity of several years before we see change, we needed to look at the strategy and what we are trying to achieve as a result of that. We have got change happening in several different places in the County, and the priorities are not the same for every area.

In the mid part of the County for instance, one school we had to prioritise is around condition, which is a different requirement compared to yourselves as such. We are fully aware of the infrastructure that we have in place across the county, and that it is not sustainable as it stands. We also have requirements of delivering the new curriculum and the ability to meet those requirements swiftly. Having done the extensive engagement we did, not last year, the year before because we have had the period of Covid, there was extensive engagement undertaken with a range of stakeholders and we took on board those comments when we pulled together the strategy approved by Cabinet last April. We then set out our intentions to meet the requirements of things raised during the engagements. It was therefore never a policy decision to do a catchment area, it was an approach. In some areas you have to look at a whole catchment or you won't be able to unlock the change. You have to do some things in a certain order to unlock the change elsewhere. It's very complex across the County.

Governor: There is now a presumption that the very last thing you do with a rural school, is to close it. Can you tell us the options that you have considered in Castle Caereinion, which is a rural school, and why you have decided that the only option is to close it?

Marianne Evans: There are several options in the consultation document that we looked at, which included federation, mergers and closure. We have assessed these very thoroughly and carried out SWOT analyses and assessed the factors against the School Organisation Code. The presumption against the closure of rural schools means that we have additional steps to follow in order to come to a preferred option and those steps were carried out as part of this process.

Governor: You mentioned federation, were there others?

Marianne Evans: There is a whole range of options that we have included, and I can share these on the screen. Would you like me to go through them?

Governor: I would like you to go through them and explain to me why you rejected each one of them.

Marianne Evans: The information is in the report, in the consultation document, page 46 and 47 onwards and the weaknesses and strengths of each are there. These include status-quo, which is go on as you are, Federation with Welshpool C. in W. School, the reasons are also there. There was also an option to merge with Welshpool C. in W. School, establishing a new school on two sites. The link with Welshpool Church in W. School is there because of the need to ensure sufficient Church provision is available. Close Castle Caereinion but retain the site as part of Welshpool C. in W. School. Merge with Berriew to establish a new school on two sites. Close Castle Caereinion but retain the site as part of Berriew. Merge with Berriew to establish a new school on the Berriew site. Option 8 merge with Berriew to establish a new school on the Castle Caereinion site. Close Castle Caereinion, pupils to attend their nearest alternative schools, and you can see from the consultation document that we have taken those through a SWOT analysis and assessed them against the Critical Success Factors and the School Organisation Code. There's a lengthy part of the consultation document which shows how we have reached the preferred option which we are consulting on.

Governor: Following on from that, in the assessment for each option, you've got option 7 and you have 2 question marks, "could be met", and option 9 is obviously 4. If those question marks, "could be met", then surely they should be ticked and that would be 4 and 4? Yet the only option seems to be to close and therefore option 7 should still be available to us.

Marianne Evans: We will respond to that in the consultation report, the process we use is a technical process but the reason we proposed this closure is the reasons stated there and a reason why we discounted the other options. There is also the opportunity for you to present alternative options, anybody can present an alternative option and we would then need to look at that in the consultation report.

Lynette Lovell: I think all of the points you have brought up are important, it's important that you make them clear in the consultation process. We are aware of the time we are in and the anxiety and stress it can bring. Please make sure your voice is heard, it is what the process is all about. Just to make you aware in terms of the staff and the children at the school, the support is there and Sarah Christoforou from HR is on the call tonight. She is working solely on transformation work, and we have a big programme of change and the support is there for staff at this time. I just wanted to make you aware as Governors, that we want to work alongside the staff to make sure that they have all their questions answered and yours too. If you have anything you want to bring up in the consultation, please do. It is about you and if

you have ideas and thoughts that could be looked at, it is an open consultation so please use it.

In the process so far we have been doing a number of consultations over the past couple of months, and the responses have been really good with a high level of response, through undertaking meetings like this and the process itself. We are having a lot of information and suggestions from people throughout, which will be taken into consideration when everything is presented before Cabinet. I wanted to ensure you that it will be done the best way we can. We know we have to see change in Powys moving forward but we need to do it in a way that everyone feels their voice is heard.

Emma Palmer: Can I please just check, are there any further questions anyone would like to raise whilst we are with you tonight? Otherwise, I am going to call the meeting to a close.

Emma brought the meeting to an end and thanked everyone very much for their thoughtfulness and comments.

3. Consultation meeting with the School Council of Castle Caereinion C. in W. School

19th May 2021 – Held virtually on Microsoft Teams

Present: Marianne Evans, Sarah Astley, Huw Rowlands – Powys County Council
Sarah Brian, Headteacher – Castle Caereinion Church in Wales School

Officers from Powys County Council met virtually via Microsoft Teams with representatives from the School Council of Castle Caereinion Church in Wales school to discuss the consultation to close Castle Caereinion Church in Wales school from 31 August 2022 with pupils to attend their nearest alternative schools.

The School Council group consisted of 8 pupils.

Pupils gave a short presentation about Castle Caereinion School, which is transcribed below:

'We would like you to save our school because we are happy here. The lessons that we do are fun, we are learning new things all of the time! We have large classrooms that have lots of space to move around and to do lots of team work! We are excited about the new curriculum and think our school is going to be a great place to learn in this fun new learning style, with the four purposes.

As part of our new curriculum learning we are doing a whole school topic of green which is great as we get to chose what we want to learn about! We are also learning to speak a new language, Polish! We can say words like, Tak, Nie, Czesc, Dovidenia and Dziękuję Ci. We don't mind practising and getting it a bit wrong because we are all friends and no body laughs at you. We all help each other to learn and to get better.

We are like a family in Castle Caereinion CiW School. Everybody knows each other really well and we all look after each other. We are all friends but if we have to move to different schools we will lose our friendships as we will all be split up.

We have great outdoor areas that allow us to take our learning outdoors! We have our own pond to do pond dipping, seated areas and an outdoor classroom. We have raised beds where we can plant lots of different things. All of the garden areas are kept locked so that we can be kept safe inside them! We also have Forest Schools starting here and we are really excited about it!

When Covid goes away we will be able to go back to having lots of after school clubs, like craft club, coding club and sports club. We always do Christmas crafts too but couldn't last year because of Covid. If we go to another school we might not be able to stay to do after school clubs because our mummies and daddies would have

to pick us up as we would miss the bus. This wouldn't be fair, because we would never get to do the fun clubs that we can here in Castle school.

We will also be able to do school trips again, they are always great fun. We have been to the Senedd in Cardiff to learn about our capital city. We also went to the zoo!

Our school is great because we have so many great resources. We have our very own ICT suite with PCs. We also have laptops, ipads and chrome books that we can use in class! Each classroom has an interactive whiteboard and these have been great at helping us to join in live assemblies with Google, a range of famous authors on World Book Day and more recently with Keep Wales Tidy for our Climate Change week.

Our school is special because we have nice teachers who care about us and know us all really well.

Its better being taught in a smaller school because there are less children so we get to have more help from the teachers. The children are all really friendly too, in bigger schools not everyone is nice to you all of the time.

Our school is close to our Church which is really good because we can walk to our Church for services. We go there to learn about God and for special events like Christingle, Harvest and Easter. We also go there for RE lessons where we have role play sessions and act out Baptisms and weddings. Our vicar, Rev. Steve is able to come to our school lots and is able to teach us all about Jesus and God. He might not be able to come to us if we go to another school.

We also have the Impact teams come to visit us with their big bus. This won't happen if we don't go to a Church school. We all love it when the Impact bus comes! The people from the Church link in with us a lot, they hold messy Church clubs where we all get to do lots of really fun craft activities with the people from the community and the church.

Most of us live in the village so at the moment we can walk to our school. If our school closes we may not be able to walk to our school and that will mean putting more cars on the roads. That causes more pollution and that is not good for the environment.

Our village is growing too, we have more houses being built and people might not move here if there is no school. If you leave our school open then the new families will be able to send their children here and we can make even more friends. It's really good living in the same village as our school because we are able to meet up after school and play in the park. If we go to other schools our friends might live in different places so we would need to have lifts to go and meet them. This would be bad for the environment.

Our school is next door to the community centre. This is great because we get to have cake stalls, Christmas and Summer Fayres, school plays and tea mornings. All of the people from the village can get to come to these, so it helps us to work together as a Community. It is also a great chance for the older members of the community to get out of the house and to do something fun with us, the youngest members of the community.

In school we have Committees, like the School Council, Healthy Schools, Eco Schools and Criw Cymraeg. Because we are a small school we get to be in more than one of these clubs which is great! We work in our committees to make positive changes. The School Council organise fundraising events for things like Young Minds, Red Nose Day and World Book Day. We have a Healthy Schools Week coming up where we will learn all about being healthy and we will have a healthy tuck shop! Our Criw Cymraeg are really good and they are teaching us new words and phrases all of the time. We have got our Bronze Award and we meet with Mrs Andrew a lot as she is helping us to work towards our Silver Award for the Siatr Iait.

We have lots of great sports equipment and we have fun in our PE lessons using it! We are really looking forward to Covid going away so we can compete against other schools in sporting competitions!

Thank you for listening!

Following the presentation, the pupils were asked several questions and their responses are summarised below.

It was explained that the first question would have been **'What do you like about Castle Caereinion school'**, however pupils have already answered that question in their presentation. Officers moved on to the second question:

Is there anything you don't like about the school? Is there anything that could be better?

- No

It was explained that from time to time Powys County Council had to look at the schools in Powys, and sometimes some changes have to be made to some of the school. The Council has been reviewing Castle Caereinion School, and is wondering whether the school should close.

The consultation process was explained and the fact that no final decision had been made yet, it was still an idea and there was now an opportunity for people to say what they think. It was explained that the Council especially wants to hear what pupils think about this idea.

Do you all understand what we are here to speak to you about?

- Yes

If there was no school in Castle Caereinion, what would change for you as pupils?

- We would lose friends as they would be moving to a different school, so we would have to split from some of them.
- We wouldn't be able to meet together after school.
- We couldn't walk to school and we would have to drive to a different school and cause more pollution.

How many of you live in the village and walk to school now?

- 5 pupils put their hands up
- Many of us live in the village

If the school was to close which other school would you go to?

- Llanfair, Welshpool, Welshpool, Llanfair, Llanfair, Llanfair, Llanfair, Guilsfield

So a lot of you think you would go to Llanfair, but nobody would go to Berriew? Does nobody live closer to Berriew?

- Some live closer to Berriew but parental choice means that they would go elsewhere.

Is there anything else you can think of that would be different, or worse for you if there was no school in Castle Caereinion?

- If there was no school here, people would not want to move to this village
- You wouldn't be able to meet up with people in the village.

I'm getting the feeling that Castle Caereinion school is very important to you as a community, it's wider than just the school. Do you think you would feel part of the community if you move to a different school?

- No.

Why would that be?

- You would have to meet new children in a new school. Some could be mean to you. Here everyone is kind.
- If we don't go to the school we're not supporting the community.

A lot of you have mentioned going to Llanfair school if Castle Caereinion school closes. It's much bigger than Castle Caereinion school. Is there anything you think would be good about being in a bigger school?

- I would see my cousin
- More friends
- A wider group of friends
- Lots of friends

Is there anything that would be worse about going to a bigger school?

- We could get lost
- Difficult to make friends as other children will already have their friends
- More people could/might bully you
- You might get lost
- Being shy
- Feel like the odd one out

At the moment you're in 2 classes in Castle Caereinion school and there are a number of year group in each class. In a bigger school there would be less year groups in each class, maybe Reception and year 1 together, years 1 and 2 together, years 2 and 3 together, 4 and 5 together. Would that be a good or bad thing?

- It would be bad because I would be separated from my friend
- You wouldn't be able to see your friends

How would you feel things would change for your teachers if Castle Caereinion school closes?

- It would be hard for them to find a job
- People would lose their jobs
- Sad
- I would like them to try for work at Llanfair school

Do you have any other questions? Is there anything else you would like to add? Is there anything worrying you about the plans?

- Why do you need to close our school?

Officers explained that the Council has to look at all its schools. At the moment there are lots of schools across the whole of Powys. Some schools are very small and it's difficult to keep them going if they are small. We think pupils would have more friends and opportunities in larger schools.

- Why does it have to be our school? I've been to bigger schools and children were not kind to me, but they are here.

Officers explained that the Council is looking at other schools in Powys as well as Castle Caereinion – it's not only Castle Caereinion.

- What would you do with the school – sell it, knock it down, it wouldn't be suitable for houses as it's close to the community centre?

The school is owned by the Church in Wales, so they would decide what to do with the building.

- Are you closing the school just to save money?

No, the Council feels that there are more opportunities for pupils in larger schools as they have more opportunities to make more friends.

- I do have a friend who's in Welshpool and we don't talk and she is mean to me sometimes so I'm a bit concerned about that
- Would you be able to see year 1 and Reception kids at playtime at bigger schools?

Yes, you would see them at breaktime.

Officers asked the pupils how they feel about what the Council is doing? Are they happy, sad, worried?

- Worried and sad
- Sad

Officers explained what happens next, which is that this is a consultation period where everyone's views are being asked. Pupils were encouraged to send any further comments or views to the Council by 2 June 2021, when the consultation closes, and to ask their teachers if they need any help to do this.

After the 2nd June, a report summarising everything people and pupils have said during the consultation period will be prepared. It was explained that this would include all of the things pupils have said in today's meeting, as well as what governors and staff have said in meetings held with them, and what other people have said.

The report will then be considered by the Council's Cabinet. It was explained that they are the people who make the decisions in the Council, and they will look at all the comments made and decide if they want to close the school or not. If they decide not to carry on then that would be the end of this plan. If they decide to carry on, then what's known as a Statutory Notice would be published, formally saying that the

Council wants to close the school, and then there would be a 28 day period for people to respond, and to say if they don't agree. Another report would then need to be prepared and considered by the Cabinet.

There's still quite a way to go in the process, and no decision has been made yet, and if the process proceeds, no final decision will be made until just before Christmas. If Cabinet does decide in the end to close the school, that would be in September 2022.

Pupils were reminded once again of the opportunity to send in any further comments and were thanked for attending the meeting and giving their views.

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Proposal to close Castle Caereinion C. in W. School

Final Impact Assessments

June 2021

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Proposal to close Castle Caereinion C. in W. School

Final Impact Assessments

1. Introduction

Powys County Council is consulting on proposals to close Castle Caereinion C. in W. School. The proposal is as follows:

- To close Castle Caereinion C. in W. School from the 31st August 2022, with pupils to transfer to their nearest alternative school.

In line with the Council's policy, an Integrated Impact Assessment has been carried out which incorporates the Welsh Language, Equalities, Well-being of Future Generations Act, Sustainable Development Principles, Communication and Engagement, Safeguarding, Corporate Parenting, Community Cohesion and Risk Management.

In addition, the Welsh Government's School Organisation Code (2018) requires local authorities to carry out an Equality Impact Assessment and Community Impact Assessment in relation to all school reorganisation proposals. For proposals which affect teaching through the medium of Welsh, local authorities are also required to carry out a Welsh Language Impact Assessment.

The impact assessments are provided in draft form as part of the consultation documentation. The draft Equality Impact Assessment has been carried out based on the latest PLASC information available. The draft Community Impact Assessment has been carried out with input from Castle Caereinion C. in W. School.

Following the consultation period, the impact assessments have been updated to incorporate any issues raised during the consultation period. The updated versions will be considered by the council's Cabinet when determining how to proceed in relation to this proposal.

2. Integrated Impact Assessment

The Impact Assessment (IA) below incorporates Welsh Language, Equalities, Well-being of Future Generations Act, Sustainable Development Principles, Communication and Engagement, Safeguarding, Corporate Parenting, Community Cohesion and Risk Management, supporting effective decision making and ensuring compliance with respective legislation.

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

Outline Summary / Description of Proposal
In February 2021, the Council's Cabinet approved carrying out consultation on the following proposal: <ul style="list-style-type: none"> To close Castle Caereinion C. in W. School from the 31st August 2022, with pupils to transfer to their nearest alternative schools

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

Version	Author	Date
1	Sarah Astley - Strategic Programme Manager – Schools Transformation	January 2021
2	Marianne Evans - Senior Manager Schools Transformation	January 2021
3	Marianne Evans – Service Manager Schools Transformation	June 2021

2. Profile of savings delivery (if applicable)

2020-21	2021-22	2022-23	2023-24	2024-25	TOTAL
£	£	£33,891.67	£24,208.33	£	£58,100

3. Consultation requirements

Consultation Requirement	Consultation deadline/or justification for no consultation
Public consultation required	Consultation in accordance with the School Organisation Code was carried out from the 14 th April 2021 to the 2 nd June 2021.

4. Impact on Other Service Areas

Does the proposal have potential to impact on another service area? (Have you considered the implications on Health & Safety and Corporate Parenting?) PLEASE ENSURE YOU INFORM / ENGAGE ANY AFFECTED SERVICE AREAS AT THE EARLIEST OPPORTUNITY	
Adult Services	<input type="checkbox"/>
Children's Services	<input checked="" type="checkbox"/>
Commissioning	<input type="checkbox"/>
Digital Services	<input checked="" type="checkbox"/>
Education	<input checked="" type="checkbox"/>
Finance	<input checked="" type="checkbox"/>
Highways, Transportation and Recycling	<input checked="" type="checkbox"/>
Housing and Community Development	<input checked="" type="checkbox"/>
Legal and Democratic Services	<input checked="" type="checkbox"/>
Property, Planning and Public Protection	<input checked="" type="checkbox"/>
Transformation and Communications	<input checked="" type="checkbox"/>
Workforce and OD	<input checked="" type="checkbox"/>
Data Protection Impact Assessment	

Will the proposal involve processing the personal details of individuals? Yes ✓ No

Is Powys County Council the data controller? Yes ✓ No

If you have answered yes to either of the above you will be required to complete, as a minimum, the screening questions on the data protection impact assessment.

For further advice please contact the Data Compliance Team.

4a Geographical Locations

What geographical area(s) will be impacted by the proposal? (Chose all those applicable)

Powys

North

Mid

South

Brecon

Builth and Llanwrtyd

Crickhowell

Hay and Talgarth

Knighton and Presteigne

Llandrindod and Rhayader

Llanfair Caereinion

Llanfyllin

Llanidloes

Machynlleth

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

5. How does your proposal impact on Vision 2025?

Council's Well-being Objective	How does the proposal impact on this Well-being Objective?	<u>IMPACT</u> Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from drop down box below
The Economy We will develop a vibrant economy	Implementation of the proposal would have an impact on employment opportunities in Castle Caereinion as there would no longer be a school in the village. It is also possible that there would be an impact on local businesses in Castle Caereinion and the surrounding area should there be less people in the area.	Poor		Poor
Health and Care We will lead the way in providing effective, integrated health and care in a rural environment	No impact	Neutral		
Learning and skills We will strengthen learning and skills	The proposal would result in closure of Castle Caereinion C. in W. School, with pupils transferring to their nearest alternative schools. For the majority of pupils, the closest alternative	Good		

	<p>school would be Berriew C.P. School. However it is possible that pupils may also choose to attend Welshpool C. in W. School as the nearest Church in Wales school, or Llanfair Caereinion C.P. School or Guilsfield C.P. School as other nearby schools.</p> <p>The Council's view is that all of these schools would provide education for pupils which is of at least equivalent quality as that provided at Castle Caereinion C. in W. School, therefore it is not anticipated that implementation of the preferred option would have a negative impact on standards and progress overall. The overall aim of the proposal is to improve learning opportunities for pupils. Castle Caereinion C. in W. School, Berriew C.P. School and Llanfair Caereinion C.P. School were categorised as Amber in the latest school categorisations carried out in 2019, whilst Welshpool C. in W. School was categorised as Yellow. Guilsfield C.P. School was classified as a Green school.</p> <p>The alternative schools which pupils may attend are larger schools, and it is anticipated that they would provide additional opportunities for pupils to take part in extra-curricular activities.</p> <p>Welshpool C. in W. School moved to a new build in January 2021, which has further improved the educational experience provided to learners, ensuring that the school can provide education which fully meets the requirements of the new curriculum in 21st century facilities. Any current pupils at Castle Caereinion C. in W. School</p>			
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	transferring to Welshpool C. in W. School would also benefit from these improved facilities.			
<p>Residents and Communities</p> <p>We will support our residents and communities</p>	<p>There would be a significant impact on the community of Castle Caereinion as there would be no provision in Castle Caereinion. Many comments received emphasise the importance of the school within the local community and the benefits of being part of a close community for the development of pupils. It is also recognised that there are strong links between the school, being a C. in W. school and the local church, and how this contributes to pupils' development, and that this would be lost should the school close.</p> <p>In particular, there could be an impact on the financial viability of the community centre and closure of the school could mean that people would not want to live in Castle Caereinion in the future, and could lead to a reduction in community activity in the village. In addition, the village has already suffered a loss of community facilities, and there is concern that closure of the school could lead to closure of other facilities in the village.</p> <p>Additional travel would be required for pupils currently attending Castle Caereinion C. in W. School.</p> <p>Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirement</p>	Very Poor	<p>As a Church in Wales School, the Castle Caereinion School building is owned by the Diocese, therefore the Diocese would need to determine the building's future use, and therefore whether or not facilities would remain in Castle Caereinion.</p> <p>Most of the alternative schools that pupils may transfer to, should Castle Caereinion C. in W. school close, are located in rural areas. These schools would already be experienced in providing a range of extra-curricular activities for pupils including those who access home-to-school transport.</p>	Very Poor

	<p>for parents in order to access school activities / events.</p> <p>Comments received suggest closure of the school could mean that families and others aren't attracted to live in the Castle Caereinion area any more, reducing community interaction.</p> <p>A separate community impact assessment has been carried out which includes input from the school. This will be updated as required throughout the process.</p>			
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Source of Outline Evidence to support judgements

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

Well-being Goal	How does proposal contribute to this goal?	<u>IMPACT</u> Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from drop down box below
<p>A prosperous Wales:</p> <p>An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which</p>	<p>No impact</p>	<p>Neutral</p>		

<p>generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.</p>				
<p>A resilient Wales:</p> <p>A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).</p>	<p>Implementation of the proposal would require additional travel for pupils currently attending Castle Caereinion C. in W. School for whom this is their closest school. This would have a negative environmental impact as more home to school transport would need to be provided to transport pupils to their nearest alternative school..</p> <p>It is also recognised that there may be additional transport required for secondary aged pupils to Welshpool High School if pupils transferred to alternative schools in the Welshpool cluster area.</p>	Neutral	<p>It is expected that the number of pupils requiring additional transport would be relatively small, and it is possible that they could be accommodated on transport which is already operating.</p>	
<p>A healthier Wales:</p> <p>A society in which people’s physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.</p> <p>Public Health (Wales) Act, 2017:</p> <p>Part 6 of the Act requires for public bodies to undertake a health impact assessment to assess the likely effect of a proposed action or decision on the physical or mental health of the people of Wales.</p>	<p>Implementation of the proposal would result in closure of Castle Caereinion C. in W. School, with pupils transferring to alternative schools. It is acknowledged that this could have a negative impact on the mental well-being of pupils, staff and other stakeholders associated with the school during the transition period, however the long term aim is to provide improved learning opportunities for all learners.</p> <p>Any school reorganisation proposal creates a period of uncertainty for the pupils involved, and that this is exacerbated this year due to the Covid pandemic.</p> <p>Information received during the consultation includes the potential impact of closing the school on the Community Centre, and concern</p>	Poor	<p>Support will be provided to pupils during the transition period to enable them to transfer effectively to their new schools.</p> <p>Process to be concluded as quickly as possible to minimise the period of uncertainty for pupils, staff and other stakeholders.</p> <p>The Council would expect that pupils are fully supported by their teachers and other staff at the school during any periods of uncertainty to minimise the impact on their wellbeing.</p> <p>Should the school close, the receiving school or any other school pupils would transfer to would provide support to pupils to aid their transition, ensuring a successful transition to their new school to ensure that all pupils can achieve their potential.</p>	Neutral

	around the future viability of the Centre. The Centre plays an important role to support the wellbeing of members of the community as a number of events and activities take place at the Centre.		Should the school close, the management committee of the Community Centre would need to consider how best to utilise the Centre so that it remains viable.	
<p>A Wales of cohesive communities:</p> <p>Attractive, viable, safe and well-connected Communities.</p>	<p>There would be a significant impact on the community of Castle Caereinion as there would be no provision in Castle Caereinion. Many comments received emphasise the importance of the school within the local community and the benefits of being part of a close community on the development of pupils. It is also recognised that there are strong links between the school, being a C. in W. school and the local church, and how this contributes to pupils' development, and that this would be lost should the school close.</p> <p>In particular, there could be an impact on the financial viability of the community centre and closure of the school could mean that people would not want to live in Castle Caereinion in the future, and could lead to a reduction in community activity in the village. In addition, the village has already suffered a loss of community facilities, and there is concern that closure of the school could lead to closure of other facilities in the village.</p> <p>Additional travel would be required for pupils currently attending Castle Caereinion C. in W. School.</p>	Very Poor	As a Church in Wales School, the Castle Caereinion School building is owned by the Diocese, therefore the Diocese would need to determine the building's future use, and therefore whether or not facilities would remain in Castle Caereinion.	Very Poor

	<p>Comments received suggest closure of the school could mean that families and others aren't attracted to live in the Castle Caereinion area any more, reducing community interaction.</p> <p>Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirement for parents in order to access school activities / events.</p>			
<p>A globally responsible Wales: A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.</p> <p>Human Rights - is about being proactive (see guidance)</p> <p>UN Convention on the Rights of the Child: The Convention gives rights to everyone under the age of 18, which include the right to be treated fairly and to be protected from discrimination; that organisations act for the best interest of the child; the right to life, survival and development; and the right to be heard.</p>	<p>The aim of implementing the proposal is to provide the best possible opportunities to learners, enabling them to reach their full potential.</p> <p>The Council has carried out consultation on the proposal, which included consultation with all pupils affected by the proposal, ensuring that all affected by the plans had the opportunity to give their views.</p>	Neutral		

A Wales of vibrant culture and thriving Welsh language: A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.

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

Well-being Goal	How does proposal contribute to this goal?	<u>IMPACT</u> Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from drop down box below
<i>Opportunities for persons to use the Welsh language, and treating the Welsh language no less favourable than the English language</i>	<p>Castle Caereinion C. in W. School is an English-medium school, therefore it is not anticipated that implementation of the proposal would impact on opportunities for persons to use the Welsh language, or on treating the Welsh language no less favourably than the English language.</p> <p>During the consultation period, comments were received which expressed concern that pupils transferring to primary schools in the Welshpool cluster would then transfer to Welshpool High School, which is an English-medium secondary school, instead of Caereinion High School, which is a dual stream secondary school, and that this would mean that they had less opportunities to use the language and less exposure to the language.</p>	Neutral	All schools of all language categories are expected to provide opportunities for pupils to use Welsh.	
<i>Opportunities to promote the Welsh language</i>	<p>Castle Caereinion C. in W. School is an English-medium school, therefore it is not anticipated that implementation of the proposal would impact on opportunities to promote the Welsh language.</p> <p>During the consultation period, comments were received which expressed concern that pupils</p>	Neutral	All schools of all language categories are expected to provide opportunities for pupils to use Welsh.	

	transferring to primary schools in the Welshpool cluster would then transfer to Welshpool High School, which is an English-medium secondary school, instead of Caereinion High School, which is a dual stream secondary school, and that this would mean that they had less opportunities to use the language and less exposure to the language.			
<i>People are encouraged to do sport, art and recreation.</i>	<p>Implementation of the proposal would lead to the closure of Castle Caereinion C. in W. School, with pupils transferring to their nearest alternative schools.</p> <p>It is likely that pupils would transfer to larger schools, and it is anticipated that being part of a larger school would result in additional opportunities for pupils to take part in sport, art and other extra-curricular activities.</p> <p>However, during the consultation period, comments were received about the extent of activities available at Castle Caereinion C. in W. School and that the size of the school meant that all pupils had an opportunity to take part, which may not be the case in larger schools.</p>	Neutral	All schools, regardless of size, are expected to provide extra-curricular opportunities for pupils, including sport, art and recreation.	Neutral

A more equal Wales: A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio economic background and circumstances).

Incorporating requirements under the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011 and the Social Economic duty (2020).

Well-being Goal	How does proposal contribute to this goal?	<u>IMPACT</u> Please select from	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u>
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		drop down box below		Please select from drop down box below
Age	The proposal would impact on primary aged pupils currently attending Castle Caereinion C. in W. School. The proposal aims to provide improved educational opportunities for all affected pupils.	Neutral		
Disability	The proposal would impact on any pupils with disabilities currently attending Castle Caereinion C. in W. School. The proposal aims to provide improved educational opportunities for all affected pupils, including any pupils with disabilities. Comments received during the consultation refer to the fact that Castle Caereinion C. in W. School has received significant investment to make disability adaptations to the school.	Neutral	Should the school close, the Council would ensure that the requirements for pupils with additional needs are met at whichever school they may choose to attend.	Neutral
Gender reassignment	No impact			
Marriage or civil partnership	No impact			
Race	The proposal would impact on all primary aged pupils currently attending Castle Caereinion C. in W. School, including pupils belonging to protected characteristic groups due to their race. The proposal aims to provide improved educational opportunities for all affected pupils.	Neutral		
Religion or belief	The proposal aims to provide improved educational opportunities for all pupils currently attending Castle Caereinion C. in W. School, regardless of their religion or belief.	Neutral	The Council has an appeals process for transport applications. If transport is refused, parents could appeal the decision.	Neutral

	<p>Castle Caereinion C. in W. School is a church school. Should the school close, alternative church provision is available at Welshpool C. in W. School for pupils wishing to continue to access denominational provision, however the Council's home to school transport policy does not provide transport to denominational provision, therefore pupils would not receive transport to the school unless it was their closest school.</p> <p>Comments received during the consultation suggest that this has a negative impact on the ability of pupils/parents to access alternative denominational provision, and that this could particularly impact any parents on low incomes or without access to their own transport who wish for their children to continue to access church provision.</p>			
Sex	The proposal aims to provide improved educational opportunities for all pupils currently attending Castle Caereinion C. in W. School.	Neutral		
Sexual Orientation	The proposal aims to provide improved educational opportunities for all pupils currently attending Castle Caereinion C. in W. School, regardless of their sexual orientation.	Neutral		
Pregnancy and Maternity	No impact	Neutral		
Socio-economic duty	The aim of the proposal is to provide improved educational opportunities for all pupils currently attending Castle Caereinion C. in W. School, including any eligible for Free School Meals, however based on PLASC 2020 information, no	Poor	Most of the alternative schools that pupils may transfer to, should Castle Caereinion C. in W. school close, are located in rural areas. These schools would already be experienced in providing a range of	

	<p>pupils at Castle Caereinion C. in W. School were eligible for Free School Meals.</p> <p>Should the proposal be implemented, there would be no school in Castle Caereinion. This would mean that pupils currently attending Castle Caereinion C. in W. School would need to travel to their nearest alternative provision. Whilst home to school transport would be provided to eligible pupils, it is possible that this would impact on pupils' ability to access extra-curricular / after school activities, and that this impact would be greater in respect of pupils from lower income households or pupils from homes that do not have their own transport. There would also be an impact on the parents of these pupils in terms of accessing school activities.</p>		<p>extra-curricular activities for pupils including those who access home-to-school transport.</p>	
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Source of Outline Evidence to support judgements

7. How does your proposal impact on the council's other key guiding principles?

Sustainable Development Principle (5 ways of working)

Principle	How does the proposal impact on this principle?	<u>IMPACT</u> Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from drop down box below
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<p>Long Term: <i>Looking to the long term so that we do not compromise the ability of future generations to meet their own needs.</i></p>	<p>Pupil numbers at Castle Caereinion C. in W. School are low and are not expected to increase significantly over the coming years. The aim of the proposal to close the school is to ensure the best possible opportunities for learners in the area now and in the future, and to ensure better strategic management of the Powys schools estate.</p>	<p>Good</p>		
<p>Collaboration: <i>Working with others in a collaborative way to find shared sustainable solutions.</i></p>	<p>Consultation has been carried out, which has enabled all interested parties to give their views. This included an opportunity to suggest any alternative options for the school.</p>	<p>Neutral</p>		
<p>Involvement (including Communication and Engagement): <i>Involving a diversity of the population in the decisions that affect them including:</i></p> <p>Unpaid Carers:</p> <p><i>Ensuring that unpaid carers views are sought and taken into account</i></p>	<p>Full consultation has been carried out in accordance with the School Organisation Code in order to achieve this. All interested parties have had an opportunity to give their views. The findings of this exercise will be reported to Cabinet and will be taken into consideration when determining how to proceed.</p> <p>All stakeholders have had the opportunity to give their views as part of this process, this would include any unpaid carers in the area.</p>	<p>Good</p>		
<p>Prevention: <i>Understanding the root causes of issues to prevent them from occurring including:</i></p> <p>Safeguarding:</p>	<p>The aim of the proposal to close the school is to ensure the best possible opportunities for learners in the area now and in the future, and to ensure better strategic management of the Powys schools estate.</p> <p>Ensuring appropriate safeguarding arrangements is a key aspect of any school organisation</p>	<p>Good</p>		

<i>Preventing and responding to abuse and neglect of children, young people and adults with health and social care needs who can't protect themselves.</i>	proposal. The intention is that the proposal would maintain or improve the safeguarding arrangements for all pupils.			
Integration: <i>Taking an integrated approach so that public bodies look at all the well-being goals in deciding on their well-being objectives.</i>	No impact	Neutral		
Powys County Council Workforce: What Impact will this change have on the Workforce?	Implementation of the proposal would impact on all current staff at Castle Caereinion C. in W. School as there would no longer be a school in Castle Caereinion, therefore staff would be subject to a Management of Change process. Full consultation has been carried out in accordance with the School Organisation Code. This process was supported by relevant LA teams (e.g. HR). This included consultation with staff, which ensured that they had an opportunity to give their views.	Neutral		
Payroll: How will this impact salary, any overtime/enhanced payments etc? Does this affect any particular group of employees? E.g. Male/Female dominated workforce. Does this proposal comply with the Councils Single Status Terms and Conditions?	Implementation of the preferred way forward could impact on salary arrangements for current staff at Castle Caereinion C. in W. School. All staff at Castle Caereinion C. in W. School are female.	Neutral		

Welsh Language impact on staff	Castle Caereinion C. in W. School is an English-medium school, therefore it is not anticipated that there would be a Welsh language impact on staff.	Neutral		
Apprenticeships: Has consideration been given to whether this change impacts negatively, or positively on Apprenticeships within the service?	No impact	Neutral		

Source of Outline Evidence to support judgements
Consultation responses

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

Communities	How does the proposal impact on residents and community?	<u>IMPACT</u> See impact definitions in guidance document	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> See impact definitions in guidance document	Source of Outline Evidence to support judgement
Castle Caereinion	There would be a significant impact on the community of Castle Caereinion as there would be no provision in Castle Caereinion. Many comments received emphasise the importance of the school within the local community and the benefits of being part of a close community on the development of pupils.	Major	As a Church in Wales School, the Castle Caereinion School building is owned by the Diocese, therefore the Diocese would need to determine the building's future use, and therefore whether or not facilities would remain in Castle Caereinion.	Major	

	<p>It is also recognised that there are strong links between the school, being a C. in W. school and the local church, and how this contributes to pupils' development, and that this would be lost should the school close.</p> <p>In particular, there could be an impact on the financial viability of the community centre and closure of the school could mean that people would not want to live in Castle Caereinion in the future, and could lead to a reduction in community activity in the village. In addition, the village has already suffered a loss of community facilities, and there is concern that closure of the school could lead to closure of other facilities in the village.</p> <p>Comments received suggest closure of the school could mean that families and others aren't attracted to live in the Castle Caereinion area any more, reducing community interaction.</p> <p>Additional travel would be required for pupils currently attending Castle Caereinion C. in W. School.</p> <p>Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirement for</p>				
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	<p>parents in order to access school activities / events, which is likely to have a greater impact on low income families and/or families who do not have access to their own transport.</p> <p>A separate community impact assessment has been carried out. This has been updated to reflect comments received during the consultation period.</p>				
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9. What are the risks to service delivery or the council following implementation of this proposal?

Risk Identified	Inherent Risk Rating Impact X Likelihood (See Risk Matrix in guidance document)	Mitigation	Residual Risk Rating Impact X Likelihood (See Risk Matrix in guidance document)
Period of uncertainty for Castle Caereinion C. in W. School if a statutory process is carried out and implemented which might have a negative effect on standards at the school	Medium	The Council to provide advice and support to the school and governing body to ensure that standards and performance do not deteriorate during the transition period	Medium
Uncertainty for staff during any transition period might result in some staff leaving	Medium	Engagement with staff to take place throughout the process and staff to be kept informed of developments	Medium
Negative impact on pupils wellbeing which has already been affected due to the pandemic.	High	It is expected that pupils are supported through any periods of change by teachers and other staff at the school.	Medium

10. Overall Summary and Judgement of this Impact Assessment?

The aim of the proposal is to improve the educational provision for learners. However, whilst this impact assessment has identified some positive aspects, in particular relating to learning and skills and ensuring the best strategic management of the Powys schools estate, the assessment has also identified some negative aspects. These primarily relate to the impact on the community of Castle Caereinion due to loss of educational provision from the village, potential impact on the viability of the Community Centre, loss of close links with the local Church, and the associated additional travel requirements for pupils and impact on families. The wellbeing of pupils, staff and families has also been raised as a key concern, particularly as the consultation process has been carried out during a pandemic.

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

What additional evidence and data has informed the development of your proposal?

Consultation responses.

12. On-going monitoring arrangements?

What arrangements will be put in place to monitor the impact over time?

The Transforming Education Programme Board will continue to monitor impact over time.

Please state when this Impact Assessment will be reviewed.

This impact assessment will be reviewed at each stage of the process

13. Sign Off

Position	Name	Signature	Date
Impact Assessment Lead:	Sarah Astley		
Head of Service:	Lynette Lovell		
Portfolio Holder:	Cllr Phyl Davies		

14. Governance

Decision to be made by	Cabinet	Date required	

3. Equality Impact Assessment

Powys County Council

Equality Impact Assessment (EqIA)



Proposal	To close Castle Caereinion C. in W. School from the 31st August 2022, with pupils to transfer to their nearest alternative schools
Service Area	Schools Service
Date of Assessment	January 2021
Lead Person undertaking the assessment	Huw Rowlands
Relevant Head of Service who has agreed this assessment	Lynette Lovell

The Equality Act 2010, requires that public sector organisations in the exercise of their functions, pay due regard to the following 'general duty':

- (a) Eliminating discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;**
- (b) Advancing equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;**
- (c) Fostering good relations between persons who share a relevant protected characteristic and persons who do not share it.**

The protected characteristics include: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, marriage and civil partnership, sex and sexual orientation. This assessment also includes a consideration of impact upon people and communities whose language of choice is Welsh.

The specific regulations for Wales [Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011] require public sector bodies to monitor relevant policy and practises and then assess and report on the impact based upon an analysis of relevant data and evidence.

1. AIM or PURPOSE

Briefly describe the aim or purpose of the change proposal being assessed.

In February 2021, the Council's Cabinet approved carrying out consultation on the following proposal:

- To close Castle Caereinion C. in W. Primary School from the 31st August 2022, with pupils to transfer to their nearest alternative schools

2. OBJECTIVES

Please state the current business objectives of the change proposal.

The Council is proposing to close Castle Caereinion C. in W. School for the following reasons:

- Would address the issue of low pupil numbers at Castle Caereinion C. in W. Primary School
- Would reduce the Council's overall surplus capacity in primary schools
- Revenue saving to the Council
- Pupils would attend larger schools, which would be better equipped to meet the requirements of the new curriculum
- Pupils would attend larger schools, which could provide a wider range of educational and extra-curricular opportunities
- Meets all of the Critical Success Factors

3. BENEFITS and OUTCOMES

i) What are the intended benefits or outcomes from the change proposal?

The benefits of the proposal are:

- Would address the issue of low pupil numbers at Castle Caereinion C. in W. Primary School
- Would reduce the Council's overall surplus capacity in primary schools
- Revenue saving to the Council
- Pupils would attend larger schools, which would be better equipped to meet the requirements of the new curriculum
- Pupils would attend larger schools, which could provide a wider range of educational and extra-curricular opportunities

4. CORPORATE RELEVANCE

How does this change proposal relate to Vision 2025?

Learning and Skills is one of the four priorities outlined in Corporate Improvement Plan 2020-25: Vision 2025. Within this priority, the Plan includes a commitment to 'Improve our schools infrastructure'.

5. DATA USED

5.1. What data has been used to conduct this assessment?

Tick/shade boxes as appropriate.

Profiling of service users, providing a breakdown of who uses the service by the protected characteristics.	✓
Service user satisfaction rates, broken down by the protected characteristics.	
Qualitative data (analysed against the protected characteristics) which provides evidence about current services users experience accessing the service.	✓
Qualitative data gathered from those that are not currently using the service.	✓
Complaints monitoring against the protected characteristics.	
Wider research reports and findings.	
Relevant service based Equality Impact Assessment.	

5.2. Are there any gaps in the data?

No

6. DATA ANALYSIS

6.1 Quantitative Summarise the key quantitative data analysis results, providing key headline statistics.	<u>PLASC January 2020</u>
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<p>Include data that relates to existing provision and also data relating to proposal. E.g. statistics generated from a consultation questionnaire.</p> <p>Key questions:</p> <p>i) Are certain groups currently underrepresented in service user figures? Will a change affect this?</p> <p>ii) How do satisfaction levels compare across the protected characteristic groups? How will a change affect this?</p>	<p>Based on the information provided in the school's PLASC return in January 2020, the following pupils belong to the protected characteristic groups:</p> <ul style="list-style-type: none"> - Free school meals: 4.2% of pupils are eligible for Free School Meals. - ALN: 29.2% of pupils have special educational needs. Of these, 16.7% of pupils are on School Action, 12.5% of pupils are on School Action Plus and 0.0% of pupils have statements. - Disabilities: 29.2% of pupils have additional learning needs. - English as an Additional Language: 8.3% of pupils are identified as EAL pupils. - Ethnicity: The ethnic group of 79.2% of pupils in the school is White British. 8.3% of pupils belong to ethnic groups other than White British. - Looked after Children: 0% of pupils are looked after. <p>This information shows that a proportion of pupils that belong to the protected characteristic groups will be affected by this proposal. In particular:</p> <ul style="list-style-type: none"> - 4.2% of pupils at Castle Caereinion C. in W. School are eligible for Free School Meals. This is lower than the Powys average for primary schools (12.7%) - 29.2% of pupils at Castle Caereinion C. in W. School have additional learning needs. This is higher than the Powys average for primary schools (18.8%) - 8.3% of pupils are identified as EAL pupils and belong to ethnic groups other than White British. <p>The proposal to close Castle Caereinion C. in W. School would impact on all pupils currently attending the school, including those pupils belonging to protected characteristic groups.</p>
<p>6.2 Qualitative Summarise the key qualitative data analysis, providing key themes or patterns.</p>	<p>Full consultation will be carried out on the proposal relating to Castle Caereinion C. in W. School, which will include consultation with pupils at the affected schools. This will provide qualitative data in respect of the proposal, and any additional impact on pupils that belong to protected characteristic groups.</p>

<p>Include data that relates to existing provision and also data relating to proposal. E.g. protected characteristics focus group on the proposal.</p> <p>Key questions:</p> <p>i) Do certain groups have a different service user experience? How will a change affect this?</p> <p>ii) Have any areas for improvement been communicated by particular groups? Will a change have an impact upon these views?</p> <p>iii) What are the reasons behind some groups not using the service? How will a change affect this position?</p> <p>iv) What has consultation on your proposals revealed about impact on the protected characteristics?</p>	<p>Further detail will be added to this EqIA following the conclusion of the consultation period and the consideration of the responses received.</p>
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7. EqIA RESULT

Based on an analysis of the available qualitative and quantitative data, please tick/shade the appropriate box opposite to provide the EqIA assessment result.

<p>The proposal does not present any adverse impact on equality. [Proceed to question 10]</p>	<input checked="" type="checkbox"/>
<p>The proposal presents some adverse impact on equality. [Proceed to question 8]</p>	<input type="checkbox"/>
<p>The proposal presents significant impact on equality [Proceed to question 8]</p>	<input type="checkbox"/>

8. AREAS for IMPROVEMENT

<p>Please provide detail of weak or sensitive areas of the proposal identified by the assessment.</p> <p>i) Which protected characteristic groups are particularly affected?</p> <p>ii) Will people on low incomes be affected?</p> <p>iii) Will Welsh speakers be affected?</p>	<p>i) The proposal will impact on pupils with additional learning needs, pupils that belong to ethnic groups other than White British and EAL pupils. The proportion of pupils with ALN at the school is higher than the Powys average.</p> <p>ii) 4.2% of pupils attending Castle Caereinion C. in W. School are eligible for Free School Meals. This is lower than the Powys average.</p> <p>iii) Castle Caereinion C. in W. School is an English medium school - therefore the proposal will not directly affect Welsh speakers.</p>
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9. EQUALITY IMPROVEMENT

<p>9.1 Having identified problematic aspects to the proposal, how will this now be addressed?</p> <p><i>i.e. Are you able to involve (in some capacity) people from protected characteristic groups, Welsh Speakers, people on low incomes, to assist you in this process?</i></p> <p>i) Can the impact be mitigated, and how will this be done?</p> <p>ii) Does the proposal require modification to reduce or remove this impact?</p> <p>iii) Should the proposal be considered for removal, owing to the degree of impact it is likely to have?</p>	<p>Should the proposal be implemented, Castle Caereinion C. in W. School would close, and pupils would transfer to their nearest alternative school.</p> <p>This would have a significant impact on pupils currently attending Castle Caereinion C. in W. School, including any pupils belonging to the protected characteristic groups that attend that school, as some additional travel would be required in order to attend their nearest alternative school.</p> <p>Whilst it is acknowledged that the proposal would impact on pupils belonging to the protected characteristic groups that attend the school, there is no reason to believe that the nearest alternative schools would be unable to meet the needs of pupils belonging to the protected characteristic groups that would be affected, including pupils with Additional Learning Needs, pupils belonging to Ethnic Groups other than White British, pupils eligible for Free School Meals and Looked After Children. It is recognised that Castle Caereinion has received significant investment for disability adaptations, however, the Council would ensure that all schools would be able to meet the needs of learners with disabilities.</p>
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9.2 Will the management of the impact as outlined in 9.1, be included in the Service Improvement Plan?

<p>Yes <input type="checkbox"/></p> <p>Date added.....</p> <p>Reference.....</p>	<p>No <input checked="" type="checkbox"/></p> <p>If no, please explain why not: Need was not identified at time of writing Service Strategy</p>
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4. Community Impact Assessment – Castle Caereinion C. in W. School

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

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

School	% of Pupils
Berriew C.P. School	4.2%
Castle Caereinion C. in W. School	75.0%
Guilsfield C.P. School	8.3%
Llanidloes C.P. School	4.2%
Welshpool C. in W. School	8.3%

This suggests that 75% of pupils attending the school were attending their closest primary school, whilst 25% of pupils attending the school live closer to other primary schools.

ii) After-school clubs and extra-curricular activities provided by the school

The school provides the following after-school clubs and extra-curricular activities including the following:

- Craft Club
- Coding Club
- Sports Club
- Science Club
- Breakfast Club

iii) Any other facilities or services the school accommodates or services the school provides

The school accommodates or provides the following other facilities or services:

The school works closely with Castle Caereinion Bright Sparks playgroup. The children from the playgroup benefit from the use of the school building as well as the Community Centre. This helps the children

familiarise themselves with the school in readiness for their transition. It also enables a sharing of equipment and resources between the school and the playgroup. This close working relationship allows for the youngest members of the community to attend a playgroup that is linked to their feeder primary school. The playgroup is able to take place in the hall as the school covers the hiring fee for the time that the hall is being used by Bright Sparks.

iv) Other use by the community of the school building

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

- Various activities such as school plays and Summer and Winter fetes, which are very popular with members of the community.

v) Other links between the school and the community

- The school are regular attendees at the Church for Services, with children doing readings and singing at Services.
- Links with the Castle Caereinion Recreation Association.
- Members of the community are invited to all school events, which they enjoy being able to attend.
- The school have organised for a Dragon Bags clothes recycling bank to be sited in the school carpark to allow members of the community to have clothes recycling facilities in their immediate area.
- The Community Hall benefits from using the school's refuse facilities, thus saving them additional costs.
- The school contributes to the community's quarterly newsletter, Castle News.
- Community Remembrance Day activities, to include collecting money and attending a prayer service with local members of the community.
- Harvest – the school collects donations of food items to create hampers which are then donated to members of the local community who are most in need, which are delivered by the children.
- The school is the main financial contributor to the Community Centre.

vi) If accommodation, facilities or services are provided by a school, where would they be provided in the event of closure?

Should the proposal be implemented, then the intention is that all existing pupils would transfer to their nearest alternative school, and Castle Caereinion C. in W. School would close.

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

It is acknowledged that there would be a significant impact on the community of Castle Caereinion were the school to close. There would be a potential loss of community facilities and services provided by the school.

Comments received during the consultation suggest that the adjacent Community Centre would be unviable as the school is the main financial contributor.

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

Should the proposal be implemented, then the intention is that all existing Castle Caereinion C.in W. pupils would transfer to their nearest alternative school. There would therefore be an impact on distance and travelling times for pupils currently attending Castle Caereinion C. in W. School for whom this is currently their closest school.

The closest alternative school for the pupils that were attending Castle Caereinion C. in W. School in January 2020 is as follows:

	Pupils' closest school should there be no school in Castle Caereinion
Berriew C.P. School	70.8%
Welshpool C. in W. School	12.5%
Guilsfield C.P. School	8.3%
Llanfair Caereinion C.P. School	4.2%
Llanidloes C.P. School	4.2%

An analysis of pupils attending Castle Caereinion C. in W. School in January 2020 suggests that the furthest distance to the nearest alternative school for pupils for whom Castle Caereinion C. in W. School is currently the closest school would be 3.8 miles.

Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, it is also acknowledged that there could be an impact on some pupils' ability to access after school activities, and could impact on the ability of parents to take part in school events, meetings etc.

viii) How parents' and pupils' engagement with the alternative school and any facilities it may offer could be supported

Should the Council proceed with the statutory process and eventually implementation of the preferred option, support would be provided to pupils and their parents as part of the transition process, to ensure full engagement with their new schools. The nature of this support would depend on the needs of the parents / pupils, however this could include provision for effective transition to the receiving school by the headteacher and class teachers.

ix) Any wider implications e.g. impact on public transport provision, wider community safety issues

The school's grounds are used by members of the community and local children outside of school hours. Children, young people and their families sit in the gardens of the school grounds having picnics and using the frames to play on. If the school was closed, this facility may no longer be available, and there would be an impact on community safety as this forms a safe place for families and children to be when the school is closed, without requiring children to cross the road to the local playground.

Should the school close, although the Local Authority would provide transport for pupils, if a parent needed to attend the new school they would struggle to get there in a timely manner with the current public transport options.

x) Additional considerations for rural schools

The School Organisation Code includes a number of additional considerations that are likely to be relevant when carrying out a community impact assessment for a rural school closure. As Castle Caereinion C. in W. School is identified as a rural school, these factors are considered below:

- **Whether closure would encourage families with school-age children to leave the community or discourage young families from moving to the community**

Information received from the school suggests that the school provides a number of facilities which could be attractive to families, and which increase the attractiveness of the community to potential young families.

Should there be no school in Castle Caereinion, it is possible that families would leave the village in order to live in the community of any alternative school, and that young families would be discouraged from moving to the village.

- **What impact closure might have on other services provided locally, for instance if the school is the only remaining public building in a community**

Should the Council proceed with the proposal, there would be no school in Castle Caereinion. As a Church in Wales School, the school building is owned by the Diocese, therefore the Diocese would need to determine the building's future use, and therefore whether or not facilities would remain in Castle Caereinion.

- **Whether, or not, the school is a real hub of community life, used for other purpose – such as public meetings, local events, fetes surgeries, and other get togethers – which would either cease or be diminished by being required to move elsewhere**

Information received from the school suggests that are extensive links between the school and the community, and that the school and the support and join each other's events. The school's outdoor space is available for use by the members of the community, and functions being held in the hall also use the school's outdoor areas for some of their activities, and events held by the school are attended by the whole community. There are also extensive links with the local church.

Should the Council proceed with the proposal, there would be no school in Castle Caereinion. As a Church in Wales School, the school building is owned by the Diocese, therefore the Diocese would need to determine the building's future use, and therefore whether or not facilities would remain in Castle Caereinion.

- **Whether or not the loss of the school, and potentially families, will have a detrimental effect on the wider economy of the community**

It is possible that the loss of the school could impact on the local economy. In particular, there would be a reduction in employment opportunities in the village, and an impact on local businesses in Castle Caereinion and the surrounding area. It is also noted that the school is an important funding source for the community centre, and therefore in the longer term, it is possible that closure of the school could impact on the viability of the community centre.

- **How parents' and pupils' engagement with the alternative school and any facilities it may offer could be supported (e.g. how pupils, (particularly any less advantaged pupils) will be helped to participate in after school activities)**

Should the Council continue with the statutory process and eventually implementation of the preferred option, support would be provided to pupils and their parents as part of the transition process, to ensure full engagement with their new schools. The nature of this support would depend on the needs of the parents / pupils, however this could include provision for effective transition to the receiving school by headteacher and class teachers.

It is acknowledged that there would be an impact on pupils' ability to participate in after school activities as there would be an additional travel requirement for parents in order to access school activities/events.

- **The overall effect of closure on the local community (including the loss of school based facilities which are used by the local community)**

The information received from the school indicates that there are extensive links between the school and the local community. It is therefore likely that the proposal to remove school provision from the village of Castle Caereinion would have a significant effect on the local community.

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

xi) Issues raised during the consultation period

A number of comments were received during the consultation period which related to the proposal's impact on the community.

These comments are listed in full in the consultation report produced in respect of this proposal along with the Council's response to the points raised, and are also summarised below:

- **Travel implications**

- The proposal would lead to additional travel
- Concern about the impact on the environment
- Concern about impact on pupils' access to after school activities
- Concern about the impact on low income families

- **Comments about Church in Wales provision**

- Links between the church and the school
- Concern that pupils would not be able to access alternative Church in Wales provision
- Transport to alternative Church in Wales provision

- **Impact on the community**

- General concern about the impact on the community / village
- Concern about impact on the community centre
- Reference to housing developments in Castle Caereinion
- Closure of the school would mean that people would not want to live in Castle Caereinion
- Reference to the loss of other community facilities
- The school brings the community together / is a focus for community activity
- Concern that pupils would no longer feel part of the community
- Comments relating to community well-being
- Reference to previous generations of families that have attended the school
- General comments about the closure of rural / village schools
- Queries about what would happen to the school building

xii) Conclusion

The proposal would have a significant impact on the community of Castle Caereinion as there would be no provision in Castle Caereinion. Many comments received during the consultation period emphasise the importance of the school within the local community and the benefits of being part of a close community on the development of pupils. It is also recognised that there are strong links between the school, being a C. in W. school and the local church, and how this contributes to pupils' development, and that this would be lost should the school close.

In particular, there could be an impact on the financial viability of the community centre, and closure of the school could mean that people would not want to live in Castle Caereinion in the future, and could lead to a reduction in community activity in the village. In addition, the village has already suffered a loss of community facilities, and there is concern that closure of the school could lead to the closure of other facilities in the village.

It is clear that a wide range of extra curricular activities are available to pupils at Castle Caereinion C. in W. School, and that as the school is a small school, all pupils are able to take part in all activities. Should the proposal be implemented, then the school would close with pupils moving to their nearest alternative school. These would be larger schools, and the expectation is that at least a similar range of activities would be available for pupils. However, it is acknowledged that pupils would need to travel to the alternative schools, which could impact on their ability to access activities, particularly where these take place after school.

Should the proposal be implemented, there would be no school provision in the village of Castle Caereinion. The information provided above indicates that there is currently extensive community use of the Castle Caereinion building, and extensive links between the school and the local community. As a Church in Wales School, the Castle Caereinion School building is owned by the Diocese, therefore the Diocese would need to determine the building's future use, and therefore whether or not facilities would remain in Castle Caereinion.

It is also acknowledged that implementation of the proposal would result in additional travel to school for pupils for whom Castle Caereinion is currently their closest school. Whilst free home to school transport would be provided to eligible pupils in accordance with the home to school transport policy which is in operation at that time, it is acknowledged that there could be an impact on some pupils' ability to access after school activities, and could impact on the ability of parents to take part in school events, meetings etc.

Whilst free home to school transport would be provided to eligible pupils to their nearest alternative school in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirement for parents in order to access school activities / events, which is likely to have a greater impact on low income families and/or families who do not have access to their own transport. The Council recognises that should Castle Caereinion C. in W. School close, pupils would transfer to alternative primary schools, and that some of these would be in a different secondary cluster i.e Welshpool High School. The Council also agrees that this would have transport implications as outlined below:

Pupils who attend Castle Caereinion CiW School normally transfer to Caereinion High School and free home-to-school transport is normally provided for those pupils attending Castle Caereinion CiW School to Caereinion High School.

Should Castle Caereinion CiW Primary School close, pupils living in the Castle Caereinion area would be provided with free home-to-school transport to their nearest or catchment secondary school. In the case of pupils choosing to attend Berriew CP School, Welshpool CiW Primary School or Guilsfield CP School, they would ordinarily transfer to Welshpool High School.

Pupils currently accessing free home-to-school transport from the Castle Caereinion area to Caereinion High School would continue to receive this service until they finish their education. However, this would not be available to pupils from Castle Caereinion if they have transferred to Berriew C.P. School, Guilsfield C. P. School or Welshpool C. in W. School unless Caereinion High School is their nearest secondary school. This would have an implication for families who may already have older siblings being transported to Caereinion High School.

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CYNGOR SIR POWYS COUNTY COUNCIL.

CABINET EXECUTIVE

13th July 2021

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

REPORT TITLE: Llanfyllin/North Welshpool Area Transformation Phase 2
Proposal Paper

REPORT FOR: Decision

1. Purpose

1.1 This paper requests Cabinet approval to commence the statutory process on the following proposal:

- To close Ysgol Bro Cynllaith from the 31st August 2022, with pupils to transfer to their nearest alternative schools in Powys

1.2 The report is supported by the following appendices:

- Appendix A – Options Appraisal – Bro Cynllaith, Pennant, Llanrhaeadr
- Appendix B – Options Appraisal – Ysgol Bro Cynllaith
- Appendix C – Draft Community Impact Assessment
- Appendix D – Draft Integrated Impact Assessment

2. Background

Strategy for Transforming Education in Powys

2.1 On the 14th April 2020, a new Strategy for Transforming Education in Powys was approved by the Leader via a delegated decision.

2.2 The Strategy was developed following extensive engagement with a range of stakeholders during two separate periods between October 2019 and March 2020.

2.3 The Strategy sets out a new vision for education in Powys, which is as follows:

‘All children and young people in Powys will experience a high quality, inspiring education to help develop the knowledge, skills and attributes that will enable them to become healthy, personally fulfilled, economically productive, socially responsible and globally engaged citizens of 21st century Wales.’

2.4 The Strategy also sets out a number of guiding principles which will underpin the transformation of education in Powys. These are as follows:

- *A world class rural education system that has learner entitlement at its core*
- *Schools that are fully inclusive, with a culture of deep collaboration in order to improve learner outcomes and experience*
- *A broad choice and high quality of provision for 14 – 19 year old learners, that includes both academic and vocational provision, meeting the needs of all learners, communities and the Powys economy*
- *Welsh-medium provision that is accessible and provides a full curriculum in Welsh from Meithrin to age 19 and beyond*
- *Provision for learners with Special Educational Needs (SEN)/Additional Learning Needs (ALN) that is accessible as near to home as is practicably possible, with the appropriate specialist teaching, support and facilities that enables every learner to meet their potential*
- *A digitally-rich schools sector that enables all learners and staff to enhance their teaching and learning experience*
- *Community-focused schools that are the central point for multi-agency services to support children, young people, families and the community*
- *Early years provision that is designed to meet the needs of all children, mindful of their particular circumstances, language requirements or any special or additional learning needs*
- *Financially and environmentally sustainable schools*
- *The highest priority is given to staff wellbeing and professional development*

2.5 The new Strategy sets out a number of Strategic Aims and Objectives, to shape the Council's work to transform the Powys education system over the coming years. One of these aims is to '*improve learner entitlement and experience*' and includes an objective to '*rationalise primary provision*'.

Llanfyllin / North Welshpool Programme Business Case

2.6 Following approval of the new Strategy, a Programme Business Case (PBC) was developed for the Llanfyllin / North Welshpool catchment. The PBC was considered by Cabinet on the 29th September 2020.

2.7 Without requiring Cabinet to make a decision on the future configuration of schools in the catchment, the PBC identified a preferred way forward for the Llanfyllin / North Welshpool area as follows:

- A new community campus for approximately 900 pupils aged 4 – 18 in Llanfyllin, replacing the current poor condition buildings of Ysgol Llanfyllin – to be built on the current Ysgol Llanfyllin site.
- To establish and build a new 360 place area school, to replace Carreghofa School and Llandysilio C. in W. School – this could also potentially include neighbouring schools in the Welshpool catchment as well. Site to be confirmed.
- To establish a new Welsh-medium school on the current Llanrhaeadr-ym-Mochnant site, replacing both Ysgol Pennant and Llanrhaeadr-ym-Mochnant Primary School. This may require capital funding to extend the school.
- To provide an extension to Llansantffraid C. in W. Primary School.
- Possible closure of Llangedwyn C. in W. School, Llanfechain C. in W. School and Ysgol Bro Cynllaith.

2.8 On the 18th March 2021, Cabinet considered a further paper in respect of Llangedwyn C. in W. School, Llanfechain C. in W. School and Llansantffraid C. in W. School, which considered options for the church schools in the area in light of the PBC for the catchment. This paper set out the Council's intention to take forward the Transformation Programme in the Llanfyllin/North Welshpool catchment area on a phased basis as follows:

- Phase 1 – the development and consideration of options for Llangedwyn CIW Primary School and Llanfechain CIW Primary School, along with plans for capital investment in Llansantffraid CIW Primary School.
- Phase 2 – the development and consideration of options for Ysgol Bro Cynllaith, Ysgol Gynradd Pennant and Ysgol Gynradd Llanrhaeadr-ym-Mochnant.
- Phase 3 – the development and consideration of options for Llandysilio CiW Primary School, Carreghofa CP School, Arddleen CP School and Brynhafren CP School.

2.9 The paper considered by Cabinet on the 19th March addressed Phase 1 above, and included a recommendation to commence the statutory process on proposals relating to Llangedwyn C. in W. School, Llanfechain C. in W. School and Llansantffraid C. in W. School. Consultation on these proposals is expected to commence in the autumn term.

2.10 The Council has subsequently considered options for Ysgol Bro Cynllaith, Ysgol Gynradd Pennant and Ysgol Gynradd Llanrhaeadr-ym-Mochnant in order to take forward Phase 2 as outlined above.

2.11 This paper only relates to Phase 2 above and does not refer to Phases 1 or 3. A paper in respect of Phase 3 will be considered by Cabinet in due course.

Options for Ysgol Bro Cynllaith, Ysgol Pennant and Ysgol Llanrhaeadr-ym-Mochnant

- 2.12 An Options Appraisal exercise has been carried out in respect of Ysgol Bro Cynllaith, Ysgol Pennant and Ysgol Llanrhaeadr-ym-Mochnant. This is attached to this report as Appendix A.
- 2.13 The Options Appraisal exercise has included the following steps:
- Consideration of key data relating to Ysgol Bro Cynllaith, Ysgol Pennant, Ysgol Llanrhaeadr-ym-Mochnant
 - Identification of options
 - SWOT analysis of each option
 - Assessment of each option against a number of critical success factors
 - Identification of an emerging preferred option
- 2.14 The Options Appraisal carried out in respect of the three schools identified 4 possible options. All 4 of these options involve the closure of Ysgol Bro Cynllaith.
- 2.15 Based on the outcome of the Options Appraisal exercise, the following next steps are identified:

9.1 Ysgol Bro Cynllaith

All of the options identified as possible options for Ysgol Bro Cynllaith, Ysgol Gynradd Pennant and Ysgol Gynradd Llanrhaeadr-ym-Mochnant include the closure of Ysgol Bro Cynllaith.

It is therefore recommended that the Council develops a further options appraisal paper relating to the potential closure of Ysgol Bro Cynllaith, to be considered by Cabinet in due course.

9.2 Ysgol Gynradd Pennant and Ysgol Gynradd Llanrhaeadr-ym-Mochnant

There are a number of options which have been identified as 'possible' options in respect of Ysgol Llanrhaeadr and Ysgol Pennant.

However, as indicated in section 3.2 above, the most significant challenges affecting schools in this area of the Llanfyllin catchment relate to Ysgol Bro Cynllaith not Ysgol Gynradd Pennant or Ysgol Gynradd Llanrhaeadr-ym-Mochnant. It is therefore recommended that the Council does not proceed with any of these options for Ysgol Gynradd Pennant or Ysgol Gynradd Llanrhaeadr-ym-Mochnant at this time.

The Council will continue to monitor the situation at the two schools, and should there be a significant change in pupil numbers and/or leadership arrangements at either school, the Council will reconsider options relating to the two schools.

The dual stream model at Ysgol Gynradd Llanrhaeadr-ym-Mochnant continues to be a concern, due to the small number of pupils attending each stream. In accordance with Strategic Objective 3.1 of the Strategy for Transforming Education in Powys – ‘Move schools along the language continuum’ – it is recommended that Workstream 3 (Welsh-medium) of the Transforming Education is asked to develop a plan to support Ysgol Gynradd Llanrhaeadr-ym-Mochnant to increase the proportion of pupils accessing Welsh-medium provision at the school, with the aim of moving the school along the language continuum.’

- 2.16 A separate Options Appraisal has subsequently been prepared to consider options for Ysgol Bro Cynllaith. This is attached to this report at Appendix B.

3. The Case for Change – Ysgol Bro Cynllaith

3.1 Information about Ysgol Bro Cynllaith

The following primary schools are located within approximately 10 miles of Ysgol Bro Cynllaith:

School	Distance from Ysgol Bro Cynllaith by road (miles)
Llangedwyn C. in W. School	3.573 miles
Trefonen CofE Primary School (Shropshire)	4.255 miles
Woodside Primary School (Shropshire)	5.149 miles
Selattyn CofE Primary School (Shropshire)	5.304 miles
Ysgol Llanarmon DC (Wrexham)	6.136 miles
Llanrhaeadr Ym Mochnant C.P. School	6.233 miles
Llansantffraid C. in W. (A) School	6.411 miles
Llanfechain C. in W. School	6.939 miles
Ysgol Llanfyllin	8.341 miles

Ysgol Pennant	8.525 miles
Bryn Offa CofE Primary School (Shropshire)	8.553 miles
Carreghofa C.P. School	9.761 miles

The following is a summary of key data relating to Ysgol Bro Cynllaith:

	School Type	Language Category	Admission Number	Rural School? ¹
Ysgol Bro Cynllaith	Community Primary School building owned by Powys County Council	English-medium	7	Yes

Pupil numbers

i) Pupil numbers

Pupil Finance Count Day – November 2020

	R	1	2	3	4	5	6	Total
Ysgol Bro Cynllaith	4	1	3	4	5	3	4	24

Teacher Centre – 7th July 2021

	R	1	2	3	4	5	6	Total
Ysgol Bro Cynllaith	4	1	4	4	6	3	4	26

ii) Historical pupil numbers²

¹ Annex F of the Welsh Government's School Organisation Code (2018) (<https://gov.wales/sites/default/files/publications/2018-10/school-organisation-code-second-edition.pdf>) includes a list of 'rural schools', to which the 'Presumption against the closure of rural schools' applies. Whilst the Code does not identify Ysgol Bro Cynllaith on the list of 'rural school', the Council acknowledges that the school is a rural school, and therefore will undertake the additional steps required in respect of Ysgol Bro Cynllaith.

² PLASC 2020

	Jan. 2014	Jan. 2015	Jan. 2016	Jan. 2017	Jan. 2018	Jan. 2019	Jan. 2020
Ysgol Bro Cynllaith	42	38	38	32	29	30	26

iii) Projected pupil numbers (Birth rate)³

	Jan. 2021	Jan. 2022	Jan. 2023	Jan. 2024	Jan. 2025
Ysgol Bro Cynllaith	26	27	28	27	25

iv) Projected pupil numbers (Finance projections)⁴

	Jan. 2022	Jan. 2023	Jan. 2024	Jan. 2025	Jan. 2026
Ysgol Bro Cynllaith	24	25	27	N/A	N/A

Building Capacity and Condition

i) Capacity

The following table provides information about the school's current capacity:

	Current Capacity ⁵	Currently Filled	Surplus Capacity
Ysgol Bro Cynllaith	48	24 (50%)	24 (50%)

ii) Building condition⁶

In 2009, Welsh Government carried out condition and suitability assessments of the school.

	Condition	Suitability	Access to hall on site	Estimated backlog maintenance

³ Powys Schools Service Projections based on PLASC & Birth Rates

⁴ Powys Finance Projections based on data provided by the school

⁵ Welsh Government School Places Return – August 2020

⁶ Premises Data Return to Welsh Government – 2020

Ysgol Bro Cynllaith	B Good	B Good	Yes – access to community hall	
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In 2020, the Council commissioned a new condition assessment of the school which judged the school's condition to be C+.

Standards of Education

i) Estyn

	Ysgol Bro Cynllaith
Date of Inspection	June 2015
Standards	Good
Wellbeing	Good
Learning experiences	Adequate
Teaching	Good
Care, support and guidance	Good
Learning environment	Good
Leadership	Good
Improving quality	Adequate
Partnership working	Good
Resource management	Good
Follow Up	School to draw up action plan. Estyn to monitor progress.

ii) School Categorisation⁷

	Standards Group	Improvement Capacity	Support Capacity
Ysgol Bro Cynllaith	N/A	B	Yellow

⁷ 2019. Categorisations were not carried out in 2020 due to Covid-19.

Financial information

i) Cost per pupil (Section 52 Budget Statement, 2019/2020)

	Budget share per school	Budget share per pupil	Notional SEN budget	Non ISB funds devolved to the school
Ysgol Bro Cynllaith	£197,000	£7,295	£14,000	£3,000
Powys average (Primary)	N/A	£4,264	N/A	N/A

3.2 Why change is needed

The following is a summary of the main challenges facing Ysgol Bro Cynllaith:

i) Low pupil numbers

Current pupil numbers⁸ at Ysgol Bro Cynllaith are as follows:

	R	1	2	3	4	5	6	Total
Ysgol Bro Cynllaith	4	1	3	4	5	3	4	24

The Welsh Government defines a 'small school' as a school with fewer than 91 pupils, and are expected to remain below 30 for the foreseeable future.

The school's low pupil numbers have also resulted in a high number of surplus places at the school. Based on current pupil numbers, there is currently 50% surplus capacity at the school.

ii) High budget share per pupil

Based on the Council's Section 52 Budget Statement for 2020-21, the school's budget share per pupil during 2020-21 was £7,295. This is significantly higher than the Powys average of £4,264. Ysgol Bro Cynllaith is ranked the 3rd highest school in Powys by budget share per pupil.

iii) Issues with the building

⁸ Finance NOR – 2020 Pupil Count Day (6th November 2020)

A Welsh Government condition survey carried out in 2009 judged that the condition of the building was 'B – Good' and its suitability was 'B – Good'. In 2020, the Council commissioned a new condition survey which concluded that the condition grading of the school was C+. The school is run from within a building thought to have been constructed circa 1960's. The original building is constructed from cavity walls and laid in a stretcher bond formation, with one timber framed building used as an additional teaching area. The cabin known as 'Block B' is approaching the end of its life expectancy and is showing signs of deterioration.

iv) Leadership

Whilst there is permanent leadership in place in Ysgol Bro Cynllaith, the headteacher has a significant teaching commitment, which limits the time available to focus on leadership of the school.

v) Combined age classes

The small pupil numbers at the school mean that pupils are taught in whole key stage classes, with Key Stage 2 in one class and Foundation Phase in another class. Because pupil numbers in each year group are small, it is more difficult to ensure all pupils are appropriately challenged.

4. Options Appraisal exercise

- 4.1 Following the options appraisal exercise for Ysgol Bro Cynllaith, Ysgol Pennant and Ysgol Llanrhaeadr which is described below, a separate options appraisal has been carried out for Ysgol Bro Cynllaith.
- 4.2 The options appraisal considers a range of identified reasonable options for Ysgol Bro Cynllaith, including the possibility of federation. School. This is attached to this report as Appendix A.
- 4.3 The options appraisal included the following steps:
 - Consideration of key data relating to Ysgol Bro Cynllaith
 - Identification of options
 - SWOT analysis of each option
 - Assessment of each option against a number of critical success factors
 - Identification of an initial emerging preferred option
 - Further consideration of the emerging preferred option against factors listed in the School Organisation Code (2018) as factors to be taken into account when developing school organisation proposals.
- 4.4 Based on the options appraisal carried out and further consideration against factors outlined in the School Organisation Code, the preferred option is as follows:

Close Ysgol Bro Cynllaith, pupils to transfer to their nearest alternative schools in Powys.

4.5 The reasons for this are:

- Would address the issue of low pupil numbers
- Would reduce the Council's overall surplus capacity in primary schools
- Revenue saving to the Council
- Pupils would attend larger schools, which could provide a wider range of educational and extra-curricular opportunities
- Pupils will be taught in classes with peers of similar ages
- Pupils would attend schools with better quality accommodation
- Minimal impact on any other schools
- Would enable pupils to continue to access provision in Powys
- Meets all of the Critical Success Factors

5 Presumption against closure of Rural Schools

The School Organisation Code (2018) includes special arrangements in regard to schools identified in Appendix F of the Code as rural schools, which require proposers to follow a more detailed set of procedures and requirements in formulating a rural school closure proposal and in consulting on and reaching a decision as to whether to implement a rural school closure proposal.

As indicated in the Code:

'This does not mean that a rural school will never close but the case for closure must be strong and all viable alternatives to closure must have been conscientiously considered by the proposer, including federation.'

The School Organisation Code includes a number of steps required to be taken when formulating a rural school proposal which relate to the following headings:

- Formulating the proposal
- Identifying reasonable alternatives
- Preparing a proposal paper for the decision maker

Whilst the School Organisation Code does not identify Ysgol Bro Cynllaith as a rural school, the Council acknowledges that the school is a rural school, and therefore the additional requirements for rural schools have been addressed when developing the proposal paper.

6 Draft Community Impact Assessment

6.1 A draft Community Impact Assessment has been carried out on the preferred option, which considers the impact on the community. This has

been developed with input from the school. This is attached as Appendix C.

6.2 The draft Community Impact Assessment includes the following conclusion:

- It is clear that a wide range of extra curricular activities are available to pupils at Ysgol Bro Cynllaith. Should there be no school in Llansilin, pupils would transfer to alternative schools in Powys. These would be larger schools, and the expectation is that at least a similar range of activities would be available for pupils. However, it is acknowledged that for pupils for whom Ysgol Bro Cynllaith is currently the closest school, additional travel would be required to enable pupils to access their closest school. This could impact on their ability to access activities, particularly where these take place after school.
- The information received by the school suggests that there are extensive links between the school and the local community, and that many community activities are arranged in the school which are accessed by the community. It is therefore acknowledged that closure of the school could have an impact on the community in terms of the services and activities available.
- Should the Council proceed with the proposal, it is anticipated that facilities and services would be provided in the community hall should there be no school in Llansilin. However, the school has indicated that the closure of the school could have a significant impact on the ability for the hall to continue to run.
- It is also acknowledged that implementation of the proposal would result in additional travel to school for pupils for whom Llansilin is currently their closest school. Whilst free home to school transport would be provided to eligible pupils in accordance with the home to school transport policy which is in operation at that time, it is acknowledged that there could be an impact on some pupils' ability to access after school activities, and could impact on the ability of parents to take part in school events, meetings etc.

7 Advice

7.1 It is advised that Cabinet approves a recommendation to commence the statutory process on the following proposal:

- To close Ysgol Bro Cynllaith from the 31st August 2022, with pupils to transfer to their nearest alternative schools in Powys

7.2 The reasons for this are:

- Would address the issue of low pupil numbers
- Would reduce the Council's overall surplus capacity in primary schools
- Revenue saving to the Council
- Pupils would attend larger schools, which could provide a wider range of educational and extra-curricular opportunities
- Pupil would be taught in classes with peers of similar ages
- Pupils would attend schools with better quality accommodation
- Minimal impact on any other schools
- Would enable pupils to continue to access provision in Powys
- Meets all of the Critical Success Factors

7.3 Should the recommendation to commence the statutory process be approved, it is anticipated that consultation would commence in September 2021.

7.4 It must also be noted that implementation of this proposal does not preclude that school from being a part of future reorganisation proposals.

8. Resource Implications

8.1 The amount of funding provided to schools is driven by the funding formula. Any change to the formula funding provided will impact on the Council's revenue budget. Based on the current formula, it is estimated that implementation of the proposal would result in annual revenue savings to the Council of around **£81,300**. This overall figure comprises a potential saving on Schools' delegated funding of over £140,000, estimated catering savings of £1,300 offset by estimated additional transport costs of £60,000.

8.2 It must be noted that there are other developments within the area which could impact on these estimated savings. These are complex catchment-wide proposals that are particularly sensitive to the final destinations of the learners and the potential for the need for an additional class at one of the receiving schools. If this were the case, then this could reduce the estimated savings by around £60,000.

8.2 In line with the Council's Scheme for Financing Schools, should a school be in a deficit budget position when closed the deficit is written off.

8.3 The Scheme for Financing Schools also states the following in section 3.7.2:

'In order to ensure effective stewardship of the resources available to schools, the Authority may impose additional restrictions on a school scheduled to close, including but not limited to:

- Restriction of expenditure to agreed plans

- Removal of powers of virement'

The Council will consider the use of these powers of intervention where appropriate.

- 8.4 Implementation of the proposal would require involvement from a number of service areas, including staff from the Schools Service, Finance, HR and ICT. These service areas will be kept informed of the development of the proposal throughout the statutory process.
- 8.5 The Deputy Head of Finance (Deputy Section 151 Officer) notes the content of the report and can support the recommendation.

9. Legal implications

- 9.1 Legal: the recommendations can be accepted from a legal point of view
- 9.2 The Head of Legal and Democratic Services (Monitoring Officer) has commented as follows: " I note the legal comment and have nothing to add to the report".

10. Comment from local member(s)

- 10.1 Cllr Aled Davies: I note the community impact assessment, which has been developed with information supplied by the school, which shows that there would be a significant impact on the community if the school were to close. I'm also very concerned about the travel times for the younger children to travel to alternative schools. It is very important for the Council to ensure that the consultation process is carried out in a fair, transparent and thorough manner to ensure that all views are heard.

11. Integrated Impact Assessment (draft)

- 11.1 A draft integrated impact assessment in respect of the recommendation is attached as Appendix D. The impact assessment considers the proposal's impact on the Welsh Government's well-being goals, as outlined in the Well-being of Future Generations Act.
- 11.2 The summary of the impact assessment is as follows:

The aim of the proposal is to improve the educational provision for learners in line with the new Curriculum for Wales which is being rolled out. However, whilst this impact assessment has identified some positive aspects, in particular relating to learning and skills and ensuring the best strategic management of the Powys schools' estate, the assessment has also identified some negative aspects. These primarily relate to the impact on the community of Llansilin due to loss of educational provision from the village, and the associated additional travel requirements for pupils. In addition, whilst the proposal is that

pupils would transfer to alternative schools in Powys, it is possible that some pupils would transfer to provision in Shropshire, which would mean that they would no longer access a Welsh curriculum, and could impact on the Welsh identity of the village of Llansilin.

- 11.3 Should Cabinet approve the commencement of the statutory process in respect of the recommendation, the impact assessment would be updated throughout the process, to take account of feedback received.

12. **Recommendation**

- 12.1 It is recommended that Cabinet approves commencing the statutory process on the following proposal:

- To close Ysgol Bro Cynllaith from the 31st August 2022, with pupils to transfer to their nearest alternative schools in Powys

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Transforming Education in Powys

Options Appraisal

Ysgol Bro Cynllaith, Ysgol Gynradd Pennant and Ysgol Gynradd Llanrhaeadr-ym-Mochnant

Version Control:

Version	Date	Brief Summary of Change	Author
0.1	24/02/2021	Document created	AM/RW/HR
0.2	15/04/2021	Version for WS1 / Prog Board	SA
0.3	07/07/2021	Version for consideration by Cabinet	SA

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1. INTRODUCTION

On the 29th September 2020, the Council's Cabinet considered a Programme Business Case (PBC) in respect of primary provision in the Llanfyllin / North Welshpool catchment.

The PBC considered by Cabinet identified a preferred way forward for the Llanfyllin / North Welshpool catchment, which is as follows:

- A new community campus for approximately 900 pupils aged 4 – 18 in Llanfyllin, replacing the current poor condition buildings of Ysgol Llanfyllin – to be built on the current Ysgol Llanfyllin site.
- To establish and build a new 360 place area school, to replace Carreghofa School and Llandysilio C. in W. School – this could also potentially include neighbouring schools in the Welshpool catchment as well. Site to be confirmed.
- To establish a new Welsh-medium school on the current Llanrhaeadr-ym-Mochnant site, replacing both Ysgol Pennant and Llanrhaeadr-ym-Mochnant Primary School. This may require capital funding to extend the school.
- To provide an extension to Llansantffraid C. in W. Primary School.
- Possible closure of Llangedwyn C. in W. School, Llanfechain C. in W. School and Ysgol Bro Cynllaith.

At the Cabinet meeting on the 29th September, Cabinet approved the submission of the PBC for the Llanfyllin / North Welshpool catchment to Welsh Government, and also approved that officers bring back a further report to Cabinet outlining the implementation steps, including consultation, required to achieve the new facilities.

On the 18th March 2021, Cabinet considered a further paper in respect of Llangedwyn C. in W. School, Llanfechain C. in W. School and Llansantffraid C. in W. School, which considered options for the church schools in the area in light of the PBC for the catchment. This paper set out the Council's intention to take forward the Transformation Programme in the Llanfyllin/North Welshpool catchment area on a phased basis as follows:

- Phase 1 – the development and consideration of options for Llangedwyn CIW Primary School and Llanfechain CIW Primary School, along with plans for capital investment in Llansantffraid CIW Primary School.
- Phase 2 – the development and consideration of options for Ysgol Bro Cynllaith, Ysgol Gynradd Pennant and Ysgol Gynradd Llanrhaeadr-ym-Mochnant – it is expected that this exercise will be concluded shortly after Easter 2021.
- Phase 3 – the development and consideration of options for Llandysilio CiW Primary School, Carreghofa CP School, Arddleen CP School and Brynhafren CP School, which is expected to be undertaken in the autumn term 2021.

The paper considered by Cabinet on the 19th March addressed Phase 1 above.

The purpose of this paper is to consider options for Ysgol Bro Cynllaith, Ysgol Gynradd Pennant and Ysgol Gynradd Llanrhaeadr-ym-Mochnant, as outlined in Phase 2 above.

Pupil numbers¹ at the three schools are as follows:

		R	1	2	3	4	5	6	Total
Ysgol Bro Cynllaith		4	1	3	4	5	3	4	24
Ysgol Gynradd Pennant		17	10	8	12	11	11	13	82
Ysgol Gynradd Llanrhaeadr-ym-Mochnant	English	7	5	5	6	3	6	3	34
	Welsh	5	5	11	3	3	7	5	39
	Total	12	10	16	9	6	13	8	73

¹ Finance NOR – 2020 Pupil Count Day (6th November 2020)

PART A – THE CASE FOR CHANGE

2. STRATEGIC CONTEXT

2.1 POLICY CONTEXT

Following the inspection of Powys Education Services carried out by Estyn in the summer of 2019, the Council carried out a strategic review of schools during 2019-20, which led to the development of a new Strategy for Transforming Education in Powys. The strategy, which was developed following engagement with a wide range of stakeholders, was approved in April 2020.

The strategy sets out a Vision Statement and Guiding Principles which will underpin the Council's work to transform the Powys education system over the coming years. The Vision Statement is as follows:

All children and young people in Powys will experience a high-quality, inspiring education to help develop the knowledge, skills and attributes that will enable them to become healthy, personally fulfilled, economically productive, socially responsible and globally engaged citizens of 21st century Wales.

In addition, the strategy outlines a number of aims and objectives, which include an objective to 'Develop a network of all-age schools based around the 13 current secondary school locations' in order to improve overall learner entitlement and experience in Powys.

To take forward this objective, the Council is reviewing the smallest schools in Powys, with the aim of identifying solutions for these schools which will meet the objective to 'Reconfigure and rationalise primary provision', in order to ensure that education in Powys is delivered through an affordable, resilient infrastructure which provides the best possible opportunities to learners, now and in the future.

2.2 WHY CHANGE IS NEEDED IN POWYS

Powys is a large, rural authority. Covering a quarter of the landmass of Wales, it contains only 4.2% of the population, making it the most sparsely populated county in Wales. Delivering services across such a large, sparsely populated area is challenging and expensive.

Whilst there has been some reorganisation activity in Powys over recent years, the county's schools' infrastructure largely remains similar to that which was in place 20 years ago.

The Council's new Strategy for Transforming Education in Powys outlines a number of challenges facing education in Powys, which were identified following engagement with key stakeholders during the autumn term 2019 and spring term 2020.

The following is a summary of the main challenges facing the Council:

i) High proportion of small schools

Based on PLASC 2019 figures, there were 33 small primary schools in Powys – this is approximately 40% of the primary provision in the county. 21 schools had fewer than 50 pupils, and for those schools the budget share per pupil is generally higher than the Powys average for primary schools.

ii) Decreasing pupil numbers

Pupil numbers have decreased over the past decade, and are expected to decrease further over the next five years. Pupil numbers in the primary sector in Powys are expected to decrease by approximately 4% by 2025.

iii) High number of surplus places

Based on PLASC 2019 figures, there was 18% surplus capacity in Powys primary schools. With pupil numbers across Powys projected to decrease overall over the coming years, the proportion of surplus places across the county will continue to increase.

iv) Building condition

Whilst the Council has invested in its school's estate through the 21st Century Schools Programme and the Asset Management Plan, building condition remains an issue across Powys, with associated maintenance costs.

v) Financial pressures

The Council is currently facing significant financial pressures in general. This is affecting all service areas, including the schools' sector. There are significant variations in the budget share per pupil across Powys schools, ranging from £3,276 to £11,912 in the primary sector.

vi) Inequality in access to Welsh-medium education

In contrast to other areas of Wales, there has been no growth in Welsh-medium pupil numbers in Powys over recent years. Significant changes are needed to the Welsh-medium offer in Powys to reverse the trend of the

last few years and ensure that all Powys learners can access comprehensive Welsh-medium provision throughout n

vii) Limited post-14 and post-16 offer

In September 2019, the Council's Cabinet considered a report on post-16 provision, which outlined a number of challenges facing the sector, including decreasing learner numbers, financial challenges and sustainability of the curriculum offer, including Welsh-medium provision.

viii) Inequality in access to SEN provision

Within Powys, pupils with special education needs (SEN) attend a range of settings, including special schools, specialist centres, the pupil referral unit (PRU) as well as mainstream schools.

Currently, not all pupils are educated in the setting that meets their needs best, and depending on where pupils live, they have access to a different quality and type of provision.

ix) Historical lack of political decision making

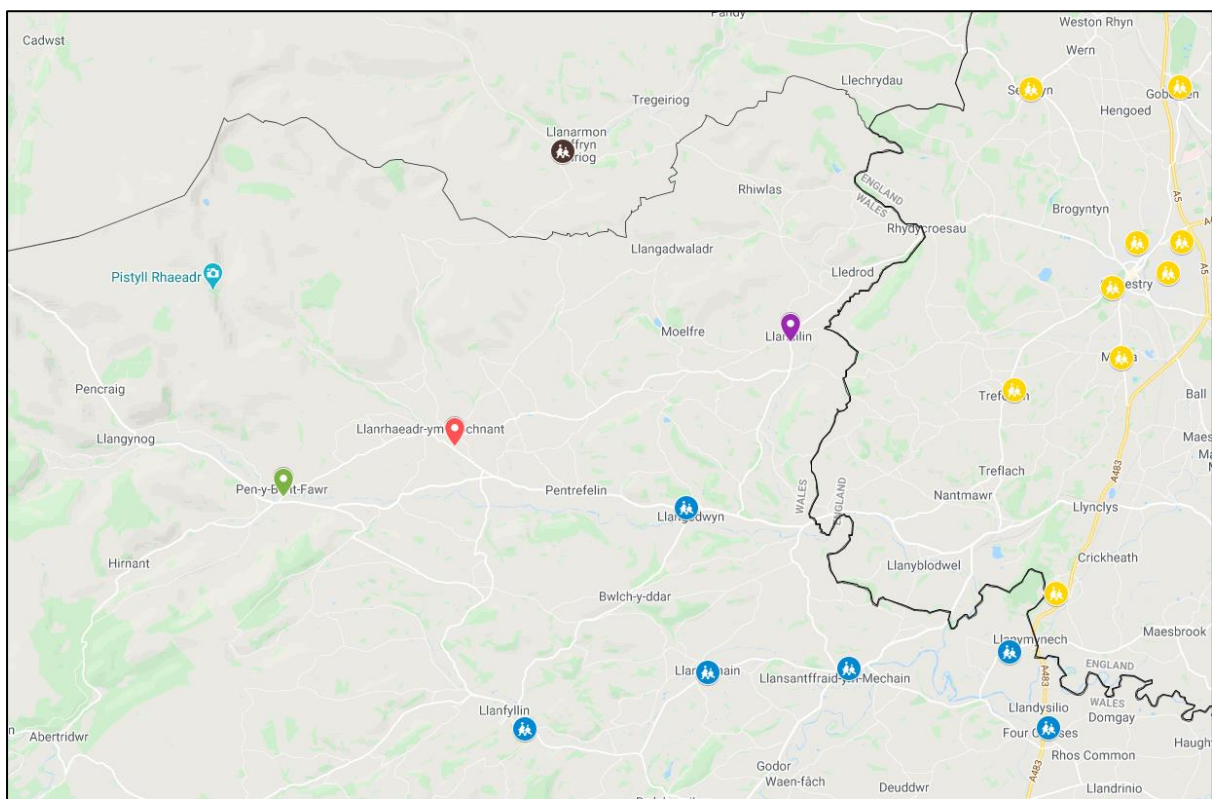
Although there have been some developments in terms of the schools' infrastructure over recent years, the Council's failure to implement a number of high-profile proposals in the last few years has left a legacy in Powys, and there has been a reluctance to embark on large scale reorganisation of education provision since then.

3. WHY CHANGE IS NEEDED IN YSGOL BRO CYNLLAITH, YSGOL GYNRADD PENNANT AND YSGOL GYNRADD LLANRHAEDR-YM-MOCHNANT

3.1 THE CURRENT SITUATION

Ysgol Bro Cynllaith, Ysgol Gynradd Pennant and Ysgol Gynradd Llanrhaeadr-ym-Mochnant are located in the Llanfyllin catchment in North Powys. Ysgol Bro Cynllaith is an English-medium school, Ysgol Gynradd Pennant is a Welsh-medium school and Ysgol Gynradd Llanrhaeadr-ym-Mochnant is a dual stream school.

The following map shows the location of the three schools:



Green – Ysgol Pennant, Red - Ysgol Gynradd Llanrhaeadr-ym-Mochnant, Purple – Ysgol Bro Cynllaith, Blue – Powys Schools, Brown – Ysgol Llanarmon DC (Out of County), Yellow – Shropshire Schools (Out of County)

The following primary schools are located within 10 miles of the three schools²:

² GIS mapping

Ysgol Bro Cynllaith	Distance from schools by road (miles)
Llangedwyn C. in W. School	3.60
Trefonen CofE Primary School	4.26
Woodside Primary School	5.15
Selattyn CofE Primary School	5.30
Ysgol Llanarmon DC	6.13
Ysgol Gynradd Llanrhaeadr-ym-Mochnant	6.23
Llansantffraid C. in W. School	6.41
Llanfechain C. in W. School	6.93
Ysgol Llanfyllin	8.34
Ysgol Gynradd Pennant	8.53
Bryn Offa Primary School	8.55
Carreghofa C.P. School	9.76

Ysgol Gynradd Pennant	Distance from schools by road (miles)
Ysgol Gynradd Llanrhaeadr-ym-Mochnant	2.99
Llangedwyn C. in W. School	6.45
Ysgol Llanfyllin	6.80
Llanfechain C. in W. School	8.10
Ysgol Bro Cynllaith	8.53
Ysgol Llanarmon DC	8.75

Ysgol Gynradd Llanrhaeadr-ym-Mochnant	Distance from schools by road (miles)
--	--

Ysgol Pennant	2.99
Llangedwyn C. in W. School	3.71
Ysgol Llanfyllin	5.70
Ysgol Bro Cynllaith	6.23
Ysgol Llanarmon DC	6.58
Llanfechain C. in W. School	6.69
Llansantffraid C. in W. School	8.20
Trefonen CofE Primary School	9.66

The following is a summary of key data relating to the three schools:

	School Type	Language Category	Admission Number³	Rural School?⁴
Ysgol Bro Cynllaith	Community Primary School building owned by Powys County Council	English Medium	7	Yes
Ysgol Gynradd Pennant	Community Primary School building owned by Powys County Council	Welsh Medium	12	Yes
Ysgol Gynradd Llanrhaeadr-ym-Mochnant	Community Primary School building owned by Powys County Council	Dual Stream	15	Yes

Pupil Numbers

i) Current pupil numbers⁵

³ Powys Admissions Information and Arrangements 2021-22

⁴ Annex F of the Welsh Government's School Organisation Code (2018)

(<https://gov.wales/sites/default/files/publications/2018-10/school-organisation-code-second-edition.pdf>)

includes a list of 'rural schools', to which the 'Presumption against the closure of rural schools' applies.

⁵ Finance NOR – 2020 Pupil Count Day (6th November 2020)

	R	1	2	3	4	5	6	Total
Ysgol Bro Cynllaith	4	1	3	4	5	3	4	24
Ysgol Gynradd Pennant	17	10	8	12	11	11	13	82
Ysgol Gynradd Llanrhaeadr-ym-Mochnant	English	7	5	5	6	3	6	34
	Welsh	5	5	11	3	3	7	39
	Total	12	10	16	9	6	13	73

ii) Historical pupil numbers⁶

	Jan. 2014	Jan. 2015	Jan. 2016	Jan. 2017	Jan. 2018	Jan. 2019	Jan. 2020
Ysgol Bro Cynllaith	42	38	38	32	29	30	28
Ysgol Gynradd Pennant	65	67	68	70	70	70	70
Ysgol Gynradd Llanrhaeadr-ym-Mochnant	80	87	80	85	75	71	75
TOTAL	187	192	186	187	174	171	173

iii) Projected pupil numbers (Birth rate)⁷

	Jan. 2021	Jan. 2022	Jan. 2023	Jan. 2024	Jan. 2025
Ysgol Bro Cynllaith	26	27	28	27	25
Ysgol Gynradd Pennant	77	73	71	71	69
Ysgol Gynradd Llanrhaeadr-ym-Mochnant	74	79	79	87	80

⁶ PLASC

⁷ Powys Schools Service Projections (R – Yr6) based on PLASC 2020 & Birth Rates

TOTAL	177	17	178	185	174
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iv) Projected pupil numbers (Finance projections)⁸

	Jan. 2022	Jan. 2023	Jan. 2024	Jan. 2025
Ysgol Bro Cynllaith	24	25	27	N/A
Ysgol Gynradd Pennant	82	85	90	N/A
Ysgol Gynradd Llanrhaeadr-ym-Mochnant	73	78	78	N/A
TOTAL	179	188	195	N/A

Building Capacity and Condition

i) Capacity

The following table provides information about the current capacities of school and the capacity:

	Current Capacity⁹	Currently Filled	Surplus Capacity
Ysgol Bro Cynllaith	48	24 (50%)	24 (50%)
Ysgol Gynradd Pennant	88	82 (93.2%)	6 (6.8%)
Ysgol Gynradd Llanrhaeadr-ym-Mochnant	108	73 (67.6%)	35 (32.4%)

ii) Building condition

In 2009, Welsh Government carried out condition and suitability assessments of the schools.

⁸ Powys Finance Projections based on actual pupil numbers – November 2020

⁹ Welsh Government School Places Return – August 2020

	Condition	Suitability	Access to hall on site
Ysgol Bro Cynllaith	B	B	Yes
Ysgol Gynradd Pennant	B	B/C	Yes
Ysgol Gynradd Llanrhaeadr-ym-Mochnant	A	A	Yes

Standards of Education

i) Estyn

	Ysgol Bro Cynllaith
Date of Inspection	June 2015
Standards	Good
Wellbeing	Good
Learning Experiences	Adequate
Teaching	Good
Care, support and guidance	Good
Learning Environment	Good
Leadership	Good
Improving Quality	Adequate
Partnership Working	Good
Resource Management	Good
Follow Up	The school will draw up an action plan, which shows how it is going to address the

	recommendations. Estyn will monitor the school's progress.
--	--

	Ysgol Gynradd Pennant
Date of Inspection	March 2018
Standards	Good
Wellbeing and attitudes to learning	Good
Teaching and learning experiences	Good
Care, support, and guidance	Good
Leadership and management	Good
Follow Up	The school will produce an action plan to address the recommendations from the inspection.

	Ysgol Gynradd Llanrhaeadr-ym-Mochnant
Date of Inspection	January 2013
Standards	Good
Wellbeing	Good
Learning experiences	Adequate
Teaching	Adequate
Care, support, and guidance	Adequate
Learning environment	Good
Leadership	Good
Improving quality	Good

Partnership working	Good
Resource management	Good
Follow Up	The school will draw up an action plan which shows how it will address the recommendations. Estyn will monitor the school's progress.

ii) **School Categorisation¹⁰**

	Standards Group	Improvement Capacity	Support Capacity
Ysgol Bro Cynllaith	N/A	B	Yellow
Ysgol Gynradd Pennant	N/A	B	Yellow
Ysgol Gynradd Llanrhaeadr-ym-Mochnant	N/A	C	Amber

Financial information

Cost per pupil¹¹

	Budget share per school	Budget share per pupil	Notional SEN budget	Non ISB funds devolved to the school
Ysgol Bro Cynllaith	£197,000	£7,295	£14,000	£3,000
Ysgol Gynradd Pennant	£303,000	£4,335	£15,000	£0
Ysgol Gynradd Llanrhaeadr-ym-Mochnant	£434,000	£5,860	£16,000	£4,000

¹⁰ 2019

¹¹ Section 52 Budget Statement, 2020/21

Powys average (Primary)	N/A	£4,264	N/A	N/A
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Equalities Information

i) Free School Meals¹²

	Percentage of pupils who had a free school meal on Census day
Ysgol Bro Cynllaith	7.7%
Ysgol Gynradd Pennant	4.3%
Ysgol Gynradd Llanrhaeadr-ym-Mochnant	6.7%

ii) Pupils in care¹³

	Percentage of pupils in care
Ysgol Bro Cynllaith	3.7%
Ysgol Gynradd Pennant	1.4%
Ysgol Gynradd Llanrhaeadr-ym-Mochnant	0%

iii) English as an Additional Language¹⁴

	Percentage of EAL pupils
Ysgol Bro Cynllaith	0%
Ysgol Gynradd Pennant	0%
Ysgol Gynradd Llanrhaeadr-ym-Mochnant	0%

iv) SEN/ALN¹⁵

¹² PLASC 2020

¹³ PLASC 2020

¹⁴ PLASC 2020

¹⁵ PLASC 2020

	School Action	School Action Plus	Statement
Ysgol Bro Cynllaith	7.7%	0%	3.8%
Ysgol Gynradd Pennant	15.7%	2.9%	0%
Ysgol Gynradd Llanrhaeadr-ym-Mochnant	21.3%	1.3%	1.3%

Early Years

The following maintained early years providers operate in the three schools:

Ysgol Bro Cynllaith – No provision

Ysgol Pennant – Cylch Meithrin Penybontfawr

Ysgol Gynradd Llanrhaeadr-ym-Mochnant – Cylch Meithrin Llanrhaeadr

Travel Assessments

i) Closest school

An analysis of pupil travel patterns has been carried out, based on the pupils that were attending the three schools on the 2020 PLASC date.

The closest provider for the pupils at each school was as follows:

	Pupils attending Ysgol Bro Cynllaith
Ysgol Bro Cynllaith	88.5%
Trefonen CofE Primary School	3.8%
Llangedwyn C. in W. School	3.8%
Ysgol Gynradd Llanrhaeadr-ym-Mochnant	3.8%

Based on this information, Ysgol Bro Cynllaith is the closest school for 88.5% of the school's pupils on roll in January 2020.

	Pupils attending Ysgol Gynradd Pennant
Ysgol Gynradd Pennant	85.7%

Ysgol Gynradd Llanrhaeadr-ym-Mochnant	8.6%
Ysgol Pontrobert	2.9%
Ysgol Cwm Banwy	1.4%
Ysgol Llanfyllin	1.4%

Based on this information, Ysgol Gynradd Pennant is the closest school for 85.7% of the school's pupils on roll in January 2020.

	Pupils attending Ysgol Gynradd Llanrhaeadr-ym-Mochnant
Ysgol Gynradd Llanrhaeadr-ym-Mochnant	86.3%
Ysgol Gynradd Pennant	5.5%
Llansantffraid C. in W. School	2.7%
Llangedwyn C. in W. School	2.7%
Ysgol Llanfyllin	2.7%

Based on this information, Ysgol Gynradd Llanrhaeadr-ym-Mochnant is the closest school for 86.3% of the school's pupils on roll in January 2020.

ii) Average travel distance

The average travel distance for all pupils on roll in January 2020 at Ysgol Bro Cynllaith is 1.77 miles.

The average travel distance for all pupils on roll in January 2020 at Ysgol Gynradd Pennant is 2.98 miles.

The average travel distance for all pupils on roll in January 2020 at Ysgol Gynradd Llanrhaeadr-ym-Mochnant is 3.01 miles.

iii) Furthest travel distance

Of the pupils that attended Ysgol Bro Cynllaith in January 2020, the furthest travel distance to the school for those pupils for whom Ysgol Bro Cynllaith is the closest provider is 3.4 miles.

Of the pupils that attended Ysgol Gynradd Pennant in January 2020, the furthest travel distance to the school for those pupils for whom Ysgol Gynradd Pennant is the closest provider is 8.4 miles.

Of the pupils that attended Ysgol Gynradd Llanrhaeadr-ym-Mochnant in January 2020, the furthest travel distance to the school for those pupils for whom Ysgol Gynradd Llanrhaeadr-ym-Mochnant is the closest provider is 12.5 miles.

3.2 WHY CHANGE IS NEEDED AT YSGOL BRO CYNLLAITH, YSGOL GYNRADD PENNANT AND YSGOL GYNRADD LLANRHAEDR-YM-MOCHNANT

The Programme Business Case for the Llanfyllin / North Welshpool catchment which was considered by Cabinet in September 2020 identified four significant issues in respect of the catchment area:

- i) The catchment includes a number of small schools, which fall below the Welsh Government’s definition of a small school (schools below 91 pupils), and there is a trend of falling school rolls in these schools
- ii) There are currently 341 surplus places in the catchment
- iii) A number of schools in the catchment area means have an average budget share pupil which is significantly higher than the Powys average
- iv) Four of the ten schools in the catchment have a school building which is condition C. Only one school in the catchment is assessed as condition A.

In addition, the Programme Business Case outlines the Council’s aim to improve access to Welsh-medium provision across all key stages.

The following is a summary of the challenges facing each of the three schools.

3.2.1 YSGOL BRO CYNLLAITH

i) Low pupil numbers

Current pupil numbers¹⁶ at Ysgol Bro Cynllaith are as follows:

	R	1	2	3	4	5	6	Total
Ysgol Bro Cynllaith	4	1	3	4	5	3	4	24

The Welsh Government defines a ‘small school’ as a school with fewer than 91 pupils, and are expected to remain below 30 for the foreseeable future.

¹⁶ Finance NOR – 2020 Pupil Count Day (6th November 2020)

The school's low pupil numbers have also resulted in a high number of surplus places at the school. Based on current pupil numbers, there is currently 50% surplus capacity at the school.

ii) High budget share per pupil

Based on the Council's Section 52 Budget Statement for 2020-21, the school's budget share per pupil during 2020-21 was £7,295. This is significantly higher than the Powys average of £4,264. Ysgol Bro Cynllaith is ranked the 3rd highest school in Powys by budget share per pupil.

iii) Issues with the building

A Welsh Government condition survey carried out in 2009 judged that the condition of the building was 'B – Good' and its suitability was 'B – Good'. In 2020, the Council commissioned a new condition survey which concluded that the condition grading of the school was C+. The school is run from within a building thought to have been constructed circa 1960's. The original building is constructed from cavity walls and laid in a stretcher bond formation, with one timber framed building used as an additional teaching area. The cabin known as 'Block B' is approaching the end of its life expectancy and is showing signs of deterioration.

iv) Leadership

Whilst there is permanent leadership in place in Ysgol Bro Cynllaith, the headteacher has a significant teaching commitment, which limits the time available to focus on leadership of the school.

3.2.2 YSGOL PENNANT

i) Relatively small school

The Welsh Government defines a 'small school' as a school with fewer than 91 pupils.

Current pupil numbers at Ysgol Pennant are 82, and pupil numbers at Ysgol Pennant are expected to fall to 69 by 2025, therefore the school meets the Welsh Government's definition of a 'small school'.

i) Issues with the building

The findings of the Welsh Government's condition survey carried out in 2009 found that the condition of the building was 'B – Good', however its suitability was assessed as 'B/C – Good/Poor'. The school has a mobile classroom that is in a poor condition.

3.2.3 YSGOL LLANRHAEADR-YM-MOCHNANT

i) Relatively small school

The Welsh Government defines a 'small school' as a school with fewer than 91 pupils. Ysgol Llanrhaeadr-ym-Mochnant currently has 73 pupils, therefore meets the Welsh Government's definition of a small school.

Pupil projections show a growth in pupil numbers by 2025, from 73 to 89. Even with the projected growth in pupil numbers, the school would continue to come within the Welsh Government's definition of a 'small school'.

Based on current pupil numbers, the school has 35 (32.4%) surplus places.

ii) Budget share per pupil

Based on the Council's Section 52 Budget Statement for 2020-21, the school's budget share per pupil during 2020-21 was £5,860. This is higher than the Powys average of £4,264. Ysgol Llanrhaeadr-ym-Mochnant is ranked the 11th highest school in Powys by budget share per pupil.

iii) Dual stream model

Ysgol Llanrhaeadr-ym-Mochnant is a dual-stream school, with pupils taught in either the Welsh or English language. However, pupil numbers at the school are relatively small, and the number of pupils taught in each stream is also small. There are currently 39 pupils in the Welsh stream, and 34 pupils in the English stream.

This is a challenge for the school as educational provision and resources are duplicated. It also means that pupils are taught in classes with a high number of year groups in each class.

PART B – OPTIONS FOR YSGOL BRO CYNLLAITH, YSGOL GYNRADD PENNANT, AND YSGOL GYNRADD LLANRHAEDR YM MOCHANT

4. AVAILABLE OPTIONS

The following options have been identified in respect of Ysgol Bro Cynllaith, Ysgol Gynradd Pennant and Ysgol Gynradd Llanrhaeadr-ym-Mochnant.

Option	Description
1	Status quo – the three schools continue as standalone schools.
<u>2 – Federation options</u>	
2a	Federate Bro Cynllaith and Llanrhaeadr. Pennant continues as standalone school.
2b	Federate Llanrhaeadr and Pennant. Bro Cynllaith continues as standalone school.
2c	Federate Bro Cynllaith and Pennant. Llanrhaeadr continues as standalone school.
2d	Federate Bro Cynllaith, Llanrhaeadr and Pennant.
<u>3 – Federation and closure</u>	
3a	Federate Bro Cynllaith and Llanrhaeadr. Close Pennant.
3b	Federate Llanrhaeadr and Pennant. Close Bro Cynllaith.
3c	Federate Bro Cynllaith and Pennant. Close Llanrhaeadr.
<u>4 – 2 sited school options</u>	
4a	Merge Bro C and Llanrhaeadr to establish a new school on two sites. Pennant continues as standalone school.
4b	Merge Llanrhaeadr and Pennant to establish a new school on two sites. Bro C continues as standalone school.
4c	Merge Bro C and Pennant to establish a new school on two sites. Llanrhaeadr continues as standalone school.
<u>5 – 2 sited school options and closure</u>	

5a	Merge Bro C and Llanrhaeadr to establish a new school on two sites. Close Pennant.
5b	Merge Llanrhaeadr and Pennant to establish a new school on two sites. Close Bro C.
5c	Merge Bro C and Pennant to establish a new school on two sites. Close Llanrhaeadr.
<u>6 – 3 sited school option</u>	
6	Merge Bro C, Llanrhaeadr and Pennant to establish a new school on three sites.
<u>7 – 2 school merger on 1 site</u>	
7a	Merge Bro C and Llanrhaeadr to establish a new school on one site – Bro C. Pennant continues as standalone school.
7b	Merge Bro C and Llanrhaeadr to establish a new school on one site – Llanrhaeadr. Pennant continues as standalone school.
7c	Merge Llanrhaeadr and Pennant to establish a new school on one site - Llanrhaeadr. Bro C continues as standalone school.
7d	Merge Llanrhaeadr and Pennant to establish a new school on one site - Pennant. Bro C continues as standalone school.
7e	Merge Bro C and Pennant to establish a new school on one site – Bro C. Llanrhaeadr continues as a standalone school.
7f	Merge Bro C and Pennant to establish a new school on one site – Pennant. Llanrhaeadr continues as a standalone school.
<u>8 – 2 school merger on 1 site and closure</u>	
8a	Merge Bro C and Llanrhaeadr to establish a new school on one site – Bro C. Close Pennant.
8b	Merge Bro C and Llanrhaeadr to establish a new school on one site – Llanrhaeadr. Close Pennant.
8c	Merge Llanrhaeadr and Pennant to establish a new school on one site - Llanrhaeadr. Close Bro C.
8d	Merge Llanrhaeadr and Pennant to establish a new school on one site - Pennant. Close Bro C.

8e	Merge Bro C and Pennant to establish a new school on one site – Bro C. Close Llanrhaeadr.
8f	Merge Bro C and Pennant to establish a new school on one site – Pennant. Close Llanrhaeadr.
<u>9 – 3 school merger on 2 sites</u>	
9a	Merge Bro C, Llanrhaeadr and Pennant to establish a new school on two sites – Bro C and Llanrhaeadr.
9b	Merge Bro C, Llanrhaeadr and Pennant to establish a new school on two sites – Bro C and Pennant.
9c	Merge Bro C, Llanrhaeadr and Pennant to establish a new school on two sites – Llanrhaeadr and Pennant.
<u>10 – Close 1 school</u>	
10a	Close Ysgol Bro C. Retain Llanrhaeadr and Pennant as standalone schools.
10b	Close Pennant. Retain Ysgol Bro C and Llanrhaeadr as standalone schools.
10c	Close Llanrhaeadr. Retain Ysgol Bro C and Pennant as standalone schools.
<u>11 – Close 2 schools</u>	
11a	Close Ysgol Bro C and Pennant. Retain Llanrhaeadr.
11b	Close Ysgol Bro C and Llanrhaeadr. Retain Pennant.
11c	Close Pennant and Llanrhaeadr. Retain Ysgol Bro C.
<u>12 – Close all 3 schools</u>	
12	Close Ysgol Bro C, Pennant and Llanrhaeadr.

5. SWOT ANALYSIS OF EACH OPTION

SWOT analyses for all of the four options are provided below.

Option 1: Status quo – the three schools continue as standalone schools

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Llansilin, Pennant and Llanrhaeadr-ym-Mochnant - There would be no additional home to school transport costs - No requirement for a reorganisation process - No change for staff - No impact on pupils - Would provide continued access to Welsh-medium, dual stream and English-medium provision in the area 	<ul style="list-style-type: none"> - All three schools would continue to meet the Welsh Government definition of a 'small school' - Pupil numbers at Ysgol Bro Cynllaith would remain below 30 - Would not lead to a rationalisation of primary provision - Would still be running three buildings - Would not reduce surplus places in the area - Would not lead to a financial saving - Would not address issues with suitability and condition of school buildings - Would not address the high budget per pupil
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunities for further collaboration between the three schools to provide increased opportunities for pupils 	<ul style="list-style-type: none"> - Introduction of the new curriculum could be a challenge at Ysgol Bro Cynllaith due to small pupil numbers

Option 2a: Federate Bro Cynllaith and Llanrhaeadr. Pennant continues as standalone school

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Llansilin, Pennant and Llanrhaeadr-ym-Mochnant - There would be no additional home to school transport costs - No change for staff - Would provide continued access to Welsh-medium, dual stream and English-medium provision in the area 	<ul style="list-style-type: none"> - All three schools would continue to meet the Welsh Government definition of a 'small school' - Pupil numbers at Ysgol Bro Cynllaith would remain below 30 - Would not lead to a rationalisation of primary provision - Pupils at the three schools would still be taught separately - Would still be running three buildings - Would not reduce surplus places - Would not lead to a financial saving to the Council - Would not address issues with the condition and suitability of the school buildings

	<ul style="list-style-type: none"> - Would not address the high budget per pupil - Ysgol Bro Cynllaith is an English-medium school whilst Ysgol Llanrhaeadr is a dual stream school
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunities for further collaboration between Bro Cynllaith and Llanrhaeadr to provide increased opportunities for pupils - More opportunities for networking and sharing good practice between staff at Bro Cynllaith and Llanrhaeadr - Opportunities to introduce shared leadership across the Bro Cynllaith and Llanrhaeadr sites. - Opportunity for Ysgol Bro Cynllaith and Llanrhaeadr to operate more efficiently as part of a federation. 	<ul style="list-style-type: none"> - Introduction of the new curriculum – would be difficult to provide educational opportunities which meet the requirements of the new curriculum on the Ysgol Bro Cynllaith site

Option 2b: Federate Llanrhaeadr and Pennant. Bro C continues as standalone school

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Llansilin, Pennant and Llanrhaeadr-ym-Mochnant - There would be no additional home to school transport costs - No change for staff - Would provide continued access to Welsh-medium, dual stream and English-medium provision in the area 	<ul style="list-style-type: none"> - All three schools would continue to meet the Welsh Government definition of a ‘small school’ - Pupil numbers at Ysgol Bro Cynllaith would remain below 30 - Would not lead to a rationalisation of primary provision - Pupils at the three schools would still be taught separately - Would still be running three buildings - Would not reduce surplus places - Would not lead to a financial saving to the Council - Would not address issues with the condition and suitability of the school buildings - Would not address the high budget per pupil - Ysgol Pennant is a Welsh-medium school whilst Ysgol Llanrhaeadr is a dual stream school

	<ul style="list-style-type: none"> - Does not introduce any change to the smallest of the three schools
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunities for further collaboration between Pennant and Llanrhaeadr to provide increased opportunities for pupils - More opportunities for networking and sharing good practice between staff at Pennant and Llanrhaeadr - Opportunities to introduce shared leadership across the Pennant and Llanrhaeadr sites. - Opportunity for Pennant and Llanrhaeadr to operate more efficiently as part of a federation. 	<ul style="list-style-type: none"> - Introduction of the new curriculum – would be difficult to provide educational opportunities which meet the requirements of the new curriculum on the Ysgol Bro Cynllaith site

Option 2c: Federate Bro Cynllaith and Pennant. Llanrhaeadr continues as standalone school

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Llansilin, Pennant and Llanrhaeadr-ym-Mochnant - There would be no additional home to school transport costs - No change for staff - Would provide continued access to Welsh-medium, dual stream and English-medium provision in the area 	<ul style="list-style-type: none"> - All three schools would continue to meet the Welsh Government definition of a 'small school' - Pupil numbers at Ysgol Bro Cynllaith would remain below 30 - Would not lead to a rationalisation of primary provision - Pupils at the three schools would still be taught separately - Would still be running three buildings - Would not reduce surplus places - Would not lead to a financial saving to the Council - Would not address issues with the condition and suitability of the school buildings - Would not address the high budget per pupil - Ysgol Bro Cynllaith is an English-medium school whilst Ysgol Pennant is a Welsh-medium school - Doesn't make geographical sense – Llanrhaeadr is located in between Bro Cynllaith and Pennant

Opportunities	Threats
<ul style="list-style-type: none"> - Opportunities for further collaboration between Bro Cynllaith and Pennant to provide increased opportunities for pupils - More opportunities for networking and sharing good practice between staff at Bro Cynllaith and Pennant - Opportunities to introduce shared leadership across the Bro Cynllaith and Pennant sites. - Opportunity for Bro Cynllaith and Pennant to operate more efficiently as part of a federation. 	<ul style="list-style-type: none"> - Introduction of the new curriculum – would be difficult to provide educational opportunities which meet the requirements of the new curriculum on the Ysgol Bro Cynllaith site - Possible impact on Welsh language ethos of Ysgol Pennant

Option 2d: Federate Bro Cynllaith, Llanrhaeadr and Pennant.

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Llansilin, Pennant and Llanrhaeadr-ym-Mochnant - There would be no additional home to school transport costs - Minimal change for staff - Would provide continued access to Welsh-medium, dual stream and English-medium provision in the area - Improved governance arrangements through the establishment of one governing body to oversee all three schools. 	<ul style="list-style-type: none"> - All three schools would continue to meet the Welsh Government definition of a ‘small school’ - Pupil numbers at Ysgol Bro Cynllaith would remain below 30 - Would not lead to a rationalisation of primary provision - Pupils at the three schools would still be taught separately - Would still be running three buildings - Would not reduce surplus places - Would not lead to a financial saving to the Council - Would not address issues with the condition and suitability of the school buildings - Would not address the high budget per pupil - All three schools are different language categories
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunities for further collaboration between the three schools to provide increased opportunities for pupils 	<ul style="list-style-type: none"> - Introduction of the new curriculum – would be difficult to provide educational opportunities which meet the requirements of the new

<ul style="list-style-type: none"> - More opportunities for networking and sharing good practice between staff at the three schools - Opportunities to introduce shared leadership across the three schools. - Opportunity for the three schools to operate more efficiently as part of a federation. 	<ul style="list-style-type: none"> curriculum on the Ysgol Bro Cynllaith site - Possible impact on Welsh language ethos of Ysgol Pennant
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Option 3a: Federate Bro Cynllaith and Llanrhaeadr. Close Pennant

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Llansilin and Llanrhaeadr-ym-Mochnant - Would lead to rationalisation of primary provision in the area through the closure of Ysgol Pennant - Would reduce surplus places in the area - Would lead to an increase in pupil numbers at Llanrhaeadr - Would lead to a financial saving to the authority - Minimal impact on staff at Bro Cynllaith and Llanrhaeadr 	<ul style="list-style-type: none"> - Pupil numbers at Ysgol Bro Cynllaith would remain below 30 - Pupils at Bro Cynllaith and Llanrhaeadr would still be taught separately. - Loss of provision from Penybontfawr - Loss of community facilities associated with Ysgol Pennant from Penybontfawr - Additional travel would be required for pupils currently attending Ysgol Pennant - Pupils currently attending Ysgol Pennant would need to transfer to other schools - Impact on staff at Pennant - Would lead to closure of the largest school of the three - Would not be capacity at Llanrhaeadr to accommodate all pupils currently attending Pennant - Investment would be needed at Llanrhaeadr to provide additional places - Would lead to closure of the only designated Welsh-medium school in the Llanfyllin catchment
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunities for further collaboration between Bro Cynllaith and Llanrhaeadr to provide increased opportunities for pupils - More opportunities for networking and sharing good practice between 	<ul style="list-style-type: none"> - Introduction of the new curriculum – would be difficult to provide educational opportunities which meet the requirements of the new curriculum on the Ysgol Bro Cynllaith site

<p>staff at Bro Cynllaith and Llanrhaeadr</p> <ul style="list-style-type: none"> - Opportunities to introduce shared leadership across the Bro Cynllaith and Llanrhaeadr sites. - Opportunity for Ysgol Bro Cynllaith and Llanrhaeadr to operate more efficiently as part of a federation. - Opportunity to strengthen the Welsh ethos of Llanrhaeadr should Pennant pupils transfer to the school. - Opportunity to realise a capital receipt from sale of the Pennant site. 	<ul style="list-style-type: none"> - Pupils currently attending a Welsh-medium school would need to transfer to a dual stream school.
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Option 3b: Federate Llanrhaeadr and Pennant. Close Bro Cynllaith

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Pennant and Llanrhaeadr-ym-Mochnant - Would lead to rationalisation of primary provision in the area through the closure of Ysgol Bro Cynllaith - Would reduce surplus places in the area - Would address the high budget per pupil - Would lead to an increase in pupil numbers at Llanrhaeadr - Would lead to a financial saving to the authority - Minimal impact on staff at Llanrhaeadr and Pennant 	<ul style="list-style-type: none"> - Pupils at Pennant and Llanrhaeadr would still be taught separately. - Loss of provision from Llansilin - Loss of community facilities associated with Ysgol Bro Cynllaith from Llansilin - Additional travel would be required for pupils currently attending Ysgol Bro Cynllaith - Pupils currently attending Ysgol bro Cynllaith would need to transfer to other schools - Some pupils currently attending Ysgol Bro Cynllaith may live closer to schools outside Powys - Impact on staff at Ysgol Bro Cynllaith - Ysgol Pennant is a Welsh-medium school whilst Ysgol Llanrhaeadr is a dual stream school
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunities for further collaboration between Pennant and Llanrhaeadr to provide increased opportunities for pupils - More opportunities for networking and sharing good practice between staff at Pennant and Llanrhaeadr 	<ul style="list-style-type: none"> - Introduction of the new curriculum – would be difficult to provide educational opportunities which meet the requirements of the new curriculum on the Ysgol Bro Cynllaith site

<ul style="list-style-type: none"> - Opportunities to introduce shared leadership across the Pennant and Llanrhaeadr sites. - Opportunity for Pennant and Llanrhaeadr to operate more efficiently as part of a federation. - Opportunity to strengthen the Welsh ethos of Llanrhaeadr - Opportunity to realise a capital receipt from sale of the Bro Cynllaith site. 	
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Option 3c: Federate Bro Cynllaith and Pennant. Close Llanrhaeadr.

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Pennant and Llansilin - Would lead to rationalisation of primary provision in the area through the closure of Llanrhaeadr - Would reduce surplus places in the area - Would lead to a financial saving to the authority - Minimal impact on staff at Bro Cynllaith and Pennant. 	<ul style="list-style-type: none"> - Pupil numbers at Ysgol Bro Cynllaith would remain below 30 - Pupils at Bro Cynllaith and Pennant would still be taught separately. - Loss of provision from Llanrhaeadr - Loss of community facilities associated with Ysgol Llanrhaeadr from the village - Additional travel would be required for pupils currently attending Ysgol Llanrhaeadr - Pupils currently attending Ysgol Llanrhaeadr would need to transfer to other schools - Impact on staff at Llanrhaeadr - Would lead to closure of the building which is in the best condition of the three - May not be capacity at other schools to accommodate all pupils currently attending Llanrhaeadr - Ysgol Bro Cynllaith is an English-medium school whilst Ysgol Pennant is a Welsh-medium school
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunities for further collaboration between Bro Cynllaith and Pennant to provide increased opportunities for pupils 	<ul style="list-style-type: none"> - Introduction of the new curriculum – would be difficult to provide educational opportunities which meet the requirements of the new curriculum on the Ysgol Bro Cynllaith site

<ul style="list-style-type: none"> - More opportunities for networking and sharing good practice between staff at Bro Cynllaith and Pennant - Opportunities to introduce shared leadership across the Bro Cynllaith and Pennant sites. - Opportunity for Bro Cynllaith and Pennant to operate more efficiently as part of a federation. - Opportunity to realise a capital receipt from sale of the Llanrhaeadr site. 	<ul style="list-style-type: none"> - Possible impact on Welsh language ethos of Ysgol Pennant
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Option 4a: Merge Bro C and Llanrhaeadr to establish a new school on two sites. Pennant continues as a standalone school

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Llansilin, Pennant and Llanrhaeadr-ym-Mochnant - There would be no additional home to school transport costs - Would provide continued access to a designated Welsh-medium school in the area - Opportunity to realise a financial saving to the authority - Minimal impact on pupils 	<ul style="list-style-type: none"> - Pupil numbers on the Llansilin site would remain below 30 - Would not lead to a rationalisation of primary provision - Pupils on the three sites would still be taught separately - Would still be running three buildings - Would not reduce surplus places - Would not address issues with the condition and suitability of the school buildings - Ysgol Bro Cynllaith is an English-medium school whilst Ysgol Llanrhaeadr is a dual stream school - Staff at Bro Cynllaith and Llanrhaeadr would have to undergo a restructure process
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunities for further collaboration across the Llansilin and Llanrhaeadr sites to provide increased opportunities for pupils - More opportunities for networking and sharing good practice between staff at Bro Cynllaith and Llanrhaeadr - Opportunity for Ysgol Bro Cynllaith and Llanrhaeadr to operate more 	<ul style="list-style-type: none"> - Introduction of the new curriculum – would be difficult to provide educational opportunities which meet the requirements of the new curriculum on the Llansilin site

efficiently as part of a dual sited school.	
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Option 4b: Merge Llanrhaeadr and Pennant to establish a new school on two sites. Bro C continues as standalone school

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Llansilin, Pennant and Llanrhaeadr-ym-Mochnant - There would be no additional home to school transport costs - Opportunity to realise a financial saving to the authority - Minimal impact on pupils 	<ul style="list-style-type: none"> - Pupil numbers at Ysgol Bro Cynllaith would remain below 30 - Would not lead to a rationalisation of primary provision - Pupils on the three sites would still be taught separately - Would still be running three buildings - Would not reduce surplus places - Would not address issues with the condition and suitability of the school buildings - Would not address the high budget per pupil at Bro Cynllaith - Ysgol Pennant is currently a Welsh-medium school whilst Ysgol Llanrhaeadr is a dual stream school - Does not introduce any change to the smallest of the three schools - Staff at Pennant and Llanrhaeadr would have to undergo a restructure process
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunities for further collaboration across the Pennant and Llanrhaeadr sites to provide increased opportunities for pupils - More opportunities for networking and sharing good practice between staff at the Pennant and Llanrhaeadr sites - Opportunity for Pennant and Llanrhaeadr to operate more efficiently as part of a dual sited school. - Opportunity to strengthen the Welsh language ethos on the Llanrhaeadr site 	<ul style="list-style-type: none"> - Introduction of the new curriculum – would be difficult to provide educational opportunities which meet the requirements of the new curriculum on the Ysgol Bro Cynllaith site - Possible threat to the Welsh language ethos of Ysgol Pennant

Option 4c: Merge Bro C and Pennant to establish a new school on two sites.
Llanrhaeadr continues as a standalone school

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Llansilin, Pennant and Llanrhaeadr-ym-Mochnant - There would be no additional home to school transport costs - Opportunity to realise a financial saving to the authority - Minimal impact on pupils 	<ul style="list-style-type: none"> - Pupil numbers on the Llansilin site would remain below 30 - Would not lead to a rationalisation of primary provision - Pupils on the three sites would still be taught separately - Would still be running three buildings - Would not reduce surplus places - Would not address issues with the condition and suitability of the school buildings - Would not address the high budget per pupil at Ysgol Bro Cynllaith - Ysgol Bro Cynllaith is an English-medium school whilst Ysgol Pennant is a Welsh-medium school - Doesn't make geographical sense – Llanrhaeadr is located in between Bro Cynllaith and Pennant - Staff at Bro Cynllaith and Pennant would have to undergo a restructure process
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunities for further collaboration across the Bro Cynllaith and Pennant sites to provide increased opportunities for pupils - More opportunities for networking and sharing good practice between staff at the Bro Cynllaith and Pennant sites - Opportunity for Bro Cynllaith and Pennant to operate more efficiently as part of a dual sited school. 	<ul style="list-style-type: none"> - Introduction of the new curriculum – would be difficult to provide educational opportunities which meet the requirements of the new curriculum on the Llansilin site - Possible threat to the Welsh language ethos of Ysgol Pennant

Option 5a: Merge Bro C and Llanrhaeadr to establish a new school on two sites.
Close Pennant

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Llansilin and Llanrhaeadr-ym-Mochnant - Would lead to rationalisation of primary provision in the area through the closure of Ysgol Pennant - Would reduce surplus places in the area - Would lead to an increase in pupil numbers on the Llanrhaeadr site - Would lead to a financial saving to the authority - Minimal impact on pupils at Bro Cynllaith and Llanrhaeadr 	<ul style="list-style-type: none"> - Pupil numbers on the Llansilin site would remain below 30 - Pupils at Bro Cynllaith and Llanrhaeadr would still be taught separately. - Loss of provision from Penybontfawr - Loss of community facilities associated with Ysgol Pennant from Penybontfawr - Additional travel would be required for pupils currently attending Ysgol Pennant - Pupils currently attending Ysgol Pennant would need to transfer to other schools - Impact on staff at Pennant - Would lead to closure of the largest school of the three - Would not be capacity at Llanrhaeadr to accommodate all pupils currently attending Pennant - Investment would be needed at Llanrhaeadr to provide additional places - Would lead to closure of the only designated Welsh-medium school in the Llanfyllin catchment - Staff at Bro Cynllaith and Llanrhaeadr would have to undergo a restructure process. - Bro Cynllaith is an English-medium school whilst Llanrhaeadr is dual stream.
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunities for further collaboration across the Llansilin and Llanrhaeadr sites to provide increased opportunities for pupils - More opportunities for networking and sharing good practice between staff at Bro Cynllaith and Llanrhaeadr - Opportunity for Ysgol Bro Cynllaith and Llanrhaeadr to operate more efficiently as part of a dual sited school. 	<ul style="list-style-type: none"> - Introduction of the new curriculum – would be difficult to provide educational opportunities which meet the requirements of the new curriculum on the Ysgol Bro Cynllaith site - Pupils currently attending a Welsh-medium school would need to transfer to a dual stream school.

<ul style="list-style-type: none"> - Opportunity to strengthen the Welsh ethos on the Llanrhaeadr site should Pennant pupils transfer to the school. - Opportunity to realise a capital receipt from sale of the Pennant site. 	
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Option 5b: Merge Llanrhaeadr and Pennant to establish a new school on two sites. Close Bro C

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Pennant and Llanrhaeadr-ym-Mochnant - Would lead to rationalisation of primary provision in the area through the closure of Ysgol Bro Cynllaith - Would reduce surplus places in the area - Would address the high budget per pupil at Ysgol Bro Cynllaith - Would lead to an increase in pupil numbers at Llanrhaeadr - Would lead to a financial saving to the authority - Minimal impact on pupils at Llanrhaeadr and Pennant 	<ul style="list-style-type: none"> - Pupils at Pennant and Llanrhaeadr would still be taught separately. - Loss of provision from Llansilin - Loss of community facilities associated with Ysgol Bro Cynllaith from Llansilin - Additional travel would be required for pupils currently attending Ysgol Bro Cynllaith - Pupils currently attending Ysgol Bro Cynllaith would need to transfer to other schools - Some pupils currently attending Ysgol Bro Cynllaith may live closer to schools outside Powys - Impact on staff at Ysgol Bro Cynllaith - Staff at Llanrhaeadr and Pennant would have to undergo a restructure process - Ysgol Pennant is a Welsh-medium school whilst Ysgol Llanrhaeadr is a dual stream school
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunities for further collaboration across the Pennant and Llanrhaeadr sites to provide increased opportunities for pupils - More opportunities for networking and sharing good practice between staff at the Pennant and Llanrhaeadr sites - Opportunity for Pennant and Llanrhaeadr to operate more 	<ul style="list-style-type: none"> - Introduction of the new curriculum – would be difficult to provide educational opportunities which meet the requirements of the new curriculum on the Llansilin site. - Possible threat to the Welsh language ethos of Pennant.

<p>efficiently as part of a dual sited school.</p> <ul style="list-style-type: none"> - Opportunity to strengthen the Welsh ethos of Llanrhaeadr - Opportunity to realise a capital receipt from sale of the Bro Cynllaith site. 	
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Option 5c: Merge Bro C and Pennant to establish a new school on two sites. Close Llanrhaeadr

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Pennant and Llansilin - Would lead to rationalisation of primary provision in the area through the closure of Llanrhaeadr - Would reduce surplus places in the area - Would lead to a financial saving to the authority - Minimal impact on pupils at Pennant and Llansilin. 	<ul style="list-style-type: none"> - Pupils at Llansilin and Pennant would still be taught separately. - Loss of provision from Llanrhaeadr - Loss of community facilities associated with Ysgol Llanrhaeadr from the village - Additional travel would be required for pupils currently attending Ysgol Llanrhaeadr - Pupils currently attending Ysgol Llanrhaeadr would need to transfer to other schools - Impact on staff at Llanrhaeadr - Would lead to closure of the building which is in the best condition of the three - May not be capacity at other schools to accommodate all pupils currently attending Llanrhaeadr - Staff at Bro Cynllaith and Pennant would have to undergo a restructure process - Ysgol Bro Cynllaith is an English-medium school whilst Ysgol Pennant is a Welsh-medium school
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunities for further collaboration between the Llansilin and Pennant sites to provide increased opportunities for pupils - More opportunities for networking and sharing good practice between 	<ul style="list-style-type: none"> - Introduction of the new curriculum – would be difficult to provide educational opportunities which meet the requirements of the new curriculum on the Llansilin site - Possible impact on Welsh language ethos of Ysgol Pennant

<p>staff on the Llansilin and Pennant sites</p> <ul style="list-style-type: none"> - Opportunity for Bro Cynllaith and Pennant to operate more efficiently as part of a dual sited school. - Opportunity to realise a capital receipt from sale of the Llanrhaeadr site. 	
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Option 6: Merge Bro C, Llanrhaeadr and Pennant to establish a new school on three sites

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Llansilin, Llanrhaeadr-ym-mochnant and Pennant - Pupils at all three schools would continue to attend school on their current site - There would be no additional home to school transport costs - More opportunities could be provided to pupils at all current schools - Could provide a financial saving to the Council - All staff would have the opportunity to apply for positions at the new school - Improved opportunities for staff from working in one larger school 	<ul style="list-style-type: none"> - Small numbers would remain on the Llansilin site in particular - Pupils would continue to be taught separately - Would still need to maintain three buildings - Would not address school building suitability and condition issues - Would not reduce surplus places - All schools would lose their identities - Possible additional transport costs during the school day to enable pupils to access joint activities - Would impact on staff at all three current schools - Possible reduction in job opportunities - The new school would have one very small site - Need to restructure leadership across all of the schools - All three schools have different language categories
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunities for further collaboration across the sites - More opportunities for networking and sharing good practice between staff at the three sites 	<ul style="list-style-type: none"> - Introduction of the new curriculum – would be difficult to provide educational opportunities which meet the requirements of the new curriculum on the Llansilin site - Possible impact on the Welsh language ethos of Ysgol Pennant

<ul style="list-style-type: none"> - Opportunities for the three schools to operate more efficiently as part of a multi sited school. 	
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Option 7a: Merge Bro C and Llanrhaeadr to establish a new school on one site – Bro C. Pennant continues as standalone school

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Llansilin and Pennant - Would lead to rationalisation of primary provision in the area through the closure of Ysgol Llanrhaeadr - Would reduce surplus places in the area - Would provide continued access to a designated Welsh-medium school in the area - Would lead to a financial saving to the authority - No impact on pupils at Pennant - No impact on staff at Pennant - All staff at Bro Cynllaith and Llanrhaeadr would have the opportunity to secure posts in the new school 	<ul style="list-style-type: none"> - Loss of provision from Llanrhaeadr - Loss of community facilities associated with Ysgol Llanrhaeadr from the village - Additional travel would be required for pupils currently attending Ysgol Llanrhaeadr - Pupils currently attending Ysgol Llanrhaeadr would need to transfer to other schools - Staff at Bro Cynllaith and Llanrhaeadr would have to undergo a restructure process - Possible reduction in staffing requirements - Would lead to closure of the building which is in the best condition of the three - May not be capacity at other schools to accommodate all pupils currently attending Llanrhaeadr - Investment would be needed to provide additional capacity
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunity to realise a capital receipt from sale of the Llanrhaeadr site. 	<ul style="list-style-type: none"> - Introduction of the new curriculum – would be difficult to provide educational opportunities which meet the requirements of the new curriculum on the Llansilin site

Option 7b: Merge Bro C and Llanrhaeadr to establish a new school on one site – Llanrhaeadr. Pennant continues as standalone school

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Llanrhaeadr and Pennant - Would lead to rationalisation of primary provision in the area through the closure of the Ysgol Bro Cynllaith site - Would reduce surplus places in the area - Would provide continued access to a designated Welsh-medium school in the area - Would lead to a financial saving to the authority - No impact on pupils at Pennant - No impact on staff at Pennant - All staff at Bro Cynllaith and Llanrhaeadr would have the opportunity to secure posts in the new school - Pupils currently attending Ysgol Bro Cynllaith would attend a building which is in better condition should they transfer to Llanrhaeadr 	<ul style="list-style-type: none"> - Loss of provision from Llansilin - Loss of community facilities associated with Ysgol Bro Cynllaith from the village - Additional travel would be required for pupils currently attending Ysgol Bro Cynllaith - Pupils currently attending Ysgol Bro Cynllaith would need to transfer to other schools - Some pupils currently attending Ysgol Bro Cynllaith may live closer to schools outside Powys - Staff at Bro Cynllaith and Llanrhaeadr would have to undergo a restructure process - Possible reduction in staffing requirements
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunity to realise a capital receipt from sale of the Ysgol Bro Cynllaith site 	

Option 7c: Merge Llanrhaeadr and Pennant to establish a new school on one site - Llanrhaeadr. Bro C continues as standalone school

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Llanrhaeadr and Llansilin - Would lead to rationalisation of primary provision in the area through the closure of Ysgol Pennant - Would reduce surplus places in the area - Would lead to a financial saving to the authority - No impact on pupils at Ysgol Bro Cynllaith 	<ul style="list-style-type: none"> - Loss of provision from Pennant - Loss of community facilities associated with Ysgol Pennant from the village - Additional travel would be required for pupils currently attending Ysgol Pennant - Pupils currently attending Ysgol Pennant would need to transfer to other schools

<ul style="list-style-type: none"> - No impact on staff at Ysgol Bro Cynllaith - All staff at Llanrhaeadr and Pennant would have the opportunity to secure posts in the new school 	<ul style="list-style-type: none"> - Staff at Llanrhaeadr and Pennant would have to undergo a restructure process - Possible reduction in staffing requirements - Some investment would be needed to provide additional capacity - Ysgol Pennant is a Welsh-medium stream whilst Llanrhaeadr is a dual stream - Pupil numbers at Ysgol Bro Cynllaith would remain below 30 - Would not address the high budget per pupil at Bro Cynllaith - Does not introduce any change to the smallest of the three schools
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunity to realise a capital receipt from sale of the Pennant site. 	<ul style="list-style-type: none"> - Introduction of the new curriculum – would be difficult to provide educational opportunities which meet the requirements of the new curriculum at Ysgol Bro Cynllaith. - Possible threat to the Welsh language ethos at Pennant

Option 7d: Merge Llanrhaeadr and Pennant to establish a new school on one site - Pennant. Bro C continues as standalone school

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Pennant and Llansilin - Would lead to rationalisation of primary provision in the area through the closure of Ysgol Llanrhaeadr - Would reduce surplus places in the area - Would lead to a financial saving to the authority - No impact on pupils at Ysgol Bro Cynllaith - No impact on staff at Ysgol Bro Cynllaith - All staff at Llanrhaeadr and Pennant would have the opportunity to secure posts in the new school 	<ul style="list-style-type: none"> - Loss of provision from Llanrhaeadr - Loss of community facilities associated with Ysgol Llanrhaeadr from the village - Additional travel would be required for pupils currently attending Ysgol Llanrhaeadr - Pupils currently attending Ysgol Llanrhaeadr would need to transfer to other schools - Staff at Llanrhaeadr and Pennant would have to undergo a restructure process - Possible reduction in staffing requirements

	<ul style="list-style-type: none"> - Some investment would be needed to provide additional capacity - Ysgol Pennant is a Welsh-medium stream whilst Llanrhaeadr is a dual stream - Would lead to closure of the building which is in the best condition of the three - Pupil numbers at Ysgol Bro Cynllaith would remain below 30 - Would not address the high budget per pupil at Bro Cynllaith - Does not introduce any change to the smallest of the three schools
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunity to realise a capital receipt from sale of the Llanrhaeadr site. 	<ul style="list-style-type: none"> - Introduction of the new curriculum – would be difficult to provide educational opportunities which meet the requirements of the new curriculum at Ysgol Bro Cynllaith. - Possible threat to the Welsh language ethos at Pennant

Option 7e: Merge Bro C and Pennant to establish a new school on one site – Bro C. Llanrhaeadr continues as a standalone school

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Llansilin and Llanrhaeadr - Would lead to rationalisation of primary provision in the area through the closure of Ysgol Pennant - Would reduce surplus places in the area - Would lead to a financial saving to the authority - No impact on pupils at Llanrhaeadr - No impact on staff at Llanrhaeadr - All staff at Bro Cynllaith and Pennant would have the opportunity to secure posts in the new school 	<ul style="list-style-type: none"> - Loss of provision from Pennant - Loss of community facilities associated with Ysgol Pennant from the village - Additional travel would be required for pupils currently attending Ysgol Pennant - Pupils currently attending Ysgol Pennant would need to transfer to other schools - Staff at Bro Cynllaith and Pennant would have to undergo a restructure process - Possible reduction in staffing requirements - Would lead to retention of the smallest of the three sites

	<ul style="list-style-type: none"> - May not be capacity at other schools to accommodate all pupils currently attending Pennant - Investment would be needed to provide additional capacity - Pennant is a Welsh-medium school whilst Bro Cynllaith is an English-medium school - Unlikely that Pennant pupils would transfer to the Llansilin site - Doesn't make geographical sense – Llanrhaeadr is located in between Bro Cynllaith and Pennant
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunity to realise a capital receipt from sale of the Pennant site. 	<ul style="list-style-type: none"> - Introduction of the new curriculum – would be difficult to provide educational opportunities which meet the requirements of the new curriculum on the Llansilin site - Pupils currently attending a Welsh-medium school would need to transfer to a dual stream school.

Option 7f: Merge Bro C and Pennant to establish a new school on one site – Pennant. Llanrhaeadr continues as a standalone school.

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Pennant and Llanrhaeadr - Would lead to rationalisation of primary provision in the area through the closure of Ysgol Bro Cynllaith - Would lead to closure of the smallest site of the three - Would reduce surplus places in the area - Would lead to a financial saving to the authority - No impact on pupils at Llanrhaeadr - No impact on staff at Llanrhaeadr - All staff at Bro Cynllaith and Pennant would have the opportunity to secure posts in the new school 	<ul style="list-style-type: none"> - Loss of provision from Llansilin - Loss of community facilities associated with Ysgol Bro Cynllaith from the village - Additional travel would be required for pupils currently attending Ysgol Bro Cynllaith - Pupils currently attending Ysgol Bro Cynllaith would need to transfer to other schools - Some pupils currently attending Ysgol Bro Cynllaith may live closer to schools outside Powys - Staff at Bro Cynllaith and Pennant would have to undergo a restructure process - Possible reduction in staffing requirements

	<ul style="list-style-type: none"> - Pennant is a Welsh-medium school whilst Bro Cynllaith is an English-medium school - Doesn't make geographical sense – Llanrhaeadr is located in between Bro Cynllaith and Pennant
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunity to realise a capital receipt from sale of the Ysgol Bro Cynllaith site. 	<ul style="list-style-type: none"> - Possible threat to the Welsh language ethos of Ysgol Pennant.

Option 8a: Merge Bro C and Llanrhaeadr to establish a new school on one site – Bro C. Close Pennant

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Llansilin - Would lead to rationalisation of primary provision in the area through the closure of Ysgol Llanrhaeadr and Ysgol Pennant - Would reduce surplus places in the area - Would lead to a financial saving to the authority - All staff at Bro Cynllaith and Llanrhaeadr would have the opportunity to secure posts in the new school 	<ul style="list-style-type: none"> - Loss of provision from Llanrhaeadr and Pennant - Loss of community facilities associated with Ysgol Llanrhaeadr and Ysgol Pennant from the villages - Additional travel would be required for pupils currently attending Ysgol Llanrhaeadr and Ysgol Pennant - Pupils currently attending Ysgol Llanrhaeadr and Ysgol Pennant would need to transfer to other schools - Staff at Bro Cynllaith and Llanrhaeadr would have to undergo a restructure process - Staff at Ysgol Pennant would face a redundancy process - Unfair to staff at Ysgol Pennant - Would lead to retention of the smallest site of the three - Would not be capacity at other schools to accommodate all pupils currently attending Llanrhaeadr and Pennant - Significant investment would be needed to provide additional capacity - Would lead to closure of the building which is in the best condition of the three

	<ul style="list-style-type: none"> - Would lead to closure of the only Welsh-medium school in the catchment area
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunity to realise a capital receipt from sale of the Llanrhaeadr and Pennant sites. 	<ul style="list-style-type: none"> - Introduction of the new curriculum – would be difficult to provide educational opportunities which meet the requirements of the new curriculum on the Llansilin site - Significant capital investment would be needed – unlikely that this would be funded by WG - Would lead to closure of the only Welsh-medium school in the catchment area

Option 8b: Merge Bro C and Llanrhaeadr to establish a new school on one site – Llanrhaeadr. Close Pennant

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Llanrhaeadr - Would lead to rationalisation of primary provision in the area through the closure of Ysgol Bro Cynllaith and Ysgol Pennant - Would reduce surplus places in the area - Would lead to a financial saving to the authority - All staff at Bro Cynllaith and Llanrhaeadr would have the opportunity to secure posts in the new school - Would address the high budget per pupil at Ysgol Bro Cynllaith 	<ul style="list-style-type: none"> - Loss of provision from Llansilin and Pennant - Loss of community facilities associated with Ysgol Bro Cynllaith and Ysgol Pennant from the villages - Additional travel would be required for pupils currently attending Ysgol Bro Cynllaith and Ysgol Pennant - Pupils currently attending Ysgol Bro Cynllaith and Ysgol Pennant would need to transfer to other schools - Some pupils currently attending Ysgol Bro Cynllaith may live closer to schools outside Powys - Staff at Bro Cynllaith and Llanrhaeadr would have to undergo a restructure process - Staff at Ysgol Pennant would face a redundancy process - Unfair to staff at Ysgol Pennant - Some investment would be needed to provide additional capacity at Llanrhaeadr

	- Would lead to closure of the only Welsh-medium school in the catchment area
Opportunities	Threats
- Opportunity to realise a capital receipt from sale of the Bro Cynllaith and Pennant sites.	- Would lead to closure of the only Welsh-medium school in the catchment area

Option 8c: Merge Llanrhaeadr and Pennant to establish a new school on one site - Llanrhaeadr. Close Bro C

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Llanrhaeadr - Would retain the building which is in the best condition of the three - Would lead to rationalisation of primary provision in the area through the closure of Ysgol Bro Cynllaith and Ysgol Pennant - Would reduce surplus places in the area - Would lead to a financial saving to the authority - All staff at Llanrhaeadr and Pennant would have the opportunity to secure posts in the new school - Would address the high budget per pupil at Ysgol Bro Cynllaith 	<ul style="list-style-type: none"> - Loss of provision from Llansilin and Pennant - Loss of community facilities associated with Ysgol Bro Cynllaith and Ysgol Pennant from the villages - Additional travel would be required for pupils currently attending Ysgol Bro Cynllaith and Ysgol Pennant - Pupils currently attending Ysgol Bro Cynllaith and Ysgol Pennant would need to transfer to other schools - Some pupils currently attending Ysgol Bro Cynllaith may live closer to schools outside Powys - Staff at Llanrhaeadr and Pennant would have to undergo a restructure process - Staff at Ysgol Bro Cynllaith would face a redundancy process - Unfair to staff at Ysgol Bro Cynllaith - Some investment would be needed to provide additional capacity at Llanrhaeadr - Ysgol Pennant is a Welsh-medium school whilst Llanrhaeadr is dual stream
Opportunities	Threats
- Opportunity to realise a capital receipt from sale of the Bro Cynllaith and Pennant sites.	- Possible threat to the Welsh-medium ethos of Ysgol Pennant

- Opportunity to strengthen the Welsh ethos at Llanrhaeadr	
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Option 8d: Merge Llanrhaeadr and Pennant to establish a new school on one site - Pennant. Close Bro C

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Pennant - Would lead to rationalisation of primary provision in the area through the closure of Ysgol Bro Cynllaith and Ysgol Llanrhaeadr - Would reduce surplus places in the area - Would lead to a financial saving to the authority - All staff at Llanrhaeadr and Pennant would have the opportunity to secure posts in the new school - Would address the high budget per pupil at Ysgol Bro Cynllaith 	<ul style="list-style-type: none"> - Loss of provision from Llansilin and Llanrhaeadr - Loss of community facilities associated with Ysgol Bro Cynllaith and Ysgol Llanrhaeadr from the villages - Additional travel would be required for pupils currently attending Ysgol Bro Cynllaith and Ysgol Llanrhaeadr - Pupils currently attending Ysgol Bro Cynllaith and Ysgol Llanrhaeadr would need to transfer to other schools - Some pupils currently attending Ysgol Bro Cynllaith may live closer to schools outside Powys - Staff at Llanrhaeadr and Pennant would have to undergo a restructure process - Staff at Ysgol Bro Cynllaith would face a redundancy process - Unfair to staff at Ysgol Bro Cynllaith - Investment would be needed to provide additional capacity at Pennant - Ysgol Pennant is a Welsh-medium school whilst Llanrhaeadr is dual stream - Would lead to closure of the building which is in the best condition of the three
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunity to realise a capital receipt from sale of the Bro Cynllaith and Llanrhaeadr sites. 	<ul style="list-style-type: none"> - Possible threat to the Welsh-medium ethos of Ysgol Pennant

Option 8e: Merge Bro C and Pennant to establish a new school on one site – Bro C. Close Llanrhaeadr

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Llansilin - Would lead to rationalisation of primary provision in the area through the closure of Ysgol Llanrhaeadr and Ysgol Pennant - Would reduce surplus places in the area - Would lead to a financial saving to the authority - All staff at Bro Cynllaith and Pennant would have the opportunity to secure posts in the new school 	<ul style="list-style-type: none"> - Loss of provision from Llanrhaeadr and Pennant - Loss of community facilities associated with Ysgol Llanrhaeadr and Ysgol Pennant from the villages - Additional travel would be required for pupils currently attending Ysgol Llanrhaeadr and Ysgol Pennant - Pupils currently attending Ysgol Llanrhaeadr and Ysgol Pennant would need to transfer to other schools - Staff at Bro Cynllaith and Pennant would have to undergo a restructure process - Staff at Llanrhaeadr would face a redundancy process - Unfair to staff at Ysgol Llanrhaeadr - Would lead to retention of the smallest site of the three - Would not be capacity at other schools to accommodate all pupils currently attending Llanrhaeadr and Pennant - Significant investment would be needed to provide additional capacity - Would lead to closure of the building which is in the best condition of the three - Ysgol Pennant is a Welsh-medium school whilst Ysgol Bro Cynllaith is an English-medium school - Doesn't make geographical sense – Llanrhaeadr is located in between Ysgol Pennant and Ysgol Bro Cynllaith
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunity to realise a capital receipt from sale of the Llanrhaeadr and Pennant sites. 	<ul style="list-style-type: none"> - Introduction of the new curriculum – would be difficult to provide educational opportunities which

	<p>meet the requirements of the new curriculum on the Llansilin site</p> <ul style="list-style-type: none"> - Significant capital investment would be needed – unlikely that this would be funded by WG - Threat to the Welsh ethos of Ysgol Pennant
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Option 8f: Merge Bro C and Pennant to establish a new school on one site – Pennant. Close Llanrhaeadr.

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Pennant - Would lead to rationalisation of primary provision in the area through the closure of Ysgol Llanrhaeadr and Ysgol Bro Cynllaith - Would reduce surplus places in the area - Would lead to a financial saving to the authority - All staff at Bro Cynllaith and Pennant would have the opportunity to secure posts in the new school 	<ul style="list-style-type: none"> - Loss of provision from Llanrhaeadr and Llansilin - Loss of community facilities associated with Ysgol Llanrhaeadr and Ysgol Bro Cynllaith from the villages - Additional travel would be required for pupils currently attending Ysgol Llanrhaeadr and Ysgol Bro Cynllaith - Pupils currently attending Ysgol Llanrhaeadr and Ysgol Bro Cynllaith would need to transfer to other schools - Some pupils currently attending Ysgol Bro Cynllaith may live closer to schools outside Powys - Staff at Bro Cynllaith and Pennant would have to undergo a restructure process - Staff at Llanrhaeadr would face a redundancy process - Unfair to staff at Ysgol Llanrhaeadr - Would not be capacity at other schools to accommodate all pupils currently attending Llanrhaeadr - Investment would be needed to provide additional capacity - Would lead to closure of the building which is in the best condition of the three - Ysgol Pennant is a Welsh-medium school whilst Ysgol Bro Cynllaith is an English-medium school - Doesn't make geographical sense – Llanrhaeadr is located in between

	Ysgol Pennant and Ysgol Bro Cynllaith
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunity to realise a capital receipt from sale of the Llanrhaeadr and Ysgol Bro Cynllaith sites. 	<ul style="list-style-type: none"> - Capital investment would be needed – unlikely that this would be funded by WG - Threat to the Welsh ethos of Ysgol Pennant

Option 9a: Merge Bro C, Llanrhaeadr and Pennant to establish a new school on two sites – Bro C and Llanrhaeadr

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would lead to rationalisation of primary provision in the area through the closure of the Pennant site - Would reduce surplus places in the area - Would lead to a financial saving to the authority - Would retain provision in Llanrhaeadr and Llansilin - Fairer for staff – all staff at the three schools would have the opportunity to apply for positions in the new school 	<ul style="list-style-type: none"> - Loss of provision from Pennant - Loss of community facilities associated with Ysgol Pennant from the village - Additional travel would be required for pupils currently attending Ysgol Pennant - Pupils currently attending Pennant would have to transfer to a different location - Would not address issues with the suitability and condition of Bro Cynllaith building - All staff would have to undergo a restructure process - May be a reduction in staffing requirements - There might not be sufficient capacity at Bro Cynllaith and Llanrhaeadr for all of Pennant pupils - All three schools have different language categories
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunities for further collaboration across the two sites - More opportunities for networking and sharing good practice between staff at the two sites 	<ul style="list-style-type: none"> - Threat to the Welsh ethos of Ysgol Pennant

<ul style="list-style-type: none"> - Opportunities for the schools to operate more efficiently as part of a multi sited school. - Opportunity to realise a capital receipt from sale of the Pennant site. 	
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Option 9b: Merge Bro C, Llanrhaeadr and Pennant to establish a new school on two sites – Bro C and Pennant

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would lead to rationalisation of primary provision in the area through the closure of the Llanrhaeadr site - Would reduce surplus places in the area - Would lead to a financial saving to the authority - Would retain provision in Pennant and Llansilin - Fairer for staff – all staff at the three schools would have the opportunity to apply for positions in the new school 	<ul style="list-style-type: none"> - Loss of provision from Llanrhaeadr - Loss of community facilities associated with Ysgol Llanrhaeadr from the village - Additional travel would be required for pupils currently attending Ysgol Llanrhaeadr - Pupils currently attending Llanrhaeadr would have to transfer to a different location - Would not address issues with the suitability and condition of Bro Cynllaith building - Would lead to closure of the building which is in the best condition - All staff would have to undergo a restructure process - May be a reduction in staffing requirements - There might not be sufficient capacity at Bro Cynllaith and Pennant for all of the Llanrhaeadr pupils - All three schools have different language categories
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunities for further collaboration across the two sites - More opportunities for networking and sharing good practice between staff at the two sites 	<ul style="list-style-type: none"> - Threat to the Welsh ethos of Ysgol Pennant

<ul style="list-style-type: none"> - Opportunities for the schools to operate more efficiently as part of a multi sited school. - Opportunity to realise a capital receipt from sale of the Llanrhaeadr site. 	
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Option 9c: Merge Bro C, Llanrhaeadr and Pennant to establish a new school on two sites – Llanrhaeadr and Pennant

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would lead to rationalisation of primary provision in the area through the closure of the Bro Cynllaith site - Would reduce surplus places in the area - Would lead to a financial saving to the authority - Would retain provision in Pennant and Llanrhaeadr - Would lead to closure of the smallest of three sites - Fairer for staff – all staff at the three schools would have the opportunity to apply for positions in the new school 	<ul style="list-style-type: none"> - Loss of provision from Llansilin - Loss of community facilities associated with Ysgol Bro Cynllaith from the village - Additional travel would be required for pupils currently attending Ysgol Bro Cynllaith - Pupils currently attending Ysgol Bro Cynllaith would have to transfer to a different location - Some pupils currently attending Ysgol Bro Cynllaith may live closer to schools outside Powys - All staff would have to undergo a restructure process - May be a reduction in staffing requirements - All three schools have different language categories
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunities for further collaboration across the two sites - More opportunities for networking and sharing good practice between staff at the two sites - Opportunities for the schools to operate more efficiently as part of a multi sited school. - Opportunity to realise a capital receipt from sale of the Llanrhaeadr site. 	<ul style="list-style-type: none"> - Threat to the Welsh ethos of Ysgol Pennant

Option 10a: Close Ysgol Bro C. Retain Llanrhaeadr and Pennant as standalone schools

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Llanrhaeadr and Pennant - Would address the issue of low pupil numbers at Bro Cynllaith - Would reduce the Council's overall surplus capacity in primary schools - The Council would no longer need to maintain the Bro Cynllaith building - Revenue saving to the Council - Would lead to closure of the smallest of the three schools - Minimal impact on the other schools - Pupils would attend larger schools, which would be better equipped to meet the requirements of the new curriculum - Pupils would attend larger schools, which could provide a wider range of educational and extra-curricular opportunities - Would retain access to Welsh-medium provision at Pennant and Llanrhaeadr 	<ul style="list-style-type: none"> - Loss of provision from Llansilin - Loss of community facilities associated with Ysgol Bro Cynllaith from the village - Additional travel would be required for pupils currently attending Ysgol Bro Cynllaith - Pupils currently attending Ysgol Bro Cynllaith would need to transfer to other schools - Some pupils currently attending Ysgol Bro Cynllaith may live closer to schools outside Powys County Council Staff at Ysgol Bro Cynllaith would face a redundancy process
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunity to realise a capital receipt from sale of the Bro Cynllaith site 	

Option 10b: Close Pennant. Retain Ysgol Bro C and Llanrhaeadr as standalone schools

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Llansilin and Llanrhaeadr - Would reduce the Council's overall surplus capacity in primary schools - The Council would no longer need to maintain the Pennant building - Revenue saving to the Council 	<ul style="list-style-type: none"> - Loss of provision from Pennant - Loss of community facilities associated with Ysgol Pennant from the village - Additional travel would be required for pupils currently attending Ysgol Pennant

- Minimal impact on any other schools	<ul style="list-style-type: none"> - Pupils currently attending Ysgol Pennant would need to transfer to other schools - Staff at Ysgol Pennant would face a redundancy process - Would lead to closure of the only Welsh-medium school in the catchment area - Would lead to retention of the smallest of the three schools - There may not be sufficient capacity at Bro Cynllaith and Llanrhaeadr for all Pennant pupils
Opportunities	Threats
-	<ul style="list-style-type: none"> - May not be sufficient available capacity in nearby schools -

Option 10c: Close Llanrhaeadr. Retain Ysgol Bro C and Pennant as standalone schools

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Llansilin and Pennant - Would reduce the Council's overall surplus capacity in primary schools - The Council would no longer need to maintain the Llanrhaeadr building - Revenue saving to the Council - Minimal impact on any other schools - Would retain access to a designated Welsh-medium school in the area 	<ul style="list-style-type: none"> - Loss of provision from Llanrhaeadr - Loss of community facilities associated with Ysgol Llanrhaeadr from the village - Additional travel would be required for pupils currently attending Ysgol Llanrhaeadr - Pupils currently attending Ysgol Llanrhaeadr would need to transfer to other schools - Staff at Ysgol Llanrhaeadr would face a redundancy process - Would lead to closure of the building which is in the best condition of the three - Would lead to retention of the smallest of the three schools - There may not be sufficient capacity at Bro Cynllaith and Pennant for all Llanrhaeadr pupils
Opportunities	Threats

- Opportunity to realise a capital receipt from sale of the Llanrhaeadr site	- May not be sufficient available capacity in nearby schools - Unlikely that capital investment would be funded by WG
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Option 11a: Close Ysgol Bro C and Pennant. Retain Llanrhaeadr

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Llanrhaeadr - Would retain the building which is in the best condition of the three - Would lead to rationalisation of primary provision in the area through the closure of Ysgol Bro Cynllaith and Ysgol Pennant - The Council would no longer need to maintain the Bro Cynllaith and Pennant buildings - Revenue saving to the Council - Pupils currently attending Ysgol Bro Cynllaith would attend larger schools, which would be better equipped to meet the requirements of the new curriculum - Pupils currently attending Ysgol Bro Cynllaith would attend larger schools, which could provide a wider range of educational and extra-curricular opportunities - Llanrhaeadr School is located in a central area 	<ul style="list-style-type: none"> - Loss of provision from Llansilin and Pennant - Loss of community facilities associated with Ysgol Bro Cynllaith and Ysgol pennant from the villages - Additional travel would be required for pupils currently attending Ysgol Bro Cynllaith and Ysgol Pennant - Pupils currently attending Ysgol Bro Cynllaith and Ysgol Pennant would need to transfer to other schools - Some pupils currently attending Ysgol Bro Cynllaith may live closer to schools outside Powys - Staff at Ysgol Bro Cynllaith and Ysgol Pennant would face a redundancy process - Would lead to closure of the only designated Welsh-medium school in the area - May not be sufficient capacity at Llanrhaeadr to accommodate all pupils - Investment would be needed to provide additional capacity
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunity to realise a capital receipt from sale of the Pennant site 	<ul style="list-style-type: none"> - Pupils currently attending a Welsh-medium school would be expected to transfer to a dual stream school

Option 11b: Close Ysgol Bro C and Llanrhaeadr. Retain Pennant

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Pennant 	<ul style="list-style-type: none"> - Loss of provision from Llansilin and Llanrhaeadr

<ul style="list-style-type: none"> - Would retain access to a designated Welsh-medium school in the area - Would lead to rationalisation of primary provision in the area through the closure of Ysgol Bro Cynllaith and Ysgol Llanrhaeadr - The Council would no longer need to maintain the Bro Cynllaith and Llanrhaeadr buildings - Revenue saving to the Council - Pupils currently attending Ysgol Bro Cynllaith would attend larger schools, which would be better equipped to meet the requirements of the new curriculum - Pupils currently attending Ysgol Bro Cynllaith would attend larger schools, which could provide a wider range of educational and extra-curricular opportunities 	<ul style="list-style-type: none"> - Loss of community facilities associated with Ysgol Bro Cynllaith and Ysgol Llanrhaeadr from the villages - Additional travel would be required for pupils currently attending Ysgol Bro Cynllaith and Ysgol Llanrhaeadr - Pupils currently attending Ysgol Bro Cynllaith and Ysgol Llanrhaeadr would need to transfer to other schools - Some pupils currently attending Ysgol Bro Cynllaith may live closer to schools outside Powys - Staff at Ysgol Bro Cynllaith and Ysgol Llanrhaeadr would face a redundancy process - Would lead to closure of the building which is in the best condition of the three - Would not be sufficient capacity at Pennant to accommodate all pupils - Investment would be needed to provide additional capacity - Pennant is not in the most central location to serve the area - Would be no access to English-medium provision in the area
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunity to realise a capital receipt from sale of the Llanrhaeadr and Bro Cynllaith sites 	<ul style="list-style-type: none"> - Pupils may transfer to different schools - Additional capacity would be required – unlikely that capital investment would be funded by WG

Option 11c: Close Pennant and Llanrhaeadr. Retain Ysgol Bro C

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Lansilin - Would lead to rationalisation of primary provision in the area through the closure of Ysgol Pennant and Ysgol Llanrhaeadr - Would reduce surplus places in the area 	<ul style="list-style-type: none"> - Loss of provision from Pennant and Llanrhaeadr - Loss of community facilities associated with Ysgol Pennant and Ysgol Llanrhaeadr from the villages

<ul style="list-style-type: none"> - Would lead to a financial saving to the authority 	<ul style="list-style-type: none"> - Additional travel would be required for pupils currently attending Ysgol Pennant and Ysgol Llanrhaeadr - Pupils currently attending Ysgol Pennant and Ysgol Llanrhaeadr would need to transfer to other schools - Staff at Ysgol Pennant and Ysgol Llanrhaeadr would face a redundancy process - Would lead to closure of the building which is in the best condition of the three - Would not be sufficient capacity at Ysgol Bro Cynllaith to accommodate all pupils - Significant investment would be needed to provide additional capacity - Llansilin is not in the most central location to serve the area - Would be no access to Welsh-medium provision in the area
<p>Opportunities</p>	<p>Threats</p>
<ul style="list-style-type: none"> - Opportunity to realise a capital receipt from sale of the Llanrhaeadr and Pennant sites 	<ul style="list-style-type: none"> - Capital investment would be needed – unlikely that this would be funded by WG - Significant impact on access to Welsh-medium provision in the area

Option 12: Close Ysgol Bro C, Pennant and Llanrhaeadr

<p>Strengths</p>	<p>Weaknesses</p>
<ul style="list-style-type: none"> - Would lead to rationalisation of primary provision in the area through the closure of all three schools - Would reduce the Council's overall surplus capacity in primary schools - The Council would no longer need to maintain the Bro Cynllaith, Llanrhaeadr and Pennant buildings - Would lead to a financial saving to the authority 	<ul style="list-style-type: none"> - Loss of provision from all three communities - Loss of community facilities associated with the schools from the three villages - Additional travel would be required for pupils currently attending all three schools - Pupils currently attending the three schools would need to transfer to other schools - Some pupils currently attending Ysgol Bro Cynllaith may live closer

	<p>to schools outside Powys County Council Staff at all three schools would have to undergo a restructure process</p> <ul style="list-style-type: none"> - Would not be capacity at other schools to accommodate all pupils currently attending the three schools - Investment would be needed to provide additional capacity - Would lead to closure of the Llanrhaeadr building which is a relatively new building - Would lead to closure of the only designated Welsh-medium school in the catchment
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunity to realise capital receipts from sale of the three sites 	<ul style="list-style-type: none"> - Capital investment would be needed – unlikely that this would be funded by WG - Significant impact on access to Welsh-medium provision in the area

6. IMPACT OF EACH OPTION

The likely impact of each option on quality and standards, the community and travelling arrangements is considered below:

Option	Likely impact on quality and standards	Likely impact on the community	Likely impact of different travelling arrangements
<p>Option 1 – Status quo – the three schools continue as standalone schools</p>	<p>Ysgol Bro Cynllaith, Ysgol Pennant and Ysgol Llanrhaeadr would continue to operate as standalone schools, therefore there would be no impact on quality and standards.</p>	<p>There would be no impact on the community – provision would continue to be available in all three current locations.</p>	<p>There would be no impact on travel arrangements – pupils would continue in all three current locations.</p>
<p>Option 2a - Federate Bro Cynllaith and Llanrhaeadr. Pennant continues as standalone school</p>	<p>The impact on quality and standards would be minimal. Bro Cynllaith and Llanrhaeadr would continue to operate as standalone schools. However, federation would mean that one joint governing body would be responsible for both schools. There would also be the potential for shared leadership across the two schools.</p> <p>Establishment of a federation could lead to opportunities to share staff / resources across the federation, which would have a positive impact on quality and standards.</p>	<p>The impact on the community would be minimal – provision would continue to be available in all three current locations.</p> <p>However, one new governing body would be responsible for Bro Cynllaith and Llanrhaeadr, therefore there could be a perceived reduction in community involvement in management of the school, depending on the make up of the federated governing body.</p>	<p>Primary provision would continue to be available on all three current sites, therefore it is not anticipated that any additional home to school travel would be required.</p> <p>However, some additional travel may be required between Bro Cynllaith and Llanrhaeadr in order to access joint activities and events.</p>

	There would be no impact on Pennant.		
Option 2b - Federate Llanrhaeadr and Pennant. Bro Cynllaith continues as standalone school	<p>The impact on quality and standards would be minimal. Llanrhaeadr and Pennant would continue to operate as standalone schools. However, federation would mean that one joint governing body would be responsible for both schools. There would also be the potential for shared leadership across the two schools.</p> <p>Establishment of a federation could lead to opportunities to share staff / resources across the federation, which would have a positive impact on quality and standards.</p> <p>There would be no impact on Bro Cynllaith.</p>	<p>The impact on the community would be minimal – provision would continue to be available in all three current locations.</p> <p>However, one new governing body would be responsible for Llanrhaeadr and Pennant, therefore there could be a perceived reduction in community involvement in management of the school, depending on the make up of the federated governing body.</p>	<p>Primary provision would continue to be available on all three current sites, therefore it is not anticipated that any additional home to school travel would be required.</p> <p>However, some additional travel may be required between Llanrhaeadr and Pennant in order to access joint activities and events.</p>
Option 2c – Federate Bro Cynllaith and Pennant. Llanrhaeadr continues as a standalone school	<p>The impact on quality and standards would be minimal. Bro Cynllaith and Pennant would continue to operate as standalone schools. However, federation would mean that one joint governing body would be responsible for both schools. There</p>	<p>The impact on the community would be minimal – provision would continue to be available in all three current locations.</p> <p>However, one new governing body would be responsible for Bro Cynllaith and Pennant, therefore</p>	<p>Primary provision would continue to be available on all three current sites, therefore it is not anticipated that any additional home to school travel would be required.</p> <p>However, some additional travel may be required between Bro</p>

	<p>would also be the potential for shared leadership across the two schools.</p> <p>Establishment of a federation could lead to opportunities to share staff / resources across the federation, which would have a positive impact on quality and standards.</p> <p>There would be no impact on Llanrhaeadr.</p>	<p>there could be a perceived reduction in community involvement in management of the school, depending on the make up of the federated governing body.</p>	<p>Cynllaith and Pennant in order to access joint activities and events.</p>
<p>Option 2d - Federate Bro Cynllaith, Llanrhaeadr and Pennant</p>	<p>The impact on quality and standards would be minimal. Bro Cynllaith, Llanrheadr and Pennant would continue to operate as standalone schools. However, federation would mean that one joint governing body would be responsible for all three schools. There would also be the potential for shared leadership across the three schools.</p> <p>Establishment of a federation could lead to opportunities to share staff / resources across the federation, which would have a positive impact on quality and standards.</p>	<p>The impact on the community would be minimal – provision would continue to be available in all three current locations.</p> <p>However, one new governing body would be responsible for the three sites, therefore there could be a perceived reduction in community involvement in management of the school, depending on the make up of the federated governing body.</p>	<p>Primary provision would continue to be available on all three current sites, therefore it is not anticipated that any additional home to school travel would be required.</p> <p>However, some additional travel may be required between the three sites in order to access joint activities and events.</p>

<p>Option 3a - Federate Bro Cynllaith and Llanrhaeadr. Close Pennant.</p>	<p>The impact on quality and standards would be minimal. Bro Cynllaith and Llanrhaeadr would continue to operate as standalone schools. However, federation would mean that one joint governing body would be responsible for the two schools. There would also be the potential for shared leadership across the two schools.</p> <p>Establishment of a federation could lead to opportunities to share staff / resources across the federation, which would have a positive impact on quality and standards.</p> <p>Pennant would close and pupils would transfer to their closest alternative schools. For many pupils, this would be the Bro Cynllaith and Llanrhaeadr federation. The Council's view is that this would not have a significant impact on quality and standard of provision available for pupils. However, Welsh-medium pupils would be required to transfer to a dual stream school.</p>	<p>Primary provision would continue to be available in Llansilin and Llanrhaeadr, however one new governing body would be responsible for the sites, therefore there could be a perceived reduction in community involvement in management of the school, depending on the make up of the federated governing body.</p> <p>This option would lead to closure of Ysgol Pennant, therefore there would be a significant impact on the local community in Penybontfawr. Should the school close, the Council would need to determine the future use of the building. Should the Council declare the building to be surplus to requirements and seek to sell the building, this would mean that the school's facilities would no longer be available to the community in Penybontfawr.</p>	<p>Primary provision would continue to be available at Ysgol Bro Cynllaith and Llanrhaeadr, therefore it is not anticipated that any additional home to school travel would be required. However, some additional travel may be required between the two schools in order to access joint activities and events.</p> <p>Additional travel would be required for pupils currently attending Ysgol Pennant. Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirements for parents in order to access school activities / events.</p>
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<p>Option 3b - Federate Llanrhaeadr and Pennant. Close Bro Cynllaith</p>	<p>The impact on quality and standards would be minimal. Llanrhaeadr and Pennant would continue to operate as standalone schools. However, federation would mean that one joint governing body would be responsible for the two schools. There would also be the potential for shared leadership across the two schools.</p> <p>Establishment of a federation could lead to opportunities to share staff / resources across the federation, which would have a positive impact on quality and standards.</p> <p>Bro Cynllaith would close and pupils would transfer to their closest alternative schools. For many pupils, this would be the Llanrhaeadr and Pennant federation. The Council's view is that this would not have a significant impact on quality and standard of provision available for pupils.</p>	<p>Primary provision would continue to be available in Llanrhaeadr and Pennant, however one new governing body would be responsible for the sites, therefore there could be a perceived reduction in community involvement in management of the school, depending on the make up of the federated governing body.</p> <p>This option would lead to closure of Ysgol Bro Cynllaith, therefore there would be a significant impact on the local community in Llansilin. Should the school close, the Council would need to determine the future use of the building. Should the Council declare the building to be surplus to requirements and seek to sell the building, this would mean that the school's facilities would no longer be available to the community in Llansilin.</p>	<p>Primary provision would continue to be available at Llanrhaeadr and Pennant, therefore it is not anticipated that any additional home to school travel would be required. However, some additional travel may be required between the two schools in order to access joint activities and events.</p> <p>Additional travel would be required for pupils currently attending Ysgol Bro Cynllaith. Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirements for parents in order to access school activities / events.</p>
<p>Option 3c – Federate Bro Cynllaith and</p>	<p>The impact on quality and standards would be minimal. Bro Cynllaith and Pennant would</p>	<p>Primary provision would continue to be available in Llansilin and Pennant, however one new</p>	<p>Primary provision would continue to be available at Ysgol Bro Cynllaith and Ysgol Pennant,</p>

<p>Pennant. Close Llanrhaeadr.</p>	<p>continue to operate as standalone schools. However, federation would mean that one joint governing body would be responsible for the two schools. There would also be the potential for shared leadership across the two schools.</p> <p>Llanrhaeadr would close and pupils would transfer to their closest alternative schools. For many pupils, this would be the Bro Cynllaith and Pennant federation. The Council's view is that this would not have a significant impact on quality and standard of provision available for pupils.</p>	<p>governing body would be responsible for the sites, therefore there could be a perceived reduction in community involvement in management of the school, depending on the make up of the federated governing body.</p> <p>This option would lead to closure of Ysgol Llanrhaeadr, therefore there would be a significant impact on the local community in Llanrhaeadr. Should the school close, the Council would need to determine the future use of the building. Should the Council declare the building to be surplus to requirements and seek to sell the building, this would mean that the school's facilities would no longer be available to the community in Llanrhaeadr.</p>	<p>therefore it is not anticipated that any additional home to school travel would be required. However, some additional travel may be required between the two schools in order to access joint activities and events.</p> <p>Additional travel would be required for pupils currently attending Llanrhaeadr. Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirements for parents in order to access school activities / events.</p>
<p>Option 4a - Merge Bro C and Llanrhaeadr to establish a new school on two sites. Pennant continues as standalone school</p>	<p>Based on the latest school categorisations, carried out in 2019, Bro Cynllaith is currently in the yellow support capacity with an improvement capacity of B. Llanrhaeadr is in the amber support capacity with an improvement capacity of C.</p>	<p>The impact on the community would be minimal – provision would continue to be available in all three current locations.</p> <p>However, one new governing body would be responsible for Bro Cynllaith and Llanrhaeadr, therefore there could be a</p>	<p>Primary provision would continue to be available on all three current sites, therefore it is not anticipated that any additional home to school travel would be required.</p> <p>However, some additional travel may be required between Bro Cynllaith and Llanrhaeadr in order</p>

	<p>Merging the two schools would provide opportunities to improve the provision at Llanrhaeadr through bringing the strengths of each school together.</p> <p>Whilst pupils would be on separate sites, there would be better opportunities for pupils by being part of a larger cohort of pupils.</p> <p>There would be no change to quality and standards at Pennant.</p>	<p>perceived reduction in community involvement in management of the school, depending on the make up of the governing body.</p>	<p>to access joint activities and events.</p>
<p>Option 4b - Merge Llanrhaeadr and Pennant to establish a new school on two sites. Bro C continues as standalone school</p>	<p>Based on the latest school categorisations, carried out in 2019, Llanrhaeadr is in the amber support category with an improvement capacity of C. Pennant is currently in the yellow support capacity with an improvement capacity of B. Merging the two schools would provide opportunities to improve the provision at Llanrhaeadr through bringing the strengths of each school together.</p> <p>Whilst pupils would be on separate sites, there would be better opportunities for pupils by being part of a larger cohort of pupils.</p>	<p>The impact on the community would be minimal – provision would continue to be available in all three current locations.</p> <p>However, one new governing body would be responsible for Llanrhaeadr and Pennant, therefore there could be a perceived reduction in community involvement in management of the school, depending on the make up of the governing body.</p>	<p>Primary provision would continue to be available on all three current sites, therefore it is not anticipated that any additional home to school travel would be required.</p> <p>However, some additional travel may be required between Llanrhaeadr and Pennant in order to access joint activities and events.</p>

	There would be no change to quality and standards at Bro Cynllaith.		
Option 4c – Merge Bro C and Pennant to establish a new school on two sites. Llanrhaeadr continues as a standalone school	<p>Based on the latest school categorisations, carried out in 2019, both Bro Cynllaith and Pennant are currently in the yellow support capacity with an improvement capacity of B.</p> <p>Merging the two schools would provide opportunities to improve the provision through bringing the strengths of each school together.</p> <p>Whilst pupils would be on separate sites, there would be better opportunities for pupils by being part of a larger cohort of pupils.</p> <p>There would be no change to quality and standards at Llanrhaeadr.</p>	<p>The impact on the community would be minimal – provision would continue to be available in all three current locations.</p> <p>However, one new governing body would be responsible for Bro Cynllaith and Pennant, therefore there could be a perceived reduction in community involvement in management of the school, depending on the make up of the governing body.</p>	<p>Primary provision would continue to be available on all three current sites, therefore it is not anticipated that any additional home to school travel would be required.</p> <p>However, some additional travel may be required between Bro Cynllaith and Pennant in order to access joint activities and events.</p>
Option 5a – Merge Bro C and Llanrhaeadr to establish a new school on two sites. Close Pennant	Based on the latest school categorisations, carried out in 2019, Bro Cynllaith is currently in the yellow support capacity with an improvement capacity of B. Llanrhaeadr is in the amber	Primary provision would continue to be available in Llansilin and Llanrhaeadr, however one new governing body would be responsible for the sites, therefore there could be a perceived	Primary provision would continue to be available at Ysgol Bro Cynllaith and Llanrhaeadr, therefore it is not anticipated that any additional home to school travel would be required. However,

	<p>support capacity with an improvement capacity of C.</p> <p>Merging the two schools would provide opportunities to improve the provision at Llanrhaeadr through bringing the strengths of each school together.</p> <p>Whilst pupils would be on separate sites, there would be better opportunities for pupils by being part of a larger cohort of pupils.</p> <p>This options would lead to closure of Ysgol Pennant. Primary provision for pupils at Pennant pupils would be available at Bro Cynllaith and Llanrhaeadr. Whilst Llanrhaeadr is in the amber support capacity with an improvement capacity of C, it would be reasonable to expect that standards at the merged school would be at least the same standard as that currently provided in Pennant.</p> <p>Welsh-medium provision in the area would be lost.</p>	<p>reduction in community involvement in management of the school, depending on the make up of the governing body.</p> <p>This option would lead to closure of Ysgol Pennant, therefore there would be a significant impact on the local community in Penybontfawr. Should the school close, the Council would need to determine the future use of the building. Should the Council declare the building to be surplus to requirements and seek to sell the building, this would mean that the school's facilities would no longer be available to the community in Penybontfawr.</p>	<p>some additional travel may be required between the two schools in order to access joint activities and events.</p> <p>Additional travel would be required for pupils currently attending Ysgol Pennant. Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirements for parents in order to access school activities / events.</p>
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<p>Option 5b – Merge Llanrhaeadr and Pennant to establish a new school on two sites. Close Bro C</p>	<p>Based on the latest school categorisations, carried out in 2019, Pennant is currently in the yellow support capacity with an improvement capacity of B. Llanrhaeadr is in the amber support capacity with an improvement capacity of C.</p> <p>Merging the two schools would provide opportunities to improve the provision at Llanrhaeadr through bringing the strengths of each school together.</p> <p>Whilst pupils would be on separate sites, there would be better opportunities for pupils by being part of a larger cohort of pupils.</p> <p>This options would lead to closure of Ysgol Bro Cynllaith. Primary provision for pupils at Bro Cynllaith would be available at Llanrhaeadr and Pennant. Whilst Llanrhaeadr is in the amber support capacity with an improvement capacity of C, it would be reasonable to expect that standards at the merged school would be at least the same standard as that currently provided in Bro Cynllaith.</p>	<p>Primary provision would continue to be available in Llanrhaeadr and Pennant, however one new governing body would be responsible for the sites, therefore there could be a perceived reduction in community involvement in management of the school, depending on the make up of the governing body.</p> <p>This option would lead to closure of Ysgol Bro Cynllaith, therefore there would be a significant impact on the local community in Llansilin. Should the school close, the Council would need to determine the future use of the building. Should the Council declare the building to be surplus to requirements and seek to sell the building, this would mean that the school’s facilities would no longer be available to the community in Llansilin.</p>	<p>Primary provision would continue to be available at Llanrhaeadr and Pennant, therefore it is not anticipated that any additional home to school travel would be required. However, some additional travel may be required between the two schools in order to access joint activities and events.</p> <p>Additional travel would be required for pupils currently attending Ysgol Bro Cynllaith. Whilst free home to school transport would be provided to eligible pupils in accordance with the Council’s Home to School Transport Policy, there would also be an additional travel requirements for parents in order to access school activities / events.</p>
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<p>Option 5c – Merge Bro C and Pennant to establish a new school on two sites. Close Llanrhaeadr</p>	<p>Based on the latest school categorisations, carried out in 2019, both Bro Cynllaith and Pennant are currently in the yellow support capacity with an improvement capacity of B.</p> <p>Whilst pupils would be on separate sites, there would be better opportunities for pupils by being part of a larger cohort of pupils.</p> <p>This option would lead to closure of Llanrhaeadr. Primary provision for pupils at Llanrhaeadr pupils would be available at Bro Cynllaith and Pennant.</p> <p>It would be expected that the impact on provision and educational standards would be positive.</p>	<p>Primary provision would continue to be available in Llansilin and Pennant, however one new governing body would be responsible for the sites, therefore there could be a perceived reduction in community involvement in management of the school, depending on the make up of the governing body.</p> <p>This option would lead to closure of Ysgol Llanrhaeadr, therefore there would be a significant impact on the local community in Llanrhaeadr. Should the school close, the Council would need to determine the future use of the building. Should the Council declare the building to be surplus to requirements and seek to sell the building, this would mean that the school’s facilities would no longer be available to the community in Llanrhaeadr.</p>	<p>Primary provision would continue to be available at Ysgol Bro Cynllaith and Ysgol Pennant, therefore it is not anticipated that any additional home to school travel would be required. However, some additional travel may be required between the two schools in order to access joint activities and events.</p> <p>Additional travel would be required for pupils currently attending Llanrhaeadr. Whilst free home to school transport would be provided to eligible pupils in accordance with the Council’s Home to School Transport Policy, there would also be an additional travel requirements for parents in order to access school activities / events.</p>
<p>Option 6 – Merge Bro C, Llanrhaeadr and Pennant to establish a new school on three sites</p>	<p>Based on the latest school categorisations, carried out in 2019, Bro Cynllaith and Pennant are currently in the yellow support capacity with an improvement</p>	<p>The impact on the community would be minimal – provision would continue to be available in all three current locations.</p>	<p>Primary provision would continue to be available on all three current sites, therefore it is not anticipated that any additional home to school travel would be required.</p>

	<p>capacity of B. Llanrhaeadr is in the amber support capacity with an improvement capacity of C.</p> <p>Merging the three schools would provide opportunities to improve the provision at Llanrhaeadr by bringing the strengths of each school together.</p> <p>Whilst pupils would be on separate sites, there would be better opportunities for pupils by being part of a larger cohort of pupils.</p>	<p>However, one new governing body would be responsible for the three sites, therefore there could be a perceived reduction in community involvement in management of the school, depending on the make up of the governing body.</p>	<p>However, some additional travel may be required between the three sites in order to access joint activities and events.</p>
<p>Option 7a – Merge Bro C and Llanrhaeadr to establish a new school on one site – Bro C. Pennant continues as standalone school</p>	<p>Based on the latest school categorisations, carried out in 2019, Bro Cynllaith is currently in the yellow support capacity with an improvement capacity of B. Llanrhaeadr is in the amber support capacity with an improvement capacity of C.</p> <p>Merging the two schools and establishing a new school on the Bro Cynllaith site would provide opportunities to improve the provision at Llanrhaeadr through bringing the strengths of each school together.</p>	<p>Ysgol Pennant would continue to operate as a standalone school, therefore there would be no impact on the community in the Pennant area.</p> <p>Ysgol Bro Cynllaith and Ysgol Llanrhaeadr would merge to establish one new school on the Ysgol Bro Cynllaith site. This would mean that there would be no provision in Llanrhaeadr, therefore there would be a significant impact on the local community in Llanrhaeadr-ym-Mochnant. Should the school close, the Council would need to determine the future use of</p>	<p>Ysgol Pennant would continue to operate as a standalone school, therefore no additional travel would be required for pupils attending Ysgol Pennant.</p> <p>Provision would continue on the Ysgol Bro Cynllaith site, therefore no additional travel would be required for pupils attending Ysgol Bro Cynllaith.</p> <p>There would no longer be provision at Llanrhaeadr, therefore additional travel would be required for pupils currently attending Ysgol Llanrhaeadr. Whilst free home to</p>

	<p>There would be better opportunities for pupils by being part of a larger cohort of pupils.</p> <p>However, the Llanrhaeadr building is in better condition than the Bro Cynllaith building. Locating the new school in the Bro Cynllaith building could impact on the opportunities available to learners by requiring them to attend a building which is in poorer condition.</p> <p>There would be no impact on the provision in Pennant.</p>	<p>the building. Should the Council declare the building to be surplus to requirements and seek to sell the building, this would mean that the school's facilities would no longer be available to the community in Llanrhaeadr-ym-Mochnant.</p>	<p>school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirements for parents in order to access school activities / events.</p>
<p>Option 7b - Merge Bro C and Llanrhaeadr to establish a new school on one site – Llanrhaeadr. Pennant continues as standalone school</p>	<p>Based on the latest school categorisations, carried out in 2019, Bro Cynllaith is currently in the yellow support capacity with an improvement capacity of B. Llanrhaeadr is in the amber support capacity with an improvement capacity of C.</p> <p>Merging the two schools and establishing a new school on the Llanrhaeadr site would provide opportunities to improve the provision at Llanrhaeadr by</p>	<p>Ysgol Pennant would continue to operate as a standalone school, therefore there would be no impact on the community in the Pennant area.</p> <p>Ysgol Bro Cynllaith and Ysgol Llanrhaeadr would merge to establish one new school on the Llanrhaeadr site. This would mean that there would be no provision on the Ysgol Bro Cynllaith site, therefore there would be a significant impact on the local community in Llansilin. Should the</p>	<p>Ysgol Pennant would continue to operate as a standalone school, therefore no additional travel would be required for pupils attending Ysgol Pennant.</p> <p>Provision would continue on the Llanrhaeadr site, therefore no additional travel would be required for pupils attending Ysgol Llanrhaeadr.</p> <p>There would no longer be provision at Ysgol Bro Cynllaith, therefore additional travel would be required</p>

	<p>bringing the strengths of each school together.</p> <p>There would be better opportunities for pupils by being part of a larger cohort of pupils.</p> <p>The Llanrhaeadr building is in better condition than the Bro Cynllaith building. Locating the new school in the Llanrhaeadr building would have a positive impact on learners currently attending Ysgol Bro Cynllaith as they would attend school in a better quality building.</p> <p>There would be no impact on the provision in Pennant.</p>	<p>school close, the Council would need to determine the future use of the building. Should the Council declare the building to be surplus to requirements and seek to sell the building, this would mean that the school's facilities would no longer be available to the community in Llansilin.</p>	<p>for pupils currently attending Ysgol Bro Cynllaith. Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirements for parents in order to access school activities / events.</p>
<p>Option 7c - Merge Llanrhaeadr and Pennant to establish a new school on one site - Llanrhaeadr. Bro C continues as standalone school</p>	<p>Based on the latest school categorisations, carried out in 2019, Llanrhaeadr is currently in the amber support capacity with an improvement capacity of C. Pennant is in the amber support capacity with an improvement capacity of B.</p> <p>Merging the two schools and establishing a new school on the Llanrhaeadr site would provide</p>	<p>Ysgol Bro Cynllaith would continue to operate as a standalone school, therefore there would be no impact on the community in the Llansilin area.</p> <p>Ysgol Llanrhaeadr and Ysgol Pennant would merge to establish one new school on the Llanrhaeadr site. This would mean that there would be no provision on the Pennant site, therefore there would</p>	<p>Ysgol Bro Cynllaith would continue to operate as a standalone school, therefore no additional travel would be required for pupils attending Ysgol Bro Cynllaith.</p> <p>Provision would continue on the Ysgol Llanrhaeadr site, therefore no additional travel would be required for pupils attending Ysgol Llanrhaeadr.</p>

	<p>opportunities to improve the provision at Llanrhaeadr by bringing the strengths of each school together.</p> <p>There would be better opportunities for pupils by being part of a larger cohort of pupils.</p> <p>The Llanrhaeadr building is in better condition than the Pennant building. Locating the new school in the Llanrhaeadr building would have a positive impact on learners currently attending Ysgol Pennant as they would attend school in a better quality building.</p> <p>There would be no impact on the provision in Bro Cynllaith.</p>	<p>be a significant impact on the local community in Penybontfawr. Should the school close, the Council would need to determine the future use of the building. Should the Council declare the building to be surplus to requirements and seek to sell the building, this would mean that the school's facilities would no longer be available to the community in Penybontfawr.</p>	<p>There would no longer be provision at Pennant, therefore additional travel would be required for pupils currently attending Ysgol Pennant. Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirements for parents in order to access school activities / events.</p>
<p>Option 7d - Merge Llanrhaeadr and Pennant to establish a new school on one site - Pennant. Bro C continues as standalone school</p>	<p>Based on the latest school categorisations, carried out in 2019, Llanrhaeadr is currently in the amber support capacity with an improvement capacity of C. Pennant is in the amber support capacity with an improvement capacity of B.</p> <p>Merging the two schools and establishing a new school on the</p>	<p>Ysgol Bro Cynllaith would continue to operate as a standalone school, therefore there would be no impact on the community in the Llansilin area.</p> <p>Ysgol Llanrhaeadr and Ysgol Pennant would merge to establish one new school on the Pennant site. This would mean that there would be no provision on the</p>	<p>Ysgol Bro Cynllaith would continue to operate as a standalone school, therefore no additional travel would be required for pupils attending Ysgol Bro Cynllaith.</p> <p>Provision would continue on the Ysgol Pennant site, therefore no additional travel would be required for pupils attending Ysgol Pennant.</p>

	<p>Pennant site would provide opportunities to improve the provision at Llanrhaeadr by bringing the strengths of each school together.</p> <p>There would be better opportunities for pupils by being part of a larger cohort of pupils.</p> <p>However, the Llanrhaeadr building is in better condition than the Pennant building. Locating the new school in the Pennant building could impact on the opportunities available to learners by requiring them to attend a building which is in poorer condition.</p> <p>There would be no impact on the provision in Bro Cynllaith.</p>	<p>Llanrhaeadr site, therefore there would be a significant impact on the local community in Llanrhaeadr-ym-Mochnant. Should the school close, the Council would need to determine the future use of the building. Should the Council declare the building to be surplus to requirements and seek to sell the building, this would mean that the school's facilities would no longer be available to the community in Llanrhaeadr-ym-Mochnant.</p>	<p>There would no longer be provision at Llanrhaeadr, therefore additional travel would be required for pupils currently attending Ysgol Llanraeadr. Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirements for parents in order to access school activities / events.</p>
<p>Option 7e – Merge Bro C and Pennant to establish a new school on one site – Bro C. Llanrhaeadr continues as a standalone school</p>	<p>Based on the latest school categorisations, carried out in 2019, Bro Cynllaith is currently in the yellow support capacity with an improvement capacity of B. Pennant is in the yellow support capacity with an improvement capacity of B.</p>	<p>Ysgol Llanrhaeadr would continue to operate as a standalone school, therefore there would be no impact on the community in the Llanrhaeadr-ym-Mochnant area.</p> <p>Ysgol Bro Cynllaith and Ysgol Pennant would merge to establish one new school on the Ysgol Bro Cynllaith site. This would mean</p>	<p>Ysgol Llanrhaeadr would continue to operate as a standalone school, therefore no additional travel would be required for pupils attending Ysgol Llanrhaeadr.</p> <p>Provision would continue on the Ysgol Bro Cynllaith site, therefore no additional travel would be</p>

	<p>Merging the two schools and establishing a new school on the Bro Cynllaith site would provide opportunities to improve the provision at Bro Cynllaith and Pennant by bringing the strengths of each school together.</p> <p>There would be better opportunities for pupils by being part of a larger cohort of pupils on one site.</p> <p>There would be no impact on the provision in Llanrhaeadr.</p>	<p>that there would be no provision on the Pennant site, therefore there would be a significant impact on the local community in Penybontfawr. Should the school close, the Council would need to determine the future use of the building. Should the Council declare the building to be surplus to requirements and seek to sell the building, this would mean that the school's facilities would no longer be available to the community in Penybontfawr.</p>	<p>required for pupils attending Ysgol Bro Cynllaith.</p> <p>There would no longer be provision at Pennant, therefore additional travel would be required for pupils currently attending Ysgol Pennant. Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirements for parents in order to access school activities / events.</p>
<p>Option 7f – Merge Bro C and Pennant to establish a new school on one site – Pennant. Llanrhaeadr continues as a standalone school.</p>	<p>Based on the latest school categorisations, carried out in 2019, Bro Cynllaith is currently in the yellow support capacity with an improvement capacity of B. Pennant is in the yellow support capacity with an improvement capacity of B.</p> <p>Merging the two schools and establishing a new school on the Pennant site would provide opportunities to improve the provision at Bro Cynllaith and Pennant by bringing the strengths of each school together.</p>	<p>Ysgol Llanrhaeadr would continue to operate as a standalone school, therefore there would be no impact on the community in the Llanrhaeadr-ym-Mochnant area.</p> <p>Ysgol Bro Cynllaith and Ysgol Pennant would merge to establish one new school on the Pennant site. This would mean that there would be no provision on the Ysgol Bro Cynllaith site, therefore there would be a significant impact on the local community in Llansilin. Should the school close, the Council would need to determine</p>	<p>Ysgol Llanrhaeadr would continue to operate as a standalone school, therefore no additional travel would be required for pupils attending Ysgol Llanrhaeadr.</p> <p>Provision would continue on the Pennant site, therefore no additional travel would be required for pupils attending Ysgol Pennant.</p> <p>There would no longer be provision at Ysgol Bro Cynllaith, therefore additional travel would be required for pupils currently attending Ysgol Bro Cynllaith. Whilst free home to</p>

	<p>There would be better opportunities for pupils by being part of a larger cohort of pupils on one site.</p> <p>There would be no impact on the provision in Llanrhaeadr.</p>	<p>the future use of the building. Should the Council declare the building to be surplus to requirements and seek to sell the building, this would mean that the school's facilities would no longer be available to the community in Llansilin.</p>	<p>school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirements for parents in order to access school activities / events.</p>
<p>Option 8a - Merge Bro C and Llanrhaeadr to establish a new school on one site – Bro C. Close Pennant</p>	<p>Based on the latest school categorisations, carried out in 2019, Bro Cynllaith is currently in the yellow support capacity with an improvement capacity of B. Llanrhaeadr is in the amber support capacity with an improvement capacity of C.</p> <p>Merging the two schools and establishing a new school on the Bro Cynllaith site would provide opportunities to improve the provision at Llanrhaeadr through bringing the strengths of each school together.</p> <p>There would be better opportunities for pupils by being part of a larger cohort of pupils.</p> <p>However, the Llanrhaeadr building is in better condition than the Bro</p>	<p>Ysgol Bro Cynllaith and Ysgol Llanrhaeadr would merge to establish one new school on the Ysgol Bro Cynllaith site, therefore there would be no impact on the community in Llansilin.</p> <p>However, this would mean that there would be no provision in Llanrhaeadr, therefore there would be a significant impact on the local community in Llanrhaeadr-ym-Mochnant. Should the school close, the Council would need to determine the future use of the building. Should the Council declare the building to be surplus to requirements and seek to sell the building, this would mean that the school's facilities would no longer be available to the community in Llanrhaeadr-ym-Mochnant.</p>	<p>Provision would continue on the Ysgol Bro Cynllaith site, therefore no additional travel would be required for pupils attending Ysgol Bro Cynllaith.</p> <p>There would no longer be provision at Llanrhaeadr, therefore additional travel would be required for pupils currently attending Ysgol Llanrhaeadr. Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirements for parents in order to access school activities / events.</p> <p>Additional travel would be required for pupils currently attending Ysgol Pennant. Whilst free home to school transport would be provided</p>

	<p>Cynllaith building. Locating the new school in the Bro Cynllaith building could impact on the opportunities available to learners by requiring them to attend a building which is in poorer condition.</p> <p>This option would lead to closure of Ysgol Pennant. Pennant pupils would be likely to transfer to the new school, where it is expected that the educational provision would be of at least the same quality as that currently provided in Pennant.</p> <p>Welsh-medium provision in the area would be lost.</p>	<p>This option would lead to closure of Ysgol Pennant, therefore there would be a significant impact on the local community in Penybontfawr. Should the school close, the Council would need to determine the future use of the building. Should the Council declare the building to be surplus to requirements and seek to sell the building, this would mean that the school's facilities would no longer be available to the community in Penybontfawr.</p>	<p>to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirements for parents in order to access school activities / events.</p>
<p>Option 8b - Merge Bro C and Llanrhaeadr to establish a new school on one site – Llanrhaeadr. Close Pennant</p>	<p>Based on the latest school categorisations, carried out in 2019, Bro Cynllaith is currently in the yellow support capacity with an improvement capacity of B. Llanrhaeadr is in the amber support capacity with an improvement capacity of C.</p> <p>Merging the two schools and establishing a new school on the Llanrhaeadr site would provide</p>	<p>Ysgol Bro Cynllaith and Ysgol Llanrhaeadr would merge to establish one new school on the Llanrhaeadr site, therefore there would be no impact on the community in Llanrhaeadr.</p> <p>However, this would mean that there would be no provision on the Ysgol Bro Cynllaith site, therefore there would be a significant impact on the local community in Llansilin.</p>	<p>Provision would continue on the Llanrhaeadr site, therefore no additional travel would be required for pupils attending Ysgol Llanrhaeadr.</p> <p>There would no longer be provision at Ysgol Bro Cynllaith, therefore additional travel would be required for pupils currently attending Ysgol Bro Cynllaith. Whilst free home to school transport would be provided</p>

	<p>opportunities to improve the provision at Llanrhaeadr by bringing the strengths of each school together.</p> <p>There would be better opportunities for pupils by being part of a larger cohort of pupils.</p> <p>The Llanrhaeadr building is in better condition than the Bro Cynllaith building. Locating the new school in the Llanrhaeadr building would have a positive impact on learners currently attending Ysgol Bro Cynllaith as they would attend school in a better quality building.</p> <p>This option would lead to closure of Ysgol Pennant. Pennant pupils would be likely to transfer to the new school, where it is expected that the educational provision would be of at least the same quality as that currently provided in Pennant.</p> <p>Welsh-medium provision would be lost.</p>	<p>Should the school close, the Council would need to determine the future use of the building. Should the Council declare the building to be surplus to requirements and seek to sell the building, this would mean that the school's facilities would no longer be available to the community in Llansilin.</p> <p>This option would lead to closure of Ysgol Pennant, therefore there would be a significant impact on the local community in Penybontfawr. Should the school close, the Council would need to determine the future use of the building. Should the Council declare the building to be surplus to requirements and seek to sell the building, this would mean that the school's facilities would no longer be available to the community in Penybontfawr.</p>	<p>to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirements for parents in order to access school activities / events.</p> <p>Additional travel would be required for pupils currently attending Ysgol Pennant. Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirements for parents in order to access school activities / events.</p>
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<p>Option 8c - Merge Llanrhaeadr and Pennant to establish a new school on one site - Llanrhaeadr. Close Bro C</p>	<p>Based on the latest school categorisations, carried out in 2019, Llanrhaeadr is in the amber support capacity with an improvement capacity of C. Pennant is in the yellow support capacity with an improvement capacity of B.</p> <p>Merging the two schools and establishing a new school on the Llanrhaeadr site would provide opportunities to improve the provision at Llanrhaeadr by bringing the strengths of each school together.</p> <p>There would be better opportunities for pupils by being part of a larger cohort of pupils.</p> <p>The Llanrhaeadr building is in better condition than the Pennant building. Locating the new school in the Llanrhaeadr building would have a positive impact on learners currently attending Ysgol Pennant as they would attend school in a better quality building.</p> <p>This option would lead to closure of Ysgol Bro Cynllaith pupils would</p>	<p>Ysgol Llanrhaeadr and Ysgol Pennant would merge to establish one new school on the Llanrhaeadr site, therefore there would be no impact on the community in Llanrhaeadr.</p> <p>However, this would mean that there would be no provision on the Ysgol Pennant site, therefore there would be a significant impact on the local community in Penybontfawr. Should the school close, the Council would need to determine the future use of the building. Should the Council declare the building to be surplus to requirements and seek to sell the building, this would mean that the school's facilities would no longer be available to the community in Penybontfawr.</p> <p>This option would lead to closure of Ysgol Bro Cynllaith, therefore there would be a significant impact on the local community in Llansilin. Should the school close, the Council would need to determine the future use of the building. Should the Council declare the building to be surplus to</p>	<p>Provision would continue on the Llanrhaeadr site, therefore no additional travel would be required for pupils attending Ysgol Llanrhaeadr.</p> <p>There would no longer be provision at Ysgol Pennant, therefore additional travel would be required for pupils currently attending Ysgol Pennant. Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirements for parents in order to access school activities / events.</p> <p>Additional travel would be required for pupils currently attending Ysgol Bro Cynllaith. Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirements for parents in order to access school activities / events.</p>
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	<p>be likely to transfer to the new school, where it is expected that the educational provision would be of at least the same quality as that currently provided in Bro Cynllaith.</p>	<p>requirements and seek to sell the building, this would mean that the school's facilities would no longer be available to the community in Llansilin.</p>	
<p>Option 8d - Merge Llanrhaeadr and Pennant to establish a new school on one site – Pennant. Close Bro C</p>	<p>Based on the latest school categorisations, carried out in 2019, Llanrhaeadr is in the amber support capacity with an improvement capacity of C. Pennant is in the yellow support capacity with an improvement capacity of B.</p> <p>Merging the two schools and establishing a new school on the Pennant site would provide opportunities to improve the provision at Llanrhaeadr by bringing the strengths of each school together.</p> <p>There would be better opportunities for pupils by being part of a larger cohort of pupils.</p> <p>However, the Llanrhaeadr building is in better condition than the Pennant building. Locating the new school in the Pennant building could impact on the opportunities</p>	<p>Ysgol Llanrhaeadr and Ysgol Pennant would merge to establish one new school on the Pennant site, therefore there would be no impact on the community in Penybontfawr.</p> <p>However, this would mean that there would be no provision on the Ysgol Llanrhaeadr site, therefore there would be a significant impact on the local community in Llanrhaeadr-ym-Mochnant. Should the school close, the Council would need to determine the future use of the building. Should the Council declare the building to be surplus to requirements and seek to sell the building, this would mean that the school's facilities would no longer be available to the community in Llanrhaeadr-ym-Mochnant.</p> <p>This option would lead to closure of Ysgol Bro Cynllaith, therefore</p>	<p>Provision would continue on the Pennant site, therefore no additional travel would be required for pupils attending Ysgol Pennant.</p> <p>There would no longer be provision at Ysgol Llanrhaeadr, therefore additional travel would be required for pupils currently attending Ysgol Llanrhaeadr. Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirements for parents in order to access school activities / events.</p> <p>Additional travel would be required for pupils currently attending Ysgol Bro Cynllaith. Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel</p>

	<p>available to learners by requiring them to attend a building which is in poorer condition.</p> <p>This option would lead to closure of Ysgol Bro Cynllaith. Bro Cynllaith pupils would be likely to transfer to the new school, where it is expected that the educational provision would be of at least the same quality as that currently provided in Bro Cynllaith.</p>	<p>there would be a significant impact on the local community in Llansilin. Should the school close, the Council would need to determine the future use of the building. Should the Council declare the building to be surplus to requirements and seek to sell the building, this would mean that the school's facilities would no longer be available to the community in Llansilin.</p>	<p>requirements for parents in order to access school activities / events.</p>
<p>Option 8e – Merge Bro C and Pennant to establish a new school on one site – Bro C. Close Llanrhaeadr</p>	<p>Based on the latest school categorisations, carried out in 2019, Bro Cynllaith and Pennant are both in the yellow support capacity with an improvement capacity of B. Llanrhaeadr is in the amber support capacity with an improvement capacity of C.</p> <p>Merging the two schools and establishing a new school on the Pennant site would provide opportunities to improve the provision of both schools by bringing the strengths of each school together.</p>	<p>Ysgol Bro Cynllaith and Ysgol Pennant would merge to establish one new school on the Ysgol Bro Cynllaith site, therefore there would be no impact on the community in Llansilin.</p> <p>However, this would mean that there would be no provision on the Ysgol Pennant site, therefore there would be a significant impact on the local community in Penybontfawr. Should the school close, the Council would need to determine the future use of the building. Should the Council declare the building to be surplus to requirements and seek to sell the building, this would mean that</p>	<p>Provision would continue on the Ysgol Bro Cynllaith site, therefore no additional travel would be required for pupils attending Ysgol Bro Cynllaith.</p> <p>There would no longer be provision at Ysgol Pennant, therefore additional travel would be required for pupils currently attending Ysgol Pennant. Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirements for parents in order to access school activities / events.</p>

	<p>There would be better opportunities for pupils by being part of a larger cohort of pupils.</p> <p>This option would lead to closure of Ysgol Llanrhaeadr. Llanrhaeadr pupils would be likely to transfer to the new school, where it is expected that the educational provision would be better than that currently provided in Llanrhaeadr. However, the Llanrhaeadr building is in better condition than the bro Cynllaith. Should pupils transfer to the new school, they would be required to attend a building which is in poorer condition.</p>	<p>the school's facilities would no longer be available to the community in Penybontfawr.</p> <p>This option would lead to closure of Ysgol Llanrhaeadr, therefore there would be a significant impact on the local community in Llanrhaeadr-ym-Mochnant. Should the school close, the Council would need to determine the future use of the building. Should the Council declare the building to be surplus to requirements and seek to sell the building, this would mean that the school's facilities would no longer be available to the community in Llanrhaeadr-ym-Mochnant.</p>	<p>Additional travel would be required for pupils currently attending Ysgol Llanrhaeadr. Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirements for parents in order to access school activities / events.</p>
<p>Option 8f – Merge Bro C and Pennant to establish a new school on one site – Pennant. Close Llanrhaeadr</p>	<p>Based on the latest school categorisations, carried out in 2019, Bro Cynllaith and Pennant are both in the yellow support capacity with an improvement capacity of B. Llanrhaeadr is in the amber support capacity with an improvement capacity of C.</p> <p>Merging the two schools and establishing a new school on the Pennant site would provide</p>	<p>Ysgol Bro Cynllaith and Ysgol Pennant would merge to establish one new school on the Ysgol Pennant site, therefore there would be no impact on the community in Penybontfawr.</p> <p>However, this would mean that there would be no provision on the Ysgol Bro Cynllaith site, therefore there would be a significant impact on the local community in Llansilin.</p>	<p>Provision would continue on the Ysgol Pennant site, therefore no additional travel would be required for pupils attending Ysgol Pennant.</p> <p>There would no longer be provision at Bro Cynllaith, therefore additional travel would be required for pupils currently attending Ysgol Bro Cynllaith. Whilst free home to school transport would be provided to eligible pupils in accordance</p>

	<p>opportunities to improve the provision of both schools by bringing the strengths of each school together.</p> <p>There would be better opportunities for pupils by being part of a larger cohort of pupils.</p> <p>This option would lead to closure of Ysgol Llanrhaeadr. Llanrhaeadr pupils would be likely to transfer to the new school, where it is expected that the educational provision would be better than that currently provided in Llanrhaeadr. However, the Llanrhaeadr building is in better condition than the bro Cynllaith. Should pupils transfer to the new school, they would be required to attend a building which is in poorer condition.</p>	<p>Should the school close, the Council would need to determine the future use of the building. Should the Council declare the building to be surplus to requirements and seek to sell the building, this would mean that the school's facilities would no longer be available to the community in Llansilin.</p> <p>This option would lead to closure of Ysgol Llanrhaeadr, therefore there would be a significant impact on the local community in Llanrhaeadr-ym-Mochnant. Should the school close, the Council would need to determine the future use of the building. Should the Council declare the building to be surplus to requirements and seek to sell the building, this would mean that the school's facilities would no longer be available to the community in Llanrhaeadr-ym-Mochnant.</p>	<p>with the Council's Home to School Transport Policy, there would also be an additional travel requirements for parents in order to access school activities / events.</p> <p>Additional travel would be required for pupils currently attending Ysgol Llanrhaeadr. Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirements for parents in order to access school activities / events.</p>
<p>Option 9a – Merge Bro C, Llanrhaeadr and Pennant to establish a new school on two sites –</p>	<p>Based on the latest school categorisations, carried out in 2019, Bro Cynllaith and Pennant are currently in the yellow support capacity with an improvement</p>	<p>Provision would continue to be available at Ysgol Bro Cynllaith and Ysgol Llanrhaeadr, therefore there would be no impact on these communities.</p>	<p>Provision would continue to be available at Ysgol Bro Cynllaith and Ysgol Llanrhaeadr, therefore there would be no additional travel</p>

<p>Bro C and Llanrhaeadr</p>	<p>capacity of B. Llanrhaeadr is in the amber support capacity with an improvement capacity of C.</p> <p>Merging the three schools and establishing a new school on the Bro Cynllaith and Llanrhaeadr site would provide opportunities to improve the educational provision by bringing the strengths of three schools together.</p> <p>There would be better opportunities for pupils by being part of a larger cohort of pupils.</p>	<p>There would be no provision at Pennant, therefore there would be a significant impact on the local community in Penybontfawr. Should the school close, the Council would need to determine the future use of the building. Should the Council declare the building to be surplus to requirements and seek to sell the building, this would mean that the school's facilities would no longer be available to the community in Penybontfawr.</p>	<p>for pupils attending these two schools.</p> <p>There would be no provision at Pennant, therefore additional travel would be required for pupils currently attending Ysgol Pennant. Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirements for parents in order to access school activities / events.</p>
<p>Option 9b - Merge Bro C, Llanrhaeadr and Pennant to establish a new school on two sites – Bro C and Pennant</p>	<p>Based on the latest school categorisations, carried out in 2019, Bro Cynllaith and Pennant are currently in the yellow support capacity with an improvement capacity of B. Llanrhaeadr is in the amber support capacity with an improvement capacity of C.</p> <p>Merging the three schools and establishing a new school on the Bro Cynllaith and Pennant site would provide opportunities to improve the educational provision</p>	<p>Provision would continue to be available at Ysgol Bro Cynllaith and Ysgol Pennant, therefore there would be no impact on these communities.</p> <p>There would be no provision at Llanrhaeadr, therefore there would be a significant impact on the local community in Llanrhaeadr-ym-Mochnant. Should the school close, the Council would need to determine the future use of the building. Should the Council declare the building to be surplus</p>	<p>Provision would continue to be available at Ysgol Bro Cynllaith and Ysgol Pennant, therefore there would be no additional travel for pupils attending these two schools.</p> <p>There would be no provision at Llanrhaeadr, therefore additional travel would be required for pupils currently attending Ysgol Llanrhaeadr. Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also</p>

	<p>by bringing the strengths of the three schools together.</p> <p>There would be better opportunities for pupils by being part of a larger cohort of pupils.</p> <p>However, the Llanrhaeadr building is in better condition than the Bro Cynllaith and Pennant buildings. Pupils currently attending Ysgol Llanrhaeadr would be required to attend a building which is in poorer condition.</p>	<p>to requirements and seek to sell the building, this would mean that the school's facilities would no longer be available to the community in Llanrhaeadr-ym-Mochnant.</p>	<p>be an additional travel requirements for parents in order to access school activities / events.</p>
<p>Option 9c - Merge Bro C, Llanrhaeadr and Pennant to establish a new school on two sites – Llanrhaeadr and Pennant</p>	<p>Based on the latest school categorisations, carried out in 2019, Bro Cynllaith and Pennant are currently in the yellow support capacity with an improvement capacity of B. Llanrhaeadr is in the amber support capacity with an improvement capacity of C.</p> <p>Merging the three schools and establishing a new school on the Llanrhaeadr and Pennant site would provide opportunities to improve the educational provision by bringing the strengths of the three schools together.</p>	<p>Provision would continue to be available at Ysgol Llanrhaeadr and Ysgol Pennant, therefore there would be no impact on these communities.</p> <p>There would be no provision at Ysgol Bro Cynllaith, therefore there would be a significant impact on the local community in Llansilin. Should the school close, the Council would need to determine the future use of the building. Should the Council declare the building to be surplus to requirements and seek to sell the building, this would mean that the</p>	<p>Provision would continue to be available at Ysgol Llanrhaeadr and Ysgol Pennant, therefore there would be no additional travel for pupils attending these two schools.</p> <p>There would be no provision at Ysgol Bro Cynllaith, therefore additional travel would be required for pupils currently attending Ysgol Bro Cynllaith. Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel</p>

	There would be better opportunities for pupils by being part of a larger cohort of pupils.	school's facilities would no longer be available to the community in Llansilin.	requirements for parents in order to access school activities / events.
Option 10a - Close Ysgol Bro C. Retain Llanrhaeadr and Pennant as standalone schools	<p>Based on the latest school categorisations, carried out in 2019, Bro Cynllaith and Pennant are currently in the yellow support capacity with an improvement capacity of B. Llanrhaeadr is in the amber support capacity with an improvement capacity of C.</p> <p>Closing Bro Cynllaith would mean that pupils would need to transfer to alternative schools. For many pupils would be Llangedwyn and Llanrhaeadr. Llangedwyn is in the yellow support capacity with an improvement capacity of B.</p> <p>Therefore if pupils transferred to Llangedwyn it is not expected that there would be an impact on the educational provision. However, there might be impact on pupils transferring to Llanrhaeadr.</p>	<p>Provision would continue to be available at Llanrhaeadr and Pennant, therefore there would be no impact on these communities.</p> <p>This option would lead to closure of Ysgol Bro Cynllaith, therefore there would be a significant impact on the local community in Llansilin. Should the school close, the Council would need to determine the future use of the building. Should the Council declare the building to be surplus to requirements and seek to sell the building, this would mean that the school's facilities would no longer be available to the community in Llansilin.</p>	<p>Provision would continue to be available at Llanrhaeadr and Pennant, therefore no additional travel would be required for pupils attending these schools.</p> <p>This option would lead to closure of Ysgol Bro Cynllaith, therefore additional travel would be required for pupils currently attending Ysgol Bro Cynllaith. Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirements for parents in order to access school activities / events.</p>
Option 10b - Close Pennant. Retain Ysgol Bro C and	Based on the latest school categorisations, carried out in 2019, Bro Cynllaith and Pennant are currently in the yellow support	Provision would continue to be available at Ysgol Bro Cynllaith and Llanrhaeadr, therefore there	Provision would continue to be available at Ysgol Bro Cynllaith and Llanrhaeadr, therefore no

<p>Llanrhaeadr as standalone schools</p>	<p>capacity with an improvement capacity of B. Llanrhaeadr is in the amber support capacity with an improvement capacity of C.</p> <p>Closing Pennant would mean that pupils would need to transfer to alternative schools. For most pupils this would be Llanrhaeadr, and therefore it is possible that there might be an impact on the educational provision. Closing Pennant would also lead to the loss of designated Welsh-medium provision in the area.</p>	<p>would be no impact on these communities.</p> <p>This option would lead to closure of Ysgol Pennant, therefore there would be a significant impact on the local community in Penybontfawr. Should the school close, the Council would need to determine the future use of the building. Should the Council declare the building to be surplus to requirements and seek to sell the building, this would mean that the school's facilities would no longer be available to the community in Penybontfawr.</p>	<p>additional travel would be required for pupils attending these schools.</p> <p>This option would lead to closure of Ysgol Pennant, therefore additional travel would be required for pupils currently attending Ysgol Pennant. Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirements for parents in order to access school activities / events.</p>
<p>Option 10c - Close Llanrhaeadr. Retain Ysgol Bro C and Pennant as standalone schools</p>	<p>Based on the latest school categorisations, carried out in 2019, Bro Cynllaith and Pennant are currently in the yellow support capacity with an improvement capacity of B. Llanrhaeadr is in the amber support capacity with an improvement capacity of C.</p> <p>Closing Llanrhaeadr would mean that pupils would need to transfer to alternative schools. For most pupils this would be Pennant, Bro Cynllaith and Llangedwyn. As all</p>	<p>Provision would continue to be available at Ysgol Bro Cynllaith and Ysgol Pennant, therefore there would be no impact on these communities.</p> <p>This option would lead to closure of Ysgol Llanrhaeadr, therefore there would be a significant impact on the local community in Llanrhaeadr-ym-Mochnant. Should the school close, the Council would need to determine the future use of the building. Should the Council</p>	<p>Provision would continue to be available at Ysgol Bro Cynllaith and Ysgol Pennant, therefore no additional travel would be required for pupils attending these schools.</p> <p>This option would lead to closure of Ysgol Llanrhaeadr, therefore additional travel would be required for pupils currently attending Ysgol Llanrhaeadr. Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School</p>

	<p>these schools are in a higher school improvement category than Llanrhaeadr, it is not expected that there would be any negative impact on the educational provision of pupils.</p>	<p>declare the building to be surplus to requirements and seek to sell the building, this would mean that the school's facilities would no longer be available to the community in Llanrhaeadr-ym-Mochnant.</p>	<p>Transport Policy, there would also be an additional travel requirements for parents in order to access school activities / events.</p>
<p>Option 11a - Close Ysgol Bro C and Pennant. Retain Llanrhaeadr</p>	<p>Based on the latest school categorisations, carried out in 2019, Bro Cynllaith and Pennant are currently in the yellow support capacity with an improvement capacity of B. Llanrhaeadr is in the amber support capacity with an improvement capacity of C.</p> <p>Closing Bro Cynllaith and Pennant would mean that pupils would need to transfer to alternative schools. For most pupils, the nearest alternative school would be Llanrhaeadr or Llangedwyn. Llangedwyn is in the same school improvement category as Bro Cynllaith and Pennant. Therefore, if pupils transferred to Llangedwyn there would be no impact on education quality. If pupils moved to Llanrhaeadr there could be an impact on educational quality.</p>	<p>Provision would continue to be available at Llanrhaeadr, therefore there would be no impact on the Llanrhaeadr community.</p> <p>This option would lead to closure of Ysgol Bro Cynllaith and Ysgol Pennant, therefore there would be a significant impact on the local communities in Llansilin and Penybontfawr. Should the schools close, the Council would need to determine the future use of the buildings. Should the Council declare the buildings to be surplus to requirements and seek to sell the building, this would mean that the school's facilities would no longer be available to the communities in Llansilin and Penybontfawr.</p>	<p>Provision would continue to be available at Llanrhaeadr, therefore no additional travel would be required for pupils attending Ysgol Llanrhaeadr.</p> <p>This option would lead to closure of Ysgol Bro Cynllaith and Ysgol Pennant, therefore additional travel would be required for pupils currently attending these two schools. Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirements for parents in order to access school activities / events.</p>

	Closing Pennant would also lead to the loss of designated Welsh-medium provision in the area.		
Option 11b – Close Ysgol Bro C and Llanrhaeadr. Retain Pennant	<p>Based on the latest school categorisations, carried out in 2019, Bro Cynllaith and Pennant are currently in the yellow support capacity with an improvement capacity of B. Llanrhaeadr is in the amber support capacity with an improvement capacity of C.</p> <p>Closing Bro Cynllaith and Llanrhaeadr would mean that pupils would need to transfer to alternative schools. For most pupils, the nearest school would be Pennant or Llangedwyn. Llangedwyn is in the same school improvement category as Bro Cynllaith and Pennant. Therefore, if pupils transferred to Pennant or Llangedwyn there would be no impact on the quality of education.</p>	<p>Provision would continue to be available at Pennant, therefore there would be no impact on the Penybontfawr community.</p> <p>This option would lead to closure of Ysgol Bro Cynllaith and Ysgol Llanrhaeadr, therefore there would be a significant impact on the local communities in Llansilin and Llanrhaeadr-ym-Mochnant. Should the schools close, the Council would need to determine the future use of the buildings. Should the Council declare the buildings to be surplus to requirements and seek to sell the building, this would mean that the school's facilities would no longer be available to the communities in Llansilin and Llanrhaeadr-ym-Mochnant.</p>	<p>Provision would continue to be available at Pennant, therefore no additional travel would be required for pupils attending Ysgol Pennant.</p> <p>This option would lead to closure of Ysgol Bro Cynllaith and Ysgol Llanrhaeadr, therefore additional travel would be required for pupils currently attending these two schools. Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirements for parents in order to access school activities / events.</p>
Option 11c – Close Pennant and Llanrhaeadr. Retain Ysgol Bro C	Based on the latest school categorisations, carried out in 2019, Bro Cynllaith and Pennant are currently in the yellow support category with an improvement capacity of B. Llanrhaeadr is in the	Provision would continue to be available at Ysgol Bro Cynllaith, therefore there would be no impact on the Llansilin community.	Provision would continue to be available at Ysgol Bro Cynllaith, therefore no additional travel would be required for pupils attending Ysgol Bro Cynllaith.

	<p>amber support capacity with an improvement capacity of C.</p> <p>Closing Pennant and Llanrhaeadr would mean that pupils would need to transfer to alternative schools. For most pupils, the nearest alternative school would be Bro Cynllaith or Llangedwyn. Llangedwyn is in the same school improvement category as Bro Cynllaith and Pennant. Therefore, if pupils transferred to Bro Cynllaith or Llangedwyn there would be no impact on education quality.</p> <p>Closing Pennant would also lead to the loss of designated Welsh-medium provision in the area.</p>	<p>This option would lead to closure of Ysgol Pennant and Ysgol Llanrhaeadr, therefore there would be a significant impact on the local communities in Penybontfawr and Llanrhaeadr-ym-Mochnant. Should the schools close, the Council would need to determine the future use of the buildings. Should the Council declare the buildings to be surplus to requirements and seek to sell the building, this would mean that the school's facilities would no longer be available to the communities in Penybontfawr and Llanrhaeadr-ym-Mochnant.</p>	<p>This option would lead to closure of Ysgol Pennant and Ysgol Llanrhaeadr, therefore additional travel would be required for pupils currently attending these two schools. Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirements for parents in order to access school activities / events.</p>
<p>Option 12 – Close Ysgol Bro C, Pennant and Llanrhaeadr</p>	<p>Implementation of this option would mean that pupils would transfer to their nearest alternative schools.</p> <p>Whilst the Council's view is that the alternative schools pupils may transfer to would provide education for pupils which is of at least equivalent quality as that currently provided at Bro Cynllaith, Pennant and Rhaeadr, it is unlikely that</p>	<p>This option would result in closure of all three schools, therefore there would be a significant impact on the community in Llansilin, Penybontfawr and Llanrhaeadr-ym-Mochnant.</p> <p>Should the schools close, the Council would need to determine the future use of the buildings. Should the Council declare the buildings to be surplus to</p>	<p>This option would lead to closure of all three school, therefore additional travel would be required for pupils currently attending the three schools.</p> <p>Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be additional travel requirements</p>

	<p>there would be capacity in schools in the local area to accommodate all pupils attending these three schools without compromising the quality of provision, therefore this option would have a significant impact on the quality of provision.</p>	<p>requirements and seek to sell the building, this would mean that the school's facilities would no longer be available to the communities in Llansilin, Penybontfawr and Llanrhaeadr-ym-Mochnant.</p>	<p>for parents in order to access school activities / events.</p>
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7. CRITICAL SUCCESS FACTORS

The options have also been assessed against the following Critical Success Factors:

Critical Success Factor	Description
1 – Strategic fit and business needs	<ul style="list-style-type: none"> • The option must align with the Council’s Strategy for Transforming Education in Powys 2020-2030, to include the following: <ul style="list-style-type: none"> - Address the challenges facing education in Powys, as outlined in the Council’s Strategy for Transforming Education in Powys 2020-2030 - Align with the Vision and Guiding Principles outlined in the Council’s Strategy for Transforming Education in Powys 2020-2030 - Align with the Strategic Aims and Objectives outlined in the Council’s Strategy for Transforming Education in Powys 2020-2030 • The option must optimise the benefits of the Council’s Transforming Education Programme
2 – Value for money	<ul style="list-style-type: none"> • The option must optimise the resources available for the delivery of learning • The option must provide value for money in the delivery of learning
3 – Potential achievability	<ul style="list-style-type: none"> • The option must be achievable within current legislation • The option must be operationally achievable • The option must be physically achievable
4 – Potential affordability	<ul style="list-style-type: none"> • The extent to which the option is affordable within the Council’s forecasted revenue • The extent to which the option is affordable within the forecasted capital funding available to the Council

Each option has been assessed against the Critical Success Factors based on the following criteria:

✓ – Meets ? – Could meet x – Does not meet

The assessment for each option is as follows:

	Status Quo	Federation				Federation + closure		
	Option 1	Option 2a	Option 2b	Option 2c	Option 2d	Option 3a	Option 3b	Option 3c
1 – Strategic fit and business needs	x	x	x	x	x	?	✓	✓
2 – Value for money	x	x	x	x	x	?	✓	?
3 – Potential achievability	✓	✓	✓	✓	✓	?	✓	?
5 – Potential affordability	x	x	x	x	x	?	✓	?
Total ✓	1	1	1	1	1	0	4	1
Total x	3	3	3	3	3	0	0	0
Outcome	Discount	Discount	Discount	Discount	Discount	Discount	Possible	Discount

	2 sited school			2 sited school + closure			3 sited school
	Option 4a	Option 4b	Option 4c	Option 5a	Option 5b	Option 5c	Option 6
1 – Strategic fit and business needs	x	x	x	x	✓	?	x
2 – Value for money	?	x	x	?	?	x	x
3 – Potential achievability	✓	?	?	?	?	?	?
5 – Potential affordability	?	x	?	?	✓	?	x
Total ✓	1	0	0	0	2	0	0
Total x	1	3	2	1	0	1	3
Outcome	Discount	Discount	Discount	Discount	Possible	Discount	Discount

	2 school merger on one site						2 school merger on one site + closure					
	Option 7a	Option 7b	Option 7c	Option 7d	Option 7e	Option 7f	Option 8a	Option 8b	Option 8c	Option 8d	Option 8e	Option 8f
1 – Strategic fit and business needs	x	✓	x	x	x	?	x	x	?	?	?	?
2 – Value for money	x	X	x	x	x	x	x	?	✓	x	x	x
3 – Potential achievability	x	✓	?	?	x	?	x	?	✓	?	x	x
5 – Potential affordability	x	✓	x	x	x	✓	x	?	?	x	x	x
Total ✓	0	3	0	0	0	1	0	0	2	0	0	0
Total x	4	1	3	3	4	1	4	1	0	2	3	3
Outcome	Disc out	Disc out	Disc out	Disc out	Disc out	Disc out	Disc out	Disc out	Pos sible	Disc out	Disc out	Disc out

	3 school merger on 2 sites			Close 1 school			Close 2 schools			Close 3 schools
	Option 9a	Option 9b	Option 9c	Option 10a	Option 10b	Option 10c	Option 11a	Option 11b	Option 11c	Option 12
1 – Strategic fit and business needs	?	?	?	✓	x	x	?	?	x	?
2 – Value for money	x	x	x	✓	?	?	?	?	x	?
3 – Potential achievability	?	?	✓	✓	?	x	?	?	x	x
5 – Potential affordability	?	?	✓	✓	?	x	?	?	x	?
Total ✓	0	0	2	4	0	0	0	0	0	0
Total x	1	1	1	0	1	3	0	0	4	1
Outcome	Disco unt	Disco unt	Disco unt	Possi ble	Disco unt	Disco unt	Disco unt	Disco unt	Disco unt	Discount

8. EMERGING PREFERRED OPTION

Based on the assessments outlined above, two of the options identified for Ysgol Bro Cynllaith, Ysgol Gynradd Pennant and Ysgol Gynradd Llanrhaeadr-ym-Mochnant met all of the critical success criteria. These two options are as follows:

- **Option 3B:** Federate Ysgol Llanrhaeadr and Ysgol Pennant. Close Ysgol Bro Cynllaith
- **Option 10B:** Close Ysgol Bro Cynllaith. Retain Ysgol Llanrhaeadr and Ysgol Pennant as standalone schools

In addition, a number of other options were identified as 'possible' options as they did not fail to meet any of the critical success factors. These options are as follows:

- **Option 5B:** Merge Ysgol Llanrhaeadr and Ysgol Pennant to establish a new school on two sites. Close Ysgol Bro Cynllaith
- **Option 8C:** Merge Ysgol Llanrhaeadr and Ysgol Pennant to establish a new school on one site – Llanrhaeadr. Close Ysgol Bro Cynllaith

9. NEXT STEPS

9.1 Ysgol Bro Cynllaith

All of the options identified as possible options for Ysgol Bro Cynllaith, Ysgol Gynradd Pennant and Ysgol Gynradd Llanrhaeadr-ym-Mochnant include the closure of Ysgol Bro Cynllaith.

It is therefore recommended that the Council develops a further options appraisal paper relating to the potential closure of Ysgol Bro Cynllaith, to be considered by Cabinet in due course.

9.2 Ysgol Gynradd Pennant and Ysgol Gynradd Llanrhaeadr-ym-Mochnant

There are a number of options which have been identified as 'possible' options in respect of Ysgol Llanrhaeadr and Ysgol Pennant.

However, as indicated in section 3.2 above, the most significant challenges affecting schools in this area of the Llanfyllin catchment relate to Ysgol Bro Cynllaith not Ysgol Gynradd Pennant or Ysgol Gynradd Llanrhaeadr-ym-Mochnant. It is therefore recommended that the Council does not proceed with any of these options for Ysgol Gynradd Pennant or Ysgol Gynradd Llanrhaeadr-ym-Mochnant at this time.

The Council will continue to monitor the situation at the two schools, and should there be a significant change in pupil numbers and/or leadership arrangements at either school, the Council will reconsider options relating to the two schools.

The dual stream model at Ysgol Gynradd Llanrhaeadr-ym-Mochnant continues to be a concern, due to the small number of pupils attending each stream. In accordance with Strategic Objective 3.1 of the Strategy for Transforming Education in Powys – ‘Move schools along the language continuum’ – it is recommended that Workstream 3 (Welsh-medium) of the Transforming Education is asked to develop a plan to support Ysgol Gynradd Llanrhaeadr-ym-Mochnant to increase the proportion of pupils accessing Welsh-medium provision at the school, with the aim of moving the school along the language continuum.

Transforming Education in Powys

Options Appraisal

Ysgol Bro Cynllaith

Version Control:

Version	Date	Brief Summary of Change	Author
0.1	01/04/21	Document created	AM/RW/HR
0.2	11/05/21	Draft for consideration by WS1	SA
0.3	19/05/21	Draft for consideration by Programme Board	SA
0.4	07/07/2021	Version for consideration by Cabinet	SA

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1. INTRODUCTION

On the 29th September 2020, the Council's Cabinet considered a Programme Business Case (PBC) in respect of primary provision in the Llanfyllin / North Welshpool catchment.

The PBC considered by Cabinet identified a preferred way forward for the Llanfyllin / North Welshpool catchment, which is as follows:

- A new community campus for approximately 900 pupils aged 4 – 18 in Llanfyllin, replacing the current poor condition buildings of Ysgol Llanfyllin – to be built on the current Ysgol Llanfyllin site.
- To establish and build a new 360 place area school, to replace Carreghofa School and Llandysilio C. in W. School – this could also potentially include neighbouring schools in the Welshpool catchment as well. Site to be confirmed.
- To establish a new Welsh-medium school on the current Llanrhaeadr-ym-Mochnant site, replacing both Ysgol Pennant and Llanrhaeadr-ym-Mochnant Primary School. This may require capital funding to extend the school.
- To provide an extension to Llansantffraid C. in W. Primary School.
- Possible closure of Llangedwyn C. in W. School, Llanfechain C. in W. School and Ysgol Bro Cynllaith.

At the Cabinet meeting on the 29th September, Cabinet approved the submission of the PBC for the Llanfyllin / North Welshpool catchment to Welsh Government, and also approved that officers bring back a further report to Cabinet outlining the implementation steps, including consultation, required to achieve the new facilities.

On the 18th March 2021, Cabinet considered a further paper in respect of Llangedwyn C. in W. School, Llanfechain C. in W. School and Llansantffraid C. in W. School, which considered options for the church schools in the area in light of the PBC for the catchment. This paper set out the Council's intention to take forward the Transformation Programme in the Llanfyllin/North Welshpool catchment area on a phased basis as follows:

- Phase 1 – the development and consideration of options for Llangedwyn CIW Primary School and Llanfechain CIW Primary School, along with plans for capital investment in Llansantffraid CIW Primary School.
- Phase 2 – the development and consideration of options for Ysgol Bro Cynllaith, Ysgol Gynradd Pennant and Ysgol Gynradd Llanrhaeadr-ym-Mochnant.
- Phase 3 – the development and consideration of options for Llandysilio CiW Primary School, Carreghofa CP School, Arddleen CP School and Brynhafren CP School.

The paper considered by Cabinet on the 19th March addressed Phase 1 above.

A further options appraisal paper was subsequently developed for Ysgol Bro Cynllaith, Ysgol Gynradd Pennant and Ysgol Llanrhaeadr which considered a number of options relating to these three schools, in order to address Phase 2 as outlined above. This was considered by the Council's Transforming Education Board in April 2021. All of the options identified as possible options in respect of these three schools include the closure of Ysgol Bro Cynllaith, therefore the conclusion of this paper was to proceed to develop a separate options appraisal paper in respect of Ysgol Bro Cynllaith.

The purpose of this paper is to identify a preferred option for the future of Ysgol Bro Cynllaith.

Current pupil numbers¹ at the school are as follows:

	R	1	2	3	4	5	6	Total
Ysgol Bro Cynllaith	4	1	3	4	5	3	4	24

¹ Finance NOR – 2020 Pupil Count Day (6th November 2020)

PART A – THE CASE FOR CHANGE

2. STRATEGIC CONTEXT

2.1 POLICY CONTEXT

Following the inspection of Powys Education Services carried out by Estyn in the summer of 2019, the Council carried out a strategic review of schools during 2019-20, which led to the development of a new Strategy for Transforming Education in Powys. The strategy, which was developed following engagement with a wide range of stakeholders, was approved in April 2020.

The strategy sets out a Vision Statement and Guiding Principles which will underpin the Council's work to transform the Powys education system over the coming years. The Vision Statement is as follows:

All children and young people in Powys will experience a high-quality, inspiring education to help develop the knowledge, skills and attributes that will enable them to become healthy, personally fulfilled, economically productive, socially responsible and globally engaged citizens of 21st century Wales.

In addition, the strategy outlines a number of aims and objectives, which include an objective to 'Reconfigure and rationalise primary provision' in order to improve overall learner entitlement and experience in Powys.

To take forward this objective, the Council is reviewing the smallest schools in Powys, with the aim of identifying solutions for these schools which will meet the objective to 'Reconfigure and rationalise primary provision', in order to ensure that education in Powys is delivered through an affordable, resilient infrastructure which provides the best possible opportunities to learners, now and in the future.

2.2 WHY CHANGE IS NEEDED IN POWYS

Powys is a large, rural authority. Covering a quarter of the landmass of Wales, it contains only 4.2% of the population, making it the most sparsely populated county in Wales. Delivering services across such a large, sparsely populated area is challenging and expensive.

Whilst there has been some reorganisation activity in Powys over recent years, the county's schools' infrastructure largely remains similar to that which was in place 20 years ago.

The Council's new Strategy for Transforming Education in Powys outlines a number of challenges facing education in Powys, which were identified following engagement with key stakeholders during the autumn term 2019 and spring term 2020.

The following is a summary of the main challenges facing the Council:

i) High proportion of small schools

Based on PLASC 2019 figures, there were 33 small primary schools in Powys – this is approximately 40% of the primary provision in the county. 21 schools had fewer than 50 pupils, and for those schools the budget share per pupil is generally higher than the Powys average for primary schools.

ii) Decreasing pupil numbers

Pupil numbers have decreased over the past decade, and are expected to decrease further over the next five years. Pupil numbers in the primary sector in Powys are expected to decrease by approximately 4% by 2025.

iii) High number of surplus places

Based on PLASC 2019 figures, there was 18% surplus capacity in Powys primary schools. With pupil numbers across Powys projected to decrease overall over the coming years, the proportion of surplus places across the county will continue to increase.

iv) Building condition

Whilst the Council has invested in its school's estate through the 21st Century Schools Programme and the Asset Management Plan, building condition remains an issue across Powys, with associated maintenance costs.

v) Financial pressures

The Council is currently facing significant financial pressures in general. This is affecting all service areas, including the schools' sector. There are significant variations in the budget share per pupil across Powys schools, ranging from £3,127 to £11,912 in the primary sector.

vi) Inequality in access to Welsh-medium education

In contrast to other areas of Wales, there has been no growth in Welsh-medium pupil numbers in Powys over recent years. Significant changes are needed to the Welsh-medium offer in Powys to reverse the trend of the

last few years and ensure that all Powys learners can access comprehensive Welsh-medium provision throughout their educational careers.

vii) Limited post-14 and post-16 offer

In September 2019, the Council's Cabinet considered a report on post-16 provision, which outlined a number of challenges facing the sector, including decreasing learner numbers, financial challenges and sustainability of the curriculum offer, including Welsh-medium provision.

viii) Inequality in access to SEN provision

Within Powys, pupils with special education needs (SEN) attend a range of settings, including special schools, specialist centres, the pupil referral unit (PRU) as well as mainstream schools.

Currently, not all pupils are educated in the setting that meets their needs best, and depending on where pupils live, they have access to a different quality and type of provision.

ix) Historical lack of political decision making

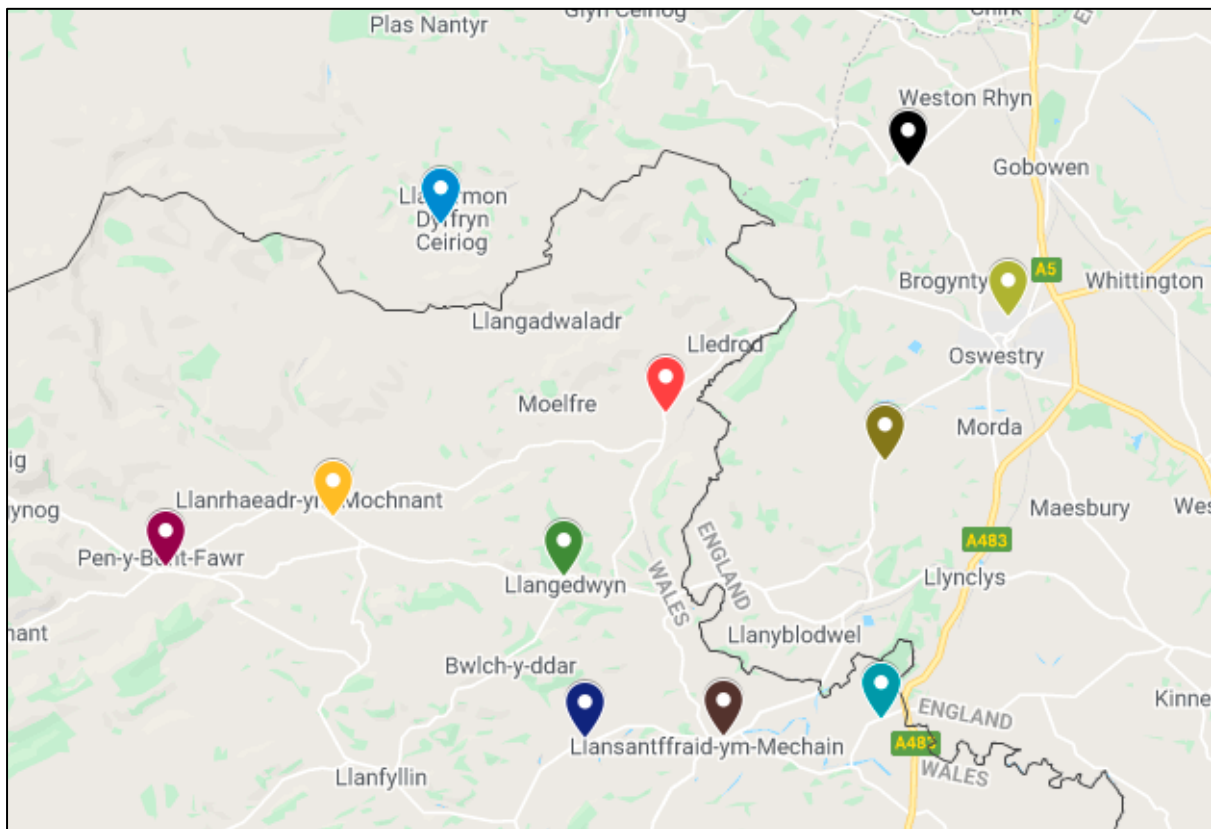
Although there have been some developments in terms of the schools' infrastructure over recent years, the Council's failure to implement a number of high-profile proposals in the last few years has left a legacy in Powys, and there has been a reluctance to embark on large scale reorganisation of education provision since then.

3. WHY CHANGE IS NEEDED IN YSGOL BRO CYNLLAITH

3.1 THE CURRENT SITUATION

Ysgol Bro Cynllaith is a community Primary school located in Llansilin in north Powys.

The following map shows the location of Ysgol Bro Cynllaith and nearby schools:



Key: Red – Ysgol Bro Cynllaith, Orange – Ysgol Llanrhaedr ym Mochant, Dark Red – Ysgol Pennant, Green – Llangedwyn C. in W. School, Dark Blue – Llanfechain C. in W. School, Brown – Llansantffraid C. in W. School, Light Blue – Carreghofa C.P. School, Blue – Ysgol Llanarmon DC, Light Brown – Trefonen C. of E. Primary School

The following primary schools are located within 10 miles of Ysgol Bro Cynllaith²:

School	Distance from Ysgol Bro Cynllaith by road (miles)
Llangedwyn C. in W. School	3.573 miles

² School Distances by Road - Council's Business Intelligence Team

Trefonen CofE Primary School (Shropshire)	4.255 miles
Woodside Primary School (Shropshire)	5.149 miles
Selattyn CofE Primary School (Shropshire)	5.304 miles
Ysgol Llanarmon DC (Wrexham)	6.136 miles
Llanrhaeadr Ym Mochnant C.P. School	6.233 miles
Llansantffraid C. in W. (A) School	6.411 miles
Llanfechain C. in W. School	6.939 miles
Ysgol Llanfyllin	8.341 miles
Ysgol Pennant	8.525 miles
Bryn Offa CofE Primary School (Shropshire)	8.553 miles
Carreghofa C.P. School	9.761 miles

The following is a summary of key data relating to Ysgol Bro Cynllaith:

	School Type	Language Category	Admission Number	Rural School? ³
Ysgol Bro Cynllaith	Community Primary School building owned by Powys County Council	English-medium	7	Yes

Pupil Numbers

i) Current pupil numbers⁴

	R	1	2	3	4	5	6	Total
Ysgol Bro Cynllaith	4	1	3	4	5	3	4	24

³ Annex F of the Welsh Government's School Organisation Code (2018) (<https://gov.wales/sites/default/files/publications/2018-10/school-organisation-code-second-edition.pdf>) includes a list of 'rural schools', to which the 'Presumption against the closure of rural schools' applies.

⁴ Finance NOR – 2020 Pupil Count Day (6th November 2020)

ii) Historical pupil numbers⁵

	Jan. 2014	Jan. 2015	Jan. 2016	Jan. 2017	Jan. 2018	Jan. 2019	Jan. 2020
Ysgol Bro Cynllaith	42	38	38	32	29	30	26

iii) Projected pupil numbers (Birth rate)⁶

	Jan. 2021	Jan. 2022	Jan. 2023	Jan. 2024	Jan. 2025
Ysgol Bro Cynllaith	26	27	28	27	25

iv) Projected pupil numbers (Finance projections)⁷

	Jan. 2022	Jan. 2023	Jan. 2024	Jan. 2025	Jan. 2026
Ysgol Bro Cynllaith	24	25	27	N/A	N/A

Building Capacity and Condition

i) Capacity

The following table provides information about the current capacities of school and the capacity:

	Current Capacity ⁸	Currently Filled	Surplus Capacity
Ysgol Bro Cynllaith	48	24 (50%)	24 (50%)

ii) Building condition⁹

⁵ PLASC 2020

⁶ Powys Schools Service Projections based on PLASC & Birth Rates

⁷ Powys Finance Projections based on data provided by the school

⁸ Welsh Government School Places Return – August 2020

⁹ Premises Data Return to Welsh Government – 2020

In 2009, Welsh Government carried out condition and suitability assessments of the school.

	Condition	Suitability	Access to hall on site
Ysgol Bro Cynllaith	B Good	B Good	Yes – access to community hall

Standards of Education

i) Estyn

	Ysgol Bro Cynllaith
Date of Inspection	June 2015
Standards	Good
Wellbeing	Good
Learning experiences	Adequate
Teaching	Good
Care, support and guidance	Good
Learning environment	Good
Leadership	Good
Improving quality	Adequate
Partnership working	Good
Resource management	Good
Follow Up	School to draw up action plan. Estyn to monitor progress.

ii) School Categorisation¹⁰

¹⁰ 2019. Categorisations were not carried out in 2020 due to Covid-19.

	Standards Group	Improvement Capacity	Support Capacity
Ysgol Bro Cynllaith	N/A	B	Yellow

Financial information

i) Cost per pupil (Section 52 Budget Statement, 2020/2021)

	Budget share per school	Budget share per pupil	Notional SEN budget	Non ISB funds devolved to the school
Ysgol Bro Cynllaith	£197,000	£7,295	£14,000	£3,000
Powys average (Primary)	N/A	£4,264	N/A	N/A

Home to school travel

i) Closest school

An analysis of pupil travel patterns has been carried out, based on the 26 pupils that were attending Ysgol Bro Cynllaith in January 2020. The closest provider for all of these pupils is as follows:

	Pupils attending Ysgol Bro Cynllaith
Ysgol Bro Cynllaith	88.5%
Llangedwyn C. in W. School	3.8%
Llanrhaeadr-ym-Mochnant C.P. School	3.8%
Trefonen Primary School (Shropshire)	3.8%

Based on this information, Ysgol Bro Cynllaith is the closest school for 88.5% of current pupils.

If there were no school in Llansilin, the closest school for all of the current pupils would be as follows:

	Pupils' closest school should there be no school in Llansilin
Llangedwyn C. in W. School ¹¹	73.1%
Llanrhaeadr-ym-Mochnant C.P. School	3.8%
Selattyn CofE Primary School (Shropshire)	19.2%
Trefonen Primary School (Shropshire)	3.8%

In March 2021, the Council's Cabinet agreed to carry out consultation on a proposal to close Llangedwyn C. in W. School, which could mean that there would be no school in Llangedwyn in the future. Should there be no school in Llansilin or Llangedwyn, the closest alternative school for pupils currently attending Ysgol Bro Cynllaith would be as follows:

	Pupils' closest school should there be no school in Llansilin or Llangedwyn
Llanrhaeadr-ym-Mochnant C.P. School	23.1%
Llansantffraid C. in W. School	3.8%
Selattyn C. of E. Primary School (Shropshire)	19.2%
Trefonen Primary School (Shropshire)	53.8%

ii) **Average travel distance**

The current average travel distance for all pupils currently attending Ysgol Bro Cynllaith is 1.3 miles.

If there was no school in Llansilin, the average travel distance for all current pupils attending the school to attend their nearest alternative provision would be 4.6 miles.

If there was no school in Llansilin or Llangedwyn, the average travel distance for all current pupils attending the school to attend their nearest alternative provision would be 5.1 miles.

¹¹ In March 2021, the Council's Cabinet agreed to carry out consultation on a proposal to close Llangedwyn C. in W. School from August 2023. Consultation is expected to commence in the autumn term 2021.

iii) Furthest travel distance

Of the pupils that currently attend Ysgol Bro Cynllaith, the furthest travel distance to the school for those pupils for whom Ysgol Bro Cynllaith is the closest provider is 3.4 miles.

If there was no school in Llansilin, the furthest distance to the nearest alternative provision for those pupils for whom Ysgol Bro Cynllaith is the closest provider would be 5.8 miles.

If there was no school in Llansilin or Llangedwyn, the furthest distance to the nearest alternative provision for those pupils for whom Ysgol Bro Cynllaith is the closest provider would be 5.8 miles.

Equalities Information

i) Free School Meals¹²

	Number of pupils who had a free school meal on Census day
Ysgol Bro Cynllaith	7.7%

ii) Pupils in care¹³

	Number of pupils in care
Ysgol Bro Cynllaith	3.8%

iii) SEN/ALN¹⁴

	School Action	School Action Plus	Statement
Ysgol Bro Cynllaith	7.7%	0	3.8%

Early Years

No early years / pre-school provision on the school site.

3.2 WHY CHANGE IS NEEDED IN YSGOL BRO CYNLLAITH

The following is a summary of the main challenges facing Ysgol Bro Cynllaith:

¹² PLASC 2020

¹³ PLASC 2020

¹⁴ PLASC 2020

i) Low pupil numbers

Current pupil numbers¹⁵ at Ysgol Bro Cynllaith are as follows:

	R	1	2	3	4	5	6	Total
Ysgol Bro Cynllaith	4	1	3	4	5	3	4	24

The Welsh Government defines a 'small school' as a school with fewer than 91 pupils, and are expected to remain below 30 for the foreseeable future.

The school's low pupil numbers have also resulted in a high number of surplus places at the school. Based on current pupil numbers, there is currently 50% surplus capacity at the school.

ii) High budget share per pupil

Based on the Council's Section 52 Budget Statement for 2020-21, the school's budget share per pupil during 2020-21 was £7,295. This is significantly higher than the Powys average of £4,264. Ysgol Bro Cynllaith is ranked the 3rd highest school in Powys by budget share per pupil.

iii) Issues with the building

A Welsh Government condition survey carried out in 2009 judged that the condition of the building was 'B – Good' and it's suitability was 'B – Good'. In 2020, the Council commissioned a new condition survey which concluded that the condition grading of the school was C+. The school is run from within a building thought to have been constructed circa 1960's. The original building is constructed from cavity walls and laid in a stretcher bond formation, with one timber framed building used as an additional teaching area. The cabin known as 'Block B' is approaching the end of its life expectancy and is showing signs of deterioration.

iv) Leadership

Whilst there is permanent leadership in place in Ysgol Bro Cynllaith, the headteacher has a significant teaching commitment, which limits the time available to focus on leadership of the school.

v) Combined age classes

¹⁵ Finance NOR – 2020 Pupil Count Day (6th November 2020)

The small pupil numbers at the school mean that pupils are taught in whole key stage classes, with Key Stage 2 in one class and Foundation Phase in another class. Because pupil numbers in each year group are small, it is more difficult to ensure all pupils are appropriately challenged.

PART B – OPTIONS FOR YSGOL BRO CYNLLAITH

4. AVAILABLE OPTIONS

The following options have been identified which could potentially provide a solution:

Option	Description
1	Status quo – continue as a standalone school
2	Federation with Llanrhaeadr-ym-Mochnant School
3	Merge with Llanrhaeadr-ym-Mochnant School to establish a new school on two sites
4	Close Ysgol Bro Cynllaith, but retain the site as part of Llanrhaeadr-ym-Mochnant School
5	Close Ysgol Bro Cynllaith, pupils to attend nearest alternative schools
6	Close Ysgol Bro Cynllaith, pupils to attend nearest alternative schools in Powys

5. SWOT ANALYSIS OF EACH OPTION

SWOT analyses for each of the four options are provided below.

Option 1: Status quo – continue as a standalone school

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Llansilin - There would be no additional transport costs - No requirement for a reorganisation process - No change for staff - No impact on pupils 	<ul style="list-style-type: none"> - Pupil numbers at Ysgol Bro Cynllaith would continue to be low - Would not lead to a rationalisation of primary provision - Would still need to maintain the Ysgol Bro Cynllaith building - Would not reduce surplus places - Would not lead to a financial saving - Would not address issues with the Ysgol Bro Cynllaith building

	- Would not address the high budget per pupil
Opportunities	Threats
- Opportunities for further collaboration with other neighbouring schools to provide increased opportunities for pupils	- Introduction of the new curriculum – would be difficult to provide educational opportunities which meet the requirements of the new curriculum

Option 2: Federation with Llanrhaeadr-ym-Mochnant School

Strengths	Weaknesses
<ul style="list-style-type: none"> - Would retain provision in Llansilin - There would be no additional transport costs - More opportunities could be provided to pupils and staff - Ysgol Bro Cynllaith pupils would continue to attend school in the same location 	<ul style="list-style-type: none"> - Pupil numbers at Ysgol Bro Cynllaith would continue to be low - Ysgol Bro Cynllaith pupils would still be taught separately - Would not lead to a rationalisation of primary provision - Would still be required to maintain the Ysgol Bro Cynllaith building - Would not reduce surplus places - Would not lead to a financial saving - Would not address issues with the Ysgol Bro Cynllaith school building - Would not address the high budget per pupil - May not be attractive to Llanrhaeadr-ym-Mochnant School - The schools are different language categories
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunities for further collaboration between the two schools to provide increased opportunities for pupils - More opportunities for networking and sharing good practice between staff 	<ul style="list-style-type: none"> - Introduction of the new curriculum – would be difficult to provide educational opportunities which meet the requirements of the new curriculum on the Ysgol Bro Cynllaith site

Option 3: Merge with Llanrhaeadr-ym-Mochnant School to establish a new school on two sites

Strengths	Weaknesses
------------------	-------------------

<ul style="list-style-type: none"> – Would retain provision in Llansilin – More opportunities could be provided to the pupils – There would be no additional transport costs – Could provide a financial saving to the Council – Opportunity for all staff to secure positions in the new school – Pupils would continue to attend school in the same location 	<ul style="list-style-type: none"> – Small numbers would remain on the Llansilin site – Llansilin pupils would still be taught separately – Would not reduce surplus places – Would still need to maintain the Ysgol Bro Cynllaith building – Both schools would lose their identity – Would also impact on the staff of Llanrhaeadr-ym-Mochnant School – May not be attractive to Llanrhaeadr-ym-Mochnant School – The schools have different language categories
Opportunities	Threats
<ul style="list-style-type: none"> – Opportunities for further collaboration across the sites – More opportunities for networking and sharing good practice between staff – Opportunity for increased leadership time for the headteacher. 	<ul style="list-style-type: none"> – Ensuring equal opportunities to all pupils due to age range of pupils in mixed age classes

Option 4: Close Ysgol Bro Cynllaith, but retain the site as part of Llanrhaeadr-ym-Mochnant School

Strengths	Weaknesses
<ul style="list-style-type: none"> – Would retain provision in Llansilin – More opportunities could be provided to the pupils – There would be no additional transport costs – Could provide a financial saving to the Council – Minimal impact on staff at Llanrhaeadr-ym-Mochnant School – Llanrhaeadr-ym-Mochnant School would retain its identity – Pupils would continue to attend school at the same location 	<ul style="list-style-type: none"> – Small numbers would remain at the Llansilin – Llansilin pupils would still be taught separately – Would still need to maintain the Llansilin building – Would not address issues with the Ysgol Bro Cynllaith building – Would not reduce surplus places – Ysgol Bro Cynllaith would lose its identity – May not be attractive to Llanrhaeadr-ym-Mochnant School – The schools have different language categories

Opportunities	Threats
<ul style="list-style-type: none"> – Opportunities for further collaboration across the sites – More opportunities for networking and sharing good practice between staff – Opportunity for increased leadership time for headteacher 	<ul style="list-style-type: none"> – Ensuring equal opportunities to all pupils due to age range of pupils in mixed age classes

Option 5: Close Ysgol Bro Cynllaith, pupils to attend nearest alternative schools

Strengths	Weaknesses
<ul style="list-style-type: none"> – Would address the issue of low pupil numbers – Would reduce the Council's overall surplus capacity in primary schools – Revenue saving to the Council – Pupils would attend larger schools, which would be better equipped to meet the requirements of the new curriculum – Pupils would attend larger schools, which could provide a wider range of educational and extra-curricular opportunities – Pupils would attend schools with more suitable accommodation – Pupils would be taught in classes with peers of similar ages 	<ul style="list-style-type: none"> – Additional travel for those pupils for whom Ysgol Bro Cynllaith is currently the closest school – Pupils currently attending Ysgol Bro Cynllaith would have to transfer to alternative provision – Loss of provision from Llansilin – Impact on the current staff of Ysgol Bro Cynllaith – Impact on the Llansilin community – Some pupils may be closer to schools in Shropshire should the Council also proceed with closure of Llangedwyn C. in W. School
Opportunities	Threats
<ul style="list-style-type: none"> – Opportunity for the Council to realise a capital receipt from sale of the school site 	

Option 6: Close Ysgol Bro Cynllaith, pupils to attend nearest alternative schools in Powys

Strengths	Weaknesses

<ul style="list-style-type: none"> - Would address the issue of low pupil numbers - Would reduce the Council's overall surplus capacity in primary schools - Revenue saving to the Council - Pupils would attend larger schools, which would be better equipped to meet the requirements of the new curriculum - Pupils would attend larger schools, which could provide a wider range of educational and extra-curricular opportunities - Pupils would attend schools with more suitable accommodation - Pupils would be taught in classes with peers of similar ages - Pupils would be able to continue to access provision in Powys 	<ul style="list-style-type: none"> - Additional travel for those pupils for whom Ysgol Bro Cynllaith is currently the closest school - Pupils currently attending Ysgol Bro Cynllaith would have to transfer to alternative provision - Loss of provision from Llansilin - Impact on the current staff of Ysgol Bro Cynllaith - Impact on the Llansilin community
Opportunities	Threats
<ul style="list-style-type: none"> - Opportunity for the Council to realise a capital receipt from sale of the school site 	

6. IMPACT OF EACH OPTION

The likely impact of each option on quality and standards, the community and travelling arrangements is considered below:

Option	Likely impact on quality and standards	Likely impact on the community	Likely impact of different travelling arrangements
Option 1: Status Quo – continue as a standalone school	There would be no impact on quality and standards – pupils would continue to attend the current provision at Ysgol Bro Cynllaith.	There would be no impact on the community – provision would continue to be available in Llansilin.	There would be no impact on travel arrangements – pupils would continue to attend Ysgol Bro Cynllaith.
Option 2: Federation with Llanrhaeadr–ym–Mochnant school	The impact on quality and standards would be minimal. Ysgol Bro Cynllaith would continue to operate as a stand alone school, however the school would be federated with Llanrhaeadr–ym–Mochnant school, meaning that one joint governing body would be responsible for both schools. There would also be the potential for shared leadership across the two schools. Establishment of the federation could lead to opportunities to share staff / resources across the federation, which would have a positive impact on quality and standards.	The impact on the community would be minimal – provision would continue to be available in Llansilin. However, one joint governing body would be responsible for both schools, therefore there could be a perceived reduction in community involvement in management of the school, depending on the make up of the federated governing body.	Pupils would continue to attend school on the current site of Ysgol Bro Cynllaith.

<p>Option 3: Merge with Llanrhaeadr-ym-Mochnant School to establish a new school on two sites</p>	<p>It is anticipated that this option would have a positive impact on quality and standards through the establishment of one larger school, with a larger number of pupils and a larger team of staff.</p> <p>Both schools currently offer a similar standard of education to their pupils.</p> <p>Whilst pupils would continue to attend separate sites, therefore they would not benefit from all being taught together, this option would provide additional opportunities for staff expertise and resources to be shared across both sites.</p> <p>Ysgol Bro Cynllaith is an English-medium school, whilst Llanrhaeadr-ym-Mochnant is a dual-stream school. Both sites would therefore have a different language category, which whilst not having a negative impact on the quality and standards of education at either school, might complicate the use of resources and teaching staff between the two sites.</p>	<p>The impact on the community would be minimal – provision would continue to be available in Llansilin.</p> <p>However, one new governing body would be responsible for both sites, therefore there could be a perceived reduction in community involvement in management of the school, depending on the make up of the federated governing body.</p> <p>In addition, it is possible that most school activities would take place on the Llanrhaeadr-ym-Mochnant site as more pupils attend this site, which could lead to a reduction in activity on the Llansilin site.</p>	<p>Pupils would continue to attend school on the current site of Ysgol Bro Cynllaith.</p> <p>However, some additional travel may be required between schools in order to access activities and events.</p>
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<p>Option 4: Close Ysgol Bro Cynllaith, but retain the site as part of Llanrhaeadr-ym-Mochnant School</p>	<p>Implementation of this option would result in closure of Ysgol Bro Cynllaith, however provision would continue on the current site.</p> <p>Both schools currently offer a similar standard of education for their pupils. This proposal would create a larger school, with a larger number of pupils and a larger team of staff, which could have a positive impact on the opportunities available for pupils and staff.</p> <p>Whilst pupils would continue to attend separate sites, therefore would not benefit from all being taught together, this option would provide additional opportunities for staff expertise and resources to be shared across both sites.</p> <p>Ysgol Bro Cynllaith is an English-medium school, whilst Llanrhaeadr-ym-Mochnant is a dual-stream school. Both sites would therefore have a different language category, which whilst not having a negative impact on the quality and standards of</p>	<p>Provision would continue to be available in Llansilin. However, the site would be managed by the current governing body of Ysgol Llanrhaeadr-ym-Mochnant, therefore there could be a perceived reduction in community involvement in management of the school. It is also possible that the school would lose its identity as a school focused in the Llansilin community.</p> <p>In addition, it is possible that most school activities would take place on the Llanrhaeadr-ym-Mochnant site as more pupils attend this site, which could lead to a reduction in activity on the Llansilin site.</p>	<p>Pupils would continue to attend school on the current site of Ysgol Bro Cynllaith.</p> <p>However, some additional travel may be required between schools in order to access activities and events.</p>
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	education at either school, might complicate the use of resources and teaching staff between the two sites.		
Option 5: Close Ysgol Bro Cynllaith, pupils to attend nearest alternative schools	<p>Implementation of this option would mean that pupils currently attending Ysgol Bro Cynllaith would transfer to their nearest alternative schools. For the majority of pupils, the closest alternative Powys school would be Llangedwyn C. in W. school.</p> <p>Based on the latest categorisations carried out in 2019, both Ysgol Bro Cynllaith and Llangedwyn C. in W. school are categorised as Yellow schools. The Council's view is that quality and standards at Llangedwyn C. in W. school would be at least as good as the provision at Ysgol Bro Cynllaith.</p> <p>The Council intends to carry out consultation on a proposal to close Llangedwyn C. in W. School, which could mean that there would be no school in Llangedwyn in the future. Should there be no school in Llansilin or Llangedwyn, the closest alternative school in Powys</p>	<p>There would be a significant impact on the community of Llansilin as there would be no provision in Llansilin.</p> <p>Should the school close, the Council would need to determine the future use of the building. Should the Council declare the building to be surplus to requirements and seek to sell the building, this would mean that the school's facilities would no longer be available to the community in Llansilin.</p> <p>Early years provision is currently provided on the school site, closure of the school could also mean that early years provision would no longer be available to the community.</p>	<p>Additional travel would be required for pupils currently attending Ysgol Bro Cynllaith.</p> <p>Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirement for parents in order to access school activities / events.</p>

	<p>would be Ysgol Llanrhaeadr-ym-Mochnant. Ysgol Llanrhaeadr-ym-Mochnant is in an amber support capacity based on the 2019 categorisations, whilst Ysgol Bro Cynllaith is in a yellow support capacity. It is therefore possible that there could be a negative impact on the quality and standards of education of pupils currently attending Ysgol Bro Cynllaith.</p> <p>Should there be no school in Llansilin or Llangedwyn, it is possible that the closest school for a number of pupils that currently attend Ysgol Bro Cynllaith would be located outside Powys, in particular Selattyn C of E School, Trefonen and Gobowen, which are located in Shropshire. It is the Council's view that pupils maintain an education in Wales.</p>		
<p>Option 6: Close Ysgol Bro Cynllaith, pupils to attend nearest alternative schools in Powys</p>	<p>Implementation of this option would mean that pupils currently attending Ysgol Bro Cynllaith would transfer to their nearest alternative schools in Powys. For the majority of pupils, the closest</p>	<p>There would be a significant impact on the community of Llansilin as there would be no provision in Llansilin.</p> <p>Should the school close, the Council would need to determine</p>	<p>Additional travel would be required for pupils currently attending Ysgol Bro Cynllaith.</p> <p>Whilst free home to school transport would be provided to eligible pupils in accordance with</p>

	<p>alternative Powys school would be Llangedwyn C. in W. school.</p> <p>Based on the latest categorisations carried out in 2019, both Ysgol Bro Cynllaith and Llangedwyn C. in W. school are categorised as Yellow schools. The Council's view is that quality and standards at Llangedwyn C. in W. school would be at least as good as the provision at Ysgol Bro Cynllaith.</p> <p>The Council intends to carry out consultation on a proposal to close Llangedwyn C. in W. School, which could mean that there would be no school in Llangedwyn in the future. Should there be no school in Llansilin or Llangedwyn, the closest alternative school in Powys would be Ysgol Llanrhaeadr-ym-Mochnant. Ysgol Llanrhaeadr-ym-Mochnant is in an amber support capacity based on the 2019 categorisations, whilst Ysgol Bro Cynllaith is in a yellow support capacity. It is therefore possible that there could be a negative impact on the quality and standards of education of pupils</p>	<p>the future use of the building. Should the Council declare the building to be surplus to requirements and seek to sell the building, this would mean that the school's facilities would no longer be available to the community in Llansilin.</p> <p>Early years provision is currently provided on the school site, closure of the school could also mean that early years provision would no longer be available to the community.</p>	<p>the Council's Home to School Transport Policy, there would also be an additional travel requirement for parents in order to access school activities / events.</p>
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	<p>currently attending Ysgol Bro Cynllaith.</p> <p>Should there be no school in Llansilin or Llangedwyn, it is possible that the closest school for a number of pupils that currently attend Ysgol Bro Cynllaith would be located outside Powys, in particular Selattyn C of E School, Trefonen and Gobowen, which are located in Shropshire. It is the Council's view that pupils maintain an education in Wales.</p>		
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7. CRITICAL SUCCESS FACTORS

The options have also been assessed against the following Critical Success Factors:

Critical Success Factor	Description
1 – Strategic fit and business needs	<ul style="list-style-type: none"> • The option must align with the Council’s Strategy for Transforming Education in Powys 2020-2030, to include the following: <ul style="list-style-type: none"> - Address the challenges facing education in Powys, as outlined in the Council’s Strategy for Transforming Education in Powys 2020-2030 - Align with the Vision and Guiding Principles outlined in the Council’s Strategy for Transforming Education in Powys 2020-2030 - Align with the Strategic Aims and Objectives outlined in the Council’s Strategy for Transforming Education in Powys 2020-2030 • The option must optimise the benefits of the Council’s Transforming Education Programme
2 – Value for money	<ul style="list-style-type: none"> • The option must optimise the resources available for the delivery of learning • The option must provide value for money in the delivery of learning
3 – Potential achievability	<ul style="list-style-type: none"> • The option must be achievable within current legislation • The option must be operationally achievable • The option must be physically achievable
4 – Potential affordability	<ul style="list-style-type: none"> • The extent to which the option is affordable within the Council’s forecasted revenue • The extent to which the option is affordable within the forecasted capital funding available to the Council

Each option has been assessed against the Critical Success Factors based on the following criteria:

✓ – Meets ? – Could meet x – Does not meet

The assessment for each option is as follows:

	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6

1 – Strategic fit and business needs	x	x	x	x	?	✓
2 – Value for money	x	x	x	x	✓	✓
3 – Potential achievability	✓	✓	✓	✓	✓	✓
5 – Potential affordability	x	x	x	x	✓	✓
Total ✓	1	1	1	1	4	4
Total x	3	3	3	3	0	0
Outcome	Discount	Discount	Discount	Discount	Possible	Preferred option

8. EMERGING PREFERRED OPTION

Based on the work carried out, the emerging preferred option for Ysgol Bro Cynllaith is:

Option 6: Close Ysgol Bro Cynllaith, pupils to attend nearest alternative schools in Powys

The reasons for this are:

- Would address the issue of low pupil numbers
- Would reduce the Council's overall surplus capacity in primary schools
- Revenue saving to the Council
- Pupils would attend larger schools, which would be better equipped to meet the requirements of the new curriculum
- Pupils would attend larger schools, which could provide a wider range of educational and extra-curricular opportunities
- Pupils would attend schools with more suitable accommodation
- Pupils would be taught in classes with peers of similar ages
- Pupils would be able to continue to access provision in Powys
- Meets all of the Critical Success Factors

Further consideration of this option will now be carried out, to include consideration of the factors outlined in the School Organisation Code.

PART C – FURTHER CONSIDERATION OF PREFERRED OPTION

The Welsh Government's School Organisation Code outlines factors to be considered when developing school organisation proposals. Consideration is given below to the impact of the preferred option, to close Ysgol Bro Cynllaith with pupils to attend nearest alternative schools in Powys, on the factors outlined in the Code.

In April 2021, the Council's Cabinet agreed to carry out consultation on a proposal to close Llangedwyn C. in W. School, which could mean that there would be no school in Llangedwyn in the future. Llangedwyn C. in W. School is located 3.5 miles from Ysgol Bro Cynllaith, therefore section 9 also considers the impact on pupils currently attending Ysgol Bro Cynllaith should there be no school in Llangedwyn or Llansilin.

9. QUALITY AND STANDARDS IN EDUCATION

9.1 Likely impact on standards and progress overall, of specific groups and in skills

Should the Council proceed with implementation of the preferred option, Ysgol Bro Cynllaith would close, and pupils would transfer to alternative schools. For the majority of pupils, the closest alternative school would be Llangedwyn C. in W. School.

The Council's view is that Llangedwyn C. in W. School would provide education for pupils which is of at least equivalent quality as that provided at Ysgol Bro Cynllaith, therefore it is not anticipated that implementation of the preferred option would have a negative impact on standards and progress overall. Both Ysgol Bro Cynllaith and Llangedwyn C. in W. School were categorised as Yellow schools in the latest school categorisations carried out in 2019/20.

The Council's Cabinet has recently agreed to carry out consultation on a proposal to close Llangedwyn C. in W. School. If this proposal was implemented it could mean that there would be no school in Llangedwyn in the future. Should there be no school in Llangedwyn or Llansilin, Ysgol Llanrhaeadr-ym-Mochnant would be the closest alternative Powys school for the majority of pupils currently attending Ysgol Bro Cynllaith. Since the last categorisation of schools in 2019, Ysgol Llanrhaeadr-ym-Mochnant has appointed a permanent headteacher and standards are now at least equivalent to that available at Ysgol Bro Cynllaith.

This would also apply in respect of pupils belonging to specific groups, such as pupils eligible for Free School Meals, pupils for whom English is an Additional Language, Looked after Children and pupils with Additional Learning Needs. Based on PLASC 2020 information, there are two pupils

eligible for Free School Meals, 1 Looked after Children and there are no pupils for whom English is an Additional Language at Ysgol Bro Cynllaith. There are 3 pupils with Additional Learning Needs, and therefore the number of pupils belonging to this group is relatively small and it is not anticipated that implementation of the preferred option would have a negative impact on the standards and progress of these pupils.

This is also the case in respect of the impact on the skills of all pupils, including literacy, numeracy and ICT. Pupils would transfer to larger schools, which would provide improved opportunities to share staff expertise and resources, and which have an improved ability to monitor pupil progress in these aspects.

9.2 Wellbeing and attitudes to learning

In the short term it is possible that there would be an impact on pupils' wellbeing, as they would need to transfer from Ysgol Bro Cynllaith to alternative schools. It is possible that pupils could choose to transfer to different schools, which could have a further impact on their wellbeing. However, the receiving school(s) would provide full support to the pupils during the transition period, to minimise any negative impact on them.

For some pupils, implementation of the preferred option could result in additional travel, which could have an impact on pupil well-being. However, alternative primary provision would be available at a number of other schools located within 10 miles of Ysgol Bro Cynllaith including schools located in Powys and schools located in Shropshire. It is not considered that the additional travel time required to alternative provision would be excessive.

In the longer term, the intention is that implementation of the preferred option would have a positive impact on pupil wellbeing and attitudes to learning as they would transfer to larger schools with larger cohorts of pupils, providing improved social and extra-curricular opportunities.

9.3 Teaching and learning experiences

9.3.1 Quality of teaching

Should the Council proceed with implementation of the preferred option, Ysgol Bro Cynllaith would close, and pupils would transfer to alternative schools. For the majority of pupils, the closest alternative school would be Llangedwyn C. in W. School. The Council has no concern about the quality of teaching at Llangedwyn C. in W. School, and is satisfied that the quality of teaching available to pupils at the school would be at least equivalent to that provided at Ysgol Bro Cynllaith.

The Council's Cabinet has recently agreed to carry out consultation on a proposal to close Llangedwyn C. in W. School. If this proposal was implemented it could mean that there would be no school in Llangedwyn in the future. Should there be no school in Llangedwyn or Llansilin, Ysgol Llanrhaeadr-ym-Mochnant would be the closest alternative Powys school for the majority of pupils currently attending Ysgol Bro Cynllaith. Since the last categorisation of schools in 2019, Ysgol Llanrhaeadr-ym-Mochnant has appointed a permanent headteacher and standards of teaching are now at least equivalent to that available at Ysgol Bro Cynllaith.

9.3.2 The breadth, balance and appropriateness of the curriculum

Should the Council proceed with implementation of the preferred option, Ysgol Bro Cynllaith would close, and pupils would transfer to alternative schools. For the majority of pupils, the closest alternative school would be Llangedwyn C. in W. School.

However, the Council's Cabinet has recently agreed to carry out consultation on a proposal to close Llangedwyn C. in W. School. If this proposal was implemented it could mean that there would be no school in Llangedwyn in the future. Should there be no school in Llangedwyn or Llansilin, Ysgol Llanrhaeadr-ym-Mochnant would be the closest alternative Powys school for the majority of pupils currently attending Ysgol Bro Cynllaith.

The Council's view is that both of these schools would provide a curriculum which is at least equivalent to that currently provided at Ysgol Bro Cynllaith. Llangedwyn C. in W. School currently operates as part of a federation with Llanfechain C. in W. School, whilst Ysgol Llanrhaeadr-ym-Mochnant is a larger schools, therefore the expectation is that there would be an improvement in the breadth, balance and appropriateness of the curriculum provided to pupils, and that the alternative schools would be better placed to develop provision which meets the requirements of the new curriculum.

Whilst the preferred option is that pupils would transfer to their closest alternative schools in Powys, some pupils would live closer to schools in Shropshire, therefore it is possible that they would choose to transfer to these schools. Should this be the case, they would not have access to the Welsh curriculum, and in particular would not be taught Welsh.

9.3.3 The provision of skills

Should the Council proceed with implementation of the preferred option, Ysgol Bro Cynllaith would close, and pupils would transfer to alternative schools. For the majority of pupils, the closest alternative school would be Llangedwyn C. in W. School.

However, the Council's Cabinet has recently agreed to carry out consultation on a proposal to close Llangedwyn C. in W. School. If this proposal was implemented it could mean that there would be no school in Llangedwyn in the future. Should there be no school in Llangedwyn or Llansilin, Ysgol Llanrhaeadr-ym-Mochnant would be the closest alternative Powys school for the majority of pupils currently attending Ysgol Bro Cynllaith.

The Council has no concerns about the provision of skills at either of these two schools, therefore it is not anticipated that implementation of the preferred option would have a negative impact on the provision of skills for pupils currently attending Ysgol Bro Cynllaith.

9.4 Care, support and guidance

9.4.1 Tracking, monitoring and the provision of learning support, personal development and safeguarding

Should the Council proceed with implementation of the preferred option, Ysgol Bro Cynllaith would close, and pupils would transfer to alternative schools. For the majority of pupils, the closest alternative school would be Llangedwyn C. in W. School.

However, the Council's Cabinet has recently agreed to carry out consultation on a proposal to close Llangedwyn C. in W. School. If this proposal was implemented it could mean that there would be no school in Llangedwyn in the future. Should there be no school in Llangedwyn or Llansilin, Ysgol Llanrhaeadr-ym-Mochnant would be the closest alternative Powys school for the majority of pupils currently attending Ysgol Bro Cynllaith.

It is anticipated that the arrangements for tracking, monitoring and the provision of learning support, personal development and safeguarding at both of these schools would be equivalent to the arrangements currently in place at Ysgol Bro Cynllaith.

9.5 Leadership and Management

9.5.1 Quality and effectiveness of leaders and managers, self evaluation processes and improvement planning

Should the Council proceed with implementation of the preferred option, Ysgol Bro Cynllaith would close, and pupils would transfer to alternative schools. For the majority of pupils, the closest alternative school would be Llangedwyn C. in W. School.

However, the Council's Cabinet has recently agreed to carry out consultation on a proposal to close Llangedwyn C. in W. School. If this proposal was implemented it could mean that there would be no school in Llangedwyn in

the future. Should there be no school in Llangedwyn or Llansilin, Ysgol Llanrhaeadr-ym-Mochnant would be the closest alternative Powys school for the majority of pupils currently attending Ysgol Bro Cynllaith.

Ysgol Bro Cynllaith has a permanent headteacher. Leadership arrangements at Llangedwyn C. in W. School are via a shared temporary headteacher for Ffederasiwn Dwy Afon, which includes Llangedwyn C. in W. School and Llanfechain C. in W. School. Ysgol Llanrhaeadr-ym-Mochnant have recently appointed a permanent headteacher.

The Council's view is that the quality and effectiveness of leaders and managers, self evaluation processes and improvement planning would be at least as good at the alternative schools which pupils may transfer to. Whilst leadership arrangements at Llangedwyn C. in W. School are temporary whilst there are permanent leadership arrangements at Ysgol Bro Cynllaith, the headteachers of these two schools are responsible for a larger number of pupils, which should mean that they have less classroom responsibility compared with Ysgol Bro Cynllaith, meaning that the headteachers would have more time available to focus on leadership and management.

9.5.2 Professional learning

It is not anticipated that implementation of the preferred option would impact on professional learning opportunities. Staff currently employed at Ysgol Bro Cynllaith would be subject to a management of change process.

9.5.3 Use of Resources

Ysgol Bro Cynllaith is currently in a surplus position and is projected to go into a slight cumulative deficit position by the 31st March 2023 which continues into the following financial year.

Whilst there is therefore some concern about the use of resources within the school, there are concerns about the use of resources overall within the Powys school infrastructure. As indicated on page 5 above, one of the main challenges facing the Powys schools infrastructure is the high proportion of small schools in the County. Ysgol Bro Cynllaith is amongst the smallest schools in the County, and the budget share per pupil at the school is higher than the Powys average for primary schools. The school also currently currently has 50% surplus capacity. This is a very inefficient use of the Council's resources.

Closure of the school would reduce the number of schools in Powys, and would enable the Council to use its resources more effectively for the benefit of all Powys learners.

Should the preferred option be implemented, it is likely that pupils would transfer to larger schools, ensuring more effective use of the Council's resources. In addition, larger often have more resources available in terms of number of staff and educational resources, therefore pupils would benefit from the opportunity to access these resources.

9.6 Impact on vulnerable groups, including children with Special Educational Needs (SEN)

Implementation of the emerging preferred option would impact on any vulnerable pupils currently attending Ysgol Bro Cynllaith, including any pupils with SEN.

Based on January 2020 PLASC information, 2 pupils at Ysgol Bro Cynllaith were on School Action, and 0 pupil were on School Action Plus. There was 1 statemented pupil.

Whilst the emerging preferred option would impact on these pupils, as they would be required to move to alternative schools, there is no reason to believe that the schools to which they might transfer would not be able to meet their needs.

Should the option be implemented, the Council would work with Ysgol Bro Cynllaith and the receiving schools to ensure an effective transition for any vulnerable children, including children with SEN, and their families. This would include working with schools located in Shropshire and/or Wrexham for any pupils choosing to transfer to schools located in Shropshire and/or Wrexham.

9.7 Ability of the school/schools which are the subject of the proposals to deliver the full curriculum at the foundation phase and each key stage of education, including the quality of curriculum delivery and the extent to which the structure or size of the school is impacting on this

Should the emerging preferred option be implemented, Ysgol Bro Cynllaith would close and pupils would transfer to alternative schools, therefore Ysgol Bro Cynllaith would no longer need to deliver the curriculum to any key stages. This would also lead to an increase in pupil numbers at the schools to which the pupils wish to transfer. However current pupil numbers at Ysgol Bro Cynllaith are small, and therefore the number of pupils likely to transfer to each year group is low, therefore the impact on alternative schools is not likely to have a significant impact on their ability to deliver the full curriculum at the foundation phase and in each key stage of education.

In some schools, it is possible that an increase in pupil numbers would improve their ability to deliver the curriculum, however depending on the class structure and current breakdown of pupils, it is likely that some schools would

need to make adjustments to their class structure in the short term to accommodate any additional pupils.

10 NEED FOR PLACES AND IMPACT ON ACCESSIBILITY OF SCHOOLS

10.1 Will the alternative provision have sufficient capacity and provide accommodation of at least equivalent quality for existing and projected pupil numbers?

The following table shows the number of spaces available and the building condition of Powys schools providing English-medium education located within 10 miles of Ysgol Bro Cynllaith school:

School	Capacity ¹⁶	Current pupil numbers ¹⁷	Available spaces	Available capacity	Building Condition	Building Suitability
Llangedwyn C. in W. School	47	22	25	53.2%	B	B
Llanrhaeadr Ym Mochnant C.P. School	108	73	35	32.4%	A	A
Llansanffraid C. in W. School	105	103	2	1.9%	B	C
Llanfechain C. in W. School	47	43	4	8.5%	C	B
Ysgol Llanfyllin (Primary)	160	141	19	11.8%	C	B/C
Carreghofa C.P. School	115	93	22	19.1%	B	B

This suggests that there are sufficient places available within 10 miles of Ysgol Bro Cynllaith to accommodate all pupils currently attending the school.

The Council's Cabinet has recently agreed to carry out consultation on a proposal to close both Llangedwyn C. in W. School and Llanfechain C. in W. School, and to provide an extension to Llansanffraid C. in W. School. Should the Council proceed with the implementation of this proposal, there would be

¹⁶ Welsh Government School Places Return – August 2020

¹⁷ Finance NOR – 2020 Pupil Count Day (6th November 2020)

no places available at Llangedwyn C. in W. School or Llanfechain C. in W. School, however there would be an increase in the places available at Llansantffraid C. in W. School. There would continue to be sufficient places available to accommodate all pupils currently attending Ysgol Bro Cynllaith.

In addition the Powys schools listed above, Trefonen CofE School, Woodside Primary School, Selattyn CofE School, Brynoffa CofE Primary School are Shropshire schools located within 10 miles of Ysgol Bro Cynllaith. Whilst the Council is committed to continuing to provide access to Ysgol Bro Cynllaith pupils in Powys schools, it is possible that some pupils will choose to attend provision in Shropshire. The following table shows the number of places available at Shropshire schools providing English-medium education located within 10 miles of Ysgol Bro Cynllaith:

School	Capacity ¹⁸	Current pupil numbers ¹⁹	Available spaces	Available capacity	Building Condition	Building Suitability
Trefonen CofE Primary School (Shropshire)	157	147	10	6.3%	N/A	N/A
Woodside Primary School (Shropshire)	504	644	-140	-32.5%	N/A	N/A
Selattyn CofE Primary School (Shropshire)	91	93	-1	4.3%	N/A	N/A
Bryn Offa CofE Primary School (Shropshire)	140	138	2	-0.7%	N/A	N/A

This information suggests that the number of places available at Shropshire schools located within 10 miles of Ysgol Bro Cynllaith are limited.

10.2 Is the alternative provision sufficient to meet existing and projected demand for schools of the same language category and (if relevant) designated religious character?

As indicated in section 10.1 above, there is sufficient English-medium capacity within 10 miles of Ysgol Bro Cynllaith to accommodate the school's current and projected pupil numbers.

¹⁸ Get information about schools via GOV.UK - <https://get-information-schools.service.gov.uk/>. Accessed 7th July 2021

¹⁹ Get information about schools via GOV.UK - <https://get-information-schools.service.gov.uk/>. Accessed 7th July 2021

Ysgol Bro Cynllaith is a community primary school. The school's neighbouring schools are a mix of Church in Wales and community provision, but consisting mostly of community provision, within 10 miles of Ysgol Bro Cynllaith, It is considered that there is therefore sufficient community primary provision in the local area for pupils not wanting to attend a Church school.

10.3 What will be the nature of journeys to alternative provision and resulting journey times for pupils including SEN pupils?

As indicated in the table in section 10.1 above, there are alternative primary places available at several other schools located within 10 miles of Ysgol Bro Cynllaith. Should Ysgol Bro Cynllaith close, it is not considered that the length and nature of journeys for pupils to alternative provision would be excessive. This includes journeys for SEN pupils. One-way journeys to alternative provision would not be in excess of 45 minutes.

11 RESOURCING OF EDUCATION AND OTHER FINANCIAL IMPLICATIONS

11.1 What effect will the proposals have on surplus places in the area?

Ysgol Bro Cynllaith currently has 50% surplus places. Implementation of the preferred option would result in closure of Ysgol Bro Cynllaith, and would therefore lead a reduction in surplus places in the area, and in the Council's overall surplus places in primary schools.

11.2 Do the proposals form part of the local authority's 21st Century Schools Investment Programme and contribute to the delivery of sustainable schools for the 21st Century and to the better strategic management of the school estate?

The review of Ysgol Bro Cynllaith does not form part of the local authority's 21st Century Schools Investment Programme.

However, the Council's Strategy for Transforming Education in Powys identifies a number of issues relating to the overall Powys schools' estate, including a high proportion of small schools, a high number of surplus places and issues with building condition. The Strategy includes a strategic objective to 'Reconfigure and rationalise primary provision', which aims to address these issues, to ensure better strategic management of the Powys school estate. The review of Ysgol Bro Cynllaith is being carried out in order to meet this objective.

11.3 What are the recurrent costs of proposals over a period of at least 3 years and is the necessary recurrent funding available?

The recurrent costs of this proposal would be the increased transport costs which are currently estimated to be an additional £60,000 per annum as detailed in 11.4. This has been included in the delegated revenue costing and is funded through savings in other areas of the formula in relation to this proposal.

11.4 Will additional transport costs be incurred as a result of the proposal?

It is estimated that there will be additional transport costs of £60,000 per annum. This estimate is based on pupils' current location and assuming that pupils will go to their next nearest school.

11.5 What are the capital costs of the proposal and is the necessary capital funding is available?

It is not anticipated that capital funding would be required in order to implement the emerging preferred option. As indicated in the table in section 10.1 above, there are sufficient places at schools located within 10 miles of Ysgol Bro Cynllaith to accommodate all current and projected pupils.

Should the Council proceed with the implementation of the proposal to close both Llangedwyn C. in W. School and Llanfechain C. in W. School, an extension would be provided to Llansantffraid C. in W. School, the costs of which were included within that Cabinet paper.

11.6 What is the scale of any projected net savings (taking into account school revenue, transport and capital costs)

Annual revenue savings to the Council are estimated at approximately £81,300. This overall figure comprises a potential saving on Schools' delegated funding of over £140,000, estimated catering savings of £1,300 offset by estimated additional transport costs of £60,000.

These are complex catchment-wide proposals that are particularly sensitive to the final destinations of the learners and the potential for the need for an additional class at one of the receiving schools. If this were the case, then this could reduce the estimated savings by around £60,000.

11.7 Without the proposals, would the schools affected face budget deficits?

Ysgol Bro Cynllaith is currently in a surplus position and is projected to go into a slight cumulative deficit position by the 31st March 2023 which continues into the following financial year.

11.8 Will any savings in recurrent costs be retained in the local authority's local schools budget?

Any savings would be reinvested in the Council's corporate budget and any reinvestment in the schools' system would be agreed as part of the annual budget planning cycle.

11.9 Will the proceeds of sales (capital receipts) of redundant sites be made available to meet the costs of the proposal or contribute to the costs of future proposals which will promote effective management of school places?

Any capital receipts received from sale of the Ysgol Bro Cynllaith site would be reinvested into the Schools Transformation programme in order to improve the educational provision across Powys.

12 OTHER GENERAL FACTORS

12.1 What impact will the proposals have on educational attainment among children from economically deprived backgrounds?

Implementation of the preferred option would impact on any pupils from economically deprived backgrounds currently attending Ysgol Bro Cynllaith. All pupils currently attending the school, including any from economically deprived backgrounds, would need to transfer to alternative schools. Free home to school transport would be provided to eligible pupils in accordance with Council's home to school transport policy, however it is acknowledged that there would be an impact on families due to the requirement to travel to school events, which could have a greater impact on children from economically deprived backgrounds.

Based on PLASC figures from January 2020, 7.7% of pupils attending Ysgol Bro Cynllaith were eligible for Free School Meals, therefore it is acknowledged that the proposal would impact on some pupils from economically deprived backgrounds. However, whilst there would be an impact on these pupils in the short term as they would need to transfer to alternative schools, it is likely that they would transfer to larger schools, which would be able to provide more opportunities to the pupils, therefore having a positive impact on their educational attainment.

12.2 Any equality issues, including those identified through equality impact assessments

Initial consideration of equalities information recorded through PLASC suggests that there are no significant equality issues in respect of pupils currently attending Ysgol Bro Cynllaith. Should the Council proceed with the statutory process in respect of the preferred option, equality impact assessments will be carried out and regularly reviewed throughout the process to ensure that any issues are identified and fully considered.

12.3 Whether the school / schools involved are subject to any trust or charitable interests which might be affected by the proposals, for example in relation to the use or disposal of land.

Ysgol Bro Cynllaith is not subject to any trust or charitable interests which might be affected by the proposals.

13. SPECIFIC FACTORS IN THE CONSIDERATION OF SCHOOL CLOSURES

13.1 Whether the establishment of multi-site schools might be considered as a means of retaining buildings, or the reasons for not pursuing this option

A range of options have been considered in respect of Ysgol Bro Cynllaith, including establishing a multi-site school. These are outlined in section 4 of this document, as well as an assessment of each option which includes a summary of the weaknesses / threats associated with each.

Pupil numbers at Ysgol Bro Cynllaith are low, and the school has a high level of surplus places. Whilst pupil numbers are projected to increase slightly over the coming years, pupil numbers are projected to remain low, and the level of surplus places at the school would remain high. Establishing a multi-site school would not address this issue.

13.2 Whether alternatives to closure, such as clustering, collaboration or federation with other schools, might be considered or the reasons for not pursuing these as an alternative

Federation of Ysgol Bro Cynllaith with Ysgol Llanrhaeadr-ym-Mochnant is one of the options considered in section 4 of this document. An assessment of this option has been carried out, which includes a summary of the weaknesses / threats associated with this option.

Pupil numbers at Ysgol Bro Cynllaith are low, and the school has a high level of surplus places. Whilst pupil numbers are projected to increase slightly over the coming years, pupil numbers are projected to remain low, and the level of surplus places at the school would remain high. Clustering, collaboration or federation with other schools would not address this issue.

13.3 Whether the possibility of making fuller use of the existing buildings as a community or educational resource could be explored

The Council's view is that making more use of the existing school building as a community or educational resource would not address the issues identified in respect of Ysgol Bro Cynllaith.

Pupil numbers at the school are low, and are not projected to increase significantly over the coming years.

There is also a village hall in Llansilin, which is used by the community for a variety of activities.

13.4 The overall effect of closure on the local community (including the loss of school based facilities which are used by the local community)

Implementation of the preferred option would mean that there would no longer be provision at Llansilin. It is acknowledged that this would have a negative impact on the Llansilin community including loss of the primary provision from the village of Llansilin, and a possible loss of any community facilities associated with the school from the village.

Should the Council proceed with the preferred option, a draft community impact assessment will be carried out, with input from the school, which will be considered by Cabinet when determining whether or not to proceed with the statutory process. Should the Council proceed with the statutory process, the draft community impact assessment would be published as part of the consultation documentation, would be updated throughout the process to reflect any feedback received, and would be considered by the Council's Cabinet as part of the decision making process.

13.5 How parents' and pupils' engagement with the alternative school and any facilities it may offer could be supported

Should the Council proceed with the statutory process and eventually implementation of the preferred option, support would be provided to pupils and their parents as part of the transition process, to ensure full engagement with their new schools. The nature of this support will depend on the needs of the parents / pupils, however this could include meetings with headteachers and class teachers to ease transition into the new schools for pupils.

14. CONCLUSION AND NEXT STEPS

Based on the options appraisal carried out and further consideration of the preferred option against the factors outlined in the School Organisation Code, the preferred option is as follows:

Option 6: Close Ysgol Bro Cynllaith, pupils to attend nearest alternative schools in Powys

The reasons for this are:

- Would address the issue of low pupil numbers
- Would reduce the Council's overall surplus capacity in primary schools
- Revenue saving to the Council
- Pupils would attend larger schools, which could provide a wider range of educational and extra-curricular opportunities
- Pupils will be taught in classes with peers of similar ages
- Pupils would attend schools with better quality accommodation
- Minimal impact on any other schools
- Would enable pupils to continue to access provision in Powys
- Meets all of the Critical Success Factors

It is recommended that a paper is considered by the Council's Cabinet, requesting approval to commence consultation on a proposal to close Ysgol Bro Cynllaith, with pupils to transfer to their nearest alternative schools in Powys.

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Proposal to close Ysgol Bro Cynllaith

Draft Community Impact Assessment

June 2021

Draft Community Impact Assessment – Ysgol Bro Cynllaith

This draft Community Impact Assessment has been developed with input from the school. Should the Council proceed to consultation, the Community Impact Assessment will be updated after the consultation period to reflect feedback received.

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

The closest provider for pupils attending Ysgol Bro Cynllaith in January 2020 was as follows:

School	% of Pupils
Ysgol Bro Cynllaith	88.5%
Llangedwyn C. in W. School	3.8%
Trefonen Primary School (Shropshire)	3.8%
Gobowen Primary School (Shropshire)	3.8%

This suggests that 88.5% of pupils attending the school were attending their closest primary school, whilst 11.5% of pupils attending the school live closer to other primary schools.

ii) After-school clubs and extra-curricular activities provided by the school

The school provides the following after-school clubs and extra-curricular activities including the following:

- After School Club
- Breakfast Club
- Dragon Sports Club
- Table Tennis Club
- Music lessons
- Eco Club
- Dance Club (ran by pupils)
- Drama Club (ran by pupils)
- Tennis Club
- School Council
- Criw Cymraeg
- Film Club

- ICT and Code Cub
- Craft Club
- Cooking Club
- 5-a-side Football Club
- Welly Wednesday Club (where pupils explore the local environment and learn about nature)

Whilst some of these clubs are run by staff and governors, some are run by pupils.

iii) Any other facilities or services the school accommodates or services the school provides

The school accommodates or provides the following other facilities or services:

- After School Club (Clwb Cynllaith – also open to secondary pupils)
- Ti a Fi Llansilin held on the site
- Cylch Meithrin Llansilin weekly meetings
- National and local government elections and referendums
- Llansilin Over 60 Club held fortnightly
- Llansilin Village Show held annually
- Llansilin Bowls Club
- Llansilin Choir Rehearsal/Practice
- History Club
- Community Council meetings
- The school field is in constant use as a village plying field for all children and was listed as a Public Green Space in a recent planning application
- Bring and Buy Sales
- The school field is used for the annual school Sports Day – a well attended event by parents, grandparents and other members of the community.

iv) Other use by the community of the school building

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

- Ffair yr Ysgub
- Easter Bingo - a well supported community event vital for fundraising
- Macmillian Coffee Mornings
- Cake Sales
- PTFA Meetings
- Storytelling Workshops

- Christmas Fayre including Santa's Grotto
- Use of the school field for the annual Llansilin Village Show

v) Other links between the school and the community

- The premises of Llansilin Memorial Hall are leased to Powys County Council giving the school a substantive exclusive occupation of the premises. The premises are shared with the school by the Hall Trustees (the Hall Management Committee) to provide out of school hours accommodation for the activities of the following community organisations:
 - o Cymdeithas Ddywylliadol
 - o Llansilin Playschool (Cylch Meithrin)
 - o Over 60s Club
 - o Indoor Bowls Club
 - o Llansilin Community Council
 - o History Society
 - o Annual Village Show
 - o Parent Teacher Association
 - o Whist Drives
 - o Playing Fields Association
 - o Côr Cymysg Llansilin
 - o Table Tennis Club
 - o Funeral refreshments
 - o After school activities
- Use of St Silin's Church for various celebrations through the year, eg. Nativity Plays, Harvest Festival, Leaver's Service – these links between the two establishments are vital for the community
- Pantomimes/Plays
- Christmas Fayre with Santa's Grotto
- Annual Llansilin Show Day
- PTFA meetings
- Community Carol Singing and refreshments
- Easter Bingo – a massive fundraising event
- May Day Fun Day where children take part in Maypole Dancing
- Bore Cymraeg
- Printing of the Village Show Programme and Church Newsletter
- Pupil litter picking activities benefiting the village

vi) If accommodation, facilities or services are provided by a school, where would they be provided in the event of closure?

Should the proposal be implemented, Ysgol Bro Cynllaith would close and pupils transferring to their nearest alternative schools in Powys and there would no longer be a school in Llansilin. It is acknowledged that this would mean that there would be no school in Llansilin, meaning that

any community facilities provided by the school would no longer be available.

There is a community hall in Llansilin (village memorial hall) which is located near the school, and which provides facilities and services, which are complemented by the school. Should there be no school in Llansilin, the community hall would continue to be available for community events and activities.

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

Should the proposal be implemented, Ysgol Bro Cynllaith would close and pupils would transfer to their nearest alternative schools in Powys. For the majority of pupils, the closest alternative Powys schools would be Llangedwyn C. in W. School.

In March 2021, the Council's Cabinet agreed to carry out consultation on a proposal to close Llangedwyn C. in W. School, which could mean that there would be no school in Llangedwyn in the future. Should there be no school in Llansilin or Llangedwyn, the closest alternative school for pupils currently attending Ysgol Bro Cynllaith would be Llanrhaeadr-ym-Mochnant C.P. School and Llansantffraid C. in W. School

An analysis of pupils attending Ysgol Bro Cynllaith in January 2020 suggests that the furthest distance to an alternative school in Powys for pupils for whom Ysgol Bro Cynllaith is their closest school would be 5.8 miles. **If there was no school in Llansilin or Llangedwyn, the furthest distance to an alternative school for pupils in Powys for whom Ysgol Bro Cynllaith is their closest school would be 14.5 miles.**

Home to school transport would be provided to eligible pupils in accordance with the home to school transport which is in operation at that time. Whilst free transport would be provided to eligible pupils, it is acknowledged that there could be an impact on some pupils' ability to access after school activities, and could impact on the ability of parents to take part in school events, meetings etc.

viii) How parents' and pupils' engagement with the alternative school and any facilities it may offer could be supported

Should the Council proceed with the statutory process and eventually implementation of the preferred option, support would be provided to pupils and their parents as part of the transition process, to ensure full engagement with their closest alternative schools.

ix) Any wider implications e.g. impact on public transport provision, wider community safety issues

- A current mini bus driver who transports children from Cefn Canol, through Rhiwlas, Moelfre and Llansilin to Llanrhaeadr says that the journey ONE WAY is 28 miles which can take up to 75 minutes.
- Parents have raised serious concerns about subjecting very young children to long journey times, early starts and late returns, bad enough in summer months but made even worse in the winter months, this is bound to have a massive impact on their capacity to learn.
- The worsening state of the roads is also a major concern which will be made all the more worse by heightened use by parents taking / collecting their children from either Llanfyllin or Llanrhaeadr.
- There are so many things to consider, including none the least, toilet issues for the very young.
- Child safeguarding – there will be no teacher/child/parent interaction during school drop off / collection – a vital part of the day for some pupils for their mental health and welfare.
- Very often the only contact parents from the outer rural areas of this community have with others is when the drop/collect their child from school. This will be very damaging for the community.
- Child wellbeing is not being considered, a four year old child should not be sitting on a coach for over 40 minutes before arriving at school.
- Moving children to Llanfyllin/Llanrhaeadr would result in a child's school day being increased to 8 hours which is far too long for young children and totally unacceptable.
- Ultimate traffic congestion in our small village street as there will without doubt be more coaches / mini buses used to take the children to and from school. This also raises serious road safety issues for the children. The current high school bus already struggles to turn about sometimes and as we are all well aware children can be unpredictable when distracted and confused in crowds of other older children with the potential of running out behind the bus.
- Ideally, a child should not be expected to make several changes on public transport. Best practice suggests that a child of primary school age should not travel for longer than 45 minutes
- There will be a huge impact on the environment with increased emissions/pollution.
- In a time where we are being encouraged to walk or cycle to school this seems to go completely against what the Government are saying.
- The current bus stop is totally unsuitable for the volume of children it would be expected to house.

- Many children will be at a disadvantage as they would be unable to take part in after school activities due to the fact that there will be no transport home and parents do not have the time or the wherewithal to collect them. Unacceptable that these children will be unable to join in with clubs they have come to love.
- Many parents have already said they WILL NOT be sending their child/children to either Llanfyllin or Llanrhaeadr – they don't want them on buses and driving them to school is not an option when they work in the opposite direction. We stand to lose these families to England
- The local roads are narrow and poorly maintained, poorly lit or not lit at all with virtually no pavements – if we are expecting young children to wait at pickup points especially in the winter months – we feel this is a very worrying safety issue.
- School closure will require the provision of transport for children to the alternative school. This will, presumably be a cost borne by the LEA. Children of primary age will also require additional supervision while travelling. How will this be achieved and at whose cost?
- There is confusion over which is Llansilin's actual 'nearest' Welsh school – we should already be armed with this information, but nonetheless as we understand it transport will only be supplied to our 'nearest' school. If this is indeed Llanrhaeadr – the new Welsh medium school – then many parents will not be sending their children there – the option then would be the long journey by car to Llanfyllin or to simply take their child across the border to an English school.
- We were led to understand that it was when the Education Committee visited the school in 2003 and experienced for themselves the journey involved, that they decided against closing the school. The journey involved has not changed.

x) Additional considerations for rural schools

The School Organisation Code includes a number of additional considerations that are likely to be relevant when carrying out a community impact assessment for a rural school closure. As Ysgol Bro Cynllaith is identified as a rural school, these factors are considered below:

- **Whether closure would encourage families with school-age children to leave the community or discourage young families from moving to the community**

Information received from a developer of a new housing estate in Llansilin, via the school indicates that there currently 23 homes being built which will mostly go to couples and young families. The development will be fully completed within 12 months. They have suggested that if the school is closed then these

properties may be bought as second homes which they suggest would have an impact on the local economy.

Information received from the school suggests that a wide range of services and activities are provided by the school, including some facilities which could be attractive to families and which increase the attractiveness of the community to potential young families. Cylch Meithrin and Ti a Fi settings meet on the school site.

Should there be no school in Llansilin, it is likely that there would be an impact on the other associated facilities available in the village, which could have an impact on families with school-age children, and which could encourage these families to leave the community or discourage young families from moving to the community.

- **What impact closure might have on other services provided locally, for instance if the school is the only remaining public building in a community**

Information received from the school suggests that a wide range of services are provided in the school, and it is regularly used as a village meeting and performance place.

There is a community hall in Llansilin which would continue to be available should there be no school in the village, therefore community activities, events and other services could be provided here. However, it is suggested by the school that closure of the school could have a significant impact on the viability of the hall in the longer term.

- **Whether, or not, the school is a real hub of community life, used for other purpose – such as public meetings, local events, fetes surgeries, and other get togethers – which would either cease or be diminished by being required to move elsewhere**

Information received from the school suggests that a wide range of events take place in the community events and activities take place in the school, as indicated in sections (iii), (iv) and (v) above. It is anticipated that that these events and activities would take place in the community hall should there be no school in Llansilin. However, it is acknowledged that the Hall relies on the support of the school, and that closure of the school could have a significant impact on the viability of the hall in the longer term.

- **Whether or not the loss of the school, and potentially families, will have a detrimental effect on the wider economy of the community**

It is possible that the loss of the school, and potentially the loss of families from Llansilin could have some impact on local business in Llansilin and the surrounding area should there be less people in the area. Information received from the school suggests that the possible loss of the school would also have an impact on the community cohesion of the area. Implementation of the proposal could eventually lead to a reduction in employment opportunities in the village of Llansilin.

- **How parents' and pupils' engagement with the alternative school and any facilities it may offer could be supported (e.g. how pupils, (particularly any less advantaged pupils) will be helped to participate in after school activities)**

As indicated in section (viii) above, should the Council proceed with the statutory process and eventually implementation of the preferred option, support would be provided to pupils and their parents as part of the transition process, to ensure full engagement with their closest alternative schools in Powys.

It is acknowledged that there would be an impact on pupils' ability to participate in after school activities as there would be an additional travel requirement for parents in order to access school activities / events.

- **The overall effect of closure on the local community (including the loss of school based facilities which are used by the local community)**

The information received from the school indicates that there is currently extensive use of the Llansilin building, and significant links between the school and the local community. It is therefore likely that the proposal to remove school provision from the village of Llansilin would have a significant effect on the local community.

Should the Council proceed with the proposal, it is anticipated that these services would be provided in the community hall should there be no school in Llansilin. However, the school has indicated that the closure of the school could have a significant impact on the ability for the hall to continue to run. Should the Council proceed with the proposal, it would endeavour to work with the community in Llansilin to identify a suitable alternative.

4.2 Conclusion

It is clear that a wide range of extra curricular activities are available to pupils at Ysgol Bro Cynllaith. Should there be no school in Llansilin, pupils would transfer to alternative schools in Powys. These would be larger schools, and the expectation is that at least a similar range of activities would be available for pupils. However, it is acknowledged that for pupils for whom Ysgol Bro Cynllaith is currently the closest

school, additional travel would be required to enable pupils to access their closest school. This could impact on their ability to access activities, particularly where these take place after school.

The information received by the school suggests that there are extensive links between the school and the local community, and that many community activities are arranged in the school which are accessed by the community. It is therefore acknowledged that closure of the school could have an impact on the community in terms of the services and activities available.

Should the Council proceed with the proposal, it is anticipated that facilities and services would be provided in the community hall should there be no school in Llansilin. However, the school has indicated that the closure of the school could have a significant impact on the ability for the hall to continue to run.

It is also acknowledged that implementation of the proposal would result in additional travel to school for pupils for whom Llansilin is currently their closest school. Whilst free home to school transport would be provided to eligible pupils in accordance with the home to school transport policy which is in operation at that time, it is acknowledged that there could be an impact on some pupils' ability to access after school activities, and could impact on the ability of parents to take part in school events, meetings etc.

INTEGRATED IMPACT ASSESSMENT

The Impact Assessment (IA) below incorporates Welsh Language, Equalities, Well-being of Future Generations Act, Sustainable Development Principles, Communication and Engagement, Safeguarding, Corporate Parenting, Community Cohesion and Risk Management, supporting effective decision making and ensuring compliance with respective legislation.

Service Area	Schools Service	Head of Service	Lynette Lovell / Emma Palmer	Portfolio Holder	Cllr Phyl Davies
Proposal	Ysgol Bro Cynllaith Proposal				
Outline Summary / Description of Proposal					
In April 2020, the Leader approved a new Strategy for Transforming Education in Powys, which sets a number of aims and objectives to transform the Powys education system over the next few years. One of the objectives is to 'Reconfigure and rationalise primary provision'.					
A review of Ysgol Bro Cynllaith has been carried out, and Cabinet approval is now requested to commence the statutory process on the following proposal in respect of the school:					
<ul style="list-style-type: none"> To close Ysgol Bro Cynllaith from the 31st August 2022, with pupils to transfer to their nearest alternative schools in Powys. 					

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

Version	Author	Job Title	Date
1	Richard Williams	Transforming Education Programme Officer	June 2021

2. Profile of savings delivery (if applicable)

2020-21	2021-22	2022-23	2023-24	2024-25	TOTAL
£	£	£48,000	£34,000		£82,000

3. Consultation requirements

Consultation Requirement	Consultation deadline/or justification for no consultation

Cyngor Sir Powys County Council

Impact Assessment (IA)

The integrated approach to support effective decision making



Public consultation required	If approved by Cabinet, it is anticipated that consultation in accordance with the School Organisation Code will commence in the Autumn of 2021.
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4. Impact on Other Service Areas

Does the proposal have potential to impact on another service area? (Have you considered the implications on Health & Safety and Corporate Parenting?) PLEASE ENSURE YOU INFORM / ENGAGE ANY AFFECTED SERVICE AREAS AT THE EARLIEST OPPORTUNITY			
Adult Services	<input type="checkbox"/>	Education	<input checked="" type="checkbox"/>
Children's Services	<input checked="" type="checkbox"/>	Finance	<input checked="" type="checkbox"/>
Commissioning	<input type="checkbox"/>	Highways, Transportation and Recycling	<input checked="" type="checkbox"/>
Digital Services	<input checked="" type="checkbox"/>	Housing and Community Development	<input checked="" type="checkbox"/>
		Legal and Democratic Services	<input checked="" type="checkbox"/>
		Property, Planning and Public Protection	<input checked="" type="checkbox"/>
		Transformation and Communications	<input checked="" type="checkbox"/>
		Workforce and OD	<input checked="" type="checkbox"/>
Data Protection Impact Assessment			
Will the proposal involve processing the personal details of individuals? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>			
Not currently, however should the Council proceed with statutory processes, this would involve processing the personal details of individuals			
Is Powys County Council the data controller? Yes <input checked="" type="checkbox"/>			
If you have answered yes to either of the above you will be required to complete, as a minimum, the screening questions on the data protection impact assessment. For further advice please contact the Data Compliance Team.			

4a Geographical Locations

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

5. How does your proposal impact on Vision 2025?

PCC: Impact Assessment Toolkit (March 2018)

Cyngor Sir Powys County Council
Impact Assessment (IA)

The integrated approach to support effective decision making



Council's Well-being Objective	How does the proposal impact on this Well-being Objective?	IMPACT Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
The Economy We will develop a vibrant economy	<p>Implementation of the proposal would have a potential impact on employment opportunities in Llansilin as there would no longer be a school in the village.</p> <p>It is also possible that the loss of the school, and potentially loss of families from the area would have a negative impact on recruitment for lower paid key worker jobs in the area, and the ability of other employers in the area to recruit to roles. There could also be an impact on local businesses in the village and the surrounding communities.</p>	<p>Poor</p>		<p>Poor</p>
Health and Care We will lead the way in providing effective, integrated health and care in a rural environment	<p>No impact</p>	<p>Neutral</p>		<p>Choose an item.</p>

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<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 526</p> <p>Learning and skills We will strengthen learning and skills</p>	<p>Should the Council proceed with implementation of the preferred option, Ysgol Bro Cynllaith would close, and pupils would transfer to alternative schools in Powys. For the majority of pupils, the closest alternative school in Powys would be Llangedwyn C. in W. School. Some pupils may also choose to attend schools in Shropshire, such as Selattyn C. of E. School.</p> <p>In March 2021, the Council’s Cabinet agreed to carry out consultation on a proposal to close Llangedwyn C. in W. School, which could mean that there would be no school in Llangedwyn in the future. Should there be no school in Llansilin or Llangedwyn, the closest alternative school for pupils currently attending Ysgol Bro Cynllaith would be Llanrhaeadr-ym-Mochnant C.P. School.</p> <p>The Council’s view is that both Llangedwyn C. in W. School and Llanrhaeadr-ym-Mochnant C.P. School would provide education for pupils which is of at least equivalent quality as that provided at Ysgol Bro Cynllaith, therefore it is not anticipated that implementation of the preferred option would have a negative impact on standards and progress overall. The overall aim of the proposal is to improve learning opportunities for pupils.</p> <p>The alternative schools which pupils may attend are larger schools, and it is anticipated that they would provide additional opportunities for pupils to take part in extra-curricular activities.</p>	<p>Good</p>		<p>Choose an item.</p>
<p>Residents and Communities</p>	<p>There would be a significant impact on the community of Llansilin, as there would be no provision in the</p>	<p>Very Poor</p>	<p>Home to school transport to be provided for pupils living in Llansilin to their nearest school in Powys to ensure that they continue to access a Welsh education.</p>	<p>Very Poor</p>

Cyngor Sir Powys County Council
Impact Assessment (IA)

The integrated approach to support effective decision making



Council's Well-being Objective	How does the proposal impact on this Well-being Objective?	IMPACT Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
<p>We will support our residents and communities</p>	<p>village, and therefore potential loss of any community facilities associated with the school.</p> <p>Additional travel would be required for pupils currently attending Ysgol Bro Cynllaith. Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirement for parents in order to access school activities / events.</p> <p>Whilst the proposal is that pupils transfer to alternative Powys schools, it is possible that some pupils would transfer to alternative schools in Shropshire, and therefore would access education in England. This could impact on the Welsh identity of Llansilin.</p> <p>A separate draft community impact assessment has been carried out which includes input from the school. This will be updated as required throughout the process.</p>		<p>Village hall to continue to be available to the community for community activities.</p>	
<p>Source of Outline Evidence to support judgements</p>				
Empty space for source of evidence				

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

Well-being Goal	How does proposal contribute to this goal?	IMPACT Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
A prosperous Wales: An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.	No impact	Neutral		Choose an item.
A resilient Wales: A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).	Implementation of the proposal would require additional travel for pupils currently attending Ysgol Bro Cynllaith for whom this is their closest school. This would have a negative environmental impact as more home to school transport would need to be provided to transport pupils to alternative schools.	Poor		Poor
A healthier Wales: A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood. Public Health (Wales) Act, 2017: Part 6 of the Act requires for public bodies to undertake a health impact assessment to assess the likely effect of a proposed action or decision on the physical or mental health of the people of Wales.	Implementation of the proposal would result in closure of Ysgol Bro Cynllaith, with pupils transferring to alternative schools. It is acknowledged that this could have a negative impact on the mental well-being of pupils, staff and other stakeholders associated with the school during the transition period, however the long term aim is to provide improved learning opportunities for all learners.	Poor	Support will be provided to pupils during the transition period to enable them to transfer effectively to their new schools. Process to be concluded as quickly as possible to minimise the period of uncertainty for pupils, staff and other stakeholders.	Neutral

Well-being Goal	How does proposal contribute to this goal?	IMPACT Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
<p>A Wales of cohesive communities: Attractive, viable, safe and well-connected Communities.</p>	<p>There would be a significant impact on the community of Llansilin as there would be no provision in the village, and therefore potential loss of any community facilities associated with the school.</p> <p>Additional travel would be required for pupils currently attending Ysgol Bro Cynllaith. Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirement for parents in order to access school activities / events.</p> <p>Whilst the proposal is that pupils transfer to alternative Powys schools, it is possible that some pupils would transfer to alternative schools in Shropshire, and therefore would access education in England. This could impact on the Welsh identity of Llansilin.</p> <p>A separate draft community impact assessment has been carried out which includes input from the school. This will be updated as required throughout the process.</p>	<p>Very Poor</p>	<p>Home to school transport to be provided for pupils living in Llansilin to their nearest school in Powys to ensure that they continue to access a Welsh education.</p> <p>Village hall to continue to be available to the community for community activities.</p>	<p>Very Poor</p>

Well-being Goal	How does proposal contribute to this goal?	IMPACT Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
<p>A globally responsible Wales: A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.</p> <p>Human Rights - is about being proactive (see guidance)</p> <p>UN Convention on the Rights of the Child: The Convention gives rights to everyone under the age of 18, which include the right to be treated fairly and to be protected from discrimination; that organisations act for the best interest of the child; the right to life, survival and development; and the right to be heard.</p>	<p>The aim of implementing the proposal is to provide the best possible opportunities to learners, enabling them to reach their full potential.</p> <p>If approved by Cabinet, the Council will carry out consultation on the proposal, which would include consultation with all pupils affected by the proposal, ensuring that all affected by the plans have the opportunity to give their views.</p>	<p>Neutral</p>		<p>Choose an item.</p>
<p>A Wales of vibrant culture and thriving Welsh language: A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation. <i>Incorporating requirements under the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards</i></p>				

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Well-being Goal	How does proposal contribute to this goal?	IMPACT Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
<p><i>Opportunities for persons to use the Welsh language, and treating the Welsh language no less favourable than the English language</i></p>	<p>Ysgol Bro Cynllaith is an English-medium school, therefore it is not anticipated that implementation of the proposal would impact on opportunities for persons to use the Welsh language, or on treating the Welsh language no less favourably than the English language should pupils transfer to alternative schools in Powys. Pupils would continue to learn Welsh, and it is possible that pupils would transfer to a dual stream school, which would provide an opportunity for them to choose Welsh-medium education.</p> <p>However, it is possible that some pupils could choose to attend alternative provision in Shropshire. This would mean that they would no longer access a Welsh curriculum, and Welsh would no longer be a part of the curriculum. This would mean that they would no longer have an opportunity to learn Welsh, and to use the Welsh language.</p>	<p>Poor</p>	<p>Home to school transport to be provided for pupils living in Llansilin to their nearest school in Powys to ensure that they continue to access a Welsh education.</p>	<p>Neutral</p>

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Well-being Goal	How does proposal contribute to this goal?	IMPACT Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
Opportunities to promote the Welsh language	<p>Ysgol Bro Cynllaith is an English-medium school, therefore it is not anticipated that implementation of the proposal would impact on opportunities for persons to use the Welsh language, or on treating the Welsh language no less favourably than the English language should pupils transfer to alternative schools in Powys. Pupils would continue to learn Welsh, and it is possible that pupils would transfer to a dual stream school, which would provide an opportunity for them to choose Welsh-medium education.</p> <p>However, it is possible that some pupils could choose to attend alternative provision in Shropshire. This would mean that they would no longer access a Welsh curriculum, and Welsh would no longer be a part of the curriculum. This would mean that they would no longer have an opportunity to learn Welsh, and to use the Welsh language. This could also impact on the Welsh identify of Llansilin and opportunities to promote the Welsh language in Llansilin.</p>	Poor	Home to school transport to be provided for pupils living in Llansilin to their nearest school in Powys to ensure that they continue to access a Welsh education.	Neutral

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Well-being Goal	How does proposal contribute to this goal?	IMPACT Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
People are encouraged to do sport, art and recreation.	Implementation of the proposal would lead to the closure of Ysgol Bro Cynllaith, with pupils transferring to their nearest alternative schools. It is likely that pupils would transfer to larger schools, and it is anticipated that being part of a larger school would result in additional opportunities for pupils to take part in sport, art and other extra-curricular activities.	Good		Choose an item.
A more equal Wales: A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio economic background and circumstances). Incorporating requirements under the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011 and the Social Economic duty (2020).				
Age	The proposal would impact on primary aged pupils currently attending Ysgol Bro Cynllaith. The proposal aims to provide improved educational opportunities for all affected pupils.	Neutral		Choose an item.
Disability	The proposal would impact on any pupils with disabilities currently attending Ysgol Bro Cynllaith. The proposal aims to provide improved educational opportunities for all affected pupils, including any pupils with disabilities.	Neutral		Choose an item.
Gender reassignment	No impact.	Neutral		Choose an item.
Marriage or civil partnership	No impact.	Neutral		Choose an item.

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Well-being Goal	How does proposal contribute to this goal?	IMPACT Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
<i>Race</i>	The proposal would impact on all primary aged pupils currently attending Ysgol Bro Cynllaith, including pupils belonging to protected characteristic groups due to their race. The proposal aims to provide improved educational opportunities for all affected pupils.	Neutral		Choose an item.
<i>Religion or belief</i>	The proposal aims to provide improved educational opportunities for all pupils currently attending Ysgol Bro Cynllaith, regardless of their religion or belief.	Neutral		Choose an item.
<i>Sex</i>	The proposal aims to provide improved educational opportunities for all pupils currently attending Ysgol Bro Cynllaith, regardless of their sex.	Neutral		Choose an item.
<i>Sexual Orientation</i>	The proposal aims to provide improved educational opportunities for all pupils currently attending Ysgol Bro Cynllaith, regardless of their sexual orientation.	Neutral		Choose an item.
<i>Pregnancy and Maternity</i>	No impact.	Neutral		Choose an item.

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Well-being Goal	How does proposal contribute to this goal?	IMPACT Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
Page 535 Socio-economic duty	<p>The aim of the proposal is to provide improved educational opportunities for all pupils currently attending Ysgol Bro Cynllaith, including any eligible for Free School Meals. PLASC 2020 information shows that some 7.7% of pupils at Ysgol Bro Cynllaith were eligible for Free School Meals, and these pupils would continue to receive free school meals at any alternative school that they would transfer to.</p> <p>Should the proposal be implemented, there would be no school in Llansilin. This would mean that pupils currently attending Ysgol Bro Cynllaith would need to travel to their nearest alternative provision. Whilst home to school transport would be provided to eligible pupils, it is possible that this would impact on pupils' ability to access extra-curricular / after school activities, and that this impact would be greater in respect of pupils from lower income households. There would also be an impact on the parents of these pupils in terms of accessing school activities.</p>	Neutral		Choose an item.

Source of Outline Evidence to support judgements

PLASC

7. How does your proposal impact on the council's other key guiding principles?

Principle	How does the proposal impact on this principle?	IMPACT Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
Sustainable Development Principle (5 ways of working)				
<p>Long Term: Looking to the long term so that we do not compromise the ability of future generations to meet their own needs.</p>	<p>Pupil numbers at Ysgol Bro Cynllaith are low and are not expected to increase over the coming years. The aim of the proposal to close the school is to ensure the best possible opportunities for learners in the area now and in the future, and to ensure better strategic management of the Powys schools estate.</p>	<p>Good</p>		<p>Choose an item.</p>
<p>Collaboration: Working with others in a collaborative way to find shared sustainable solutions.</p>	<p>Should the Cabinet agree to proceed, full consultation would be carried out, which would enable all interested parties to give their views. This would include an opportunity to suggest any alternative options for the school.</p>	<p>Neutral</p>		<p>Choose an item.</p>

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Principle	How does the proposal impact on this principle?	IMPACT Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
<p>Involvement (including Communication and Engagement): <i>Involving a diversity of the population in the decisions that affect them including:</i></p> <p>Unpaid Carers: <i>Ensuring that unpaid carers views are sought and taken into account</i></p>	<p>Should Cabinet decide to proceed, full consultation would be required in accordance with the School Organisation Code in order to achieve this. This would ensure that all interested parties would have an opportunity to give their views. The findings of this exercise would be reported to Cabinet and would be taken into consideration when determining how to proceed. This impact assessment will be updated throughout the process to reflect any feedback received.</p> <p>All stakeholders would have the opportunity to give their views as part of this process, this would include any unpaid carers in the area.</p>	<p>Good</p>		<p>Choose an item.</p>
<p>Prevention: <i>Understanding the root causes of issues to prevent them from occurring including:</i></p> <p>Safeguarding: <i>Preventing and responding to abuse and neglect of children, young people and adults with health and social care needs who can't protect themselves.</i></p>	<p>The aim of the proposal to close the school is to ensure the best possible opportunities for learners in the area now and in the future, and to ensure better strategic management of the Powys schools' estate.</p> <p>Ensuring appropriate safeguarding arrangements is a key aspect of any school organisation proposal. The intention is that the proposal would maintain or improve the safeguarding arrangements for all pupils.</p>	<p>Good</p>		<p>Choose an item.</p>
<p>Integration: <i>Taking an integrated approach so that public bodies look at all the well-being goals in deciding on their well-being objectives.</i></p>	<p>No impact.</p>	<p>Neutral</p>		<p>Choose an item.</p>

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Principle	How does the proposal impact on this principle?	IMPACT Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
Powys County Council Workforce: What Impact will this change have on the Workforce?	Implementation of the proposal would impact on all current staff at Ysgol Bro Cynllaith as there would no longer be a school in Llansilin, therefore staff would be subject to a Management of Change process. Should Cabinet decide to proceed, full consultation would be carried out in accordance with the School Organisation Code. This process would be supported by relevant LA teams (e.g. HR). This would include consultation with staff, which would ensure that they had an opportunity to give their views.	Poor		Poor
Payroll: How will this impact salary, any overtime/enhanced payments etc? Does this affect any particular group of employees? E.g. Male/Female dominated workforce. Does this proposal comply with the Councils Single Status Terms and Conditions?	Implementation of the preferred way forward could impact on salary arrangements for current staff at Ysgol Bro Cynllaith.	Neutral		Choose an item.
Welsh Language impact on staff	Ysgol Bro Cynllaith is an English-medium school, therefore it is not anticipated that there would be a Welsh language impact on staff	Neutral		Choose an item.

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Principle	How does the proposal impact on this principle?	IMPACT Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
Apprenticeships: Has consideration been given to whether this change impacts negatively, or positively on Apprenticeships within the service?	No impact	Neutral		Choose an item.
Source of Outline Evidence to support judgements				

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What is the impact of this proposal on our communities?

Communities	How does the proposal impact on residents and community?	IMPACT See impact definitions in guidance document	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	IMPACT AFTER MITIGATION See impact definitions in guidance document	Source of Outline Evidence to support judgement

<p>Llansilin</p>	<p>There would be a significant impact on the community of Llansilin as there would be no provision in the village, and therefore potential loss of any community facilities associated with the school.</p> <p>Additional travel would be required for pupils currently attending Ysgol Bro Cynllaith.</p> <p>Whilst free home to school transport would be provided to eligible pupils in accordance with the Council's Home to School Transport Policy, there would also be an additional travel requirement for parents in order to access school activities / events.</p> <p>Whilst the proposal is that pupils transfer to alternative Powys schools, it is possible that some pupils would transfer to alternative schools in Shropshire, and therefore would access education in England. This could impact on the Welsh identity of Llansilin.</p> <p>A separate draft community impact assessment has been carried out which includes input from the school. This will be updated as required throughout the process.</p>	<p>Major</p>	<p>Home to school transport to be provided for pupils living in Llansilin to their nearest school in Powys to ensure that they continue to access a Welsh education.</p> <p>Village hall to continue to be available to the community for community activities.</p>	<p>Major</p>	
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9. What are the risks to service delivery or the council following implementation of this proposal?

Description of risks

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Risk Identified	Inherent Risk Rating Impact X Likelihood (See Risk Matrix in guidance document)	Mitigation	Residual Risk Rating Impact X Likelihood (See Risk Matrix in guidance document)
Insufficient capacity at nearest Powys school to accommodate all pupils at Ysgol Bro Cynllaith.	Medium	Capacity available at schools in the local area to be monitored as the process moves forward.	Medium

10. Overall Summary and Judgement of this Impact Assessment?

Outline Assessment (to be inserted in cabinet report)	Cabinet Report Reference:
<p>The aim of the proposal is to improve the educational provision for learners in line with the new Curriculum for Wales which is being rolled out. However, whilst this impact assessment has identified some positive aspects, in particular relating to learning and skills and ensuring the best strategic management of the Powys schools' estate, the assessment has also identified some negative aspects. These primarily relate to the impact on the community of Llansilin due to loss of educational provision from the village, and the associated additional travel requirements for pupils. In addition, whilst the proposal is that pupils would transfer to alternative schools in Powys, it is possible that some pupils would transfer to provision in Shropshire, which would mean that they would no longer access a Welsh curriculum, and could impact on the Welsh identity of the village of Llansilin.</p>	

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

What additional evidence and data has informed the development of your proposal?
Full consultation would be required to implement this proposal, and this would enable the impact assessment to be further developed.

12. On-going monitoring arrangements?

What arrangements will be put in place to monitor the impact over time?
The Transforming Education Programme Board will continue to monitor impact over time.
Please state when this Impact Assessment will be reviewed.
The impact assessment will be reviewed at all stages of the development.

13. Sign Off

Position	Name	Signature	Date
Impact Assessment Lead:	Sarah Astley		
Head of Service:	Lynette Lovell		
Portfolio Holder:	Cllr Phyl Davies		

14. Governance

Decision to be made by	Cabinet	Date required	13 th July 2021
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CYNGOR SIR POWYS COUNTY COUNCIL.**CABINET EXECUTIVE
13th July 2021**

REPORT AUTHOR: County Councillor Phyl Davies
Portfolio Holder for Education

County Councillor Aled Davies
Portfolio Holder for Finance

REPORT TITLE: School Outturn Positions 31 March 2021 and Budget
Plans 2021-22

REPORT FOR: Information

1 Purpose

1.1 To inform Cabinet Members of

1.1.1 the outturn position on school reserve movements and balances at 31 March 2021, and

1.1.2 the school budget plans for 2021-22 as approved by Governing Bodies and submitted to the authority on 1st May 2021

2 Background

2.1 Powys County Council delegated a total of £80.8 million to schools through the funding formula for 2021-22, which includes £1.65 million provided for inflation and pupil number changes for 2021-22.

2.2 School Funding legislation and regulations allow schools to carry forward surplus or deficit balances from one financial year to the next and there is an expectation within the regulations that the authority will monitor those year-end balances.

2.3 Governing bodies of maintained schools are required, under the authority's Scheme for Financing Schools ("the Scheme"), to set and submit an annual budget for their school, together with initial budget plans for a minimum of the two following financial years. Where a school is planning to set a deficit budget in the current 2020-21 financial year, the budget must be approved and licensed by the Authority if it meets the requirements defined in the Scheme.

2.4 Decision making responsibility in respect of both year end balances and approval of budgets as being compliant with the Scheme is delegated to the Chief Education Officer and the Head of Finance.

- 2.5 Cumulative school deficits have been growing over a number of financial years presenting a significant risk to the Authority's finances. During Estyn's inspection of the Council's Education Services in July 2019, financial management was identified as an area of significant concern, recommending that:

“R5: Continue to improve the quality of financial management in schools and take appropriate action to address schools with significant deficit budgets”

The authority's Post Inspection Action Plan (PIAP) included a range of measures to address this recommendation and progress on these is reported separately.

- 2.6 Warning notices were issued to those schools projecting deficits of greatest concern in July 2019. Since the warning notices were issued, these schools have been working with Schools Service, Challenge Advisers, HR and Finance officers to improve their budget positions. Forecasts of school balances are reviewed each month by the Schools finance team and reviewed regularly to the Chief Education Officer.
- 2.7 At 1st April 2020 there ten warning notices in place. Two were removed during the year and two new warning notices were issued (one for non-financial reasons). In one case, the school refused to meet the requirements of the warning notice, which led to the authority withdrawing financial delegation. As a result of this there were nine warning notices in place at 1st April 2021 and one school having had financial delegation withdrawn.
- 2.8 Any new areas of concern with any school's financial position are escalated swiftly and any action required is taken forward in a timely manner, in accordance with the process set out in the Scheme (shown at Appendix A to this report).

3 Outturn Position 31st March 2021

- 3.1 At 31st March 2021 the total cumulative reserve for schools (including the loan scheme and the balance on the closed schools reserve) was in a surplus position of £2.9 million, as shown in table 1 below.
- 3.2 The total position on schools' carry forward balances is a surplus of £3.2 million. This is a much improved position compared to Schools' original budgets (May 2020) which projected a total deficit balance of £2.3 million for 31 March 2021, an improvement of £5.5 million during the financial year.
- 3.3 This is in part due to the £3.3 million of additional grant funding received by Powys schools from Welsh Government during March 2021, largely towards additional costs related to the pandemic, although some of the grants (e.g. Revenue Maintenance Grant) targeted core costs that would ordinarily have been funded by base budgets. However, a large part of the change is an improvement in the in-year positions of schools that were projecting deficits, some as a result of schools being closed for part of the year and some due to

schools reducing their on-going costs, with support from “Team¹ around the school”.

Table 1: Summary outturn position on the total cumulative schools reserve as at 31st March 2021

School Sector	Opening Reserve Balance 31st March 2020 £'000	Original Budget Projected Contribution to / from (-) Reserves 2020-21 (May 2020) £'000	Actual Contribution to / from (-) reserves 2020-21 £'000	Closing Reserve Balance 31st March 2021 £'000
Primary	2,645	-730	2,350	4,995
Special	-124	241	435	311
Secondary / All-age	-3,432	-910	1,354	-2,078
School Balances Sub-Total	-911	-1,399	4,139	3,228
Loans	-28	0	7	-21
Closed Schools Prior years	-321	0	-6	-327
Total	-1,260	-1,399	4,140	2,880

3.4 Individual school year end balances are shown in Appendix B. As at 31st March 2021 there were eighty one (81) schools in a surplus position, with a combined cumulative surplus balance of £6.9 million. Given the extraordinary circumstances of the last financial year and the significant amount of additional funding received during March 2021 which resulted in more schools having significant surpluses, the Chief Education Officer and the Head of Finance agreed that there should not be a blanket policy of requesting spend plans from those schools that have significant balances at 31st March 2021, which would be normal practice. This is due to the continued uncertainty around the impact of the pandemic and that schools will be planning to utilise these surpluses over the next academic year and beyond to provide appropriate support to learners as they return to school following the disruption caused by the COVID-19 pandemic, which will be reflected in schools’ development plans.

3.5 As at 31st March 2021, there were fourteen schools in a deficit balance position, with a combined cumulative deficit of £3.7 million. A reduction of 9 schools holding a deficit from the twenty three schools with combined deficits of £4.9 million as at 31 March 2020.

4 Governor Approved Budget Plans 2021-22 and future years

¹ Comprising senior officers from Schools Service, Challenge Advisors, HR Officers and Finance Officers along with others as required.

- 4.1 The Scheme requires schools to submit budget plans that have been approved by their Governing Body by 1st May each year. These plans should include budgets for the new financial year and indicative budget plans for the next two years (primaries) or three years (secondaries / special schools). These budget plans are then reviewed by the Chief Education Officer and the Head of Finance to assess whether they comply with the Scheme and to agree any actions that may be required.
- 4.2 As shown in Table 2 below, collectively schools intend to utilise £1.8 million of their reserves during 2021-22 resulting in a budgeted carry forward position of £1.4 million surplus balance at the end of March 2022.

Table 2: Summary of budgeted school balances position at 31st March 2022

	Projected Cumulative Position at 31 March 2022 ²				
	Primary	Secondary	All-Age	Special	Total
Governor Approved Budgets (1st May 2021)					
Number of schools in surplus	73	3	2	2	80
Projected Value of Surplus (£)	3,860,789	400,814	389,659	427,490	5,078,753
Number of schools in Deficit	4	6	0	1	11
Projected Value of Deficit (£)	(191,429)	(3,452,373)	0	(46,677)	(3,690,480)
Overall – Number	77	9	2	3	91
Overall – Value (£)	3,669,360	(3,051,560)	389,659	380,813	1,388,272

- 4.3 Of the budgets submitted, eighty schools were budgeting to be in a cumulative surplus position at 31st March 2022, meeting the criteria to be approved under the Scheme (this compares to seventy one schools in May 2020). Eleven schools are budgeting to be in a cumulative deficit position at 31st March 2022 (this compares to twenty two schools in May 2020). Four of these meet the criteria within the Scheme to be a licensed deficit, while seven did not meet the criteria and are therefore unlicensed according to the Scheme (comparative numbers for May 2020 are nine and thirteen respectively).
- 4.4 The seven schools that have submitted budgets that are in unlicensed positions are listed below, along with commentary on actions in place.

School	Comment
Brynhafren CP School	Warning notice remains in place; deficit recovery agreement in place.
Llanfechain CinW School	Recovery plan requested.
Brecon High School	Budgeted in-year surpluses throughout budget plan.

² These projected balances were submitted prior to the final position on grants to be rolled forward to 2021-22 being known, which will be included in forecasts going forward.

Warning notice remains in place, to be reviewed Autumn term 2021.

Crickhowell High School	Budgeted in-year surpluses throughout budget plan. Warning notice to be removed.
Welshpool High School	Budgeted in-year surpluses throughout budget plan. Warning notice to be removed.
Ysgol Calon Cymru	Budgeted in-year deficits throughout budget plan, although significantly reduced. Recovery plan requested. Warning notice remains in place.
Ysgol Maesydderwen	Budgeted in-year deficits in later years of budget plan. Recovery plan requested. Warning notice remains in place.

4.5 On reviewing the budgets submitted, the Chief Education Officer and the Head of Finance agreed that four schools that were on warning notices had made sufficient progress for these warning notices to be removed and Welsh Government notified. These are Ysgol Gymraeg Dyffryn Y Glowyr and Ysgol Bro Hyddgen, Crickhowell High School and Welshpool High School, with Brecon High School's warning notice to be reviewed in the Autumn term. All these schools have worked hard to achieve cumulative surpluses at year end (in the case of the first two schools) or in-year surpluses throughout the period covered by their budget plans (although remaining in an unlicensed cumulative deficit position), supported by the "Team around the school" approach.

4.6 Financial delegation continues to be suspended at Clyro CinW School, although the budget submitted (by the authority's management board) was approved as compliant with the Scheme. The authority and the school will now work together towards reinstating financial delegation.

5 Loan Scheme

5.1 In 2013-14, the authority approved the implementation of a loan scheme which was subsequently withdrawn during 2015-16. Only two schools continue to hold loans under this scheme and continue to make payments in line with their agreements, being Caersws CP School (balance at 1 April 2021: £7,500 and Ysgol Dyffryn Trannon (balance at 1 April 2021: £13,500), totalling £21,000, as shown in Table 1 above.

6 Conclusion and Resource Implications

6.1 Cumulative balances remain a concern and a significant risk to the authority, but schools are working well with Council officers to bring in-year budgets into balance and halt the growth of cumulative deficits. Once this position is achieved and consolidated, work begins on reducing the cumulative deficits.

6.2 All schools' forecasts are updated and reviewed on a monthly basis and any concerns highlighted with the Chief Education Officer and Head of Finance and

raised with individual schools at the earliest opportunity. A collaborative approach to early intervention and support is key to avoid the escalation of financial issues.

- 6.3 The Head of Finance (S151 Officer) comments as follows: “The current and projected financial position of our Schools continues to be a challenge. It is essential that all Governing Bodies work with Schools Service, HR and Finance officers to take action to provide a curriculum that can be delivered within the funding provided.”

Contact Officer:	Mari Thomas, Interim Schools Finance Manager
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Head of Service:	Lynette Lovell / Jane Thomas
Corporate Director:	

CABINET REPORT NEW TEMPLATE VERSION 2

Powys Scheme for Financing Schools 2020-21 – Processes following identification of potential deficit

Stage	School Action	Local Authority Action	Relevant Local Authority Officers
<p>Stage 1</p> <p>School identifies deficit</p> <p>or</p> <p>LA Officer raises a concern</p>	<p>School notifies LA school finance officer at earliest opportunity</p> <p>School acts with utmost prudence freezing all appointments and unplanned expenditure</p>	<p>Chief Education Officer is notified</p> <p>Chief Education Officer arranges team to ensure that Stage 2 is undertaken to ascertain financial position of the school</p>	<p>Chief Education Officer</p> <p>Challenge Adviser</p> <p>School Finance Officer</p> <p>HR Adviser</p>
<p>Stage 2</p> <p>Exploration of issue</p>	<p>School provides LA with all necessary information and prioritises required meetings</p>	<p>Discussions with school to establish possible cause of issue and potential solutions</p> <p>Notify Schools Finance Officer, HR Advisor and Challenge Adviser</p>	<p>Chief Education Officer</p> <p>Challenge Adviser</p> <p>School Finance Officer</p> <p>HR Adviser</p>
<p>Stage 3</p> <p>Finalisation of agreed actions to be undertaken</p>	<p>Following exploration of issue, agree required actions with LA, for example:</p> <ul style="list-style-type: none"> • provision of 5 year forecast outturn/cashflow and curriculum plan • a deficit recovery action plan, including timescales agreed with LA, is approved by governing body and signed by Chair 	<p>Following exploration of issue, agree required actions with the school</p> <p>LA named officers / advisers work with the school to develop recovery plan</p> <p>Recovery plan submitted to LA for agreement. LA notifies school of conditions required as part of recovery action plan and of the support and monitoring arrangements.</p>	<p>Chief Education Officer</p> <p>Challenge Adviser</p> <p>School Finance Manager</p> <p>HR Adviser</p>

Stage	School Action	Local Authority Action	Relevant Local Authority Officers
<p>Stage 4</p> <p>Implementation and monitoring as detailed in recovery action plan</p>	<p>School implements recovery action plan complying with all limitations and monitoring requirements required by LA</p>	<p>LA monitors progress with action plan and supports school as required by the recovery action plan e.g. timely decisions of staff appointments, agreement to budgets etc</p>	<p>Challenge Adviser</p> <p>School Finance Officer</p> <p>HR Adviser</p>
<p>Stage 5</p> <p>Formal meeting</p>	<p>Attendance at formal meeting by Head, Chair of Governors and Chair of Finance Committee</p>	<p>A formal meeting to be held with the school if:</p> <ul style="list-style-type: none"> • the actions agreed in stage 3 are not completed within the agreed timescale; or • the school defaults on any aspects of the recovery action plan 	<p>Section 151 Officer</p> <p>Chief Education Officer</p> <p>School Finance Manager</p> <p>Challenge Adviser</p> <p>HR Adviser</p>

The Authority may issue a notice of concern at any stage in the table above.

Where the Authority deems it appropriate, the authority may issue a Warning Notice to a school and will adopt the Welsh Government's Schools Causing Concern Guidance 2017 (222/2017) alongside the relevant legislative provisions.

Where a warning notice has been issued which has not been complied with to the satisfaction of the local authority within the compliance period, the school is eligible for intervention, as set out in the Welsh Government's Schools Causing Concern Guidance 2017 (222/2017).

Appendix B

	Draft figures used		Approved Position submitted 1st May 21						
	School	2020-21 Actual Outturn Cumulative c/fwd 31 March 2021	2021-22 Original Funding allocations	2021-22 Budgeted In year under / (over) spend	2021/22 Projected Cumulative c/fwd 31 March 2022	2022-23 Projected In year under / (over) spend	2022/23 Projected Cumulative c/fwd 31 March 2023	2023-24 Projected In year under / (over) spend	2023/24 Projected Cumulative c/fwd 31 March 2024
	Abermule CP School	70,607	312,660	(9,927)	60,680	(33,979)	26,701	(34,962)	(8,261)
	Archdeacon Griffiths C in W A School	108,624	538,426	(18,567)	90,057	(32,485)	57,572	(33,929)	23,643
	Arddleen C P School	65,293	408,778	(8,690)	56,603	1,173	57,776	1,380	59,156
	<i>Banw C P School</i>	42,174							
P Page 551	Berriew C P School	16,278	333,250	7,212	23,490	5,662	29,152	7,975	37,127
	Brynhafren C P School	(133,660)	243,709	(9,966)	(143,626)	(10,835)	(154,461)	(10,332)	(164,793)
	Builth Wells C P School	81,645	841,020	(30,553)	51,092	(38,438)	12,654	(6,694)	5,960
	Buttington/Trewern C P School	69,578	640,443	(38,874)	30,704	(27,658)	3,046	58	3,104
	Caersws C P School	42,946	283,627	(18,026)	24,920	(18,214)	6,706	(18,268)	(11,562)
	Carreghofa C P School	30,208	400,190	27,962	58,170	(545)	57,625	5,124	62,749
	c Castle Caereinion C in W School	51,788	183,531	(19,002)	32,786	(16,296)	16,490	(16,305)	185
	c Churchstoke C P School	7,136	249,561	1,277	8,413	4,965	13,377	4,463	17,840
	Clyro C in W Controlled School	34,361	363,844	(19,899)	14,462	9,170	23,632	15,831	39,463
	c Cradoc C P School	63,023	426,175	(27,114)	35,909	(28,035)	7,874	(29,670)	(21,796)
	c Crickhowell C P School	140,763	761,602	(1,773)	138,990	(30,518)	108,472	(104,030)	4,442
	Crossgates C P School	63,340	581,539	(22,199)	41,140	(23,964)	17,176	(24,844)	(7,668)
	Cwm Banwy	42,130	235,185	35,231	77,361	25,929	103,290	14,342	117,632
	Forden C in W School	34,712	318,080	(11,454)	23,258	(36,622)	(13,364)	(7,435)	(20,800)
	Franksbridge C P School	38,434	233,102	(7,997)	30,437	(3,306)	27,131	(7,876)	19,255

		Draft figures used		Approved Position submitted 1st May 21						
School		2020-21 Actual Outturn Cumulative c/fwd 31 March 2021	2021-22 Original Funding allocations	2021-22 Budgeted In year under / (over) spend	2021/22 Projected Cumulative c/fwd 31 March 2022	2022-23 Projected In year under / (over) spend	2022/23 Projected Cumulative c/fwd 31 March 2023	2023-24 Projected In year under / (over) spend	2023/24 Projected Cumulative c/fwd 31 March 2024	
		Gladestry C in W Controlled School	63,734	229,763	(18,985)	44,749	(7,171)	37,578	(7,048)	30,530
		Guilsfield C P School	99,991	526,930	(53,144)	46,847	(43,582)	3,265	(26,018)	(22,753)
	T	Hafren C P Junior School	111,998	244,923	(41,900)	70,098				
		Hay-On-Wye C P School	89,426	667,565	4,988	94,414	4,729	99,143	(5,979)	93,164
		Irfon Valley C P School	28,792	247,093	4,972	33,764	253	34,017	(28,870)	5,147
		Knighton C in W Controlled School	154,029	692,963	(54,632)	99,397	(31,504)	67,893	(9,420)	58,473
	T	Ladywell Green Infants School	42,919	212,173	(20,319)	22,600				
		Leighton C P School	62,403	335,207	837	63,240	(14,584)	48,656	(12,132)	36,524
	C	Llanbedr C in W Aided School	22,263	234,390	(8,402)	13,861	(3,586)	10,275	(3,641)	6,634
		Llanbister C P School	37,748	295,164	15,330	53,078	(25,019)	28,059	(14,669)	13,390
		Llandinam C P School	60,400	232,748	(3,654)	56,746	14,767	71,513	15,323	86,836
		Llandrindod Wells C P School Cefnlllys	57,593	787,541	(5,141)	52,452	(53,156)	(704)	(62,134)	(62,838)
		Llandysilio C in W School	32,453	330,145	(18,595)	13,858	(15,143)	(1,285)	(15,869)	(17,154)
		Llanelwedd C in W Primary School	11,659	416,067	35,372	47,031	27,901	74,932	28,135	103,067
		<i>Llanerfyl C in W Foundation School</i>	(8,817)							
		Llanfaes C P School	15,596	767,789	10,177	25,773	(17,633)	8,140	(22,407)	(14,267)
	T	Llanfair Caereinion C P School	156,552	639,735	(74,488)	82,064	(18,681)	63,383	(27,654)	35,729
	C	Llanfechain C in W School	(12,981)	236,468	896	(12,085)	(6,673)	(18,758)	(6,794)	(25,552)
	C	Llanfihangel Rhydithon C P School	27,385	210,561	11,614	38,999	13,129	52,128	13,753	65,881
		<i>Llanfyllin C P School</i>	29,603							
		Llangattock C in W Controlled School	72,698	457,444	(29,989)	42,709	(15,457)	27,252	(7,328)	19,924

	Draft figures used		Approved Position submitted 1st May 21							
	School	2020-21 Actual Outturn Cumulative c/fwd 31 March 2021	2021-22 Original Funding allocations	2021-22 Budgeted In year under / (over) spend	2021/22 Projected Cumulative c/fwd 31 March 2022	2022-23 Projected In year under / (over) spend	2022/23 Projected Cumulative c/fwd 31 March 2023	2023-24 Projected In year under / (over) spend	2023/24 Projected Cumulative c/fwd 31 March 2024	
	c	Llangedwyn C in W Voluntary Controlled School	22,958	184,353	(6,327)	16,631	(7,870)	8,761	(7,529)	1,232
		Llangors C in W Controlled School	61,192	554,423	(27,316)	33,876	(3,026)	30,850	(4,932)	25,918
		Llangynidr C P School	116,531	483,438		116,531		116,531		116,531
		Llanidloes C P School	155,668	1,053,866	(49,084)	106,584	(75,516)	31,068	(77,567)	(46,499)
		Llanrhaeadr Ym Mochnant C P School	79,114	421,614	(8,362)	70,752	(10,350)	60,402	(10,855)	49,547
Page 553		Llansantffraid C in W Aided School	(13,248)	436,359	20,961	7,713	(8,339)	(626)	(8,047)	(8,673)
		Maesyrrhandir C P School	74,165	555,355	(3,662)	70,503	(16,370)	54,133	(25,712)	28,421
		Montgomery C in W School	106,600	350,126	(67,243)	39,358	37,997	77,355	(8,238)	69,116
	c	Mount Street C P Infants School	113,027	508,474	(51,183)	61,844	(34,130)	27,714	(7,249)	20,465
	c	Mount Street C P Junior School	30,376	624,178	(19,652)	10,724	12,776	23,500	6,910	30,410
		Newbridge-On-Wye C in W Controlled School	45,718	447,208	(22,062)	23,656	(13,021)	10,635	(13,654)	(3,019)
		Penygloddfa C P School	91,333	1,052,379	(2,005)	89,328	23,728	113,056	(15,533)	97,523
		Presteigne C P School	17,635	721,858	18,874	36,509	17,350	53,859	5,989	59,848
		Priory C in W Aided School	109,663	584,447	(47,995)	61,668	(40,148)	21,520	(31,820)	(10,300)
		Radnor Valley C P School	65,691	257,739	(16,325)	49,366	(6,099)	43,267	(6,109)	37,158
		Rhayader C in W Controlled School	16,676	840,040	(43,295)	(26,619)	37,826	11,207	16,085	27,292
		Sennybridge C P School	79,474	560,283	(32,919)	46,555	968	47,523	13,842	61,365
		St Mary's Catholic School	88,507	332,677	16,364	104,871	(56,140)	48,731	(57,360)	(8,629)
		St Michael's C in W V A School	54,639	448,277	(36,559)	18,080	3,930	22,010	(44,131)	(22,121)
		Treowen C P School	30,898	546,587	(3,123)	27,775	(34,855)	(7,080)	(5,912)	(12,992)
		Welshpool C in W	333,391	942,290	(123,698)	209,693	(93,341)	116,352	(103,601)	12,751

	Draft figures used	Approved Position submitted 1st May 21							
	School	2020-21 Actual Outturn Cumulative c/fwd 31 March 2021	2021-22 Original Funding allocations	2021-22 Budgeted In year under / (over) spend	2021/22 Projected Cumulative c/fwd 31 March 2022	2022-23 Projected In year under / (over) spend	2022/23 Projected Cumulative c/fwd 31 March 2023	2023-24 Projected In year under / (over) spend	2023/24 Projected Cumulative c/fwd 31 March 2024
	Ysgol Bro Cynllaith	12,354	201,899	(3,806)	8,548	(13,708)	(5,160)	(3,766)	(8,926)
	Ysgol Bro Tawe	129,122	776,645	(36,215)	92,907	720	93,627	28,747	122,374
	Ysgol Dafydd Llwyd	21,753	679,371	(30,853)	(9,100)	45,950	36,850	37,709	74,559
	Ysgol Dolafon	47,277	271,555	(8,181)	39,096	1,490	40,586	(5,140)	35,446
Page 54	Ysgol Dyffryn Trannon	63,827	551,185	(8,492)	55,335	1,658	56,993	(3,402)	53,591
	Ysgol Glantwymyn	87,382	330,666	(30,935)	56,447	(35,653)	20,794	(12,831)	7,962
	Ysgol Golwg Y Cwm	125,725	780,872	(22,859)	102,866	(82,259)	20,607	(85,205)	(64,598)
	Ysgol Gymraeg Dyffryn Y Glowyr	83,534	1,148,598	(30,776)	52,758	9,404	62,162	10,749	72,911
	Ysgol Gymraeg Y Trallwng	113,361	354,161	(11,384)	101,977	(82,028)	19,949	(9,782)	10,166
	Ysgol Gynradd Carno	34,871	239,658	2,876	37,747	(4,717)	33,029	(4,847)	28,182
	Ysgol Llanbrynmair	120,883	323,053	(7,845)	113,038	(41,703)	71,335	(41,595)	29,740
	Ysgol Meifod	(1,475)	322,241	6,739	5,264	12,426	17,690	11,544	29,234
	Ysgol Pennant	97,175	315,473	(22,801)	74,374	(27,531)	46,843	(23,190)	23,653
	Ysgol Pontrobert	43,215	224,671	(10,062)	33,153	(3,736)	29,418	2,741	32,158
	Ysgol Rhiw Bechan	70,047	637,430	(7,716)	62,331	3,582	65,913	8,997	74,910
	Ysgol Trefonnen	75,679	869,489	(30,201)	45,478	25,063	70,541	(47,940)	22,601
	Ysgol Y Cribbarth	38,191	497,214	(21,552)	16,639	1,497	18,136	(8,224)	9,912
	Ysgol Y Mynydd Du	77,548	463,732	(33,526)	44,022	(12,199)	31,823	1,032	32,855
	Ysgol-Y- Bannau	49,890	453,987	(33,251)	16,639	31,961	48,600	(4,250)	44,350
	Total Primary	4,995,193		(1,262,873)	3,669,360	(879,821)	2,696,841	(972,002)	1,724,839

	Draft figures used	Approved Position submitted 1st May 21							
		School	2020-21 Actual Outturn Cumulative c/fwd 31 March 2021	2021-22 Original Funding allocations	2021-22 Budgeted In year under / (over) spend	2021/22 Projected Cumulative c/fwd 31 March 2022	2022-23 Projected In year under / (over) spend	2022/23 Projected Cumulative c/fwd 31 March 2023	2023-24 Projected In year under / (over) spend
WN	Brecon High School	(1,650,824)	2,944,460	18,871	(1,631,953)	103,966	(1,527,987)	262,766	(1,265,221)
WN	Crickhowell High School	(721,870)	4,001,541	73,271	(648,599)	64,713	(583,886)	88,959	(494,927)
	Gwernyfed High School	352,278	2,655,692	(268,464)	83,814	(17,857)	65,957	41,844	107,801
	<i>Llanfyllin High School</i>	(21,886)							
	Llanidloes High School	74,423	3,274,839	(9,226)	65,197	(28,733)	36,464	42,050	78,514
	Newtown High School	502,328	5,073,200	(250,525)	251,803	(244,266)	7,537	(304,349)	(296,812)
	Welshpool High School	(550,789)	3,890,969	46,757	(504,032)	49,249	(454,783)	108,060	(346,723)
WN	P Ysgol Calon Cymru	(173,451)	5,185,663	(307,458)	(480,909)	(442,937)	(923,846)	(369,166)	(1,293,012)
WN	Ysgol Maesydderwen	(209,624)	2,557,164	42,869	(166,755)	(188,862)	(355,617)	(378,269)	(733,886)
WN	T Ysgol Uwchradd Caereinion	(22,567)	2,553,639	2,442	(20,125)	85,218	65,093	84,495	149,588
	Total Secondary	(2,421,983)		(651,463)	(3,051,560)	(619,509)	(3,671,069)	(423,610)	(4,094,679)
WN	Ysgol Bro Hyddgen	(396)	2,811,504	16,893	16,497	31,304	47,801	4,424	52,225
	Ysgol Llanfyllin	343,898	4,056,437	29,265	373,163	(73,018)	300,145	(161,046)	139,099
	Total All Age	343,501		46,158	389,659	(41,714)	347,945	(156,622)	191,323
	Brynllwarch Hall Residential	154,697	1,367,687	8,662	163,360	7,655	171,014	(49,707)	121,307
WN	Ysgol Cedewain Special School	(163,841)	2,284,761	117,164	(46,677)	182,781	136,104	233,609	369,713
	Ysgol Penmaes Special School	320,009	2,230,615	(55,879)	264,130	(6,260)	257,871	11,911	269,782
	Total Special	310,865		69,948	380,813	184,177	564,989	195,813	760,802
	Total	3,227,576		(1,798,230)	1,388,272	(1,356,867)	(61,293)	(1,356,421)	(1,417,714)

Key

WN	Warning notice to be removed
WN	Warning notice
P	Initial transformation proposal discussed by Cabinet, may involve school closure
C	Transformation proposal in Consultation phase, may involve school closure
T	Transformation proposal proceeding to implementation, will involve school closure

CYNGOR SIR POWYS COUNTY COUNCIL.

CABINET EXECUTIVE

13th July 2021

REPORT AUTHOR: County Councillor Iain McIntosh
Portfolio Holder for Economic Development, Planning
and Housing

REPORT TITLE: Approval of Three Local Development Plan
Supplementary Planning Guidance documents –
Archaeology, Historic Environment, Newtown &
Llanllwchaiarn Place Plan

REPORT FOR: Decision

1. Purpose

1.1 To approve:

(a) Supplementary Planning Guidance (**SPG**) prepared in support of the Powys Local Development Plan (**LDP**) for:

- Archaeology.
- Historic Environment.
- Newtown & Llanllwchaiarn Place Plan.

(b) The updated SPG Consultation Statement.

2. Background

2.1 The LDP was adopted by Powys County Council on 17th April 2018 and on adoption immediately became operative as the statutory development plan for Powys (excluding the BBNP). The LDP includes a programme for the preparation of 11 topic based SPG to be completed over the two-year period up to April 2020. SPG builds on the policies in the LDP, adding detail and assisting in interpretation. The coronavirus pandemic has impacted on the original timetable resulting in some delays to the latter stages of the published SPG programme.

2.2 So far seven SPG documents have been approved in accordance with the SPG programme. Appended to this report for Cabinet's consideration and approval are two SPGs from the fourth set of documents included in the LDP's programme, along with an additional place-based SPG for Newtown and Llanllwchaiarn Town Council area:

- Archaeology (Appendix 1)
- Historic Environment (Appendix 2)
- Newtown & Llanllwchaiarn Place Plan (Appendix 3)

2.3 In order to prepare SPG in a consistent, clear, and transparent manner, an SPG protocol was prepared and approved in June 2018. Each of the SPG has been prepared in accordance with the SPG protocol including involvement and engagement with stakeholders. This follows the procedure set out within the Community Involvement Scheme in the SPG protocol. Welsh Government's LDP Manual stresses the importance of engagement and involvement and that without it SPG would carry little or no weight.

2.4 Following consideration by the LDP Working Group, the Draft Archaeology and Historic Environment SPGs were published for a six-week period of public consultation from 20th January to 28th February 2020.

2.5 The LDP Working Group considered the issues raised during the period of public consultation and draft Council responses in respect of the Archaeology and Historic Environment SPGs at its meeting on the 20th of March 2020. Thereafter, the coronavirus outbreak from March 2020 impacted upon the preparation and adoption schedule. SPG work recommenced in 2021 and factual updates were made to both Draft SPGs and presented to the LDP Working Group at its meeting on the 19th of April 2021.

2.6 The Newtown and Llanllwchaiarn Place Plan (hereafter described as the **Newtown Place Plan**) has been prepared by Newtown and Llanllwchaiarn Town Council with the support of the Planning Policy team. A Place Plan is centred upon local stakeholder involvement. Place Plans are about "*delivering local outcomes, helping build consensus and buy-in within the wider development plan process*". They provide a platform for local sustainable place-making, under the umbrella of policies in the LDP, and are supported by national planning policy and guidance. This is the first official Place Plan in the Powys Local Planning Authority area. Evidence from the Place Plan will help to inform the LDP Review, shaping how the replacement LDP (from 2026) may apply to the Newtown area in the future.

2.7 Following consideration by the LDP Working Group (10th December 2020), the Draft Newtown Place Plan was published for a six-week period of public consultation from 26th January to 9th March 2021.

2.8 The LDP Working Group considered the issues raised during the period of public consultation at its meeting on the 19th of April 2021. Issues were generally pertinent at the local level. The Working Group were advised that the Council and the Town Council were working together to draft responses and consider changes and that the document would need to "twin-track" its progress through the approval processes at both Newtown Town Council and PCC before implementation. The relevant Town Council meetings would be held on 13th and 24th May 2021. Due to these considerations, the LDP Working Group agreed that Planning Policy Officers

could continue to draft up responses and take an amended Place Plan SPG directly onto the Cabinet meeting (anticipated in June) for adoption purposes without the need for further consideration by the LDP Working Group.

2.9 Comments received for each of the three SPG now under consideration have been collated and summarised as issues in the updated SPG Consultation Statement (Appendix 4). Full details of each representation and Council response can be found in the corresponding reports appended to the Consultation Statement.

2.10 Officers and Councillors at Newtown Town Council, assisted by Planning Policy, developed their own responses and proposed amendments to the Newtown Place Plan as attached at Appendix 5. The changes were approved by the Newtown Town Council on 24th May 2021 and have been integrated into the final Place Plan. Appendix 5 may therefore be read in conjunction with the Council's own responses which are found in the SPG Consultation Statement (Appendix 4).

2.11 The Archaeology and Historic Environment SPGs are accompanied by easy reference documents (Appendices 6 and 7) summarising the key messages of the SPG. It is intended for the summaries to be published alongside the SPG. The Place Plan SPG is accompanied by a summary document (Appendix 8) which explains more about the Place Plan purpose and provides an overview of its content. The summary is intended to be published on the Powys County Council website, where a hyperlink will be provided to the Town Council's website which will host the Newtown Place Plan (in Welsh and English).

3 Advice

3.1 In line with the Council's constitution, the Cabinet is responsible for considering and approving the SPG. On approval they will become material planning considerations that will be afforded weight in decision-making for planning applications and at appeal.

3.2 There is a commitment to prepare SPGs in the LDP. The content of each SPG is however a matter for consideration, although each of the SPGs appended has been informed by engagement and public consultation and with input from the LDP Working Group.

3.3 Further to the LDP Working Group's consideration of the revised SPGs on 19th April 2021, it is proposed for Cabinet to approve the SPGs and updated SPG Consultation Statement in order to meet the commitment and programme of SPG preparation set out in Appendix 2 of the LDP.

3.4 In respect of the Newtown Place Plan SPG (which was not included in Appendix 2 of the LDP), Place Plans are gaining increasing prominence across Wales. They were introduced by the Welsh Government to provide a mechanism for "*communities to engage creatively with the planning process and for planners to support in place-making initiatives with local people*". It is

proposed for Cabinet to approve the Newtown Place Plan, showing support for this, the first LDP Place Plan in the Powys LPA area.

4. Resource Implications

4.1 Other services have been involved in the preparation of the SPGs so have had a direct input into the content of each. This involvement is explained in the relevant sections of the Consultation Statement. In particular, the Development Management service will be directly responsible for implementing the SPGs and has been engaged in the preparation of each SPG.

4.2 All work required to compile and keep the Supplementary Planning Guidance up to date is carried out by staff within the Planning Policy team and is within the current revenue budget of the service.

4.3 The report is of public interest and requires communication action to publicise the recommendation/decision.

4.4 The Head of Finance (Section 151 Officer) notes the content of the report and can support the recommendation.

5. Legal implications

5.1 This report presents a further three SPGs and updated SPG Consultation Statement as programmed in the LDP that are considered appropriate for adoption.

5.2 The SPGs are important documents in the development control process as they are material considerations and will therefore inform relevant planning decisions.

5.3 This report has been approved by the Monitoring Officer.

6. Data Protection

6.1 The proposal does not involve the processing of personal data. Whilst personal contact details are recorded on the LDP's database for consultation purposes, the collation of responses and reporting is managed appropriately to ensure data protection.

7. Comment from local member(s)

7.1 The SPG will apply to all areas of Powys with the exception of the area of Powys within the Brecon Beacons National Park.

7.2 The LDP Working Group has been involved in the preparation of the SPGs and in considering how the Council should respond and amend the SPGs in light of the comments received from the period of public consultation.

7.3 Local Members have been informed of the public consultation on the SPGs and have, therefore, had the opportunity to respond.

7.4 For the Newtown Place Plan, Local Members may have been involved in earlier engagement and publicity exercises undertaken by the Newtown Town Council. Some Members will have been involved as Members of Newtown Town Council.

8. Impact Assessment

8.1 The SPGs interpret and clarify the implementation of policies in the LDP and consequently individual impact assessments for each are not necessary. The policies in the LDP were subject to an Impact Assessment.

9. Recommendation

9.1 To approve:

(a) Newtown & Llanllwchaiarn Place Plan SPG, July 2021 (Appendix 3)

- (b) i Archaeology SPG, July 2021 (Appendix 1)
ii Historic Environment SPG, July 2021 (Appendix 2)

(c) The Supplementary Planning Guidance Consultation Statement, July 2021 (Appendix 4).

Reason:

- i) To show support for and to implement the first LDP Place Plan in the Powys Local Planning Authority area, and;
ii) To meet the commitment and programme for Supplementary Planning Guidance preparation in the adopted Powys LDP.

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Appendix 2 - Historic Environment SPG

Appendix 3 - Newtown & Llanllwchaiarn Place Plan SPG and Appendices

Appendix 4 - Updated SPG Consultation Statement

Appendix 5 – Newtown Town Council Agreed Responses/Revisions to the Place Plan

Appendix 6 – Summary of the Archaeology SPG

Appendix 7 – Summary of the Historic Environment SPG

Appendix 8 – Summary of the Newtown & Llanllwchaiarn Place Plan SPG



Powys Local Development Plan (2011-2026)

Supplementary Planning Guidance

Archaeology

Adopted July 2021

Mae'r ddogfen hefyd ar gael yn Gymraeg

This document is also available in Welsh

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1.0 Introduction

1.0.1 This guidance supplements the archaeology related policies of the Powys Local Development Plan (LDP) (2011-2026), which was adopted by Powys County Council on the 17th of April 2018, and has been prepared to assist decision-making on planning applications within the Powys LDP area. This guidance does not apply to areas of the County of Powys located within the Brecon Beacons National Park Authority area (BBNPA).

1.0.2 This Supplementary Planning Guidance (SPG) is intended to be read alongside the relevant policies of the LDP (see Section 5), along with any other related adopted SPG. Matters relating to other historic environment designations and Conservation Areas are covered in more detail in separate SPGs. The guidance within the Residential Design Guide complements and adds to this guidance by advising on general design matters. The Landscape SPG refers to the character and features of the historic and cultural landscape in the context of landscape considerations.

1.0.3 Archaeology can be defined as:

‘evidence of our prehistoric past and archaeological remains including evidence buried below the ground and the surviving fabric of historic buildings and other structures’ (Technical Advice Note 24).

Archaeological remains are recognised nationally as historic assets and are part of the historic environment.

1.0.4 Scheduled Monuments and other archaeological remains are considered by the LDP to be important strategic assets that require protection from unacceptable development so as to protect the economic, environmental and social well-being of Powys.

1.0.5 This SPG has been prepared to provide information and guidance on how development proposals can ensure that archaeology is protected and evaluated as part of the planning process. It aims to ensure that archaeology is appropriately considered, preserved and, where appropriate, enhanced.

2.0 Purpose of the guidance

2.0.1 The purpose of this guidance is to:

- Provide more detailed guidance to supplement relevant LDP policies.
- Provide guidance on making planning decisions relating to Scheduled Monuments and other archaeological remains.
- Provide practical information for applicants/agents, members of the public, elected Members and Council Officers involved in proposals affecting archaeology.

2.0.2 This SPG provides guidance and information on:

- National legislation, policy and guidance relating to the Archaeology.
- Archaeology in the Powys LDP area.
- The meaning of archaeological designations.
- Relevant LDP policies relating to archaeology.
- How policies relating to archaeology are to be implemented.
- The different stages of archaeological works.

- Planning application processes relating to archaeology.
- Monitoring and review proposals associated with the LDP and SPG.

3.0 Status of the guidance

3.0.1 This SPG has been produced to support the policies of the LDP which are used in the determination of planning applications. The guidance within the SPG has had regard to relevant legislation, national planning policy and other available guidance and information.

3.0.2 This SPG has been prepared in accordance with the Council's approved Protocol for Preparation and Adoption of SPG, which includes a Community Involvement Scheme. It has been subject to a 6 week public consultation stage undertaken between 20th of January and 28th of February 2020. A summary of the responses received to the public consultation along with an explanation as to how the responses have been addressed can be found within the Consultation Statement. This SPG was adopted by the Council on the 13th of July 2021.

3.0.3 This SPG is a material consideration in the determination of planning applications.

DRAFT

4.0 Planning context for archaeology in the Powys LDP area

4.1 National legislation, policy and guidance

4.1.1 The **Ancient Monuments and Archaeological Areas Act** (1979) provides the legal framework for the protection and management of archaeology. The Act makes provision for the investigation, preservation and recording of matters of archaeological or historical interest and for the regulation of operations or activities affecting such matters. Section 1 of the Act places a statutory duty on the Secretary of State to compile and maintain a schedule of monuments. Cadw is responsible for compiling and maintaining this schedule on behalf of Welsh Ministers in Wales.

4.1.2 The **Historic Environment (Wales) Act** (2016) makes changes to the UK legislation relating to the protection and management of the historic environment in Wales. It introduces measures for the positive management of change to the historic environment. In respect of archaeology, the Act makes changes to the definitions, consent processes, management and enforcement procedures in relation to Scheduled Monuments (SMs). Cadw has produced fact sheets setting out the provisions of the 2016 Act in relation to Scheduled Monuments - <https://cadw.gov.wales/advice-support/placemaking/legislation-and-guidance/scheduled-monuments>.

4.1.3 The 2016 Act provides more effective protection for SMs by introducing statutory consultation on proposals to schedule a monument, and by providing interim protection and the right to review a decision to schedule. It expands on the definition of a monument so that the Welsh Ministers can designate any sites that provide evidence of past human activity. It also places the onus on the individual to find out if a site is scheduled prior to undertaking any works on it and therefore reduces the defence of ignorance. It also gives Cadw the power to issue stop notices and enforcement notices. It makes provisions for Heritage Impact Statements and also places a duty on the Welsh Government to compile and keep up-to-date a Historic Environment Record, which contains information on archaeological features and other features of the historic environment.

4.1.4 **Planning Policy Wales (PPW) (11th Edition, 2021)** contains national planning guidance that recognises archaeological remains, including Scheduled Monuments, as historic assets. It acknowledges the need for the planning system to protect, conserve and enhance the significance of historic assets, including consideration of their settings.

4.1.5 The planning approach towards archaeological remains makes it clear that archaeological remains, whether they are scheduled or not, are material planning considerations. It is stated that:

Where nationally important remains and their settings are likely to be affected by proposed development, there should be a presumption in favour of their physical protection in situ. It will only be exceptional circumstances that planning permission will be granted if development would result in an adverse impact on a scheduled monument (or an archaeological site shown to be of national importance) or has a demonstrably and unacceptably damaging effect upon its setting.

The approach towards other non-scheduled archaeological remains will depend on the relative importance of the archaeological remains and their settings taking into account other factors, including the need for the proposed development. The need for sufficient information to allow for a full understanding of the impact of the proposal on the significance of the remains is also emphasised.

4.1.6 **Future Wales - the National Plan 2040** is the Welsh Government's National Development Framework which sets the direction for development in Wales to 2040. The document forms part of the development plan for an area alongside the Local Development Plan, and in time Strategic Development Plans. Decisions on planning applications are required to be made in accordance with both the Local Development Plan and Future Wales, and, when adopted, Strategic Development Plans. Future Wales is not intended to provide planning policy in relation to all topics, particularly where they are already addressed by Planning Policy Wales or Technical Advice Notes. It, therefore, does not include specific policies in relation to the historic environment. However, Policy 18 of Future Wales, in respect of renewable and low carbon energy developments of national significance, includes a criterion requiring that there are no unacceptable adverse impacts on statutorily protected built heritage assets. Future Wales also recognises the strong cultural heritage of Mid Wales.

4.1.7 **Technical Advice Note 24 (TAN 24)** (2017) provides further detailed national guidance relating to the topic of the historic environment and, in particular, on how the historic environment should be considered through the planning process. This guidance replaced **Welsh Office Circular 60/96: Planning and the Historic Environment: Archaeology**. It provides specific guidance on how a range of historic assets, including archaeological remains, should be considered. The section on archaeological remains provides information on the consideration of archaeological remains as part of the development management process. It provides specific guidance on the approaches towards protecting archaeological remains, including preservation *in situ* (in full or partial), recording and further understanding of archaeological evidence, together with guidance on dealing with unexpected archaeological discoveries.

4.1.8 **Technical Advice Note 12 (TAN 12)** provides national planning guidance related to design and is aimed at facilitating good design and sustainability through the planning system. It sets out the benefits of using Design and Access Statements as communication tools to outline how the design of the development proposal has been considered from the outset and how objectives of good design have informed this. With regards to the historic environment, in particular, it explains that there will be a greater need for direction and advice from the Local Planning Authority on how new development can be accommodated and change managed in areas of special character. It explains that attention should be given to archaeological features, amongst other characteristics, when appraising character.

4.1.9 Cadw has published a series of best-practice guidance to complement the Historic Environment (Wales) Act 2016 and recent planning policy and advice. The most relevant of these in respect of this SPG is **Managing Scheduled Monuments in Wales**, which sets out the general principles to consider when managing and making changes to scheduled monuments. Guidance on the **Setting of Historic Assets in Wales** explains how the setting can contribute to the significance of an asset, which may include the potential buried or archaeological elements surrounding the historic asset. The guidance on **Heritage Impact Assessments in Wales** is also relevant in that it may be necessary to submit a Heritage Impact Statement with applications for Scheduled Monument Consent.

4.1.10 Cadw's published **Conservation Principles** highlights the need to base decisions on an understanding of the impact a proposal may have on the significance of an historic asset.

4.1.11 Other Cadw publications give advice on **caring for** certain types of archaeological features, including hillforts and homesteads, historic monuments on the farm, lost farmsteads, twentieth century military sites and prehistoric funerary and ritual monuments. This guidance is available on the Cadw website - <https://cadw.gov.wales/advice->

[support/historic-assets/scheduled-monuments/best-practice-guidance#section-caring-for-hillforts-and-homesteads.](#)

4.1.12 The Welsh Government has issued statutory guidance on **Historic Environment Records in Wales: Compilation and Use** (May 2017) which includes guidance as to how the Historic Environment Record (HER) should be used to inform processes involved in preparing development plans and development management decisions.

4.1.13 The **Offa's Dyke Conservation Statement** (July 2000) by the Offa's Dyke Initiative (<http://www.cpat.org.uk/offa/odcs.pdf>) recognised Offa's Dyke as one of the most important archaeological monuments in Western Europe, but also highlighted historical and ongoing concerns regarding the destruction, damage and erosion of parts of the Dyke. In terms of its relevance to local planning policy, the Statement sought to preserve the Dyke by building an understanding of the broader landscape setting of the Dyke; encouraging a presumption against development of the Dyke and its setting; and seeking recognition of the special character of the Dyke and its setting within local planning documents.

4.1.14 Cadw, Historic England and the Offa's Dyke Association (ODA) jointly commissioned a **Conservation Management Plan** (2019) for the systematic conservation of the Dyke and its setting, through development of a strategy for division of the Dyke into project management units. This has superseded the former Offa's Dyke Conservation Statement (2000). As part of this project, work has been undertaken on a condition survey of the whole monument, which is expected to inform future policies and potentially a review of the scheduling of the Dyke. An owner information campaign has been initiated for the designated stretches of the Dyke on both sides of the border.

4.1.15 The Conservation Management Plan makes a number of recommendations that are relevant to planning. This includes the need for a joint Supplementary Planning Document to be prepared for Offa's Dyke and the need for unscheduled parts to be considered as equivalent to scheduled sections. Also, for appropriate regard to be given to the setting of the monument and for the setting to be better defined within the descriptions for individual scheduled monuments. It suggests that online data and mapped information relating to Offa's Dyke should be brought together for easy reference. It also advises that planning conditions should be used to enforce a *cordon sanitaire*/protected corridor between the Dyke and proposed development and to require the installation of permanent signage identifying the monument.

4.1.16 It is clear that recent changes in national legislation and policy relating to archaeology, and in particular to the status of the Historic Environment Record, provide a stronger framework for protecting archaeological remains. Further work undertaken by Cadw, Historic England and the Offa's Dyke Association, may also lead to additional protection through scheduling and to the development of a strategic approach in relation to Offa's Dyke.

4.1.17 Cadw is planning to prepare **joint SPG** specifically on Offa's Dyke in collaboration with Historic England and the relevant local planning authorities. This is intended to address planning matters that are specific to Offa's Dyke and therefore it is not intended to provide detailed guidance on developments affecting Offa's Dyke within this current SPG, which provides generic guidance on archaeology.

4.2 Archaeological background of the Powys LDP area

4.2.1 The Powys LDP area has a wealth of archaeological interest and, for instance, contains 22% of Wales' Scheduled Monuments (SMs). In addition to this, there are thousands of sites in the Historic Environment Record hosting archaeological remains that have not been formally recognised but may yet be of national significance, and others that are of unquestionable value to the local communities in which they exist. There is also the potential for other unknown buried archaeological remains that have yet to be formally identified that could be discovered in the course of undertaking development.

4.2.2 Appendix 1 includes a table summarising the various types of SMs in Powys. As can be seen from the table, there is a varied range of archaeological features from different historical periods, from pre-historic to modern times. The distribution of these SMs across the Powys LDP area is illustrated on the map in Appendix 2.

4.2.3 Archaeological features are more widespread than is generally realised, *"in parts of Wales, particularly Montgomeryshire, Pembrokeshire and Gwynedd, the landscape was almost as densely occupied in the Iron Age by defended farmsteads and hut groups as it is by present-day farms."* (Source Cadw: Caring for Historic Monuments on the Farm 2006).

4.2.4 Archaeological sites are perhaps the most vulnerable of Powys' historic assets, the majority having no economic use. Many of the Scheduled Monuments are within or adjacent to settlement boundaries and are at risk of development adjacent to the monuments either affecting the adjacent archaeology or impacting on their setting. The low lying archaeological sites are also at risk from flooding or agricultural improvements. The monuments on higher land outside the settlement boundaries are less at risk from flooding, but are still vulnerable from agricultural improvements, burrowing animals, and general erosion. The setting of these SMs is easily affected compared to those within the settlement boundaries.

4.2.5 Agricultural improvements in the past have had a significant effect on the survival of archaeological remains within the area. Enclosure, ploughing and field clearance have all contributed to the destruction of historic monuments and archaeological sites. The large-scale upland forestry planting of the 1960s also caused much destruction. Some hillforts were blanketed with conifers. However, many sites and monuments have survived, whether as stone-built foundations or earthworks, on pastoral slopes, in woodland and on hilltops, or as buried archaeological features below the plough soil of our fertile lowlands. In lowland areas, centuries of ploughing and field clearance have often resulted in the destruction of the upstanding remains of prehistoric forts and homesteads. Despite this, the buried archaeology contained within ditches, post holes and pit alignments is still visible as crop marks and soil marks on aerial photographs.

4.2.6 In recent times there has been financial assistance in terms of Tir Gofal, Tir Cynnal and Glastir that assist farmers in the maintenance of their environmental and historic assets. Whilst the majority of farmers are aware of their position as custodians of the landscape and treat their ecological and archaeological assets with the care that they deserve, there is the potential for a loss of those archaeological features that have yet to be identified. This results from the fact that a very small percentage are protected as Scheduled Monuments or listed buildings, although the Historic Environment Record does record non-statutorily protected archaeological features. The unknown and/or unprotected archaeology is at risk, often through lack of knowledge rather than any malicious intent.

4.2.7 The most notable archaeological site at a national level is Offa's Dyke, which is an important feature located within the east of the Powys LDP area and within the Welsh

borderlands generally. It is a significant feature in the landscape that has archaeological and historical significance and is also important as a tourism and recreational route.

4.2.8 Offa's Dyke is accompanied by a long distance footpath along the majority of its route, and the significance of this nationally important SM attracts visitors who appreciate the archaeology and the scenery. However, without careful management the visitor footfall can be as damaging as burrowing animals and agricultural practises. The Offa's Dyke Conservation Management Plan identified benign neglect, through non-management, as the main agent of destruction.

4.2.9 The vulnerability of archaeological sites in Powys is noted, particularly given that many SMs are within or adjacent to settlement boundaries and therefore at risk of development affecting adjacent archaeology or impacting on their setting. The setting of archaeological sites in rural areas can also be easily affected by development. There are particular concerns that the site of Offa's Dyke and its setting is being eroded and compromised by development. This was identified as a key issue and consideration for the LDP to address.

4.3 The meaning of archaeological designations

4.3.1 The objective of the Welsh Government, as expressed in PPW, is to conserve archaeological remains, both for their own sake and for their role in education, leisure and the economy. The need to conserve archaeological remains and their setting is a material planning consideration whether the remains have been nationally designated as Scheduled Monuments or not. The following explains the difference in the status of archaeological remains. The approach towards evaluation and protection of different kinds of archaeological remains is set out in TAN 24.

Scheduled Monuments (SMs)

4.3.2 Scheduled Monuments (SMs) are nationally important archaeological sites that are protected under the Ancient Monuments and Archaeological Areas Act (1979) and Historic Environment (Wales) Act (2016). The list of these designated sites is compiled and maintained by Cadw.

4.3.3 There are a total of 716 SMs within the Powys LDP area. A map showing the location of SMs across the Powys LDP area is provided in Appendix 2 of this SPG. The location of these designated monuments is also shown on the LDP's proposals maps. Maps and information can also be accessed through the resources set out below.

4.3.4 Proposals to damage, demolish, destroy, remove, repair, alter, add to, flood/drain, tipping onto, planting (or other forestry operations), fencing, excavation, subsoiling and metal detecting on, of a SM require **Scheduled Monument Consent** from the Welsh Government. Works involving development of a SM and installation of signage also require consent. The Scheduled Monument Consent process is a separate process to the planning application process. Cadw is the consenting authority for any works that require Scheduled Monument Consent. The carrying out of such works to a SM without consent is a criminal offence and is liable to prosecution under the 1979 Act. Certain works are covered by class consents, which do not usually require Scheduled Monument Consent.

4.3.5 Further guidance on the criteria used to designate SMs, the Scheduled Monument Consent process, classes of works for which consent is granted, and offences relating to SMs can be found in TAN 24 Annex A. The Cadw best-practice guidance on Managing Scheduled Monuments in Wales should also be referred to. Cadw have published advice notes on their website to help understand scheduling and guidance on how to look after

scheduled monuments - <https://cadw.gov.wales/advice-support/historic-assets/scheduled-monuments>.

4.3.6 The need for the protection of SMs will be a material planning consideration when making planning decisions on developments that may affect these sites or their settings.

Other recorded archaeological remains

4.3.7 Scheduled Monuments form only a small proportion of the total number of archaeological and historic sites. There are other archaeological sites and features that are not subject to any specific designation and are not subject to a separate consenting regime.

4.3.8 The **Historic Environment Record** is the primary source of information in this respect as it contains records of all known archaeological sites and features. This record contains details on archaeological sites, monuments and finds, and on historic buildings and landscape. It contains details of both designated and non-designated sites and features. The database holds records of nearly 150,000 sites and records but is by no means complete. See information on access to the record in paras 4.4.2-4.4.3 below.

4.3.9 Whilst these non-designated sites and features are not directly protected by statute, as they are yet to be recognised as being of national significance, or indeed are not deemed to be of national significance, they may nevertheless be important locally. The presence of these local assets is capable of being a material planning consideration when dealing with development that may impact on their significance. On rare occasions that features of potential national significance are encountered during the course of a development, Cadw may be asked to assess them for protection by scheduling.

4.3.10 According to the statutory guidance issued by the Welsh Government on the compilation and maintenance of the Historic Environment Record, the records should be used to support the planning process by supporting a proper consideration of the impact of a proposal on the historic environment, including advice on schemes to avoid or mitigate any adverse impacts. Early engagement with Clwyd-Powys Archaeological Trust (CPAT) is encouraged in order to determine whether a particular development might impact on known archaeological remains.

Other unrecorded archaeological remains

4.3.11 In addition to Scheduled Monuments and recorded archaeological remains, there is also the potential for unknown buried archaeological remains to be discovered in the course of undertaking development. In particular, there will be potential for finding unknown archaeology within the historic core of a settlement (see para. 4.4.4) or within the setting of a SM or otherwise known archaeological site. Development in these areas will provide an opportunity to record any archaeological evidence that may be present. Early engagement with CPAT is encouraged in order to determine whether a particular site has the potential for unknown buried archaeology.

4.4 Information on archaeology in the Powys LDP area

4.4.1 The following resources provide access to information on designated and non-designated historic assets. This list is only intended as an overview of the type of information that is available in respect of archaeology and historic assets generally. General historical information can be obtained from a range of other sources, for instances from the Powys Archives, the National Archives, the National Library of Wales and the People's Collection for Wales.

Historic Environment Record (Archwilio)

4.4.2 There are four Historic Environment Records covering the whole of Wales which are maintained by the four Welsh Archaeological Trusts. They include (or provides access to) information on tens of thousands of historic sites or investigative work across Wales. The Archwilio website provides public access to the parts of those records which make up a part of the statutory historic environment record (HER) for each local authority area in Wales. These statutory records are maintained on behalf of the Welsh Ministers by the four regional Welsh Archaeological Trusts and in fulfilment of the requirements of the Historic Environment (Wales) Act 2016.

4.4.3 In addition to providing access to the parts of the Welsh Archaeological Trusts' Historic Environment Records, the website also gives access to information on scheduled monuments, listed buildings, conservation areas, historic parks and gardens, registered historic landscapes and the historic landscape layer of LANDMAP, the inventory of historic battlefields in Wales, the list of historic place names in Wales and the maritime database for Wales, which together comprise the statutory historic environment record for Wales as defined in the 2016 Act. See: [Archwilio-the searchable database of the Welsh Archaeological Trusts](#). Guidance on the general use of the HER and Archwilio is provided in the Historic Environment SPG.

Clwyd-Powys Archaeological Trust (CPAT)

4.4.4 CPAT is one of the four Welsh Archaeological Trusts and has carried out detailed studies of historic settlements across the region in order to inform planning authorities of each settlement's history and to identify an historic core to the medieval settlement. Each survey report contains a description of the settlement and its location, a recent aerial photograph of the settlement, information on the history of development of the settlement, its heritage to AD 1750 and a map showing the historic core of the settlement. See <http://www.cpat.org.uk/ycom/intro.htm>.

4.4.5 CPAT has also been involved in work examining the historic character of areas defined by the Register of Historic Landscapes in Wales. For descriptions taken from the Register, along with information on historic landscape themes and character areas, see <http://www.cpat.org.uk/projects/longer/histland/histland.htm>.

Cof Cymru

4.4.6 Cadw's online record of the national historic assets of Wales, which includes listed buildings, scheduled monuments, World Heritage Sites, registered historic landscapes and protected wrecks. It will also include registered historic parks and gardens once the register becomes statutory. It displays depictions and associated record descriptions or summary descriptions of designated historic assets in Wales - <http://cadw.gov.wales/historicenvironment/recordsv1/cof-cymru/?lang=en>. It should be noted that summary descriptions are not the definitive scheduling descriptions, which are held by Cadw.

Coflein and RCAHMW records

4.4.7 Coflein is an online database for the National Monuments Record in Wales, the national collection of information about the historic environment in Wales. It provides access to an online catalogue of archaeological sites, monuments, buildings and maritime sites in Wales, together with an index to drawings, manuscripts and photographs held in the NMRW archive collections. See: <https://www.coflein.gov.uk/>. Coflein and other resources, including the List of Historic Place Names, can be accessed through the Royal Commission

on the Ancient and Historical Monuments of Wales (RCAHMW) website – see <https://rcahmw.gov.uk/discover/>. The RCAHMW also have useful guidance on researching the history of houses – See <https://rcahmw.gov.uk/wp-content/uploads/2016/03/Researching-Welsh-House-Histories-LP-Eng.pdf> and <https://rcahmw.gov.uk/researching-your-house-history/>.

Historic Wales Portal

4.4.8 This portal provides an online gateway to national and regional historic environment records. It comprises of an interactive map with various different layers displaying the 1st Edition Mapping, National Monuments Record for Wales, Historic Environment Records, Listed Buildings, Scheduled Monuments and National Museum Archaeology Collection. Links are included to the listing and schedule descriptions, along with details of features and artefacts, with links also to Coflein - <http://historicwales.gov.uk>.

Lle website

4.4.9 The Lle Geo-Portal has been developed as a partnership between Welsh Government and Natural Resources Wales. Lle serves as a hub for data and information covering a wide spectrum of topics, but primarily around the environment. There are two elements to the website; a catalogue for downloading datasets and a map where environmental data can be viewed. The site contains a number of WFS and WMS feeds which can be used to supply data directly into individual GIS systems.

4.4.10 The map is particularly useful when looking at how proposals will impact on historic environment designations (listed buildings, conservation area boundaries and scheduled monuments) alongside other types of environmental designations. The relevant maps can be accessed by selecting 'Viewing in Lle Map Browser' on the following webpages:

<http://lle.gov.wales/catalogue/item/ListedBuildings/?lang=en>

<http://lle.gov.wales/catalogue/item/ConservationAreas/?lang=en>

<http://lle.gov.wales/catalogue/item/ScheduledAncientMonumentsInWales/?lang=en>

Once the map has loaded, layers of data can be added or removed using the left margin of the browser.

LANDMAP

4.4.11 LANDMAP (Landscape Assessment and Decision Making Process) is an all-Wales landscape resource where landscape characteristics, qualities and influences on the landscape are recorded, evaluated and collated into a nationally consistent Geographical Information System based dataset. LANDMAP is intended to help sustainable decision making and natural resource planning at a range of levels from local to national while ensuring transparency in the decision-making process. The Historic Landscape and Cultural Landscape layers of LANDMAP may identify various elements of the historic environment. Further guidance on how to use these aspects of LANDMAP for landscape purposes is provided in Section 8 of the Landscape SPG.

4.4.12 The LANDMAP resource can be accessed through the Lle portal (see 4.20 above) and Archwilio (see 4.16 below) or through <https://landmap-maps.naturalresources.wales/>. Natural Resources Wales have produced step by step instructions on how to use the resource in <https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/evidence-to-inform-development-planning/landmap-the-welsh-landscape-baseline/?lang=en>.

List of Historic Place Names in Wales

4.4.13 This list records the various forms and spellings used for the names of topographical features, communities, thoroughfares, structures and other aspects of the landscape recorded in sources that predate the First World War. Names on the list, based on their meaning, can provide an understanding of the function of a place in the past, which can help to understand the history and historical associations of a particular place -

<https://historicplacenames.rcahmw.gov.uk/>. The list can also be accessed through the Historic Environment Record (see Archwilio above).

Inventory of Historic Battlefields in Wales

4.4.14 The RCAHMW has created an inventory of historic battlefields in Wales, which identifies over 700 battlefields, with several sites of historic battles identified in the Powys LDP area. The intention is for the inventory to increase knowledge, raise awareness and prompt further research on battlefields and other historic conflict sites in Wales -

<http://battlefields.rcahmw.gov.uk/>. The battlefields can also be accessed through the Historic Environment Record (see Archwilio above).

Local History Societies

4.4.15 There are three history societies covering the shires of Powys - Powysland Club (Montgomeryshire), the Radnorshire Society and the Brecknock Society. These societies have online archives and annual publications – the **Montgomeryshire Collection**, **Transactions of the Radnorshire Society** and **Brycheiniog** respectively - which can be accessed via their libraries, websites or Welsh Journals online. There are also Local History Societies and Groups for various towns and villages across the county.

Newtown Town Council

4.4.16 A Place Plan has been prepared for the Newtown and Llanllwchaiarn Town Council area, which includes information on the character of the town and local design matters. **The Place Plan is to be adopted by Powys County Council as Supplementary Planning Guidance** and therefore will be taken into account as a material consideration in determining planning applications.

4.4.17 Newtown Town Council will also be undertaking a project involving the archaeological dig of the Motte and Bailey Castle in Newtown, in collaboration with Cadw and CPAT, which it is envisaged will provide further information regarding this site.

Newtown and District Civic Society

4.4.18 Funding was provided to Newtown District Civic Society through the Heritage Lottery Fund (HLF) to undertake a characterisation project on the area of the Canal in Newtown. For further information on the characterisation project and toolkit developed by the Civic Trust, see <https://civictrustwales.wordpress.com/character-and-place/> and <https://civictrustwales.wordpress.com/category/characterisation/>. Since the end of the HLF funded project the group have continued to survey areas of Newtown and has recently published a book Explore Newtown: The Historic Town Centre (October 2018) the first of a planned series of publications looking at the streets and buildings of Newtown.

Machynlleth and District Civic Society

4.4.19 The Society's website provides an overview of the town and district's history and its built environment, along with useful links to other sources of information relating to Machynlleth. See: www.rogerwhit.plus.com/civic/start.html.

Welshpool Civic Pride

4.4.20 Welshpool Civic Pride is a non-profit making environmental body set up to fund and administer projects which protect Welshpool's heritage. Its aim is to restore and maintain heritage and cultural assets and to enhance the natural and built environment in the town of Welshpool. The first scheme funded and completed was the refurbishment of the Welshpool and Llanfair Light Railway cattle docks, which is a Scheduled Monument. It is planned to restore the adjacent Motte & Bailey Castle and Bowling Club, which is also a Scheduled Monument. See: <http://www.welshpoolcivicpride.org.uk/>.

Offa's Dyke Association

4.4.21 Offa's Dyke Association is a charitable trust with a cross-border remit whose purpose it is to promote the conservation, improvement and better knowledge of the Welsh Border region along the Offa's Dyke Path. The Association manages the Offa's Dyke Centre in Knighton and encourages archaeological and historic research relating to Offa's Dyke and its hinterland corridor. It also operates a conservation fund which makes financial contributions towards the cost of proactive conservation works to Offa's Dyke and associated archaeology, also areas of nature conservation interest. See: <https://offasdyke.org.uk/>.

Community Heritage Organisations

4.4.22 In 2014, the Wales Council for Voluntary Action published the findings of a project entitled [Mapping community history organisations in Wales - Cadw](#). The aim of the project was to provide an overview of the archaeological, civic and heritage conservation organisations currently operating within Wales, in order to identify potential synergies with the work of the heritage sector. Section 4 of the publication lists the groups and societies that were identified at the mapping stage across each county in Wales, including those operating in Powys.

5.0 Local Planning Policy

5.0.1 The Powys LDP aims to provide sustainable development whilst protecting and enhancing the heritage and distinctive characteristics of the LDP area. It ensures support for important assets and the guardianship of built and historic assets. The aims of the LDP in respect of the historic environment are set out in Objective 13:

LDP objective 13 – Landscape and the Historic Environment

...

ii. The Historic Environment

To protect, preserve and/or enhance the distinctive historic environment, heritage and cultural assets of Powys, in particular local assets that are not statutorily protected or designated under national legislation, and to ensure that development respects local distinctiveness.

5.0.2 The LDP contains strategic and development management policies relating to the historic environment. Each of the policies in the LDP is supported by a reasoned justification that contains an explanation behind the policy, provides guidance, and or expands on the purpose of the policy or its aims. The reasoned justification to each of the policies listed below has not been repeated in full in this guidance; users should refer to the LDP where the reasoned justification should be considered alongside the policy to inform the development proposal.

5.0.3 Policy SP7 is a strategic policy that identifies strategically important resources and assets of the Powys LDP area that are to be safeguarded. A range of historic environment designations and their settings are included within this policy. It makes specific reference at 2 iii) to Scheduled Ancient Monuments and other archaeological remains. Para. 3.40 of the reasoned justification to this policy states that ‘only development proposals that will not have an unacceptable impact on the asset / resource and the purposes for which it is safeguarded should be permitted’.

Strategic Policy SP7 – Safeguarding of Strategic Resources and Assets

To safeguard strategic resources and assets in the County, development proposals must not have an unacceptable adverse impact on the resource of asset and its operation.

The following have been identified as strategic resources and assets in Powys:

...

2. Historic environment designations, including;

- i) Registered Historic Landscapes;**
- ii) Registered Historic Parks and Gardens;**
- iii) Scheduled Ancient Monuments and other archaeological remains;**
- iv) Listed Buildings and their curtilages;**
- v) Conservation Areas.**

AND the setting of designations i), ii), iii), iv) and v).

....

NOTE: The term used for Scheduled Ancient Monuments has recently changed to Scheduled Monuments.

5.0.4 The reasoned justification refers specifically to Offa's Dyke as a resource which provides multiple benefits as a national trail and as a nationally important archaeological monument. The policy aims to safeguard both the scheduled and unscheduled parts of Offa's Dyke, and their settings.

5.0.5 LDP Policy DM13 is a development management policy that sets out criteria relating to design, character, and local distinctiveness, along with other aspects of design and resources. Criterion 1 requires the design of developments to respond to the surroundings, which may include historic assets. The protection of historic assets is also important in respect of the second criterion for their contribution towards the distinctiveness and identity of a local area. The Policy also includes a specific criterion to be applied to development within or affecting the setting of, or significant views into and out of, Conservation Areas. Guidance on this part of the policy is provided in the separate SPG on Conservation Areas.

Policy DM13 – Design and Resources

Development proposals must be able to demonstrate a good quality design and shall have regard to the qualities and amenity of the surrounding area, local infrastructure and resources.

Proposals will only be permitted where all of the following criteria, where relevant, are satisfied:

- 1. Development has been designed to complement and/or enhance the character of the surrounding area in terms of siting, appearance, integration, scale, height, massing, and design detailing.**
- 2. The development contributes towards the preservation of local distinctiveness and sense of place.**
- 3. Any development within or affecting the setting and/or significant views into and out of a Conservation Area has been designed in accordance with any relevant adopted Conservation Area Character Appraisals and Conservation Area Management Plans, or any other relevant detailed assessment or guidance adopted by the Council.**

....

5.0.6 The reasoned justification to Policy DM13 includes a section on the historic environment, which explains that many of Powys's historic environment designations are protected through legislation, policy and guidance, and, therefore, in order to avoid duplication there are no specific development management policies relating to these designations in the LDP. It also explains the need to give regard to non-designated sites and features, such as those recorded on the Historic Environment Record.

5.0.7 Reference is also made to the historic environment and assets in other parts of the Plan, such as in relation to new tourism developments under policy TD1 where the reasoned justification explains that "*the Council seeks to ensure that developments....do not have an unacceptably adverse impact and effect on...the historic environment*". Policy TD3 relating to the Montgomery Canal and Associated Development specifically refers to the scientific

and conservation designations of the Canal, and, as part of the reasoned justification, recognises the significance of the canal's natural and historic environment.

5.0.8 Policy DM4 requires development proposals to have regard to Registered Historic Landscapes, with the reasoned justification explaining that *the impact of development affecting these landscapes may require assessment under the Assessment of the Impact of Development on Historic Landscapes (ASIDOHL2) process.*

5.0.9 Specific reference is made to archaeology in Policy H8, which sets out the need to ensure that the design of any renovated abandoned dwellings takes reference from recorded evidence or the architectural or archaeological interest of the former dwelling. The reasoned justification to the Policy specifically refers to the use of the Historic Environment Record as evidence to inform the design of the renovation.

5.0.10 Policy DM10 relating to development proposals on contaminated and unstable land only permits such development where there are no unacceptable adverse impacts on matters including historic or archaeological interests.

5.0.11 The LDP also supports the Welsh language and culture by providing policy support for the protection of historic environment, as explained in the reasoned justification to Policy DM12.

5.0.12 Further information on historic environment designations, including Scheduled Monuments and other archaeological remains, along with website links to maps, legislation, policy and guidance relating to these designations, and matters relating to Setting, are contained within Appendix 6 of the LDP. Definitions of Scheduled (Ancient) Monuments and Setting, are included in the Glossary in Appendix 5 of the LDP.

6.0 Implementation of planning policy

6.0.1 All development proposals need to be designed to complement and enhance the character of the surrounding area and to contribute towards the preservation of local distinctiveness and sense of place, in accordance with policies DM13 1) and 2). For development proposals that affect historic assets or their settings, matters of local distinctiveness, character and appearance are of particular importance. These assets have been designated as valued buildings or areas in respect of these matters.

6.0.2 Proposals must avoid any unacceptable adverse effects on SMs and other archaeological remains, and their settings, in order to comply with Policy SP7 of the LDP. This section provides guidance on how applicants can ensure, at an early stage, that development proposals comply with planning policies relating to archaeology. It sets out the process involved for those planning a new development to assist them in preparing for submission.

6.0.3 **Figure 1** below identifies the key stages that should be followed for all developments on and nearby Scheduled Monuments or other archaeological remains, or on sites with archaeological potential, to demonstrate compliance with LDP Policies SP7 and DM13. It emphasises the need to demonstrate the steps taken to appraise, assess and/or evaluate the archaeological potential and context of the site and to consider any mitigation measures that may be needed, in preparation for the planning application stage.

Figure 1 - Key Stages to follow for proposals that may affect archaeological remains

Stage 1 Initial archaeological appraisal

A basic appraisal to identify the potential for archaeology within the site and its context, taking into account scheduled monuments and other recorded archaeology, including the potential for unrecorded archaeology

Stage 2 Archaeological assessment

Preparing a more detailed desk-based archaeological assessment in order to identify the known and potential archaeological resource of the site and its context.

Stage 3 Archaeological evaluation

In addition to the assessment, a field evaluation may be required to determine whether archaeological remains are present.

Stage 4 Mitigation

Proposals to mitigate any impact identified, including measures to ensure preservation of the archaeological remains *in situ*, archaeological recording, building recording or a watching brief.

Stage 5 Submitting the Proposal

Submitting your application and supporting documents: Design and Access Statement; Heritage Impact Statement; Planning Statement; Desk-based Archaeological Assessment; Archaeological Evaluation; Mitigation Strategy.

6.1 Stage 1 - Initial archaeological appraisal

6.1.1 Applicants should consider the potential for archaeology on the development site at an early stage in the process. This is particularly important where the type of development proposed involves groundworks, but also where proposals involve alterations or demolition of buildings or structures. Proposals for conversion of buildings involving alterations or change of uses involving ancillary development may impact on archaeology. Development also has the potential to impact on the setting of archaeological sites within the surrounding area. This SPG encourages early consideration of archaeology at the pre-application stage in order to avoid delays and costs at later stages of the planning process.

6.1.2 In the first instance, applicants should carry out basic research on the site itself and its surroundings by using the information sources set out in Section 4 of this SPG. In particular, the Historic Environment Record shows the location of both scheduled monuments and other recorded archaeological remains. It may also contain historic maps and aerial photographs relating to the area of the site, which may provide clues as to how the area has developed and past uses.

6.1.3 CPAT's historic settlement information should also be referred to in order to establish whether the site lies within the historic core of a settlement, as this would indicate that there is high potential for unrecorded archaeology. There may also be potential for archaeology within Registered Historic Landscapes (these areas can be viewed on [Archwilio](#)). Sites adjacent to SMs or other archaeological remains may also have potential for archaeology. The potential for archaeology may also need to be considered in connection with works to listed buildings and to other buildings of historic interest. Such buildings are of historical value and therefore may have significant archaeology associated with them.

6.1.4 It will be important to visit the site as remaining features may be visible above ground, such as ruins of buildings. A site visit will also help to identify the location of the site in relation to any surrounding archaeological sites. This is important, as the impact of development on the setting of other archaeological sites will be a consideration at the planning application stage.

6.1.5 After carrying out the research, applicants should be in a position to judge whether the site is likely to have archaeological potential. **Figure 2** below sets out a series of questions that should be used as prompts to help judge whether there is the potential for archaeology on the site:

Figure 2 Does the site have archaeological potential?

- Is the site located on or near a Scheduled Monument?
- Is the site located on or near an archaeological site recorded on the Historic Environment Record?
- Is the site located within the historic core of a settlement?
- Is the site located within a Registered Historic Landscape?
- Is the site a listed building or within the curtilage of a listed building?
- Does the site include a building that may be of local historic interest?

Does the site contain any above ground structures that appear to be historic?
Has development on the site changed over time?
Has the site been used for different purposes in the past?

6.1.6 If the answer is 'yes' to any one of these questions, it is likely that further archaeological assessment will be required (see stage 2 of the process). If the response is 'no' to all of these questions, it is unlikely that further archaeological assessment work will be required. However, a pre-cautionary approach should be adopted, and therefore, in all circumstances, applicants should contact CPAT to verify the findings of their research. CPAT will have further expertise and information, which may indicate that there is the potential for archaeology in site-specific circumstances. Early consultation with CPAT may significantly reduce the need for later archaeological intervention and avoid unplanned delays and expense. Cadw should be consulted as early as possible on sites either on or adjacent to SMs to determine whether Scheduled Monument Consent is required and any impacts on their setting.

6.1.7 For complex sites or major developments, it is recommended to engage independent archaeological expertise at an early stage to carry out an initial appraisal of the site to determine whether there is any potential for archaeological remains or impacts. It is essential to identify any potential archaeological issues at an early stage before plans are progressed.

6.1.8 A list of registered archaeological contractors and consultants can be obtained from the Chartered Institute for Archaeologists – <http://www.archaeologists.net/ro>. It is preferable for appointed archaeologists to be Registered Organisations of the Chartered Institute for Archaeologists with a proven track record in archaeological fieldwork and publication. For some types of project, consultants should also be able to demonstrate relevant specialist expertise and experience such as historic building survey, geophysical survey, topographic survey, excavation etc. Further advice on commissioning archaeological work can be obtained by contacting CPAT.

6.1.9 The archaeological potential of certain sites may already have been identified in preparing the Powys Local Development Plan (LDP). Appendix 1 of the LDP identifies allocated sites that may require archaeological assessments and/or evaluations prior to development taking place. Consultation responses from Cadw and CPAT will be taken into account when producing development briefs and when assessing proposals in respect of these sites.

6.1.10 In all cases, pre-application engagement with the Local Planning Authority (through the pre-planning application advice service), CPAT, and where SMs are concerned, Cadw, will be key to ensuring that archaeology is given appropriate consideration. TAN 24 emphasises the need for pre-application discussions to take place in order to avoid potential conflicts between development proposals and the preservation of significant archaeological remains.

6.1.11 It should be noted that developers are required to carry out pre-application consultation on proposals for major development. Where a development would impact on a SM or its setting, consultation must take place with Cadw as a specialist consultee as part of this pre-application consultation. CPAT can also be consulted as a non-statutory consultee in respect of other known archaeological sites and sites with archaeological potential. See [Pre-application Community Consultation: Best Practice Guidance for Developers](#).

6.2 Stage 2 - Archaeological Assessment

6.2.1 Where the initial research or appraisal, or pre-application with Cadw or CPAT, suggests that the site is likely to have significant archaeological potential or potential to impact on other archaeological sites, a more detailed desk-based assessment is likely to be necessary. Cadw or CPAT will advise on the need for an assessment. Where an assessment is needed, it will identify the known or potential archaeological resource of the site and within the surrounding area. CPAT will approve a **Written Scheme of Investigation** submitted by an applicant's archaeological contractor, or if necessary will assist the process by providing a brief of the archaeological work that needs to be addressed and will advise on the scope of the work required.

6.2.2 The desk-based assessment will consist of an analysis of documentary and cartographic sources available and an evaluation of the importance of any likely heritage assets. It will involve interrogation of the Historic Environment Record and other archaeological records relevant to the area, such as the sources of information set out in section 4, which includes the National Monuments Record for Wales and the Powys County Archives. Recent planning history of the site may provide clues about the impact of previous development and there may have been assessments undertaken in the past that provide useful information.

6.2.3 It should be noted that the judgements involved at this stage will need expertise in order to analyse the information gathered and evaluate its importance. In all cases, desk-based assessments must be conducted by experienced professional archaeologists, with expertise in the collection and analysis of documentary sources and, where relevant, of historic buildings. The assessment will need to be carried out in accordance with established guidelines and best practice, as set out by the Chartered Institute for Archaeologists in **Standard and guidance for historic environment desk-based assessment** (2014 and updated January 2017).

6.2.4 The desk-based assessment should assess the site for the type, extent, likely date, nature and depth of archaeological remains and if the archaeology extends off site. It should also address the potential visual impact of the development on archaeological sites within the study area, as agreed by Cadw and CPAT.

6.2.5 On some occasions a walkover survey will be undertaken in conjunction with a desk-based assessment to identify any unrecorded archaeology and verify the status and condition of previously recorded sites. A detailed photographic record should be made of the site, particularly where historic buildings are involved. The visual and physical connections between the site and other archaeological sites should be identified, as well as the potential impact of the development on inter-visibility between archaeological sites. This will help to identify whether the site lies within the setting of a SM or of other archaeological remains.

6.2.6 The desk-based assessment may also identify standing buildings or structures on the site that may be of historic interest. This may lead to the need for a separate further detailed assessment/survey of the historic buildings or structures, which should follow a similar

process of data gathering as described above, but should also involve a close examination of the building's or structure's plan and fabric. The assessment should be carried out by an experienced professional archaeologist and in accordance with the **Chartered Institute for Archaeologist's Standard and guidance for the archaeological investigation and recording of standing buildings or structures** (2014 and updated June 2019).

6.2.7 According to the Chartered Institute for Archaeologists's Standard and guidance, the purpose of a desk-based assessment is to gain an understanding of the historic environment resource and the archaeological sensitivity of a site in order to formulate, as required:

- *an assessment of the potential for heritage assets to survive within the area of study;*
- *an assessment of the significance of the known or predicted heritage assets;*
- *strategies for further evaluation (intrusive and non-intrusive) where the nature, extent or significance of the resource is not sufficiently well defined;*
- *an assessment of the impact of proposed development or other land use changes on the significance of the heritage assets and their settings;*
- *strategies to conserve the significance of heritage assets and their settings;*

6.3 Stage 3 - Archaeological evaluation

6.3.1 In addition to the desk-based assessment, Cadw or CPAT may request an archaeological evaluation to establish the precise nature of the site's archaeological potential. This will be requested where there is good reason to consider that a significant archaeological resource is present on the site. The primary purpose of the evaluation is to determine whether archaeological remains are present, and if so, their character, extent, date, integrity, state of preservation, quality and potential importance. Evaluation of a Scheduled Monument will require a Class 7 scheduled monument consent from Cadw in order to provide enough information to determine a full Scheduled Monument Consent application. This will not be granted if it is considered that the overall scheme will have an adverse impact on the monument.

6.3.2 The evaluation will involve the first-hand examination of the site, which may take the form of a limited programme of intrusive fieldwork. Intrusive field evaluation, sometimes called trial trenching or trial excavation, usually requires a number of trenches to be excavated. These trenches will usually be positioned to maximise the retrieval of archaeological information and to ensure that the archaeological resource is understood. The trenches will be excavated to the first archaeological horizon encountered, or to the natural substrate, whichever is observed first. The trenches will then be cleaned by hand to allow the identification of archaeological features, which will then be systematically examined and recorded.

6.3.3 Non-intrusive methods of evaluation may also be undertaken after a desk-based assessment in order gather further information about a site. Non-intrusive evaluation can take a number of formats, which are summarised in Figure 3 below.

Figure 3 **Formats of non-intrusive evaluation**

Fieldwalking

Where archaeological features survive below the ground surface within a field that has been ploughed, archaeological materials and artefacts are brought to the surface by the action of the plough and the stirring of the soil. Fieldwalking involves walking an area in a systematic way, along a grid of transects, to search for, locate, plot and retrieve the archaeological artefacts and materials.

Geophysical survey

A range of scientific ground-based physical sensing techniques can be used to map or produce an image that is representative of subsurface archaeological features, by detecting buried archaeological features when their physical properties contrast measurably with their surround environment. This can involve a range of techniques, but the most commonly employed are Resistivity, Magnetometry and Ground Penetrating Radar. Geophysical survey on a Scheduled Monument will require Section 42 Scheduled Monument Consent from Cadw.

Topographical survey (sometimes called earthwork survey)

Some archaeological remains survive above ground as humps, bumps, depressions and hollows, especially in areas where the ground has not been previously disturbed by development, land improvement or ploughing; these are known as earthworks. A topographic survey allows earthworks to be measured and accurately plotted to produce detailed plans and profiles of the earthwork remains.

Historic Building Appraisal/ Survey

A rapid inspection of the building and relevant data held in any local records systems in order to identify whether the impacts and implications of any proposals on the building, particularly on historic fabrics and features. This is often accompanied by a desk based assessment or a photographic survey.

NOTE: Not all of these techniques will usually be employed at the same time; often only one or two techniques that are most appropriate to the site will be used.

6.3.4 In all cases, archaeological evaluations must be conducted by experienced professional archaeologists. Archaeological contractors may be required to demonstrate relevant specialist experience and expertise for some types of work i.e. historic building survey, geophysical survey. The work will be expected to conform to national standards as set out by the **Chartered Institute for Archaeologists Standard and guidance for archaeological field evaluation (2014)**. The evaluation should be undertaken to a brief provided by CPAT and works should not take place until a detailed schedule and specification for the works (a written scheme of investigation) prepared by the archaeological contractor undertaking the work has been approved by CPAT.

6.3.5 The results of the evaluation will then be used to formulate a strategy of mitigation to ensure the recording, preservation or management of the archaeological resource. Alternatively, it may identify the need for further investigation of the archaeological resource.

6.4 Stage 4 - Mitigation

6.4.1 The results of the desk-based assessment and/or evaluation will inform the approach towards mitigating the impact of development on the archaeological interest of the site and the area. Any proposals for mitigation should be set out for discussion in a mitigation strategy.

6.4.2 The various approaches towards mitigating any identified impact on archaeology are summarised in Figure 4 below. The decision as to which form of mitigation is appropriate will depend on the circumstances of the case and, in particular, the importance of the archaeological remains and potential for significant archaeology. Applicants should seek the advice of Cadw/CPAT on any proposed mitigation measures and to confirm the brief for any works to be undertaken. Works should not take place until a detailed schedule and specification for the works (a written scheme of investigation) prepared by the archaeological contractor undertaking the work has been approved by CPAT.

Figure 4 Summary of approaches towards mitigation

Preservation *in situ*

Where nationally important remains lie within the site, there will be a presumption in favour of preservation of the remains *in situ* and in their current state, and a presumption against proposals that would significantly alter or cause damage to the remains, or proposals that would have a damaging impact on the setting of known remains. Mitigation may be required to ensure the preservation of significant archaeological remains. This could involve adopting sympathetic layout, design and engineering solutions to avoid disturbing the remains. Examples of mitigation may include:

- Avoiding development in the area covered by the archaeological remains;
- Re-locating proposed drains and other services;
- Designing sensitive foundation systems that cause minimal damage to the remains;
- Raising ground levels.

The impact of development on the setting of nationally important remains can be mitigated through sensitive siting and design, or through opportunities for enhancement of the setting, e.g. through removal of existing insensitive development.

There will be some instances where it is not possible to adequately mitigate the impact of a development on nationally important archaeological remains, which may mean that the development is unable to proceed.

Archaeological Excavation

Archaeological remains encountered during the assessment and evaluation process may be considered to be of local or regional, rather than national, importance. In such circumstances, and balanced against other planning factors, it may be appropriate to secure a programme of archaeological recording, rather than preservation *in situ*. The full excavation of archaeological remains is also an option of last resort where no scheme for preservation *in situ* can be arranged. This will mean that the development can proceed, providing that the archaeological remains are recorded. An archaeological excavation is a programme of controlled, intrusive fieldwork that examines, records and interprets archaeological deposits, features and structures and, as appropriate, retrieves artefacts, within a specified area or site. Excavation must be carried out by experienced professional

archaeologists with expertise in the type of work involved in accordance with the Chartered Institute for Archaeologists Standard and guidance for archaeological excavation (2014).

Building Survey

Where proposals involve the alteration, partial or complete demolition of a standing building or structure of historic interest, it may be necessary to undertake recording of the building or structure, or of any part, affected by the proposals. A building survey is a formal programme of work intended to establish the character, history, dating, form and archaeological development of a specified building, structure, complex and its setting, including its buried components. It should result in the production of drawings, an ordered archive and a report. A building survey can be undertaken at a number of different levels, the details of which will be determined and outlined by CPAT in a brief supplied to the applicant. A building survey will need to be carried out by an archaeological contractor or historic buildings consultant who is familiar with recording buildings to the appropriate level and in accordance with the Chartered Institute for Archaeologists' Standard and guidance for the archaeological investigation and recording of standing buildings or structures (2014 and updated June 2019)

Photographic survey

Where buildings or structures of historic interest are affected by the development, but the buildings or structures are not considered worthy of retention, it may be necessary to undertake a photographic survey of the building/structure. A photographic survey consists of a photographic record of the building/structure affected by the development accompanied by basic information of a building's/structure's age and type. The survey should include all interior and exterior walls and features, and should pay particular attention to elements that will be removed, damaged, altered or covered up as a result of the development. Particular attention should also be given to important features such as existing and blocked up windows, doors, fireplaces, stairwells etc. The photographic survey will normally need to be carried out by an archaeological contractor and may frequently be amalgamated with a building survey as described above.

Watching brief

Where it has not been possible to establish the presence and nature of any archaeological remains in advance of development, an archaeological watching brief is likely to be required. A watching brief is a formal programme of archaeological observation and investigation conducted during any operation carried out for non-archaeological reasons, on a site where there is a possibility that archaeological deposits may be disturbed or destroyed. This will result in the preparation of a report and ordered archive. All recording works should be carried out by an experienced archaeological contractor in accordance with accepted standards as set out by the Chartered Institute for Archaeologists in Standard and guidance for an archaeological watching brief (2014)

6.5 Stage 5 - Submitting the proposal

6.5.1 Following stages 1, 2, 3 and 4 above, the application will be ready for submission to the Local Planning Authority. In addition to the standard validation requirements (<https://gweddill.gov.wales/docs/desh/publications/170505section-7-annex-planning-applications-lists-of-validation-requirements-en.pdf>), applications on or affecting archaeological sites will need to be accompanied by the following:

- A Heritage Impact Statement (HIS) where required by legislation or where requested by Cadw in connection with applications for Scheduled Monument Consent.
- A Design and Access Statement (DAS) where required by legislation.
- Additional information relating to the design, where requested by the LPA.
- Where a HIS or DAS is not required, a Planning Statement which summarises how archaeological potential has been addressed within the proposal.
- Where the site involves potential archaeological remains, supporting information providing evidence of how the archaeological potential has been assessed and evaluated (reports of desk-based assessment, archaeological evaluation)
- A mitigation strategy based on the findings of the assessment and evaluation and setting out how it is proposed to mitigate the impact of development on archaeological remains.

The LPA, Cadw and CPAT will advise on any additional information requirements at the pre-application stage.

6.5.2 It should be noted that applications for full planning permission will normally require a similar level of information as that required for scheduled monument consent. Applications for scheduled monument consent and for planning permission are best made concurrently.

6.5.3 Where applications are not accompanied by sufficient information to determine the acceptability of the development against the adopted planning policies and guidance, including situations where the HIS or DAS is not considered to be sufficient, planning permission may be refused. See Section 7 for further guidance on the planning application process.

6.5.4 A process chart is provided in Section 8 (**Figure 6**) which illustrates the stages set out within this Section. The chart summarises the process involved in planning a development proposal to ensure that archaeology is taken into account at the pre-application stage.

7.0 Planning processes

7.0.1 The process set out in the previous section, Section 6, focuses on the archaeological processes involved in planning a development that may impact on archaeology. It emphasises the need to undertake any necessary appraisal, assessment or evaluation, and consider mitigation strategies, at the pre-application stage. This will ensure archaeology has been considered at an early stage in the process and that sufficient information is available at the planning application stage to enable an informed decision to be made on the planning merits of the case.

7.0.2 The following section focuses on the processes involved during and following the planning application stage. It covers the assessment processes involved, including for development requiring an Environmental Statement, Heritage Impact Statement, Design and Access Statement or Planning Statement. It also explains the post-application stages involved in discharging and monitoring planning conditions. The roles of the LPA, Cadw and CPAT in the planning process are summarised in Appendix 3.

7.1 Planning application

7.1.1 National planning policies stress the need to assess and/or evaluate archaeological sites, record them and preserve those that are most important. In summary, national policy sets a presumption in favour of physical preservation *in situ* where scheduled monuments or other nationally important archaeological remains are concerned. In other cases, where archaeological remains of less importance are involved, the significance of the remains will need to be weighed against the benefits of and need for the proposed development.

7.1.2 In order to make a judgement on archaeological matters, the LPA, firstly, requires sufficient information to be submitted with the application. On receipt of a planning application, the LPA will consider whether sufficient information has been submitted in relation to archaeology to properly consider the proposal against national and local planning policies. Where developments have followed the guidance set out in section 6 of this SPG and carried out pre-application consultation and any necessary appraisals, assessments and/or evaluations, and associated mitigation strategies, this should ensure that sufficient information is available to make a planning decision on the application.

7.1.3 Where further information is required at the planning application stage, this will be requested by the LPA and will be necessary to allow proper consideration of the application. All requests for additional information will be proportionate to the likely impact of the proposal on archaeology. Additional information may take the form of a desk-based assessment and/or evaluation (see section 6 stages 2 and 3). Where this work identifies archaeological remains, information relating to mitigation will also be required (see section 6 stage 4). It is important in cases where there is the potential for significant archaeology that assessment and/or evaluation takes place at an early stage in the process, and before an application is determined.

7.1.4 Archaeological works can be required prior to determination of a planning application or as a condition following determination of a planning application (see below section on planning conditions below). It is likely that archaeological works will be required before an application is determined where information is necessary:

- to define the character and extent of the archaeological remains that exist in the area of the development;
- to indicate that weight which ought to be attached to their preservation;

- to provide useful information for identifying potential options for minimising or avoiding damage.

The need for further information and the appropriate stage for submitting information will be informed by consultation responses received from Cadw and CPAT. Applications that are not accompanied by the necessary archaeological information, as requested, may be refused on the grounds of insufficient information.

7.1.5 Applications will also need to be accompanied by any necessary planning-related information (see Section 6 stage 5). This includes any relevant assessments required by planning legislation. For development requiring an Environment Impact Assessment, an **Environmental Statement** will need to be submitted. For major development and other certain types of development, a **Design and Access Statement** (DAS) will be required. In the case of applications for Conservation Area Consent or Listed Building Consent, a **Heritage Impact Statement** (HIS) will be required.

7.1.6 A Heritage Impact Statement may also be requested by Cadw in connection with an application for Scheduled Monument Consent or for developments that impact on the setting of a Scheduled Monument. Where this is considered necessary, applicants will be informed of this requirement at the pre-application stage. Applicants are referred to Appendix 1 of the Conservation Areas SPG, which summarises the requirements in respect of DAS and HIS for different types of development.

7.1.7 For developments not requiring a HIS or DAS, it is good practice for issues relating to archaeology to be addressed and summarised in a **Planning Statement**, which will also assist pre-application discussions and consultation. Figure 5 provides an overview of the different types of assessment processes used to inform these various statements.

Figure 5 Planning-related assessments

Developments requiring Environmental Impact Assessment

A formal Environmental Impact Assessment (EIA) may be necessary for certain types of development (listed in Schedules 1 and 2 to the The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017). Where EIA is required, the developer must provide an Environmental Statement setting out the information specified in Schedule 4 of the regulations about the site and the likely significant effects of the proposed development on the environment. This should include information relating to any significant effects on material assets and the cultural heritage, such as archaeological features and other human artefacts, and the measures envisaged to avoid, reduce or remedy such adverse effects.

Developments requiring Heritage Impact Assessment

The Historic Environment (Wales) Act 2016 requires Listed Building Consent and Conservation Area Consent to be accompanied by a Heritage Impact Statement (HIS). In the context of this guidance, the need for a HIA may arise in connection with applications for Scheduled Monument Consent or impact on the setting of SMs. This aims to ensure that the significance of the historic asset is taken into account when developing and designing proposals. The HIS is informed by the process of undertaking a Heritage Impact Assessment (HIA), which is aimed at assisting with the design of appropriate development by assessing the impact on significance. The process and outcome of the stages explained

in section 6 should be included in the HIS. Further guidance on HIA can be found in Cadw's best-practice guidance *Heritage Impact Assessments in Wales*.

Assessment for Development requiring DAS

The Town and Country Planning (Development Management Procedure) (Wales) Order 2016 requires applications for major development and, in Conservation Areas, development for one or more dwellings or for provision of buildings with floorspace of 100 square metres or more, to be accompanied by a Design and Access Statement (DAS). Where development affecting archaeology is involved, the DAS must cover the standard aspects expected of a DAS, but it must also address how the proposal relates to its particular special context. Therefore, the DAS must consider the archaeological features affected by the proposal. A DAS is required to demonstrate the steps taken to appraise the context of the development and how the design of the development takes the context into account. The process and outcome of the stages explained in section 6 should be included in the design development section of the DAS. Further detailed guidance on DAS can be found in the Welsh Government/Design Commission for Wales document *Design and Access Statements in Wales: Why, What and How*.

Assessment for other applications

For developments that do not require any of above-mentioned statements, this guidance encourages the use of Planning Statements to set out how proposals affecting archaeological remains have been considered, designed and assessed. By following the process and principles set out in this guidance, this will assist applicants to design appropriate proposals and the LPA to make informed planning decisions. It should be noted that the LPA is able to request further information where the proposed development is likely to have an impact on a designated historic asset or on design matters. This may, in some instances, involve the need for a HIS or further design information similar to that expected of a DAS. Information requirements should be established and agreed in consultation with Cadw and CPAT at the pre-application stage.

Assessment of impact on setting

For developments that are likely to impact on the setting of any Scheduled Monuments or other archaeological remains, an assessment will need to be carried out of this impact. The assessment will require a visual assessment of the development from a range of viewpoints, including any important historic or modern viewpoints. Photomontages and maps showing zones of theoretical visibility may assist with this assessment. Details of proposals to mitigate any adverse impacts should also be included in the assessment. The results of the assessment of setting may form part of the Heritage Impact Statement (see above). Further detailed guidance on matters of setting can be found in Cadw's best-practice guidance *Setting of Historic Assets in Wales*.

7.1.8 When the LPA is satisfied that it has sufficient planning and archaeological information, the planning application can proceed to determination. The LPA, with advice from Cadw and CPAT, will assess the information that has been submitted against the requirements of any relevant national and local planning policies and guidance (a summary of policy and guidance is set out in section 4).

7.1.9 When considering proposals on or affecting the setting of SMs, the LPA is required to consult with Cadw. Schedule 2 of Town and Country Planning (Development Management Procedure) Order (Wales) 2016 requires the Local Planning Authority to consult with Welsh

Ministers (Cadw) where a proposed development is likely to have a direct physical impact on a SM, and also where development is likely to be visible from a SM where it meets a set of criteria. This requires consultation with Cadw within specified distances and height/site area according to the nature of the monument and the topography or landscape within which it is located.

7.1.10 When considering proposals that could impact other archaeological remains, the Council will consult with the Clwyd-Powys Archaeological Trust and take into account the interest and importance of the sites and their settings. CPAT are required to be consulted on applications affecting any site or feature recorded on the Historic Environment Record. CPAT also examines the weekly planning lists published by the LPA to identify sites where archaeological matters may need to be addressed.

7.1.11 Cadw and CPAT will advise on the impact of the development on archaeological remains and the adequacy of any mitigation proposed. The planning approach towards preservation and recording of archaeology is set out in TAN 24.

7.1.12 Where archaeological remains of national importance would be impacted by the proposed development, there will be a presumption in favour of their preservation *in situ*. The applicant will need to submit, for approval, details of mitigation measures proposed in order to ensure protection of the archaeological remains. The presence of archaeological remains is likely to influence the design and layout of development, and, in some instances, may mean that part of the site cannot be developed. If it is not possible to preserve the remains *in situ*, this may ultimately mean that the development of the site is not acceptable and therefore the application may be refused. See Section 6 stage 4 above for further information on archaeological mitigation.

7.1.13 In cases where archaeological remains of less importance would be impacted upon by the proposed development, the LPA in consultation with CPAT, will weigh the relative importance of the archaeological remains against other factors, including the benefits of and need for the proposed development. Where preservation of the archaeological remains is not considered to be justified, sites will be expected to be excavated in order for the archaeological remains to be recorded. See further information on recording in Section 6 stage 4.

7.1.14 Where historic buildings and structures are to be impacted upon by development, either through alteration or demolition, the building or structures may need to be recorded via a building survey and/or a photographic survey. There may also be cases where there is the possibility that archaeological remains may be disturbed or damaged. In such cases, arrangements will need to be put in place to ensure that the development works are monitored via a watching brief. See further information on building recording and watching briefs in Section 6 stage 4.

7.1.15 Applications that fail to demonstrate that the impact of a development is acceptable may be refused under LDP policies SP7 and DM13, and also in line with national policy and guidance and the guidance contained within this SPG. This means that any identified adverse impacts on archaeology that cannot be satisfactorily addressed through mitigation, or are not outweighed by other issues, will be deemed unacceptable and planning permission may be refused.

7.1.16 A process chart is provided in Section 8 (**Figure 7**) which illustrates the stages set out within this Section. The chart summarises the process involved in the planning application processes and processes associated with planning conditions.

7.2 Planning conditions

7.2.1 If planning permission is granted for development in an area where archaeological remains are known to exist, conditions will need to be attached to the planning permission in order to ensure that the archaeological remains are preserved or are carefully investigated and recorded.

7.2.2 Where preservation of archaeological remains in situ is necessary and mitigation has been agreed, conditions will be attached requiring approval of details of demarcation and exclusion, or details of foundation design and groundworks. Other planning conditions may require the developer to obtain approval for a scheme of investigation/excavation. Conditions may also require the applicant to carry out a building survey or photographic survey before development commences, or arrange for an archaeological watching brief to be carried out by a professional archaeologist during development.

7.2.3 Appendix 4 of this SPG sets out standard planning conditions relating to archaeology. Consideration may also be given to attaching a condition that removes permitted development rights as future development could pose a risk to the archaeological remains.

7.2.4 Should a condition requiring archaeological works be included in a decision notice, the applicant should contact CPAT to request that a brief is produced for the archaeological work required. The brief will then be produced and sent to the applicant. The archaeological contractor or consultant should prepare a written scheme of investigation, based on the brief, containing a detailed schedule and specification for the works and submit this to CPAT for approval.

7.3 Discharge of conditions

7.3.1 In order to discharge conditions attached to the planning permission, a formal application will need to be made to the Local Planning Authority. The application to discharge the condition must be accompanied by the information required by the condition.

7.3.2 It should be noted that at certain stages in the process it will only be possible to apply to discharge part of the condition. The LPA will only consider fully discharging the conditions when all of the requirements have been properly met. CPAT will advise on whether conditions can be discharged either in full or partially as the successive stages of the archaeological work are satisfactorily completed.

7.3.3 For example, a condition requiring archaeological investigation/excavation will be partly met when the programme for the work has been submitted to the Council. Once the programme has been agreed, the works outlined in the programme will need to be undertaken. On completion of the works, a final report will need to be produced and submitted to the LPA. Full discharge of the condition will not be possible until the final report is submitted to the LPA and a copy, together with a digital copy of any archive produced, is also provided to CPAT for inclusion on the Historic Environment Record.

7.4 Monitoring of planning conditions

7.4.1 CPAT may monitor the work of the appointed archaeologist through all stages of the archaeological work, including fieldwork, post-excavation work and analysis, reporting, publication, and archive preparation and deposition. The type of monitoring will depend on the nature of the archaeological work involved. It should be noted that CPAT will usually charge a fee for carrying out monitoring visits, but the number and nature of the visits will normally be agreed in advance.

7.4.2 It is important to ensure that the requirements of any conditions attached to the planning permission are met at the relevant stage of development. Where conditions stipulate that no development shall commence until certain requirements are met, by commencing works without meeting these requirements this may invalidate the whole of the planning permission. These types of conditions are referred to as condition precedents. In such cases, the development may be deemed unlawful and will not be able to proceed without obtaining further planning permission.

7.4.3 In other cases, where the requirements of other types of conditions (that are not condition precedents) have not been met, the Council will consider issuing a breach of condition notice requiring steps to be taken to remedy the breach of planning control. Failure to comply with the requirements of a breach of condition notice is a criminal offence, against which prosecution proceedings may be taken at a Magistrates Court.

7.5 Unexpected archaeological discoveries

7.5.1 By following the approach set out above, this should help to identify the potential for archaeology. However, there may continue to be instances where archaeology is unexpectedly found during the development of a site. The approach towards unexpected archaeological discoveries is set out in TAN 24. Applicants should have contingency arrangements in place to call upon archaeological advice where archaeological remains are discovered. If the archaeological remains are considered to be of national importance, the Welsh Government has the power to schedule the site and the Welsh Government or the LPA may revoke any relevant planning permission if deemed appropriate. This will mean that the developer will be required to seek separate Scheduled Monument Consent before work can continue.

7.5.2 Where any unexpected archaeology is discovered that is not of national importance, the site would normally be completely excavated if it cannot be preserved in situ by a late change in the design and layout of the development. Normally though it is hoped to prevent unexpected archaeology appearing by going through a prior evaluation process at the pre-consent stage where there is a reasonable suspicion that archaeology may be present.

8.0 Process Charts **Figure 6** **Process involved in planning a development proposal that may impact on archaeological remains**

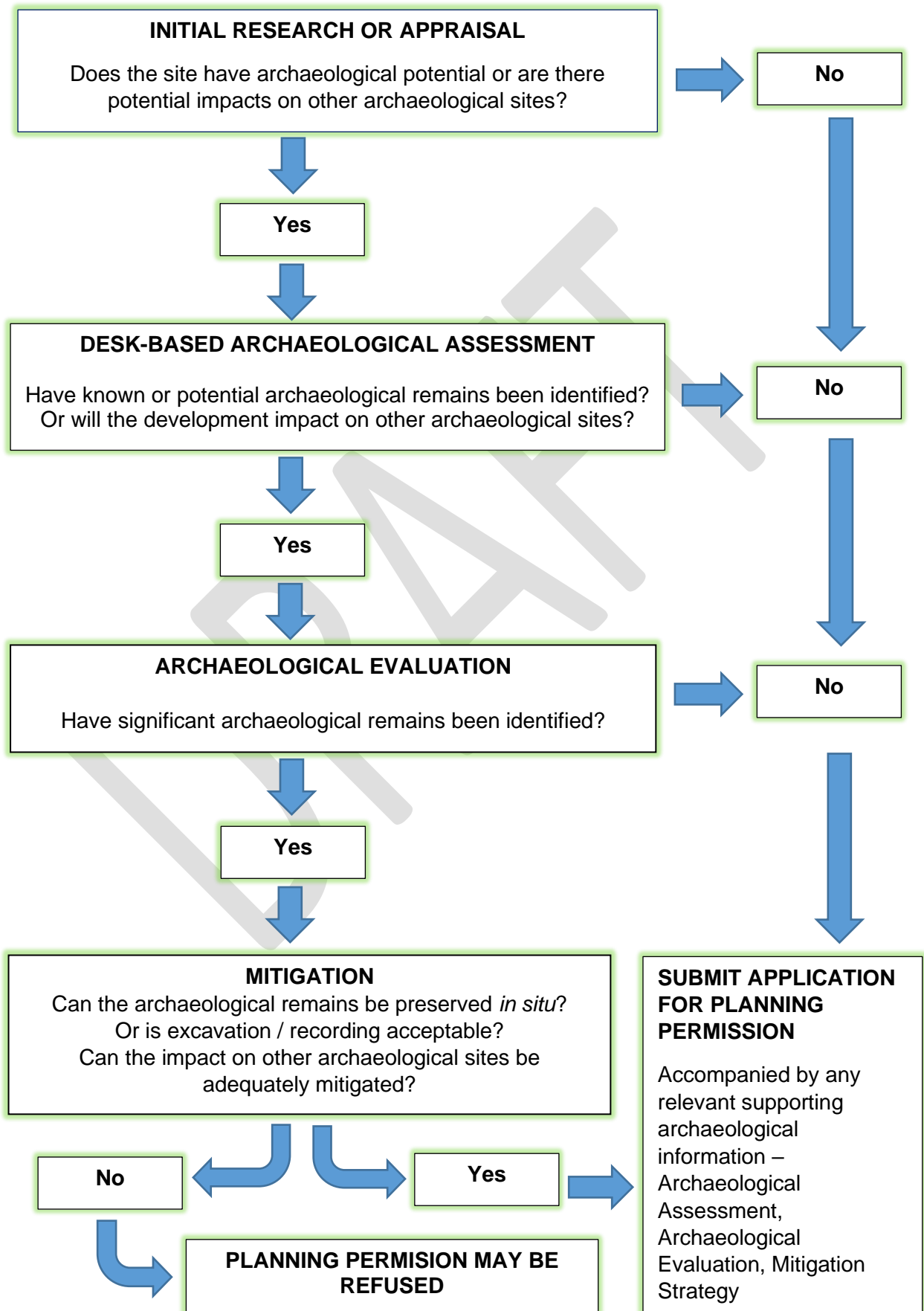
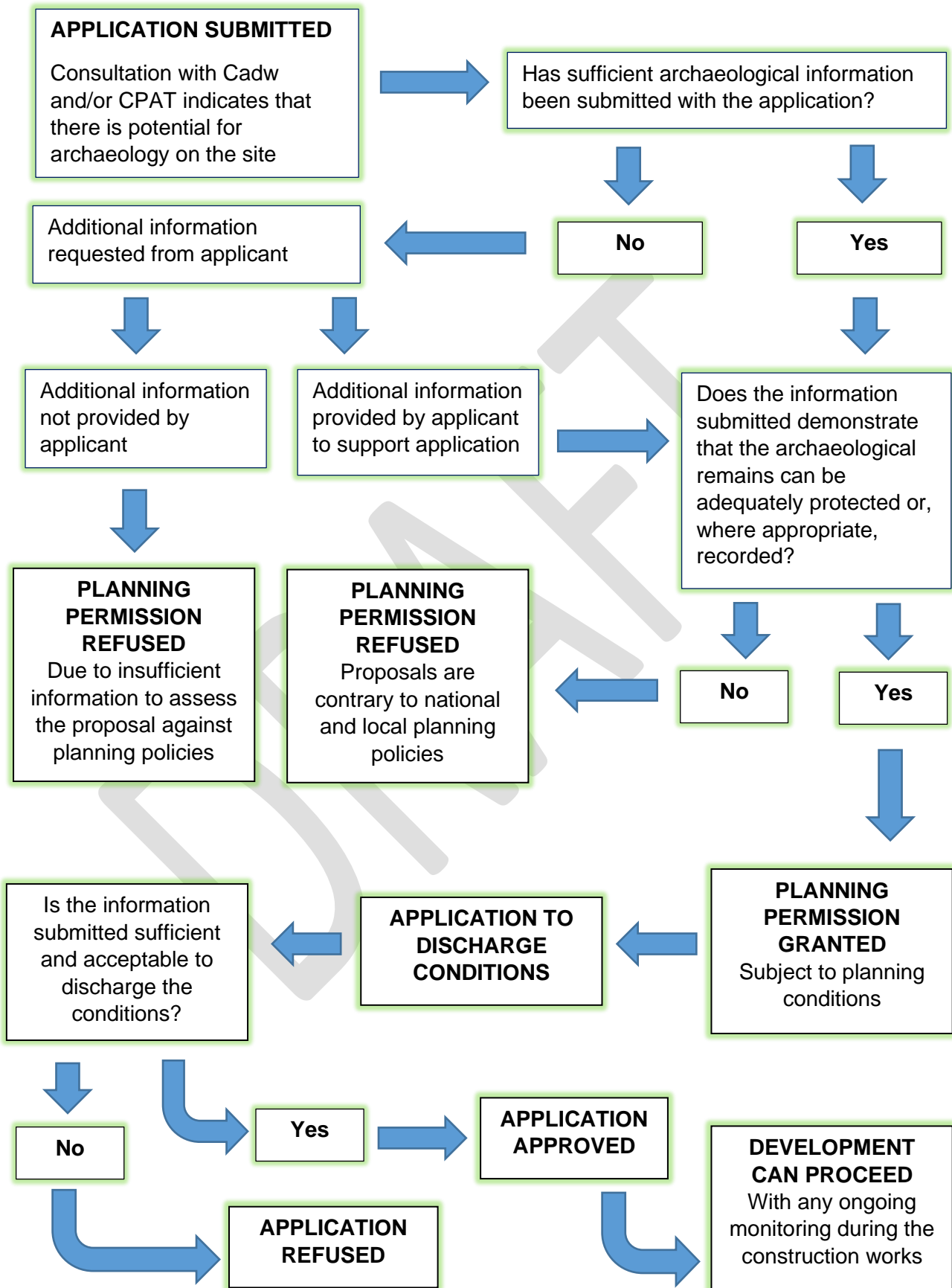


Figure 7 Planning process for developments that may impact on archaeological remains



9.0 Monitoring and Review

9.0.1 The implementation of the LDP's policies relating to archaeology through developments permitted under the LDP will be monitored annually and reported in the LDP's Annual Monitoring Report (submitted to the Welsh Government by 31st of October each year following adoption of the LDP). This monitoring includes an indicator (AMR 43) that monitors developments permitted that affect the strategic assets and resources identified by policy SP7. In particular, developments permitted against the advice of a statutory consultee or relevant Council Officer will be captured through this monitoring.

9.0.2 The LDP's Strategic Environmental Assessment monitoring will monitor the longer term effects of delivery and implementation of the LDP, for instance, the impact on environment and resources, such as historic environment designations. It includes monitoring of net gain and loss of historic environment designations, including of scheduled monuments, and of the proportion of scheduled monuments that are in stable or improved condition.

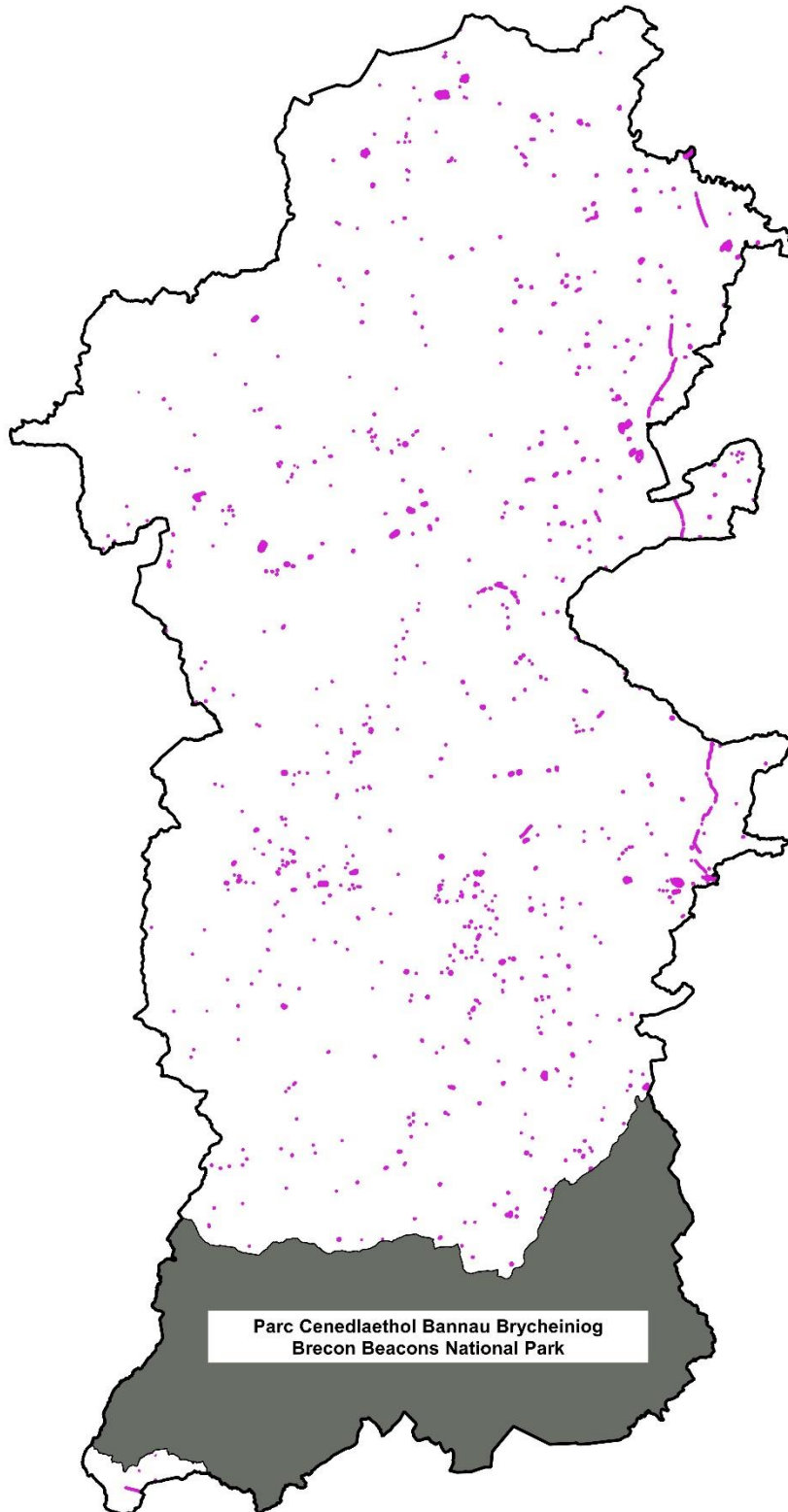
9.0.3 Consideration will be given to the quality of Heritage Impact Statements and Design and Access Statements through consultation responses received from Cadw, CPAT and the Built Heritage Conservation Officer, appeal decisions, and by comparing the assessments with completed developments.

9.0.4 The results of this monitoring will inform future review of the LDP's policy requirements relating to the Historic Environment. This will include consideration of any relevant changes to the national and local context. This SPG will be kept under review and, where necessary, updated to take into account changes in any relevant policy, guidance, evidence or circumstances, and in response to relevant issues raised with the SPG in practice.

APPENDIX 1 Scheduled Monuments in Powys by type

Classification and Age	Number
Total number of Agriculture and subsistence	11
Early Medieval	1
Medieval	9
Post-Medieval/Modern	1
Total number of Civil	7
Roman	2
Medieval	5
Total number of Communications	1
Total number of Defence	181
Prehistoric	61
Roman	15
Medieval	96
Post-Medieval	4
Other/not categorised	5
Total number of Domestic	59
Prehistoric	4
Medieval	42
Post-Medieval/Modern	13
Total number of Garden	3
Total number of Industrial	12
Prehistoric	1
Early Medieval	1
Post-Medieval/Modern	10
Total number of Monument	101
Prehistoric	40
Roman	7
Early Medieval	36
Medieval	12
Other/not categorised	6
Total number of Religious, Ritual and Funerary	324
Prehistoric	302
Early Medieval	10
Medieval	6
Other/not categorised	6
Total number of Transport	13
Roman	7
Post-Medieval/Modern	6
Total number of Water	2
Total of all classifications	716

APPENDIX 2 Map of Scheduled Monuments across the Powys LDP area



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APPENDIX 3 Roles of the LPA, Cadw and CPAT in the planning process

Role of the Local Planning Authority

LPAs play a crucial role in safeguarding the archaeological heritage through their development management functions. In making decisions on planning applications, LPAs must consider the impact of development on Scheduled Monuments or other archaeological remains, and their settings, as these are material planning considerations. The LPA will need sufficient information to weigh the relative importance of archaeology against other factors, including the need for the proposed development.

In order to safeguard historic environment interests, Powys LPA works closely with CPAT, who maintain the regional Historic Environment Record (HER) and provide professional archaeological advice to the LPA. Where development proposals affect Scheduled Monuments, or their settings, the LPA will consult with Welsh Government through Cadw, the Welsh Government's historic environment service.

Role of Cadw

Cadw's role in the planning system is to provide advice about the likely impact of proposed development on the historic environment. Cadw advises LPAs, Natural Resources Wales, the Planning Inspectorate, developers and others involved in the planning process. Cadw's advice is based on national land use planning policy and guidance contained in Planning Policy Wales, TAN 24, Cadw's 'Conservation Principles' and 'Setting of Historic Assets in Wales'.

Cadw provides the LPA with an assessment of the likely impact of development proposals on Registered Historic Parks and Gardens and their settings, Registered Historic Landscapes and World Heritage Sites. With regards to archaeology, Cadw provides the LPA with an assessment about the likely impact of development proposals on Scheduled Monuments and their settings.

The LPA will take into account Cadw's advice alongside all other relevant issues when making their decision on a planning application. If a planning application is refused consent by the local planning authority, the applicant can appeal to The Planning Inspectorate. Under these circumstances, Cadw provides planning inspectors with assessments of the likely impact of the development on the Scheduled Monument and its setting.

Role of the Clwyd-Powys Archaeological Trust (CPAT)

CPAT is an educational charity established in 1975. The Trust is one of four Welsh Archaeological Trusts that have been established to advance the education of the public in archaeology. It works closely with other national, regional and local bodies to help conserve, understand and promote all aspects of the historic environment in Wales. The Trust is organised into three departments comprising of advisory services, field services, and education and outreach.

The Advisory Service of the Trust provides professional archaeological planning advice to the LPA, and to developers and other bodies involved in development. It also maintains the Historic Environment Record (HER) which is used to inform decisions made by the LPA on development proposals that may impact on the historic environment. The advice given by CPAT to the LPA is taken into account when identifying whether a proposed development is likely to impact on archaeological remains and on potential approaches towards mitigating

this impact. CPAT will also advise the LPA on applications to discharge conditions and will be involved in monitoring conditions.

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APPENDIX 4 Standard planning conditions relating to archaeology

The following is a list of commonly used planning conditions relevant to archaeology. Other bespoke conditions may be considered to meet particular circumstances. For further information and clarification on the requirements of conditions, applicants should contact CPAT.

Condition to secure a watching brief

The developer shall ensure that a suitably qualified archaeological contractor is present during the undertaking of any ground works in the development area so that an archaeological watching brief can be conducted. The archaeological watching brief must meet the standards laid down by the Chartered Institute for Archaeologists Standard and guidance for archaeological watching briefs. A copy of the resulting report should be submitted to the Local Planning Authority and the Development Control Archaeologist, Clwyd-Powys Archaeological Trust (The Offices, Coed y Dinas, Welshpool SY21 8RP Email: mark.walters@cpat.org.uk Tel: 01938 553670). After approval by the Local Planning Authority, a copy of the report and resulting archive should also be sent to the Historic Environment Record Officer, Clwyd-Powys Archaeological Trust for inclusion in the regional Historic Environment Record.

Reason: To secure preservation by record of any archaeological remains which may be revealed during ground excavations for the consented development in accordance with policy SP7 of the Powys Local Development Plan.

Condition to facilitate a scheme of archaeological investigation/ excavation

No development shall take place within the application area until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation, which has been submitted by the applicant and approved in writing by the Local Planning Authority.

The archaeological programme of work will be undertaken and completed in accordance with the relevant Standards and laid down by the Chartered Institute for Archaeologists. A copy of the resulting report should be submitted to the Local Planning Authority and the Development Control Archaeologist, Clwyd-Powys Archaeological Trust (The Offices, Coed y Dinas, Welshpool SY21 8RP Email: mark.walters@cpat.org.uk Tel: 01938 553670). After approval by the Local Planning Authority, a copy of the report and resulting archive should also be sent to the Historic Environment Record Officer, Clwyd-Powys Archaeological Trust for inclusion in the regional Historic Environment Record.

Reason: To secure preservation by record of all archaeological remains which will be impacted by the development in accordance with policy SP7 of the Powys Local Development Plan.

Condition to facilitate a programme of historic building recording

No development shall take place until a programme of building recording and analysis, equivalent to an Historic England Level ** building survey, has been secured and implemented, in accordance with a brief issued by the local planning authority and a written scheme of investigation which has been submitted by an archaeological contractor and

approved in writing by the local planning authority. The programme of building analysis and recording will be completed by an archaeological contractor and must meet the standards laid down by the Chartered Institute for Archaeologists in their Standard and guidance for the archaeological investigation and recording of standing buildings or structures. A copy of the resulting report should be submitted to the Local Planning Authority and the Development Control Archaeologist, Clwyd-Powys Archaeological Trust (The Offices, Coed y Dinas, Welshpool SY21 8RP Email: mark.walters@cpat.org.uk Tel: 01938 553670). After approval by the Local Planning Authority, a copy of the report and resulting archive should also be sent to the Historic Environment Record Officer, Clwyd-Powys Archaeological Trust for inclusion in the regional Historic Environment Record.

Reason:

To allow an adequate analytical record of the building to be made, before it is altered, to ensure that the buildings origins, use and development are understood and the main features, character and state of preservation are recorded in accordance with policy SP7 of the Powys Local Development Plan.

Condition to facilitate a photographic survey of the building

Development shall not begin until an appropriate Photographic Survey (Historic England Photographic Survey specification Understanding Historic Buildings 2016, 5.5, p.27) of the existing building has been carried out in accordance with details to be submitted to, and approved by, the Local Planning Authority. The photographic survey must be completed by an archaeological contractor. The resulting digital photographs should be forwarded on appropriate digital media to the Local Planning Authority and the Development Control Archaeologist (Clwyd-Powys Archaeological Trust, The Offices, Coed y Dinas, Welshpool SY21 8RP Email: mark.walters@cpat.org.uk Tel: 01938 553670). After approval by the Local Planning Authority, a digital copy of the photographs should also be sent to the Historic Environment Record Officer, Clwyd-Powys Archaeological Trust for inclusion in the regional Historic Environment Record.

Reason: To secure a basic photographic record of the original building prior to alteration/conversion in accordance with policy SP7 of the Powys Local Development Plan.

Condition to secure preservation of recorded archaeological remains *in situ* by demarcation and exclusion

In order to preserve important archaeological remains listed within the Historic Environment Record, the development herein permitted shall not begin until an appropriate fenced area, surrounding these remains, has been marked out in accordance with a specification approved by the Local Planning Authority. Throughout the course of the development no works shall be undertaken within the area surrounded by fencing without the consent of the Local Planning Authority. Information and advice on this matter can be obtained from the Development Control Archaeologist, (Clwyd-Powys Archaeological Trust, The Offices, Coed y Dinas, Welshpool SY21 8RP. Email: mark.walters@cpat.org.uk Tel: 01938 553670).

Reason: To secure preservation *in-situ* of recorded archaeological remains which may be vulnerable to damage during construction in accordance with policy SP7 of the Powys Local Development Plan.

Condition to secure preservation of recorded archaeological remains *in situ* by design

No development shall take place until a detailed scheme showing the scope and arrangement of the foundation design and all new groundwork, which may have an impact

on important archaeological remains, has been approved in writing by the Local Planning Authority and the Development Control Archaeologist (Clwyd-Powys Archaeological Trust, The Offices, Coed y Dinas, Welshpool SY21 8RP Email: mark.walters@cpat.org.uk Tel: 01938 553670). The approved scheme shall be monitored by the council or a council representative.

Reason: To ensure that important archaeological remains are not disturbed or damaged by foundations and other groundwork but are, where appropriate, preserved *in situ* by an agreed design in accordance with policy SP7 of the Powys Local Development Plan.

Condition to secure demarcation of a site

Prior to the commencement of construction works, ***** shall be clearly demarcated on the ground using unique and readily visible materials. Fencing around the monument and appropriate signage shall be erected prior to the commencement of construction so as to avoid accidental damage. The extent of the area to be demarcated shall be agreed with the local planning authority beforehand. The fencing shall remain in place until the ***** is operational/built and thereafter the fencing shall be removed.

The site will be demarcated by the site contractors, under the direction of an archaeologist, using wooden fence posts and a single strand of plain wire, a technique which has proved effective for similar schemes elsewhere. Appropriate signage will be attached to the fence, while the posts will be either painted or provided with readily visible materials in order to ensure their clear identification. The demarcated area will be clearly marked on all constraints mapping for the project.

Reason: To ensure that important archaeological remains are not disturbed or damaged by foundations and other groundwork in accordance with policy SP7 of the Powys Local Development Plan.

APPENDIX 5 Contacts

Planning Services

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LD1 5LG

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Council for British Archaeology

<http://new.archaeologyuk.org/>

Ancient Monuments Society

<http://ancientmonumentsociety.org.uk/>

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Powys Local Development Plan (2011-2026)

Supplementary Planning Guidance Historic Environment Including Historic Environment Record

Adopted July 2021

Mae'r ddogfen hefyd ar gael yn Gymraeg

This document is also available in Welsh

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1.0 Introduction

1.0.1 This guidance supplements the Historic Environment related policies of the Powys Local Development Plan (LDP) (2011-2026), which was adopted by Powys County Council on the 17th of April 2018, and has been prepared to assist decision-making on planning applications within the Powys LDP area. This guidance does not apply to areas of the County of Powys located within the Brecon Beacons National Park Authority area (BBNPA).

1.0.2 This Supplementary Planning Guidance (SPG) is intended to be read alongside the relevant policies of the LDP (see Section 5), along with any other related adopted SPG. This SPG focuses on historic environment assets that are not subject to individual SPGs. Matters relating to Conservation Areas and Archaeology are covered in more detail within their individual SPGs. The guidance within the Residential Design Guide complements and adds to this guidance by advising on general design matters. The Landscape SPG refers to the character and features of the historic and cultural landscape in the context of landscape considerations.

1.0.3 Historic Environment designations are considered by the LDP to be important strategic assets that require protection from unacceptable development so as to protect the economic, environmental and social well-being of Powys.

1.0.4 This SPG has been prepared to provide information and guidance on how, through implementation of the policies in the LDP, development proposals should ensure that the historic environment is appropriately considered, preserved and, where appropriate, enhanced. This guidance is also aimed at improving the approach towards protecting and enhancing local distinctiveness through preservation and enhancement of the historic environment.

2.0 Purpose of the guidance

2.0.1 The purpose of this guidance is to:

- Provide more detailed guidance to supplement relevant LDP policies.
- Provide guidance on wider designated areas and non-designated sites not subject to individual SPGs.
- Provide guidance on how to access and evaluate data on the historic environment.
- Provide practical information for applicants/agents, members of the public, elected Members and Council Officers involved in proposals affecting the historic environment.

2.0.2 This SPG provides guidance and information on:

- National legislation, policy and guidance relating to the Historic Environment.
- The Historic Environment in the Powys LDP area.
- The meaning of historic environment designations.
- Information sources relating to the historic environment.
- Relevant LDP policies relating to the historic environment.
- How policies relating to the historic environment are to be implemented.
- Using the Historic Environment Record.
- Monitoring and review proposals associated with the LDP and SPG.

3.0 Status of the guidance

3.0.1 This SPG has been produced to support the policies of the LDP which are used in the determination of planning applications. The guidance within the SPG has had regard to relevant legislation, national planning policy and other available guidance and information.

3.0.2 This SPG has been prepared in accordance with the Council's approved Protocol for Preparation and Adoption of SPG, which includes a Community Involvement Scheme. It has been subject to a 6 week public consultation stage undertaken between 20th of January and 28th of February 2020. A summary of the responses received to the public consultation along with an explanation as to how the responses have been addressed can be found within the Consultation Statement. This SPG was adopted by the Council on the 13th of July 2021.

3.0.3 This SPG is a material consideration in the determination of planning applications.

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4.0 Planning context for the Historic Environment in the Powys LDP Area

4.1 National legislation, policy and guidance

4.1.1 The **Planning (Listed Building and Conservation Areas) Act** (1990) and the **Ancient Monuments and Archaeological Areas Act** (1979) provide the legal framework for the protection and management of the historic environment. Section 16 of the 1990 Act contains the duty that requires LPAs and the Secretary of State when making decisions on listed building applications to have *special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*.

4.1.2 The **Historic Environment (Wales) Act** (2016) makes changes to the UK legislation relating to the protection and management of the historic environment in Wales. It introduces measures for the positive management of change to the historic environment, such as requiring all applications for Listed Building Consent and for Conservation Area Consent to be accompanied by Heritage Impact Statements. It also places a duty on the Welsh Government to compile and keep up-to-date a Historic Environment Record and a list of Historic Place Names. The duty within the Act to compile and keep up-to-date a Register of Historic Parks and Gardens is due to come into force in 2019.

4.1.3 The **Well-being of Future Generations Act** (2015) places a duty on public bodies to carry out sustainable development. In order to achieve sustainable development, the Act puts in place seven well-being goals. The most relevant goal in relation to the historic environment is the goal of *a Wales of vibrant culture and thriving Welsh language*.

4.1.4 **Planning Policy Wales (PPW) (11th Edition 2021)** sets out national planning guidance in respect of the historic environment and other planning matters. This latest edition aligns national planning policy with Future Wales (see para. 4.1.6 below) and reflects wider legislative, policy and guidance updates since the previous edition.

4.1.5 The overall approach towards the historic environment is set out under the theme of Distinctive and Natural Places. This guidance recognises the historic environment as a resource for the general well-being of present and future generations and, therefore, the need to ensure that the historic environment is protected, conserved, promoted and enhanced. It includes sections on Listed Buildings, Registered Historic Parks and Gardens and Registered Historic Landscapes, amongst other historic environment designations, and the Historic Environment Record.

4.1.6 **Future Wales - the National Plan 2040** is the Welsh Government's National Development Framework which sets the direction for development in Wales to 2040. The document forms part of the development plan for an area alongside the Local Development Plan, and in time Strategic Development Plans. Decisions on planning applications are required to be made in accordance with both the Local Development Plan and Future Wales, and, when adopted, Strategic Development Plans. Future Wales is not intended to provide planning policy in relation to all topics, particularly where they are already addressed by Planning Policy Wales or Technical Advice Notes. It, therefore, does not include specific policies in relation to the historic environment. However, Policy 18 of Future Wales, in respect of renewable and low carbon energy developments of national significance, includes a criterion requiring that there are no unacceptable adverse impacts on statutorily protected built heritage assets. Future Wales also recognises the strong cultural heritage of Mid Wales.

4.1.7 **Technical Advice Note 24 (TAN24)** (2017) supplements the guidance within PPW by giving more detailed advice on the historic environment in relation to the planning system in Wales. This guidance replaced Welsh Office Circular 61/96 'Planning and the Historic Environment: Historic Buildings and Conservation Areas', 60/96 'Planning and the Historic Environment: Archaeology' and 1/98 'Planning and the Historic Environment: Directions by the Secretary of State for Wales'. It provides guidance on how a range of historic assets should be considered, covering Archaeological Remains, Scheduled Monuments, Listed Buildings, Conservation Areas, Registered Historic Parks and Gardens, Registered Historic Landscapes and Historic Assets of Special Local Interest. With particular relevance to the scope of this SPG, TAN 24 provides information on:

- Listed Building designation, and the requirements and procedures associated with applications for listed building consent.
- Requirements and procedures for applications that could affect Registered Historic Park and Gardens and Registered Historic Landscapes.
- The use of the Historic Environment Record as an information source for preparing development plans and making planning decisions.

4.1.8 **Technical Advice Note 12 (TAN 12)** provides national planning guidance related to design and is aimed at facilitating good design and sustainability through the planning system. It sets out the benefits of using Design and Access Statements as communication tools to outline how the design of the development proposal has been considered from the outset and how objectives of good design have informed this. With regards to the historic environment, it explains that there will be a greater need for direction and advice from the Local Planning Authority on how new development can be accommodated and change managed in areas of special character.

4.1.9 Cadw has published a series of best-practice guidance to complement the Historic Environment (Wales) Act 2016 and recent planning policy and advice. The most relevant of these in respect of this SPG are:

- **Managing Change to Listed Buildings in Wales,**
- **Managing Change to Registered Historic Parks and Gardens in Wales,**
- **Heritage Impact Assessment in Wales,** and
- **Setting of Historic Assets in Wales.**

4.1.10 Cadw's published **Conservation Principles** highlights the need to base decisions on an understanding of the impact a proposal may have on the significance of an historic asset.

4.1.11 Other Cadw publications give **best-practice guidance** on a range of different types of historic assets, including war memorials, chapels, converting historic farm buildings, industrial worker's housing, renewable energy and historic buildings, small rural dwellings, and traditional agricultural buildings. Cadw has also published detailed guidance on **Understanding Listing in Wales**. Guidance can also be found on the Cadw website on **understanding registered historic parks and gardens** along with other information associated with these topics. The Welsh Government has also recently consulted upon updated best-practice guidance in respect of **easy access to listed buildings in Wales**.

4.1.12 In 2007, the Welsh Government, Countryside Council for Wales and Cadw, with assistance from the four Welsh Archaeological Trusts, published **Guide to Good Practice on Using the Register of Landscapes of Historic Interest in the Planning and Development Process** (commonly referred to as ASIDOHL2). It is a non-statutory document that is aimed at assisting local planning authorities in making planning decisions

and others involved in the planning process to ensure that plans and proposals brought forward have the least possible adverse impact on historic landscape areas on the Register. This is accompanied by a **Historic Landscapes Assessment Form**. Another document called **Caring for Historic Landscapes in Wales** provides an overview of the importance and value of historic landscapes.

4.1.13 The Welsh Government has issued statutory guidance on **Historic Environment Records in Wales: Compilation and Use** (May 2017) which explains that the Historic Environment Record (HER) should be used to inform processes involved in preparing development plans and development management decisions.

4.1.14 In 2005, the Montgomery Canal Partnership (led at the time by British Waterways and made up of groups interested in the Canal, including Powys County Council) published a **Conservation Management Strategy**. The document set a framework for taking forward the restoration and wider regeneration of the Montgomery Canal, whilst balancing these aims with the requirements relating to its natural and historic designations. In terms of built heritage, it set out key conservation principles and management proposals for development on and adjacent to the Canal.

4.1.15 The Partnership (now led by the Canal & River Trust) has subsequently published a document **The Montgomery Canal: Regeneration through Sustainable Restoration** (June 2016), which presents the Partnership's programme for restoration of the Canal. In terms of the principles set for the built heritage of the Canal, repairs and restoration will seek to minimise loss of the existing fabric, and compatible and alternative uses for historic buildings will be sought.

4.2 Historical background of the Powys LDP area

4.2.1 The following provides a brief summary of the historical background of the Powys LDP area. It focuses on the relatively recent history of the built historic environment, rather than pre-historic periods and archaeological remains, as more detail on this is provided within the separate SPG on Archaeology.

4.2.2 Powys has a rich wealth of historical architecture, ranging through all periods and all building types, from castles, ruined monasteries, large gentry houses dating from the fifteenth century, through to larger Georgian Country houses, Georgian town houses, industrial terraced workers housing, large Victorian villas, farmhouses and farm buildings.

4.2.3 The history of Powys and its important location within the Welsh Marches is reflected in its historic buildings. It has been estimated that over 200 castles were built within Powys and whilst some had limited impact, others resulted in planned "Norman" towns such as New Radnor (c.1257) Montgomery (c.1223), Knighton (c.1260), Llanfyllin (c.1293), Painscastle (c.1231), Old Radnor (1095 – 1100), Rhayader (c.1304) and Welshpool (1247-52) which although the original buildings have been replaced, the street layout still retains its early origins.

4.2.4 Llewellyn ap Gruffydd established a new town and market in 1273 adjacent to his castle at Dolforwyn, which was not allowed to develop due to its proximity to Montgomery. Llewellyn later established towns at Caersws (undated), Llanidloes (1280-93) and Newtown (1280-1321). When the stone castles were no longer required, (some had a long life into the uprising of Owain Glyndwr and again in the Civil War), they were used as a quarry for materials, as were the Abbeys and Priors after the restoration, providing good building stone.

4.2.5 Powys is well blessed with vernacular farmhouses, which are considered as true “Welsh” architecture. Iorwerth Peate in his book “The Welsh House” (1940) describes such buildings as peasant architecture where “social climatic and geographical conditions all combine to produce an architecture in which fashion or style play little or no part”.

4.2.6 The majority of the historic buildings in Powys are vernacular, although it should be remembered that only the better quality buildings have survived, despite often being considered as small and humble by today’s standards. The first form of house was single storey with an open fireplace in the centre of the hall. When first floor accommodation and fireplaces became in common use, different areas of Powys used different means for achieving the position of their fireplace and entrance. The Royal Commission for Ancient and Historical Monuments in Wales studied this phenomenon in great detail and published their findings in “Houses of the Welsh Countryside”.

4.2.7 The vernacular buildings are usually now confined to the rural areas, although not exclusively so, however, the “vernacular” buildings of Powys are not the only buildings that denote the architectural character of an area. Among the industrial communities, terraced housing for the workers was constructed in such numbers as to dominate i.e. Llangynog and later to house the textile workers of Newtown and Llanidloes. The houses of Llangynog being local stone, whereas local brick companies in Newtown and Llanidloes provided bricks which prevailed where good building stone was in a short supply, even with the expense of bricks at that time.

4.2.8 The construction of the Montgomery Canal brought with it its own style of building and materials could now be imported. Alongside this Newtown expanded as a centre of textile and yarn production, with new materials and structural advances with autocratic manufacturing efficiency and experiments in social planning. The Textile Museum building on Commercial Street combined six back-to-back houses on its lower two floors with open workrooms on the upper two floors. These workers houses of Newtown originally exhibited qualities such as courtyards and back to back houses that were previously unseen in Powys. Sadly most of the communal courtyards are now divided and historical unity of the area has been compromised.

4.2.9 The expansion of the railways into Powys, together with the attraction of our Spa towns for tourism and the provision for a constant supply of fresh water to the Midlands resulted in an inheritance of building materials and construction methods normally associated with larger conurbations and urban centres. Examples of these distant influences that were assimilated into the “character” of local architectural tradition include decorative brickwork and terracotta details in the centre of Rhayader and the use of faience on the elevations of the Automobile Palace in Llandrindod Wells. The Victorian architecture of Llandrindod Wells and Llanwrtyd Wells is an architectural symbol of the wealth and confidence that occurred in Powys at that time.

4.2.10 Victorian architecture was confident in its abilities and in its display of wealth. The use of concrete was successfully used by Sir Edmund Buckley with the construction of a mass concrete granary, farm buildings and walled garden on his Plas Dinas estate at Dinas Mawddwy, just over the border in Gwynedd. The use of concrete on the estate of the Hanbury-Tracy family at Gregynog, some forty miles away to the west near Newtown, was slightly more advanced in its development and execution. At the model farmstead buildings of Dolmelinau, an estate property near Tregynon, the red glow of the crushed brick aggregate can still be seen quite clearly. Both here and in each of the fourteen other locations at Gregynog where there are mass concrete buildings and structures.

4.2.11 This history has provided Powys with a significant legacy of buildings, sites and areas of historic interest. The total number of historic environment designations by type is set out within **Table 1**.

Table 1 Historic Environment designations in the Powys LDP area

Designation	Number
Listed Buildings	3935
Conservation Areas	55
Scheduled Monuments	716
Registered Historic Landscapes	10
Registered Historic Parks and Gardens	37

4.2.12 Maps showing the location of Listed Buildings, Registered Historic Landscapes, and Registered Historic Parks and Gardens are provided in Appendices 1, 2 and 3. These maps provide an overview of the location of designations, however for maps showing the exact location of individual buildings or boundaries of individual areas, see the information sources set out at the end of this Section. Information on the mapping of Conservation Areas and Scheduled Monuments can be found in the relevant separate SPGs.

4.2.13 The Montgomery Canal is a significant feature within the landscape and within the social and historical development of the area. The route of the canal starts at its junction with the Llangollen Canal at Lower Frankton in Shropshire, before crossing over the border into Powys to Llanymynech and then terminating at Newtown. The route of the canal is shown on the LDP's proposals maps. The sustainable sensitive restoration of the canal, working within the requirements of the canal's scientific and nature conservation designations, is being supported by the Council, as part of the Montgomery Canal Partnership project.

4.2.14 There is a high number of historic assets associated with the Canal, as can be seen from **Table 2**.

Table 2 Listed structures associated with Montgomery Canal in the Powys LDP area

Structure	Grade	Number
Aqueduct	II*	2
Aqueduct	II	6
Canal bridge	II*	1
Canal bridge	II	42
Limekilns	II	8
Locks weirs/gear	II	23
Other canal structures	II	19
TOTAL		101

The listed structures are in the main preserved, however the canal covers a large part of Montgomeryshire and there is pressure from development directly adjacent to the canal. The setting of these listed buildings can also be impacted upon by adjacent development. Further guidance on specific planning issues relating to the protection of the historic environment of the Canal is provided in section 6 of this SPG.

4.3 The meaning of historic environment designations

Registered Historic Landscapes

4.3.1. The Register of Historic Landscapes is a non-statutory designation, however it is intended to be used to inform policy making and decision-making at a strategic level and to inform Environmental Impact Assessments. The Register identifies the most important and best surviving historic landscapes in Wales. The purpose of the Register is to provide information to decision makers and landscape managers to help ensure that the historic character of the landscape is sustained, and that where change is contemplated, it is well-informed.

4.3.2 There are 10 Registered Historic Landscapes located either wholly or partly within the Powys LDP area, as identified in **Table 3**.

Table 3 Registered Historic Landscapes within the Powys LDP area

Name of the RHL	Location of the RHL
The Berwyn	Within Denbighshire and Powys
The Elan Valley	Within Powys and Ceredigion
The Caersws Basin	Within Powys
The Clywedog Valley	Within Powys
The Middle Usk Valley	Within Brecon Beacons National Park and Powys
The Middle Wye Valley	Within Brecon Beacons National Park, Powys and Herefordshire
The Tanat Valley	Within Powys and Denbighshire
The Tywi Valley	Within Ceredigion and Powys
Upland Ceredigion	Within Ceredigion and Powys
The Vale of Montgomery	Within Powys and Shropshire

4.3.3 A map showing the location of the Registered Historic Landscapes across the Powys LDP area is provided in Appendix 1 of this SPG. These designated landscapes are also shown on the LDP's proposals maps. Maps and information can also be accessed through the resources set out at the end of this section. It should be noted that the boundaries of RHLs are due to be revised, which may take some of the areas noted above out of Powys entirely, and therefore applicants should refer to Cof Cymru for up-to-date maps – see para. 4.4.6 below.

4.3.4 The landscapes on the Register have been identified as they are considered to be of outstanding (part 1 of the register) or special (part 2 of the register) historic interest such as to be of national importance, and are some of the best examples of different types of historic landscapes in Wales. The criteria for identifying these landscapes are set out within Annex C to TAN 24.

4.3.5 The creation of the register has been accompanied by a programme of Historic Landscape Characterisation. The characterisation process divides each landscape area on the Register into a number of smaller, more discrete, geographical areas of broadly consistent historic character called 'Historic Character Areas'. These areas are defined according to their key historic elements or characteristics. For example, an area might be physically characterised by a particular form of historic settlement or land use pattern or boundaries or it might have distinctive historic buildings, archaeological sites or traditional field boundaries, or it might contain important ancient habitats, and so on. For details on access to this information, see para. 4.4.5.

4.3.6 According to the website of the Clwyd-Powys Archaeological Trust *“Recognising and raising awareness of the importance and wealth of the historic fabric of the landscape has been the central theme and message of the non-statutory Register of Landscapes of Historic Interest in Wales”*. It goes on to explain that *“protecting the legacy of the past in the landscape is not to be achieved by preventing change or fossilising the landscape but rather by informing the process of change, creating tomorrow's landscapes without necessarily sacrificing the best of yesterday's”*.

4.3.7 The Welsh Government's objective in relation to Registered Historic Landscapes, as expressed in Planning Policy Wales, is to protect such areas of land on the Register. The need for protection of these areas will be a material planning consideration when making planning decisions on developments that may affect these areas or their settings. Further detail on the decision-making process is provided in Section 6 of this guidance.

Registered Historic Park and Gardens

4.3.8 The Register of Historic Park and Gardens is due to become a statutory register in 2021. This means that Welsh Ministers will have a statutory duty to compile and maintain a register of historic parks and gardens in Wales. This duty is discharged by Cadw on behalf of the Welsh Ministers in Wales. Whilst the Register itself will become statutory, there will be no additional consenting regime separate to the planning application process in respect of this designation.

4.3.9 There are 37 Registered Historic Parks and Gardens (RHPG) located within the Powys LDP area. A list of the RHPGs in the Powys LDP area can be found in Appendix 6 part (ii) of the Powys LDP. A map showing the location of the RHPGs across the Powys LDP area is provided in Appendix 2 of this SPG. These parks and gardens, along with those that are kitchen gardens, are also shown on the LDP's proposals maps. It should be noted that, in preparation for the introduction of the statutory register, Cadw has been reviewing the boundaries of all RHPGs and consulting with owners and occupiers as part of this. Applicants are, therefore, directed to Cof Cymru (see para. 4.4.6 below) which will show the updated boundaries of the parks and gardens.

4.3.10 RHPGs are designated for their historic interest, contents, features, condition and historical associations. RHPGs are subject to a grading system. Details of the definition and grading system used to select historic parks and gardens for the Register are provided in Annexe C to TAN 24.

4.3.11 The register will include an entry for each registered historic park and garden, which will include the name of the park or garden, its grade, a reference number and National Grid Reference, a brief description, the primary reasons for registration and a map indicating the extent of the garden or park and any significant views. This information will be available from Cof Cymru – see the sources of information set out at the end of this Section. The original publication of the register included a long description of each of the registered sites. This information is available on request from Cadw.

4.3.12 The majority of Registered Historic Parks and Gardens within the Powys LDP area are gardens to large private houses, which are usually listed buildings in their own right. The aim of the designation is to prevent damage to significant features of the sites such as historic layout, structure, built features and planted elements. It is not the intention to preserve everything as it is. In fact, in many cases development is both benign and beneficial. However, it is important not to let insensitive development within or adjacent to the designated sites harm their historic and visual character.

4.3.13 Some of the Registered Parks and Gardens are open to the public either as a historic garden e.g. Gregynog, or in the case of Llandrindod Wells Public Parks, the gardens are registered because they are a public park. In some cases e.g. Bronllys Hospital, new development may be proposed under policy E5 of the LDP. All of these bring their own development pressures, which need to be carefully managed to ensure that the gardens are not compromised either by facilities for visitors or by new development.

4.3.14 The Welsh Government's objective in relation to Registered Historic Parks and Gardens, as expressed in Planning Policy Wales, is to preserve their special interest. The need to preserve their special interest will be a material planning consideration when making planning decisions on developments that may affect these areas or their settings. Further detail on the decision-making process is provided in Section 6 of this guidance.

Listed Buildings

4.3.15 Listed Buildings are nationally important buildings and other structures that have been identified and included on a list that is compiled by Welsh Ministers under the Planning (Listed Buildings and Conservation Areas) Act 1990. Cadw is responsible for discharging the duty of compiling and maintaining a list in Wales. The purpose of listing is to ensure that a building's special architectural or historic interest is fully recognised and to ensure statutory control over works that would affect its character.

4.3.16 Any works to a Listed Building that would affect its character (including demolition or alteration) require listed building consent, which is a separate consent regime to the planning application process. It is a criminal offence to carry out any such works without the required consent. Planning permission may also be required for development to a Listed Building (such as an extension) or within its curtilage (such as an outbuilding, fencing, walls, gates or hardstanding). Reference should be made to Welsh Government [guidance on permitted development rights for householders](#). Like for like repairs do not usually require consent, however the LPA should be contacted and will require exact details of the proposal to check whether there are any changes involved.

4.3.17 When a building is listed, both the interior and exterior are listed. In addition, any object or structure fixed to the building and any object or structure within the curtilage of the building which, although not fixed to the building, forms part of the land and has done so since before 1 July 1948, are also considered to be listed along with the building. Guidance on identifying curtilage structures is provided in section 5.1 of Cadw's guidance [Managing Change to Listed Buildings](#).

4.3.18 There are 3935 listed buildings in the Powys LDP area (45 of which are grade I, 244 are grade II* and 3646 are grade II). A map showing the location of listed buildings across the Powys LDP area is provided in Appendix 3 of this SPG. Maps and information can also be accessed through the resources set out at the end of this section.

4.3.19 Annex B to TAN 24 provides details of the criteria used in deciding which buildings to include on the statutory list, gradings, prosecution and enforcement procedures, and listed buildings in need of repair.

4.3.20 Listed Buildings are a finite and irreplaceable asset. They are a valuable and irreplaceable resource, representing an existing investment in local history and culture, of building materials, arts and craftsmanship, and are important landmarks in the local scene. Powys County Council as the Local Planning Authority has a statutory duty to ensure that

Listed Buildings, their settings and any features of special architectural or historic interest are preserved for future generations.

4.3.21 According to the All Wales Condition Survey of Listed Buildings, some 19% of the listed buildings within Powys are either at risk (levels 1-3) or vulnerable (level 4). Those properties assigned a degree of risk level 5 and 6 are well maintained. The purpose of the Buildings at Risk Register is to identify buildings where there is a risk of loss of historically or architecturally important fabric (structure or details) with a view to preventing that loss.

4.3.22 The Welsh Government's objective in relation to Listed Buildings, as expressed in Planning Policy Wales, is to safeguard their character and manage change so that their special architectural and historic interest is preserved. The need to preserve their special architectural and historic interest will be a material planning consideration when making decisions on works or development that may affect these buildings or their settings. Further detail on the decision-making process is provided in Section 6 of this guidance.

Non-designated sites or features

4.3.23 In addition to the above-mentioned designations, and at a local level, there is a vast range of historic assets that are not deemed to be of such national significance to warrant designation. They may also be of potential national importance, but have not yet been recognised as such. However, such assets are likely to be significant locally, and the presence of these assets is capable of being a material planning consideration when dealing with development that may impact on their significance.

4.3.24 The Historic Environment Record is the primary source of information in this respect, as it contains details on various elements of the historic environment, such as archaeological sites and monuments, archaeological finds, and historic buildings and landscapes. It contains details of both designated and non-designated sites and features. It also includes access to records of historic place names and historic battlefields. The database holds records of over 150,000 sites and projects across the Clwyd-Powys area and is continually updated. See information on access to the record in paras-4.4.2 below.

4.3.25 According to the [statutory guidance](#) issued by the Welsh Government on the compilation and maintenance of the Historic Environment Record, the records should be used to support the planning process by supporting a proper consideration of the impact of a proposal on the historic environment, including advice on schemes to avoid or mitigate any adverse impacts. Further guidance on the use of the Historic Environment Record to support the planning process is provided in Section 7 of this SPG.

Setting of historic assets

4.3.26 According to TAN 24, 'the setting of an historic asset includes the surroundings in which it is understood, experienced, and appreciated embracing present and past relationships to the surrounding landscape'. The setting is not an historic asset in itself, however it may contribute to the significance of an historic asset. Further guidance on considerations relating to setting can be found in [Technical Advice Note 24](#) and various Cadw guidance documents referenced in para. 4.1.10.

4.4 Information on the Historic Environment in the Powys LDP area

4.4.1 The following resources provide access to information on designated and non-designated historic assets. This list is only intended as an overview of the type of information that is available in respect of Listed Buildings, Registered Parks and Gardens,

Registered Historic Landscapes, and other historic assets. General historical information can be obtained from a range of other sources, for instances from the Powys Archives, the National Archives, the National Library of Wales and the People's Collection for Wales.

Historic Environment Record (Archwilio)

4.4.2 There are four Historic Environment Records covering the whole of Wales, which are maintained by the four Welsh Archaeological Trusts. It includes (or provides access to) information on tens of thousands of historic sites or investigative work across Wales. The Archwilio web site provides public access to the parts of those records which make up a part of the statutory historic environment record (HER) for each local authority area in Wales. These statutory records are maintained on behalf of the Welsh Ministers by the four regional Welsh Archaeological Trusts in fulfilment of the requirements of the Historic Environment (Wales) Act 2016.

4.4.3 In addition to providing access to parts of the Welsh Archaeological Trusts' historic environment records, the website also gives access to information on scheduled monuments, listed buildings, conservation areas, historic parks and gardens, registered historic landscapes, the historic landscape layer of LANDMAP, the inventory of historic battlefields in Wales, the list of historic place names in Wales and the maritime database for Wales, which together comprise the statutory historic environment record for Wales as defined in the 2016 Act. See: [Archwilio-the searchable database of the Welsh Archaeological Trusts](#). Further guidance on the use of the Historic Environment Record to support the planning process is provided in Section 7 of this SPG.

Clwyd-Powys Archaeological Trust (CPAT)

4.4.4 CPAT is one of the four Welsh Archaeological Trusts and has carried out detailed studies of historic settlements across the region in order to inform planning authorities of each settlement's history and to identify an historic core to the medieval settlement. Each survey report contains a description of the settlement and its location, a recent aerial photograph of the settlement, information on the history of development of the settlement, its heritage to AD 1750 and a map showing the historic core of the settlement. See <http://www.cpat.org.uk/ycom/intro.htm>.

4.4.5 CPAT has also been involved in work examining the historic character of areas defined by the Register of Historic Landscapes in Wales. These studies provide detailed historical background and a general introduction to the broad elements of character for settlements included within the registered landscape areas. For descriptions taken from the Register, along with information on historic landscape themes and character areas, see <http://www.cpat.org.uk/projects/longer/histland/histland.htm>.

Cof Cymru

4.4.6 Cadw's online record of the national historic assets of Wales, which includes listed buildings, scheduled monuments, World Heritage Sites, registered historic landscapes and protected wrecks. It will also include registered historic parks and gardens once the register becomes statutory. It displays depictions and associated record descriptions or summary descriptions of designated historic assets in Wales - <http://cadw.gov.wales/historicenvironment/recordsv1/cof-cymru/?lang=en>.

Coflein and RCAHMW records

4.4.7 Coflein is an online database for the National Monuments Record in Wales, the national collection of information about the historic environment in Wales. It provides access

to an online catalogue of archaeological sites, monuments, buildings and maritime sites in Wales, together with an index to drawings, manuscripts and photographs held in the NMRW archive collections. See: <https://www.coflein.gov.uk/>. Coflein and other resources, including the List of Historic Place Names, can be accessed through the Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW) website – see <https://rcahmw.gov.uk/discover/>. The RCAHMW also have useful guidance on researching the history of houses – See <https://rcahmw.gov.uk/wp-content/uploads/2016/03/Researching-Welsh-House-Histories-LP-Eng.pdf> and <https://rcahmw.gov.uk/researching-your-house-history/>.

Welsh Tithe maps

4.4.8 Historic tithe maps provide a very useful source of information relating to the historic environment. Tithes were payments charged on land users, and payments were originally made using commodities like crops, wood, milk and stock. Tithe maps were produced between 1838 and 1850 to ensure that all tithes were paid with money rather than produce. There are over a thousand tithe maps, which are the most detailed maps for the period. All tithe maps have associated apportionment documents which list the payable tithes, the names of the landowners and land occupiers, the land use, and in most cases, the field names. It is possible to search and browse over 300,000 entries and accompanying apportionment documents online at the following website of the National Library of Wales - <https://places.library.wales/>.

Historic Wales Portal

4.4.9 This portal provides an online gateway to national and regional historic environment records. It comprises of an interactive map with various different layers displaying the 1st Edition Mapping, National Monuments Record for Wales, Historic Environment Records, Listed Buildings, Scheduled Monuments and National Museum Archaeology Collection. Links are included to the listing and schedule descriptions, along with details of features and artefacts, with links also to Coflein - <http://historicwales.gov.uk>.

Lle website

4.4.10 The Lle Geo-Portal has been developed as a partnership between Welsh Government and Natural Resources Wales. Lle serves as a hub for data and information covering a wide spectrum of topics, but primarily around the environment. There are two elements to the website; a catalogue for downloading datasets and a map where environmental data can be viewed. The site contains a number of WFS and WMS feeds which can be used to supply data directly into individual GIS systems.

4.4.11 The map is particularly useful when looking at how proposals will impact on historic environment designations (listed buildings, conservation area boundaries and scheduled monuments) alongside other types of environmental designations. The relevant maps can be accessed by selecting 'Viewing in Lle Map Browser' on the following webpages:

<http://lle.gov.wales/catalogue/item/ListedBuildings/?lang=en>

<http://lle.gov.wales/catalogue/item/ConservationAreas/?lang=en>

<http://lle.gov.wales/catalogue/item/ScheduledAncientMonumentsInWales/?lang=en>

Once the map has loaded, layers of data can be added or removed using the left margin of the browser.

LANDMAP

4.4.12 LANDMAP (Landscape Assessment and Decision Making Process) is an all-Wales landscape resource where landscape characteristics, qualities and influences on the landscape are recorded, evaluated and collated into a nationally consistent Geographical Information System based dataset. LANDMAP is intended to help sustainable decision making and natural resource planning at a range of levels from local to national while ensuring transparency in the decision-making process. The Historic Landscape and Cultural Landscape layers of LANDMAP may identify various elements of the historic environment. Further guidance on how to use these aspects of LANDMAP for landscape purposes is provided in Section 8 of the Landscape SPG.

4.4.13 The LANDMAP resource can be accessed through the Lle portal (see 4.20 above) and Archwilio (see 4.16 below) or through <https://landmap-maps.naturalresources.wales/>. Natural Resources Wales have produced step by step instructions on how to use the resource in <https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/evidence-to-inform-development-planning/landmap-the-welsh-landscape-baseline/?lang=en>.

List of Historic Place Names in Wales

4.4.14 This list records the various forms and spellings used for the names of topographical features, communities, thoroughfares, structures and other aspects of the landscape recorded in sources that predate the First World War. Names on the list, based on their meaning, can provide an understanding of the function of a place in the past, which can help to understand the history and historical associations of a particular place - <https://historicplacenames.rcahmw.gov.uk/>. The list can also be accessed through the Historic Environment Record (see Archwilio above).

National Trust Heritage Records

4.4.15 The National Trust holds records of 83,000 archaeological sites and historic buildings situated upon or adjacent to National Trust owned land. This includes records for standing buildings, earthworks, buried archaeology, historic garden and parkland features and archaeological landscapes. The records can be accessed and searched online - <https://heritagerecords.nationaltrust.org.uk/>.

Inventory of Historic Battlefields in Wales

4.4.16 The RCAHMW has created an inventory of historic battlefields in Wales, which identifies over 700 battlefields, with several sites of historic battles identified in the Powys LDP area. The intention is for the inventory to increase knowledge, raise awareness and prompt further research on battlefields and other historic conflict sites in Wales - <http://battlefields.rcahmw.gov.uk/>. The battlefields can also be accessed through the Historic Environment Record (see Archwilio above).

Historic Gardens

4.4.17 The Cadw publication *The Historic Gardens of Wales* (1992) provides an introduction to the chronological history of parks and gardens in Wales.

Welsh Historic Garden Trust

4.4.18 The Welsh Historic Garden Trust is a national conservation and heritage charity set up to protect and conserve the historic parks and gardens in Wales. As an organisation, it campaigns to save historic gardens and parks from neglect, indifference, insensitive planning and planting, for future generations. It has a branch in Brecon and Radnor and a separate branch in Montgomeryshire. Details of research, publications, newsletters and events can be found on their website - <http://whgt.wales/>.

Montgomery Canal Partnership

4.4.19 The Montgomery Canal Partnership's **Conservation Management Strategy** (2005) provides information on the history of the Montgomery Canal. It includes a Statement of Value relating to built heritage, which provides a description of the various structures and buildings associated with the Canal and that of the wider corridor, along with information on the historical context. It also identifies the vulnerabilities of the built heritage of the Canal and provides references for further information.

Local History Societies

4.4.20 There are three history societies covering the shires of Powys - Powysland Club (Montgomeryshire), the Radnorshire Society and the Brecknock Society. These societies have online archives and annual publications – the Montgomeryshire Collection, Transactions of the Radnorshire Society and Brycheiniog respectively - which can be accessed via their libraries, websites or Welsh Journals online. There are also Local History Societies and Groups for various towns and villages across the county.

Newtown Town Council

4.4.21 A Place Plan has been prepared for the Newtown and Llanllwchaiarn Town Council area, which includes information on the character of the town and local design matters. **The Place Plan is to be adopted by Powys County Council as Supplementary Planning Guidance** and therefore will be taken into account as a material consideration in determining planning applications.

Newtown and District Civic Society

4.4.22 Funding was provided to Newtown District Civic Society through the Heritage Lottery Fund (HLF) to undertake a characterisation project on the area of the Canal in Newtown. For further information on the characterisation project and toolkit developed by the Civic Trust, see <https://civictrustwales.wordpress.com/character-and-place/> and <https://civictrustwales.wordpress.com/category/characterisation/>. Since the end of the HLF funded project the group have continued to survey areas of Newtown and has recently published a book Explore Newtown: The Historic Town Centre (October 2018) the first of a planned series of publications looking at the streets and buildings of Newtown.

Machynlleth and District Civic Society

4.4.23 The Society's website provides an overview of the town and district's history and its built environment, along with useful links to other sources of information relating to Machynlleth. See: www.rogerwhit.plus.com/civic/start.html.

Welshpool Civic Pride

4.4.24 Welshpool Civic Pride is a non-profit making environmental body set up to fund and administer projects which protect Welshpool's heritage. Its aim is to restore and maintain heritage and cultural assets and to enhance the natural and built environment in the town of Welshpool. The first scheme funded and completed was the refurbishment of the Welshpool and Llanfair Light Railway cattle docks, which is a Scheduled Monument. It is planned to restore the adjacent Motte & Bailey Castle and Bowling Club, which is also a Scheduled Monument. See: <http://www.welshpoolcivicpride.org.uk/>.

Community Heritage Organisations

4.4.25 In 2014, the Wales Council for Voluntary Action published the findings of a project entitled **Mapping community history organisations in Wales - Cadw**. The aim of the project was to provide an overview of the archaeological, civic and heritage conservation organisations currently operating within Wales, in order to identify potential synergies with the work of the heritage sector. Section 4 of the publication lists the groups and societies

that were identified at the mapping stage across each county in Wales, including those operating in Powys.

DRAFT

5.0 Local planning policy

5.0.1 The Powys LDP aims to provide sustainable development whilst protecting and enhancing the heritage and distinctive characteristics of the LDP area. It ensures support for important assets and the guardianship of built and historic assets. The aims of the LDP in respect of the historic environment are set out in Objective 13:

LDP objective 13 – Landscape and the Historic Environment

...

ii. The Historic Environment

To protect, preserve and/or enhance the distinctive historic environment, heritage and cultural assets of Powys, in particular local assets that are not statutorily protected or designated under national legislation, and to ensure that development respects local distinctiveness.

5.0.2 The LDP contains strategic and development management policies relating to the historic environment. Each of the policies in the LDP is supported by a reasoned justification that contains an explanation behind the policy, provides guidance, and or expands on the purpose of the policy or its aims. The reasoned justification to each of the policies listed below has not been repeated in full in this guidance; users should refer to the LDP where the reasoned justification should be considered alongside the policy to inform the development proposal.

5.0.3 Policy SP7 is a strategic policy that identifies strategically important resources and assets of the Powys LDP area that are to be safeguarded. A range of historic environment designations and their settings are included within this policy. Para. 3.40 of the reasoned justification to this policy states that 'only development proposals that will not have an unacceptable impact on the asset / resource and the purposes for which it is safeguarded should be permitted'.

Strategic Policy SP7 – Safeguarding of Strategic Resources and Assets

To safeguard strategic resources and assets in the County, development proposals must not have an unacceptable adverse impact on the resource of asset and its operation.

The following have been identified as strategic resources and assets in Powys:

...

2. Historic environment designations, including;

- i) Registered Historic Landscapes;**
- ii) Registered Historic Parks and Gardens;**
- iii) Scheduled Ancient Monuments and other archaeological remains;**
- iv) Listed Buildings and their curtilages;**
- v) Conservation Areas**

AND the setting of designations i), ii), iii), iv) and v).

....

NOTE: The term used for Scheduled Ancient Monuments has recently changed to Scheduled Monuments.

5.0.4 LDP Policy DM13 is a development management policy that sets out criteria relating to design, character, and local distinctiveness, along with other aspects of design and resources. Criterion 1 requires the design of developments to respond to the surroundings, which may include historic assets. The protection of historic assets is also important in respect of the second criterion for their contribution towards the distinctiveness and identity of a local area. The Policy also includes a specific criterion to be applied to development within or affecting the setting of, or significant views into and out of, Conservation Areas. Guidance on this part of the policy is provided in the separate SPG on Conservation Areas.

Policy DM13 – Design and Resources

Development proposals must be able to demonstrate a good quality design and shall have regard to the qualities and amenity of the surrounding area, local infrastructure and resources.

Proposals will only be permitted where all of the following criteria, where relevant, are satisfied:

- 1. Development has been designed to complement and/or enhance the character of the surrounding area in terms of siting, appearance, integration, scale, height, massing, and design detailing.**
- 2. The development contributes towards the preservation of local distinctiveness and sense of place.**
- 3. Any development within or affecting the setting and/or significant views into and out of a Conservation Area has been designed in accordance with any relevant adopted Conservation Area Character Appraisals and Conservation Area Management Plans, or any other relevant detailed assessment or guidance adopted by the Council.**

....

5.0.5 The reasoned justification to Policy DM13 includes a section on the historic environment, which explains that many of Powys's historic environment designations are protected through legislation, policy and guidance, and, therefore, in order to avoid duplication there are no specific development management policies relating to these designations in the LDP. It also explains the need to give regard to non-designated sites and features, such as those recorded on the Historic Environment Record.

5.0.6 The historic environment and assets are mentioned in other parts of the Plan. The reasoned justification to Policy TD1 explains that "*the Council seeks to ensure that developments....do not have an unacceptably adverse impact and effect on...the historic environment*". Policy TD3 relating to the Montgomery Canal and Associated Development specifically refers to the scientific and conservation designations of the Canal, and the reasoned justification recognises the significance of the canal's natural and historic environment.

Policy TD3 – Montgomery Canal and Associated Development

Development proposals that support the restoration of the Montgomery Canal and preserve and enhance the role of the canal as a multifunctional resource, including off-line nature reserves and other appropriate canal-related development, will be supported.

Proposals for development that would adversely affect the canal’s scientific and conservation designations or prejudice its sensitive restoration will be opposed.

5.0.7 Policy DM4 requires development proposals to have regard to Registered Historic Landscapes, with the reasoned justification explaining that *the impact of development affecting these landscapes may require assessment under the Assessment of the Impact of Development on Historic Landscapes (ASIDOHL2) process.*

5.0.8 Specific reference is made to architecture and archaeology in Policy H8, which sets out the need to ensure that the design of any renovated abandoned dwellings takes reference from recorded evidence or the architectural or archaeological interest of the former dwelling. The reasoned justification to the Policy specifically refers to the use of the Historic Environment Record as evidence to inform the design of the renovation.

5.0.9 The historic environment is also mentioned in the reasoned justification to Policy E5 relating to Bronllys Heath Park. This policy relates to the Bronllys hospital site and supports its development as a Health and Wellbeing Park. It is explained in para. 4.4.15 of the LDP that *the site contains important historic assets, which should be protected including two listed buildings and a registered historic park and garden.* It goes on to explain in para, 4.4.16 that any potential development will need to take account of the site heritage and its designation as a Historic Park and Garden.

5.0.10 Policy DM10 relating to development proposals on contaminated and unstable land includes criteria that only permits such development where there are no unacceptable adverse impacts on matters including historic or archaeological interests.

5.0.11 The LDP also supports the Welsh language and culture by providing policy support for the protection of historic environment, as explained in the reasoned justification to Policy DM12.

5.0.12 Further information on historic environment designations, along with website links to maps, legislation, policy and guidance, are contained within Appendix 6 of the LDP. Definitions of historic assets and associated terms are included in the Glossary in Appendix 5 of the LDP.

6.0 Implementation of historic environment policies

6.0.1 All development proposals need to be designed to complement and enhance the character of the surrounding area and to contribute towards the preservation of local distinctiveness and sense of place, in accordance with policies DM13 1) and 2). For development proposals that affect historic assets or their settings, matters of local distinctiveness, character and appearance are of particular importance given that these assets have been designated as valued buildings or areas in respect of these matters.

6.0.2 Proposals must avoid any unacceptable adverse effects on historic assets and their settings in order to comply with Policy SP7 of the LDP. This section provides an overview of how policies are to be implemented in respect of historic assets within the Powys LDP area. The guidance here applies to developments affecting designated sites or areas, specifically to Registered Historic Landscapes (RHL), Registered Historic Parks and Gardens (RHPG), Listed Buildings (LB), and their settings. Specific guidance is also provided on particular development issues relating to the Montgomery Canal. The next part of the guidance (Part 7) goes on to cover non-designated sites and focuses on the use of the Historic Environment Record to inform development proposals.

6.0.3 This section sets out the considerations for those planning a new development that may affect these historic assets to assist them in preparing for submission. It also sets out the decision-making process on planning applications. The process set out emphasises the importance of considering the significance of historic assets at an early stage in order to ensure that this is taken into account in preparing plans for proposed development and making planning decisions on these proposals. This approach towards considering significance is emphasised in Planning Policy Wales:

Any decisions made through the planning system must fully consider the impact on the historic environment and on the significance and heritage values of individual historic assets and their contribution to the character of place.

6.0.4 It is at this early stage that consideration should also be given to the purpose of the work, taking into account the brief and vision for the project, and to the different possible options for achieving the same objective. This will be particularly relevant to applications for listed building consent that require a Heritage Impact Statement, as this will need to explain what the works are intended to achieve and why they are desirable or necessary.

6.0.5 **Figure 1** summarises the steps that should be followed for proposals affecting RHL, RHP or LB, or their settings. Whilst the general process for preparing and assessing proposals is similar for all three designations covered by this SPG, the details of these processes differ, and therefore these designations are covered separately. The process incorporates the requirement for Heritage Impact Statements in connection with applications for listed building consent. It also encourages the use of the heritage impact assessment process for applications affecting Registered Historic Parks and Gardens and affecting the setting of historic assets.

Figure 1 - Key steps to follow for proposals affecting RHL, RHPG or LB

<p style="text-align: center;">Step 1 Identifying significance Identifying where the site is in relation to any historic assets. Undertaking background research and site visit in order to identify the significance of the historic asset</p>
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Step 2 Designing proposed changes
Siting and designing the proposal to ensure that is appropriate and sensitive to the character of the historic asset and its setting

Step 3 Assessing the impact of development
Assessing the impact of the development on the identified significance of the historic asset, including proposals to mitigate impact

Step 4 Planning application process
Submit planning application accompanied by HIS or DAS, where required, or otherwise a Planning Statement, and other supporting information

6.0.6 **Figure 8** at the end of this section summarises the general application and decision process for developments affecting historic assets.

6.1 Registered Historic Landscapes (RHL)

6.1.1 All development proposals within Registered Historic Landscapes, or near to these landscapes, will need to consider the impact that the development would have on the historic character of these areas and their settings.

6.1.2 It should be noted that the information contained on the Register will be particularly relevant to circumstances where large scale or complex developments are proposed that require Environmental Impact Assessment (EIA). However, it will also be useful to refer to information relating to the Register when planning development proposals for other developments, in order to ensure that the development does not harm the historic character of the area.

6.1.3 The following guidance sets out the basic steps that should be followed for all proposals in or adjacent to Registered Historic Landscapes at the pre-application stage. However, it should be noted that more detailed processes will be involved for developments that require EIA and ASIDOHL2 (see Appendix 4). Cadw and CPAT will advise on the need for detailed assessments in connection with development proposals.

6.1.4 Applicants may find it helpful to refer to the **Guide to Good Practice on Using the Register of Landscapes of Historic Interest in the Planning and Development Process** (commonly known as ASIDOHL2) that has been produced by Cadw and the Countryside Council for Wales, with the assistance of the archaeological trusts. The guidance is designed to help LPAs in making decisions on the impact of proposals on Registered Historic Landscapes and to assist applicants to bring forward plans that are likely to have the least possible adverse impact on Registered Historic Landscapes. Whilst the guidance is aimed at large or complex schemes, the principles within it can be applied to all forms of development.

6.1.5 This SPG seeks to simplify the process to enable applicants to demonstrate, as part of their planning application, how they have taken into account the impact of development on a Registered Historic Landscape, in order to comply with planning policy.

Step 1 Identifying significance

6.1.6 Applicants should, firstly, identify whether the site for their proposal lies within or near to a RHL. The information sources set out in Section 4 can be used to confirm this. When deciding on whether the development of a site outside of the RHL may impact on the setting of the RHL, consideration should be given to the proximity to the boundary of the RHL and to the visibility of the development from the RHL. This should also consider points at which the development and RHL would be seen together within the same view.

6.1.7 Where a development proposal is located within or could impact on the setting of an RHL, applicants should then refer to the description of the relevant RHL contained on the Register. This can be viewed on CPAT's website by clicking on the map of the relevant RHL - <https://www.cpat.org.uk/projects/longer/histland/histland.htm>. The description identifies the essential historic landscape themes of the RHL.

6.1.8 CPAT's website also provides details of the historic landscape characterisation work for each RHL. This work divides the Registered Historic Landscape area into smaller areas, called 'historic character areas'. It provides the historical background for each area and identifies the key historic landscape characteristics of each area. This includes surviving physical elements, such as historic buildings or archaeological sites, and wider characteristics of the landscape, such as land and settlement patterns. These elements combine to make the landscape locally distinct.

6.1.9 A summary of each historic character area is provided on the same page as the description of the RHL and a link is then provided to further information on each of the historic character areas. A link is also provided to a map showing the boundary of the character area overlaid on an Ordnance Survey map, which is useful to locate the site within the landscape and surrounding topography.

6.1.10 The historic landscape characterisation work undertaken by CPAT for the relevant historic character area should help to identify the elements that contribute towards the value and local distinctiveness of a particular landscape area. This characterisation work is the primary evidence used for identifying the significance of the historic landscape. Supplementary information may be found on the historic and cultural landscape layers of LANDMAP. It may also be necessary to carry out some historic research to help discover how the area appeared in the past. Historic maps and aerial photography can be particularly helpful to show how the pattern of development has evolved over time.

6.1.11 Where a development proposal is located outside an RHL, but has the potential to impact on its setting, particular attention should be given to identifying key views into and across the RHL and the surrounding landscape. The historic elements and characteristics of adjacent historic character areas should also be identified and consideration given to how the proposal would relate to this character.

6.1.12 Having undertaken this background research, applicants should undertake a site visit in order to apply the findings of the background research to their specific site. This will help to understand the location of the proposed development within the RHL and within its immediate surroundings. This will identify whether there are any historic characteristics visible either on or adjacent to the site that may be impacted upon by the development.

6.1.13 Applicants should use the detailed information on the historic character areas and other relevant information, together with their site observations, in order to identify the key characteristics of the site and surrounding area that may be affected by the proposal. Applicants should cross-reference the results of their site visit with CPAT's information on

the historic character areas and other relevant information in order to identify the value of any characteristics found on or near the site.

6.1.14 Reference to a characteristic within CPAT's information on the historic character area or within other relevant evidence will indicate that it is significant in terms of the contribution that it makes to the historic landscape character of the area. Whereas, characteristics that are not referred to in this information are less likely to be significant and therefore can normally be discounted. Applicants should also refer to Cadw's Conservation Principles, which provides guidance on assessing significance.

6.1.15 Proposals should consider the contribution that any identified features or characteristics likely to be affected by the development make to the significance of the historic landscape. In terms of the significance of the historic landscape as a whole, RHLs (whether on Part 1 or Part 2 of the Register) are nationally important and are of high value. This means that the protection of RHLs, including their features and characteristics, is an important consideration in the decision-making process.

6.1.16 The overall evaluations given to the aspect areas in LANDMAP have the following meanings:

Outstanding – international or national importance.

High – regionally or of county importance.

Moderate – local importance.

Low – little or no importance.

Particular attention should be given to aspect areas where the historic or cultural landscapes layers are evaluated as outstanding or high value by LANDMAP. Further detailed guidance on the use of LANDMAP for general landscape considerations is found in Section 8 of the Landscape SPG.

6.1.17 **Figure 2** summarises the above guidance into a set of questions that can be used when considering whether a development is likely to impact on the significance of an RHL. Further guidance on assessing this impact is provided under Step 3.

Figure 2 Key questions in relation to step 1 for RHL

Is the site located within a RHL?

Is the site located near a RHL? (i.e. within the setting of a RHL).

Is it likely that the development could be viewed from a RHL?

Is it likely that the development and the RHL would be viewed together from the same viewpoint?

Which historic character areas of the RHL could be affected by the development?

Are there any historic features or characteristics relating to the historic character area or the RHL on or near to the site, that contribute towards the significance of the RHL?

Step 2 Designing proposed changes

6.1.18 Once the significant features and characteristics of the RHL, or its setting, have been identified in step 1, consideration can then be given to how (or if) the development proposal can be sited and designed so that it is appropriate and sensitive to the character of the RHL and its setting.

6.1.19 Proposals should reflect the locally distinctive character of the RHL, through siting, built form, detailed design, and materials. For instance, materials used in proposals within the historic landscape should complement the traditional materials used in the area. The following elements of historic landscapes are likely to be relevant to developments within a RHL or its setting:

- Predominant form, layout and scale of traditional buildings, such as terraced housing.
- The relationship of traditional buildings to the street or frontages.
- The historic shape and style of traditional plots.
- The density of surrounding traditional development.
- Traditional materials used on buildings for walls, roofs, windows and doors and used for doorways, paths, drives, thresholds of drives and courtyards (i.e. tiles, brick, flag stones, stone setts, stone kerbs, cobbles, gravel).
- Use of colour that integrates well with the prevailing town/open countryside character or reflects historical use.
- Rural building patterns, including farmstead distribution and layout.
- Boundary treatments, such as native hedges on outer rural edges, and railings, brick or stone walls on internal town-side edges.
- Existing hedgerows and trees to incorporate into the design.
- Landscaping along key frontages and within the site.
- Key views to, from and across the area.
- Archaeological earthworks as relict landscape features.

Applicants should take the above elements, along with any other important historic elements of a particular landscape, into account when designing new development within a RHL.

Step 3 Assessing the impact of development

6.1.20 The impact of the development on the character of the wider historic landscape and on important characteristics of the historic character area will need to be assessed. Where the proposal would involve the removal of key features of the historic landscape or alteration of the character of the area, the contribution these characteristics make to the wider historic landscape will need to be assessed. The impact of proposals on the setting of the RHL will also need to be assessed.

6.1.21 This assessment should consider direct physical impacts on the important historic characteristics, for instance through alteration or demolition. Indirect impacts should also be considered, such as the visual impact on viewpoints to and from historic sites and buildings, or on functional or visual connections between historic sites or buildings. Developments may have the potential to interrupt or obstruct these views and connections. Further guidance on considerations relating to setting is provided in Cadw's guidance [Setting of Historic Assets](#).

6.1.22 The level of assessment will depend on the nature, scale and complexity of the proposal, as well as the sensitivity of the landscape in question. The good practice guidance focuses on the assessment processes involved in large-scale or complex developments, particularly those requiring EIA. However, it should be noted that assessments (using the

ASIDOHL2 process) may be required in connection with smaller schemes that, due to their nature, could unacceptably change the historic character of the area.

6.1.23 PPW advises that an assessment of development on a historic landscape may be required if it is proposed within a registered historic landscape or its setting and there is potential for conflict with development plan policy. The LPA will decide, in consultation with CPAT, on the need for and level of assessment required for developments that are not EIA. LPAs will consider it reasonable to request a full or partial ASIDOHL2 in connection with any proposals that are likely to have a significant impact on any of the key features or characteristics of the historic landscape, including views to, from and across the landscape.

6.1.24 In cases where neither an EIA is required or an ASIDOHL2 is requested, this SPG encourages applicants to use either the Design and Access Statement, where required, or, in other cases, a Planning Statement to explain how the historic character of the landscape has been taken into account in designing the development. This will provide a basic informal assessment of the impact of the proposal on the historic landscape character of the area. The different types of assessments involved are summarised in Appendix 4.

6.1.25 The assessment process should also consider the scope for mitigating any adverse impacts on the character of the historic landscape, such as through removing features that are not compatible with the area and opportunities for enhancement. The results of the assessment may warrant a review of the siting or design of the development to address identified impacts.

NOTE: It is important to note that this guidance focuses on assessing development proposals that impact on the character of the Registered Historic Landscapes as historic assets or historic environment designations. For guidance as to how to assess the impact of proposals on landscape generally applicants should refer to the Landscape SPG, which sets out the process for undertaking a LANDMAP-based assessment.

Step 4 Planning application process

6.1.26 The application submitted to the LPA should be accompanied by a Design and Access Statement, where required, or a Planning Statement, which will provide evidence of how the RHL has been taken into account in the development proposal. Where the application involves other heritage assets i.e. applications for listed building consent or conservation area consent, a Heritage Impact Statement will be required. The LPA, in consultation with Cadw or CPAT will advise of any additional information requirements at the pre-application stage should also be submitted. Examples of additional information may include zones of theoretical visibility or photomontages. EIA and ASIDOHL2 (see Appendix 4) may also be requested.

6.1.27 Where applications are not accompanied by sufficient information to determine the acceptability of the development against the adopted planning policies and guidance, planning permission may be refused.

6.1.28 RHLs must be taken into account when considering the implications of developments which meet the criteria for EIA, or if on call in, in the opinion of the Welsh Ministers, the development is of a sufficient scale to have more than a local impact on the historic landscape. The LPA must consult with Cadw on development within a RHL that requires an EIA.

6.1.29 The need to protect RHLs is also a material planning consideration in other cases, where EIA is not required, as Policy SP7 applies to all development and safeguards RHLs

as a historic asset. Where development does not require EIA, the LPA will consult with CPAT who will advise on the impact on the RHL.

6.1.30 In determining planning applications, the LPA will balance the benefits of the proposed development against the harm to the assets. In assessing the significance of the key characteristics that are to be harmed by development, the LPA's assessment will need to be proportionate to the importance of the assets and impact of the development on them.

6.1.31 It is important to understand that developments that are inappropriate and insensitive to the historic characteristics of the RHL will impact on the understanding and appreciation of the historical development of the area. The aim should be to ensure the integrity and coherence of the RHLs are maintained.

6.1.32 CPAT may raise objections to the principle of development in areas of the RHL that are of significant archaeological interest, or may advise on the need for archaeological works, such as preservation, excavation or recording (see Archaeology SPG). CPAT may also bring assets of potential national importance to the attention of Cadw to assess for designation.

6.1.33 Applications that fail to demonstrate that the impact on the historic character of the RHL is acceptable may be refused under LDP policies SP7 and DM4, and also in line with national policy and guidance and the guidance contained within this SPG. This means that any identified adverse impacts that cannot be satisfactorily addressed through mitigation, or are not outweighed by other issues, will be deemed unacceptable and planning permission may be refused.

6.2 Registered Historic Parks and Gardens (RHPG)

6.2.1 All development proposals within Registered Historic Parks and Gardens and their settings will need to consider the impact that the development would have on the historic character of these areas and their settings.

6.2.2 Applicants may find it helpful to refer to Cadw's guidance on [Managing Change Historic Parks and Gardens in Wales](#), which sets out the general principles to follow when considering changes that may impact on registered historic parks and gardens.

6.2.3 The following guidance sets out the basic steps that should be followed for all proposals in or adjacent to Registered Historic Parks or Gardens at the pre-application stage. This should enable applicants to demonstrate, as part of their planning application, how they have taken into account the impact of development on a registered historic park or garden, in order to comply with planning policy.

Step 1 Identifying significance

6.2.4 Applicants should, firstly identify whether the site for their proposal lies within or near to a RHPG. The information sources set out in Section 4 can be used to confirm whether the site is within a RHPG or within its setting. When deciding on whether the development of a site outside of the RHPG may impact on the setting of the RHPG, consideration should be given not only to the proximity to the boundary of the RHPG but also to whether the development would impact on any views of, from or across the RHPG.

6.2.5 Where a development proposal is located within a RHPG or could impact on the setting of a RHPG, applicants should refer to the entry for the relevant RHPG contained on the Register as a starting point to their research. Cof Cymru will provide a short description of the registered park or garden, however it will not include the full register entry, which can be requested from Cadw. The entry provides the reason for designating the site as a RHPG

and provides a map showing its boundaries and identifying significant views. The entry will also provide information relating to the site's history and development and a description of the site at the time of registration.

6.2.6 Further background research will be necessary in relation to the specific RHPG that the application relates to. Section 2.1 of Cadw's guidance on [Managing Change to Registered Historic Parks and Gardens in Wales](#) provides information on finding out about your RHPG and on sources of information that can be used in order to understand the significance of the RHPG before any changes are made.

6.2.7 Having undertaken this background research, applicants should undertake a site visit in order to apply the findings of the background research to their specific park or garden. This will help to understand the location of the proposed development within the RHPG and within the surroundings of the RHPG. This will identify whether there are any historic features or characteristics visible on or from the site that may be impacted upon by the development. It will also identify whether the development would impact on any of the mapped significant views from within and outside the RHPG.

6.2.8 Applicants should use the detailed information on the register entry and other background research, together with their site observations, in order to identify the main features and characteristics of the site and the surrounding park or garden that may be affected by the proposal. Applicants should cross-reference the results of their site visit with the information obtained from the register entry and other background research in order to identify the value of any elements and characteristics found on or near the site.

6.2.9 Reference to a feature or characteristic on the register entry or within other relevant documents will indicate that the feature or characteristic is of significance in terms of its contribution towards the historic character of the RHPG. Examples of key features of RHPGs are provided in section 2.3 of the Cadw guidance. Early consultation with the LPA and Cadw at the pre-application stage will help identify features and characteristics that may be deemed to be important to individual RHPGs. Cadw's Conservation Principles should also be referred to when assessing significance.

6.2.10 As encouraged in Cadw's guidance, the outcome of the process of identifying significance can be recorded in a Statement of Significance, which can be included as part of a Heritage Impact Statement or within a Design and Access Statement, where these are required, or in other cases, in a Planning Statement.

6.2.11 Applicants should refer to para. 1.6 of the Cadw guidance on Managing Change to Registered Historic Parks and Gardens for a summary of other considerations, such as considerations relating to listed buildings and scheduled monuments and other planning-related considerations.

6.2.12 **Figure 3** summarises the above guidance into a set of questions that can be used when considering whether a development is likely to impact on the significance of an RHPG. Further guidance on assessing this impact is provided under Step 3.

Figure 3 Key questions in relation to step 1 for RHPG

Is the site located within a RHPG?

Is the site located near a RHPG? (i.e. within the setting of a RHPG).

Is it likely that the development would impact on significant views of, from or across the RHPG?

Are there any historic features or characteristics associated with the RHPG within or adjacent to the site that the development could impact upon?

Step 2 Designing proposed changes

6.2.13 Once the important features and characteristics of the park or garden, or its setting, have been identified in step 1, consideration can then be given to how (or if) the development proposal can be sited and designed so that it is appropriate and sensitive to the character of the historic park or garden and its setting.

6.2.14 All new development and improvements to existing structures and buildings should respect the features, historical significance and condition of the RHPG, and should be of a high design standard. Factors that may assist with designing an appropriate development within a Registered Historic Park or Garden, or its setting, may include (but are not limited to):

- Retaining the historic layout of the park or garden.
- Retaining existing historic routes through the park or garden.
- Avoiding the creation of additional routes, which subdivide the space or alter the historic layout.
- Retaining historic buildings or structures, which reflect the function of the park or garden.
- Retaining historic boundary features, such as walls, hedgerows and railings.
- Avoiding creation of new permanent boundaries that would alter the historic layout.
- Opening up significant views to enhance the character of the site.
- Avoiding development that would impact on or obscure significant views within or out of the historic park or garden.
- Avoiding damage to the fabric of any buildings or structures within the site.
- Retaining historic natural or artificial water features, such as lakes, ponds, waterfalls and fountains.
- Retaining planted elements, such as parkland trees, tree-lined avenues and woodlands.
- Avoiding adverse impacts on elements of the setting, including visual and sensory aspects of the setting.
- Taking into account the archaeological importance of any above-ground structures and potential for below ground archaeology.

For guidance on good practice management, see section 2.3 of Cadw's guidance on [Managing Change to Registered Historic Parks and Gardens in Wales](#).

Step 3 Assessing the impact of development

6.2.15 The impact of the development on the character of a registered historic park or garden and on its important features and characteristics will need to be assessed. Where the proposal would involve the removal of key features of the RHPG or alteration to its character, the contribution these elements make to the RHPG will need to be assessed. The impact of proposals on the setting of the registered historic park or garden will also need to be assessed.

6.2.16 This assessment should consider direct physical impacts on the important historic features and characteristics, for instance through alteration or demolition. Indirect impacts should also be considered, such as the visual impact on viewpoints to, from and across the RHPG. Developments may have the potential to interrupt or obstruct these views and connections. Further guidance on considerations relating to setting is provided in Cadw's guidance on Setting of Historic Assets.

6.2.17 The results of the assessment may lead to a review of the siting or design of the development to address identified impacts. Consideration should be given to the scope for mitigating any adverse impacts on the character of the RHPG, such as through sensitive design, and opportunities for enhancements, for instance by removing incompatible features of the park or garden.

6.2.18 Cadw's guidance on Managing Change to Registered Historic Parks and Gardens strongly recommends the use of a Heritage Impact Assessment process to find the best way to accommodate changes to a RHPG (see Cadw guidance on HIA). This SPG encourages applicants who are not using the HIA process to use either the Design and Access Statement, where required, or, in other cases, a Planning Statement to explain how the proposal has taken into account the significance of the RHPG and its features and characteristics. Planning Statements should provide a basic informal assessment of the impact of the proposal on the character of the RHPG. The different types of assessments involved are summarised in Appendix 4.

Step 4 Planning application process

6.2.19 The application submitted to the LPA should be accompanied by an optional HIS, a Design and Access Statement, where required, or otherwise a Planning Statement. The LPA, in consultation with Cadw, may request additional information, which may involve the need for a Heritage Impact Statement, and will advise of this at pre-application stage. The LPA will consider it reasonable to request a Heritage Impact Statement where the proposed development is likely to have a significant impact on a registered historic park and garden or its setting.

6.2.20 Where applications are not accompanied by sufficient information to determine the acceptability of the development against the adopted planning policies and guidance, planning permission may be refused.

6.2.21 The LPA must consult with Cadw on planning applications that are likely to affect the site of a RHPG or its setting. The LPA may also consult with the Welsh Historic Gardens Trust.

6.2.22 In determining planning applications, the LPA will balance the benefits of the proposed development against the harm to the assets. In assessing the significance of the key characteristics that are to be harmed by the development, the LPA's assessment will need to be proportionate to the importance of the assets and impact of the development on them.

6.2.23 Applications that fail to demonstrate that the impact on the character of the RHPG or its setting, is acceptable may be refused under LDP policy SP7, and also in line with national policy and guidance and the guidance contained within this SPG. This means that any identified adverse impacts that cannot be satisfactorily addressed through mitigation, or are not outweighed by other issues, will be deemed unacceptable and planning permission may be refused.

6.3 Listed Buildings (LB)

6.3.1 All proposed works to a LB, or development within the curtilage of a LB, or located within the surroundings of a LB, will need to consider the impact that the development would have on the special architectural or historic interest of the LB and its setting.

6.3.2 Applicants may find it helpful to refer to Cadw's guidance on [Managing Change to Listed Buildings in Wales](#), which sets out the general principles to follow when considering changes that may impact on a listed building.

6.3.3 The following guidance sets out the basic steps that should be followed for all proposals to listed buildings, or proposals that may affect the setting of listed buildings, at the pre-application stage. This should enable applicants to demonstrate, as part of their application for listed building consent and/or planning application, how they have taken into account the impact of works and development on a listed building and its setting, in order to comply with planning policy.

Step 1 Identifying significance

6.3.4 Applicants should, firstly identify whether the building is a LB or is within the curtilage of a LB, or whether it is located near a LB. The information sources set out in Section 4, particularly Cof Cymru, can be used to confirm whether the proposal involves works to a listed building or within its curtilage, or whether there are any listed buildings nearby that may be impacted upon by the proposal. When deciding on whether the development of a site outside of the curtilage of a LB may impact on the setting of the LB, consideration should be given not only to the proximity to the boundary of the curtilage of the LB, but also to whether the development would impact on any views of or from the LB or its curtilage.

6.3.5 Where a proposal relates to a listed building, is located within the curtilage of a listed building, or could impact on the setting of a LB, applicants should refer to the list description for the relevant LB as a starting point for their research. The list description can be accessed by searching [Cof Cymru](#) for the relevant LB and selecting the 'details' button.

6.3.6 The list description states the name of the LB, its grading (I, II* or II), and its broad class. It provides a brief history of the LB and descriptions of its exterior and interior, and gives a reason for why the building was listed. Sometimes buildings are listed for their group value with other buildings nearby. It should be noted that the list description is aimed at identifying the property, and may not detail all of the special features of the LB, for instance it may not always provide detail as to the interior of the building and may not identify all curtilage buildings or structures.

6.3.7 Further background research is, therefore, encouraged in order to fully understand the significance of the LB and that of its historic or architectural features. Cadw's [guidance](#) suggests that further information may be available from the National Monuments Records for Wales, the Historic Environment Record and local County Archives (see section 4 for details on access to these information sources). The LPA will also hold records of planning history which will help to recognise and understand recent changes. Information may also be available in historical documents, maps and old photographs of the building.

6.3.8 Having undertaken this background research, applicants should undertake a site visit in order to apply the findings of the background research to their specific LB. This will help to understand the location of the proposal in relation to the building and its surroundings. This will identify whether there are any historic or architectural features or characteristics of the building that may be impacted upon by the proposal. It will also identify whether development would impact on any views to and from the LB.

6.3.9 Applicants should use the detailed information on the list description and other background research, together with their site observations, in order to identify the features or surroundings of the LB that may be affected by the proposal. Applicants should cross-reference the results of their site visit with the information obtained from the listing description and other background research in order to identify the value of any elements and characteristics found on or near the site.

6.3.8 Applicants should bear in mind that the whole of the building, its fixtures and curtilage structures, are listed. However, some features may be more significant than others, and this

judgement will depend on the contribution that the feature makes to the special architectural or historic interest of the LB. Features dating from the same period as the building was originally built are likely to be integral to its interest. However, some buildings may have been altered over different historical periods and therefore may reflect different ages and fashions, which is important in showing how the building has evolved through time. There may also be previous changes that were not carried out in a sympathetic manner.

6.3.9 Cadw's guidance on **Managing Change to Listed Buildings** provides further guidance on understanding detailed aspects of listed buildings, including setting, form and layout, materials, details, and interiors (section 2.1 to 2.5). It also provides guidance on matters relating to the structure, condition and performance of listed buildings (section 3). It is important that these matters are understood before making changes to the LB. Cadw's Conservation Principles should also be referred to when assessing significance.

6.3.10 For developments that are likely to impact on the setting of a LB, consideration will need to be given to the contribution that the setting makes to the significance of the LB. The setting may have physical, functional or aesthetic connections with the LB and, where there is a strong relationship, the setting is likely to be important to the special historic or architectural interest of the building. Further guidance on matters relating to setting can be found in Cadw's **Setting of Historic Assets in Wales**.

6.3.11 Where the proposal involves works to a LB that require listed building consent, the outcome of the process of identifying significance will need to be recorded in a Statement of Significance, which will be included as part of a Heritage Impact Statement. Guidance on preparing a statement of significance can be found in Cadw's guidance on **Heritage Impact Assessments** (section 4.2). In other cases, this may be recorded in a Design and Access Statement, where required, or otherwise within a Planning Statement.

6.3.12 **Figure 4** summarises the above guidance into a set of questions that can be used when considering whether a development is likely to impact on the significance of a LB. Further guidance on assessing this impact is provided under Step 3.

Figure 4 Key questions in relation to step 1 for LB

Does the site contain any LBs or any buildings or features within the curtilage of a listed building?

Is the site located near a LB? (i.e. within the setting of a LB).

Is it likely that the development would be visible from a LB?

Is it likely that the development would be seen together with the LB from the same view?

Are there any historic or architectural features or characteristics associated with the LB that the proposed works could impact upon?

Step 2 Designing proposed changes

6.3.13 Once the significance of the building, its features, curtilage and setting has been identified in step 1, consideration can then be given to how (or if) the proposed works or development can be planned and designed in a way that is appropriate to its significance.

6.3.14 All works to LBs and within their settings should respect the historical and architectural significance of the LB, and should be of a high quality design. The following principles are likely to be relevant to works or development that may affect a LB or its setting:

- Avoid or minimise the loss of historic fabric and carry out sympathetic repairs and restoration.
- Retain architectural or historic features, such as chimneys.
- Retain historical layout and original internal walls of the building.
- Locate modern additions on inconspicuous elevations or roof valleys.
- Avoid large or inappropriate extensions.
- Retain or re-use the building for sustainable uses.
- Carefully locate developments so as not to interrupt significant views of or from the building.

6.3.15 For guidance on the approach to take towards different types of works to listed buildings, see section 4 of Cadw's guidance on [Managing Change to Listed Buildings](#). This covers works including maintenance, repairs, renewal, restoration, reconstruction, new work or alteration, demolition, change of use, energy efficiency measures, accessibility, cleaning, documenting and recording. This also provides advice in respect of each type of work regarding the need for listed building consent.

Step 3 Assessing the impact of development

6.3.16 The impact of works or development on the significance of the LB will need to be assessed. Where the proposal would involve alterations to the character of a LB or the removal of important features of the LB, the contribution these elements make to the significance of the LB will need to be assessed. The impact of proposals on the setting of LBs will also need to be assessed.

6.3.17 For works to a LB, this assessment will need to take the form of a Heritage Impact Assessment. The results of the Heritage Impact Assessment process will need to be summarised in a Heritage Impact Statement, which is required to be submitted with all applications for listed building consent. Further guidance on this assessment process can be found in Cadw's guidance on [Heritage Impact Assessments](#).

6.3.18 For developments that do not require listed building consent, but may impact on the setting of a LB, applicants are encouraged to use the Heritage Impact Assessment process to assess the impact of their proposals. This SPG encourages applicants who are not using the HIA process to use either the Design and Access Statement, where required, or, in other cases, a Planning Statement to explain how the proposal has taken into account the importance of the setting to the significance of the LB. Planning Statements should provide a basic informal assessment of the impact of the proposal on the setting of the LB. The different types of assessments involved are summarised in Appendix 4. Further guidance on considerations relating to setting is provided in Cadw's best-practice guidance [Setting of Historic Assets in Wales](#).

6.3.19 The results of the assessment may lead to a review of the siting or design of the works or development to address identified impacts. Consideration should be given to the scope for mitigating any adverse impacts on the significance of the LB and its setting, such as through sensitive design and opportunities for enhancements.

Step 4 Planning application process

6.3.20 Applications for listed building consent will need to be accompanied by a Heritage Impact Statement. Other applications for planning permission that may impact on the LB and its setting may need to be accompanied by a Design and Access Statement, where required, or in other cases a Planning Statement. Applications for listed building consent also require details of the works, which may involve the need for a schedule of works. A checklist of supporting documents for applications for listed building consent is provided in the Annexe to the Cadw guidance *Managing Change to Listed Buildings*. By carrying out pre-application with the LPA, applicants will be informed of any additional information requirements at an early stage. The LPA may also request additional information, where necessary, at the planning application stage.

6.3.21 Where applications are not accompanied by sufficient information to determine the acceptability of the works or development against the adopted planning policies and guidance, listed building consent or planning permission may be refused.

6.3.22 Where a proposal requires both listed building consent and planning permission, for instance a conversion of a listed building, the planning application and application for listed building consent should be submitted at the same time in order that the proposals can be assessed concurrently. This will allow a fuller understanding of the proposal in order to assess the overall scheme.

6.3.23 Local planning authorities have a statutory duty to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. For any proposal affecting a listed building or its setting, the statutory requirement is the primary material consideration.

6.3.24 The Council's Built Heritage Conservation Officer will be consulted on all applications for listed building consent, and on any other planning applications that may impact on the setting of a listed building. Certain proposals may require the involvement of other Council services, including the County Ecologist and Building Control. This coordination is necessary to identify solutions to enable differing requirements to be met. Early pre-application consultation with the relevant Council services will also help to identify the likely requirements and solutions.

6.3.25 The Council's Built Heritage Conservation Officer will provide an assessment of the impact of the proposal on the LB or its setting to the Planning Officer. For works that involve demolition of a LB or part of a LB, the LPA is required to consult with the RCAHMW and the national amenity societies (these are listed in Appendix 5). Any consultation responses received will be taken into account in determining the planning application.

6.3.26 Where the LPA proposes to grant listed building consent, it must notify Cadw of the application, and Cadw then have 28 days whether to recommend call-in of the application to the Welsh Ministers, or whether to allow the LPA to proceed to determine the application.

6.3.27 Full details of the requirements and procedures relating to listed building policy and legislation are given in TAN24. Detailed guidance on the listed building consent process is also provided in Section 5 of Cadw's guidance on [Managing Change to Listed Buildings](#).

6.3.28 Applications that fail to demonstrate that the impact on the special architectural and historical interest of the LB and its setting, is acceptable may be refused under policy SP7, and also in line with national policy and guidance and the guidance contained within this SPG. This means that any identified adverse impacts that cannot be satisfactorily

addressed through mitigation, or are not outweighed by other issues, will be deemed unacceptable and listed building consent/planning permission may be refused.

6.4 Development associated with the Montgomery Canal

NOTE: To comply with the requirements of the Conservation or Habitat and Species Regulations 2017, a Habitat Regulations Assessment of development proposals will be required to be undertaken to ensure there is no adverse effect on the integrity of the Special Area of Conservation. The SAC designation affects the full length of the canal in Wales.

6.4.1 Powys LDP Policy TD3 is relevant to all development that would impact on the Montgomery Canal. The policy supports the sensitive restoration of the Montgomery Canal and appropriate canal-related development, and requires development to preserve and enhance the multi-functional role of the canal. The Policy protects the conservation designations associated with the canal and aims to prevent development that would adversely affect those designated features or prejudice the sensitive restoration of the canal. The following guidance on the implementation of this policy focuses primarily on the aspects relating to the historic environment.

6.4.2 Policy TD3 and the guidance within this SPG will apply to any developments either on or adjacent to the canal that would impact on the conservation designations, the restoration of the canal or on any historic assets or their settings. The presence of the nature conservation designations, and the need to safeguard route of the canal and the historic assets associated with it, will be a material consideration when dealing with applications that may impact on the canal and its historic environment.

6.4.3 The guidance here focuses on providing advice regarding canal-related issues. It should be noted that proposals to listed buildings along the canal or affecting their setting, or any other types of historic assets that may coincide with the canal, will also need to comply with LDP policy SP7 and the detailed guidance elsewhere in this SPG or in separate SPG.

6.4.4 Any proposed development either on or adjacent to the route of the Montgomery Canal, as shown on the LDP's proposal maps, will need to consider its possible impacts on the on the nature conservation and historic designations, including the effects it will have on the character and appearance of the canal, the historic assets associated with it and their settings.

6.4.5 There are sections of the canal that are not currently navigable, however these are planned to be restored in the future. Developments on or adjacent to these non-navigable sections will, therefore, need to demonstrate that the proposal would neither adversely impact the conservation designations nor prejudice the sensitive restoration of these sections of the canal. Where development is proposed along these sections, it should be designed to ensure that sufficient space is retained to enable restoration of the canal. Development that would obstruct the safeguarded route of the canal will not be permitted.

6.4.6 The setting of the canal is important to how it is experienced and appreciated by users of the canal and its towpath. It will, therefore, be important to ensure that development adjacent to the canal responds to the character and appearance of the canal. It will also be important to preserve the canal corridor by providing a buffer between the development and the canal. In addition to canal-side development, development within the wider landscape setting of the canal may also impact on the character of the setting. The setting and landscape surroundings of the canal have, in the past, been affected by inappropriate modern development and use of inappropriate boundary treatments.

6.4.7 Where development may impact on the canal, its setting, or parts of it that may be restored, additional information should be submitted with the planning application to explain how the canal has been taken into account in the design and layout of the development, and to show how the development will relate to the canal. It is recommended that this information is set out within a Heritage Impact Statement or Design and Access Statement (where these are required) or, otherwise, this information should be included in a Planning Statement.

6.4.8 Certain types of development will be inherently related to the canal and its operation, such as moorings, boat services and facilities, and canal side visitor services and accommodation. The location of such developments in close proximity to the canal is justified and they will be supported providing that they respect historic and natural environment designations and comply with the relevant policies and guidance in this respect.

6.4.9 As emphasised in previous sections of this SPG, it is important to understand the significance of any historic assets in order to inform the design of any development proposals. The Montgomery Canal Partnership's **Conservation Management Strategy** provides a statement of value of the landscape heritage and built heritage of the canal (see part 3 of the Strategy). Reference to this will help to understand the contribution that any particular features or characteristics make to the significance of the canal and its setting.

6.4.10 The information contained within the strategy relating to landscape heritage refers to the historic landscape characterisation work undertaken in respect of the canal and identifies 27 historic landscape character areas. A brief description of each area and the main historical and archaeological interests of these areas are provided in Table 3.1 of the strategy. It also sets out key national archaeological and landscape principles.

6.4.11 The information contained within the strategy relating to built heritage provides a description of the different elements and historical connections of the canal and that of the wider corridor. It also provides key built heritage conservation principles and how these will be implemented locally, along with management proposals to deliver these principles. This includes management proposals in respect of local distinctiveness, which identify the following aspects of the built heritage that are of particular importance to be safeguarded:

- George Buck paddlegear. Working examples remain at Carreghofa.
 - Curved cast iron gates. The last pair on the canal were removed from Welshpool Town Lock and are now at the Stoke Bruerne Museum. It is proposed to relocate them back to Welshpool.
 - Fish-bellied cast iron beamed bridges, as exemplified by Pentreheylin Bridge.
 - Rural stone-pitched wharves such as Crickheath.
 - Nineteenth century corrugated iron and timber sheds.
 - Small structures such as crane bases and iron hoops included in the Heritage register.
 - Cast iron and stone boundary markers.
 - The larger buildings recorded within the Heritage Register.
- (MCP Conservation Management Strategy, 2005, para. 7.2.3)

6.4.12 Guidance on identifying significance of designated historic assets, such as listed buildings, is set out earlier in this section. Guidance on Conservation Areas and Scheduled Monuments is provided in separate SPG. The Historic Environment Record may also contain information relating to the buildings, structures or archaeology of the canal. Further guidance on the use of the HER is provided in Section 7 of this guidance.

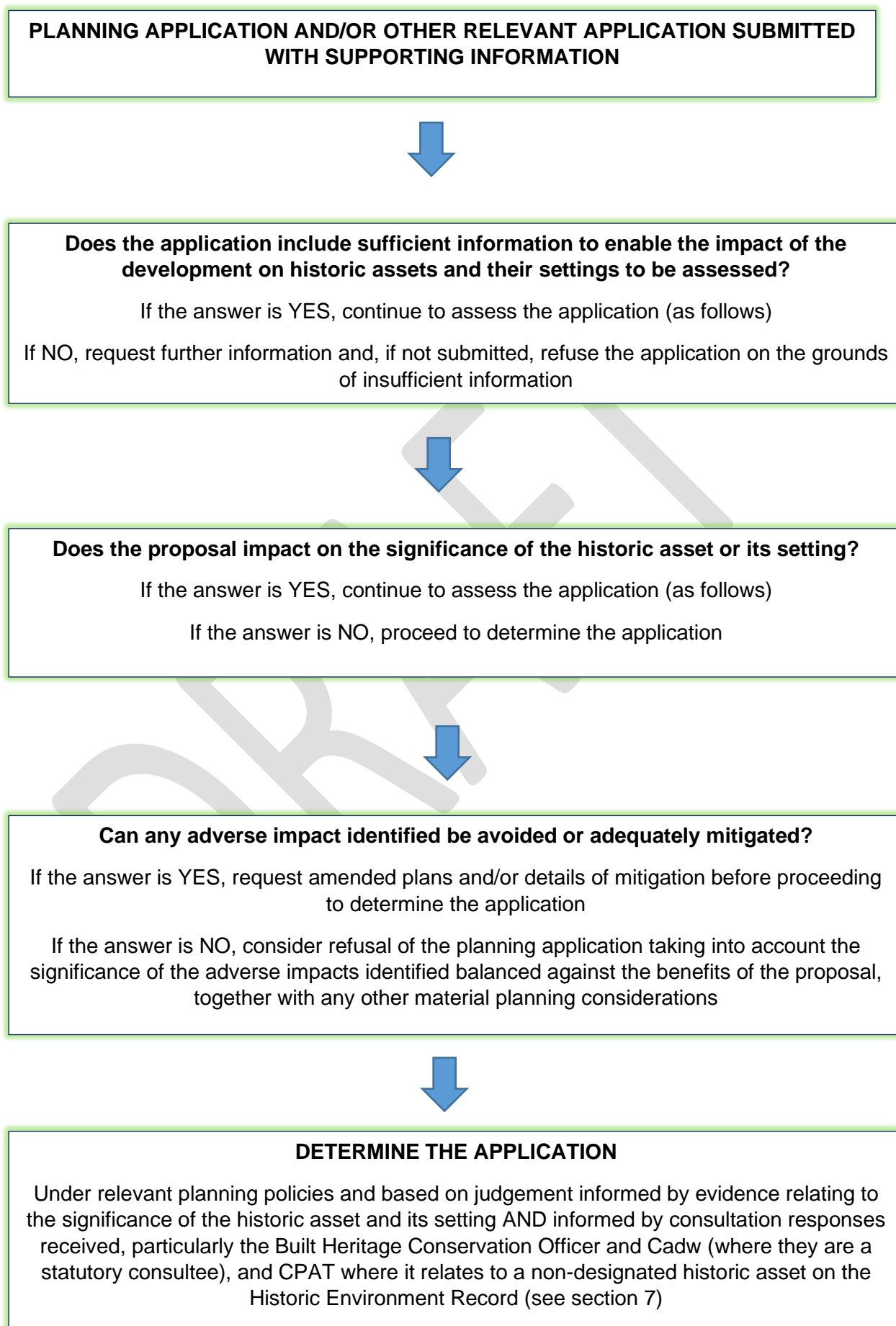
6.4.13 The following key design considerations will apply to developments on or adjacent to the Montgomery Canal (including the sections of the canal that are yet to be restored):

- Addressing the requirements of the nature conservation designations to avoid adverse impacts.
- Avoiding or minimising loss of historic fabric and carry out sympathetic repairs and restoration.
- Using local materials, for instance brick and slate roofing, or stone and half-timbered housing, where appropriate.
- Avoiding demolition of buildings or structures that are important to the character of the canal, unless justified.
- Sustainable re-use of redundant buildings for viable uses that are compatible with the use of the canal.
- Designing new development in a contemporary manner to provide a contrast to historic development.
- Respecting the scale and density of surrounding traditional buildings.
- Sensitive siting of buildings in relation to the canal, paying attention to appropriate set backs and orientation of buildings towards the canal.
- Landscaping and screening using appropriate local native species.
- Appropriate boundary treatments of development along the canal (native hedgerows are encouraged, however brick walls or metal rail estate fencing will be permitted, where appropriate).
- Hardsurfacing of paths or car parks with local stone or other materials typical of the area.
- Opening up and enhancing views of and outward from the canal corridor from the development, where appropriate.
- Improving access along and across the canal corridor, where appropriate.
- Enhancing recreational opportunities of the waterway by providing a waterside pedestrian and cycling route that is accessible to all and connects to other key pedestrian and cycling routes in the local area, where appropriate.
- Ensuring the structural integrity of the canal corridor is not harmed.
- Taking into account known or potential for archaeological remains and associated investigation and recording requirements (see Archaeology SPG).

By taking these considerations into account in designing new development, this will ensure the character of the canal is retained and a positive relationship between the development and the canal.

6.4.14 It is recommended that applicants who are planning development on or adjacent to the canal should carry out pre-application discussion with the LPA on any proposals, in order to establish the information requirements and to identify any particular issues that will need to be addressed. It should be noted that the LPA is required to consult with the Canal & River Trust on any planning applications likely to affect any inland waterway owned or managed by the Canal & River Trust.

Figure 5 Planning application and decision process



7.0 Using the Historic Environment Record

7.0.1 This section provides guidance on the use of the Historic Environment Record (HER) by applicants to research the historic interest of a proposed development site. It provides instructions on how to access and use data on historic assets and features, specifically those recorded on the HER. It also provides guidance on how the HER will be used to inform decision-making on planning applications.

7.0.2 The HER provides detailed information about the historic environment of the area. At the time of writing, the HER for the Clwyd-Powys area contains a total of almost 370,000 records (this figure also includes records for the authority areas of Flintshire, Denbighshire and part of Conwy). This figure consists of 95,647 core records, 52,232 event records and 221,267 photographic records. Core records relate to historic assets, whilst event records relate to historic or archaeological investigations. The HER comprises of a digital database and paper archive information about sites and projects of archaeological and historical interest in the Clwyd-Powys area. The HER, therefore, provides the most comprehensive record of data relating to the historic environment, and is particularly useful when considering the impact of development on historic assets, including archaeology.

7.0.3 Clwyd-Powys Archaeological Trust (CPAT) are also responsible for compiling and maintaining the statutory Historic Environment Record (HER) on behalf of Welsh Ministers, under the terms of the 2016 Historic Environment (Wales) Act, in respect of the Powys LDP area – this statutory record is available through the [Archwilio](#) website. The statutory HER also provides access to records of scheduled monuments, listed buildings, conservation areas, world heritage sites, registered parks and gardens, registered historic landscapes, the historic landscape aspect layer of LANDMAP, historic place names, historic battlefields and maritime data. Applicants should follow the instructions below, which explain how to access and use the HER when planning development.

7.0.4 Applicants should also be aware that CPAT hold significant additional information that will not necessarily appear in the on-line HER, and it is strongly recommended that where historic environment issues are seen as relevant to development progress, from on-line enquiries, advice should be sought from CPAT at the pre-application stage. This may significantly improve the passage of an application.

7.1 Instructions on accessing and using the HER

7.1.1 Online access to the digital database of the statutory Historic Environment Record is provided through the [Archwilio](#) website, which can be accessed directly or via CPAT's website - <https://cpat.org.uk/curatorial-services/historic-environment-record/>. Archwilio is a map-based facility, which enables users to search the digital database of the HER. Access to Archwilio can also be arranged at CPAT's offices by appointment with CPAT's HER Officer (Tel. 01938 553 670).

7.1.2 Users must firstly accept the conditions of use and then select the relevant unitary authority on the front page of Archwilio in order to proceed to the HER itself. Users in the Powys LDP area should select Powys either on the map or in the drop down box at the bottom of the page. The map that appears will show the boundaries of the authority's area in red. Users can zoom in or out on the map using their mouse or the buttons in the top right hand corner of the screen, which will help to locate the development site. Users can also choose between different map formats – the road map, ordnance survey map or aerial maps are likely to be the most useful maps to use to identify the location of a site.

7.1.3 Users can select which layers to add to the map by ticking the relevant boxes on the left hand side of the map, for instance to show the location of historic landscapes, park and garden or listed buildings, amongst other designations. The layers also include information on battlefields, maritime, historic place names and photographs. The HER can also be searched by using the facility on the left side of the page, which can be searched by unitary authority or community, and also by period (from prehistoric to modern), or alternatively by using a search term. There is also the option to only search in the map view.

7.1.4 It is recommended that users firstly zoom into the area of the development site. Users should then use the search facility on the left hand side and select the 'search only in the map view' box before clicking the 'search' button. Applicants should also zoom out and then re-select the 'search only in the in map view' box in order to check for any other records in the area that may be relevant. It should be noted that certain layers may only be visible at a certain scale – a message will normally appear explaining that the layer can only be viewed at a certain map view width.

7.1.5 The results of this search will appear on the map as red dots (for core data) and green boxes (for event data). By clicking on the dots or boxes, or any of the other icons, the name of the record will appear and by clicking on the record, a new window will open with details of the record. The record for core data contains information on the type of feature, which will indicate its period, use or function, along with a description of the feature, which may include information on the overall condition of feature. The record for events data contains information on the event type, i.e. excavation, and a summary of the event, along with a description of the event. Both types of records also set out sources of information relating to the record, including relevant literature, CPAT site visit records and other archives, and any corresponding core or event data relating to the site. Photographic records also appear in a new window and include a description of what the photograph is showing.

7.1.6 It should be noted that the dot, box or icon shown on the HER map only provides an indication of the location of a particular asset or event. Many of the points on the map relate to large and complex sites that may spread over hundreds of metres and it is therefore not always possible to gain an idea of the extent of sites from Archwilio. It is also not possible to identify the settings of assets from the HER map. Pre-application enquiries with CPAT will be necessary as they will have access to further information showing the extent of the asset or event and its boundaries and can advise on matters relating to setting.

7.1.7 The HER also links to other external sources. For instance, in respect of historic place names, the HER links to the Royal Commission's website for the List of Historic Place Names, which shows the location of the historic place name on a historic map and notes the period when the name was recorded. The names of other places within 1km and within the parish, together with other occurrences of this name, are also listed. The HER also links to the Royal Commission's Inventory of Historic Battlefields, which provides details of the key people associated with the battle, period, archaeological remains, along with an overview of the history of the battle, and a bibliography to enable users to undertake further research.

7.1.8 The HER contains a variety of different types of information, such as information on designations, research, publications, fieldwork, recording, unexpected archaeological discoveries, community projects and chance finds by members of the public. Some of the records will be based on professional archaeological investigations that have been undertaken as part of a development project. It is important that this information is submitted to the HER to provide a record of the work undertaken, to ensure that the HER contains up-to-date information and to inform future development proposals. This will be a requirement

of planning conditions relating to archaeological work (see Archaeology SPG). Guidance on the submission of this data is available on CPAT's website - <https://cpat.org.uk/docs/HER-Docs/Guidance%20for%20the%20Submission%20of%20Data%20to%20Welsh%20HERs%20V1%20%28EN%29.pdf>.

7.1.9 Applicants should use the HER as a starting point for their research into the historic or archaeological potential of their development site and its surroundings. However, applicants should not rely solely on the information available via Archwilio as the information shown may not provide a sufficient level of detail to research development sites and their surroundings. The full HER is supported by a paper archive containing supporting information, such as estate maps, tithe surveys, published book and journal articles, and photographs that have not been digitised. There may also be records of sites that have not yet been digitised, which means that there may still be potential for historic or archaeological interest where there are no dots, boxes or icons on the HER map. Further information of this kind is likely to be necessary to inform the research needed when planning a development that may impact on the historic environment.

7.1.10 Further information should be sought directly from the HER Officer of CPAT using the HER enquiry form available on CPAT's website - <https://cpat.org.uk/curatorial-services/historic-environment-record/#page-content>. The staff at CPAT have expert knowledge and experience to assist applicants with accessing and evaluating records that are relevant to their site. CPAT's Development Control Officer will also be able to respond to planning-related enquiring, providing advice on understanding the information contained on the Register, particularly on interpreting specialist information, and advising on its relevance to the development proposal. Research at pre-application stage should be undertaken in consultation with CPAT to ensure that development proposals are informed by sufficient information and that this information is ready for submission to the LPA as part of a planning application.

7.1.11 It should be noted that, in some instances, CPAT may request a more formal search to be undertaken of the HER, perhaps as part of a desk-based assessment undertaken by an archaeological contractor. This would involve an application to CPAT to ask for a structured response comprising various data sets for interpretation by the archaeological contractor, and on submission to CPAT, interpretation by their development control officers. This formal HER search would involve a fee payable to CPAT based on an hourly rate of £60. Further guidance on the desk-based assessment process is provided in the Archaeology SPG.

7.1.12 The steps involved in accessing and using the HER are summarised in **Figure 4 6** below.

Figure 6 Summary of instructions for accessing and using the HER

1. Access the HER using Archwilio.
2. Read and accept the conditions of use.
3. Select the relevant unitary authority area - Powys.
4. Select format of the map required.
5. Add layers to show historic environment designations and other records.
6. Zoom into the relevant area to identify the location of the development site.
7. Select the 'search only in the map view' option and then the 'search' button.

8. Select the red dots, green boxes or other icons on or near the site.
9. Read the records for any relevant historic assets or events.
10. Contact CPAT for further information and for advice on interpretation.
11. CPAT to advise on relevance of the information to the development proposal.

7.2 Use of the HER for making planning decisions

Local Planning Authorities should take account of the information held in the historic environment records in the determination of planning applications.

7.2.1 This requirement to take into account the HER in making planning decisions is contained in the [Statutory Guidance: Historic Environment Records in Wales: Compilation and Use](#). It is explained in the guidance that:

The HER is a key source of information that should be used to support the planning process, including the determination of planning applications.

It goes on to say that:

The information held on the HER supports a proper consideration of the impact of a proposal on the historic environment, including advice on schemes to avoid or mitigate any adverse impacts.

Planning Policy Wales also explains that the records must be used as a key source of information in making planning decisions affecting the historic environment.

7.2.2 The HER is designed to fulfil a wide variety of functions, but, in the context of this SPG, it is to be used to inform development management decisions on planning applications. The HER supports the planning application process in a number of ways.

7.2.3 The HER can be used to access the following information on statutory and non-statutory historic environment designations that may be impacted on directly, or indirectly on their setting, by development:

- Listed Building - links to Cadw's full report of the listing, which includes a summary of the description of the listed building, its location and description.
- Scheduled Monuments – links to Cadw's full report of the scheduling, which includes a summary of the description, its location and description.
- Conservation Areas – provides basic information showing the boundaries or the area, the name of the Conservation Area and date of designation. However, where Conservation Area Character Appraisals and Conservation Area Management Plans have been undertaken, links will be provided to these.
- Registered Historic Parks and Gardens – provides the name, other designations such as Listed Buildings or TPOs, the grading, site type and reason for designation.
- Registered Historic Landscapes – links to CPAT's historic landscape characterisation, which sets out the description taking from the Register with further detail on historic landscape themes and character areas.

7.2.4 The HER also provides access to other information that can be used as evidence to inform development management decisions. These types of information and their uses are summarised in **Figure 7** below.

Figure 7 The use of other information on the HER

Information on undesignated historical sites and features

The HER contains core records about the physical remains of historic and archaeological features in the landscape. This includes records of sites or features that have not been designated at a national level, but may still be important to the understanding of local history and archaeology. CPAT has generated local data, including the historic settlement cores, the lines of Offa's Dyke, lines of roman roads, areas of strip fields and ridge and furrow, traditional farm buildings, mapping of Cistercian landholdings, and boundaries of unregistered historic parks and gardens. CPAT's database also provides links to 250,000 digital images and metadata, site plans and transcribed from aerial photography. This information is not currently available on Archwilio. However, it will be used by CPAT to advise on the potential historical or archaeological impacts of development proposals. This emphasises the importance of early consultation with CPAT in order to identify any records that may be relevant to a development proposal.

Archaeological evidence

The HER contains event records about various archaeological interventions, such as excavations, evaluations, surveys, recording exercises and assessments or details of field visits to sites. This will provide information on any past archaeological work that has been undertaken on the site itself or within its surroundings. Such works may indicate that the archaeological resource of the site has previously been assessed and it may be appropriate to use this information to inform development proposals. It may also indicate the potential for further archaeological remains to be discovered during development, particularly on land adjacent to those works. See the Archaeology SPG for further guidance on archaeological works.

LANDMAP historic landscape areas

The HER provides access to the LANDMAP historic landscapes layer by linking to the Natural Resources Wales website showing survey details for the historic landscape aspect area. It provides details on monitoring of the information relating to the area, description of the aspect area, overall evaluation, recommendations, and evaluation matrix (based on integrity, survival, condition, rarity, and potential) including the justification for the overall evaluation.

The summary description provides information on the key/patterns and elements of the area in landscape terms. The record will provide information on the historical development of the area, significant periods and types of buildings, surviving elements, boundary types, the nature of any significant archaeological interest, historical associations, and whether there are any historic environment designations within the area. Reference should also be made to the guidance on how to use LANDMAP for landscape purposes provided in the Landscape SPG.

Historic battlefields

The HER provides access to the Inventory of Historic Battlefields in Wales which is compiled and maintained by the Royal Commission on the Ancient and Historical Monuments of Wales on behalf of Cadw. The HER is required to provide details of every conflict site in an

authority's area which the Welsh Ministers consider to be of historic interest. Conflict is defined as a) a battlefield or a site on which some other conflict involving military forces took place; or b) a site on which significant activities relating to a battle or other such conflict as mentioned in a).

The inventory focuses on the location of the battle, however it should be noted that the location of some battlefields are uncertain or disputed, and some are more precisely defined than others. 47 of the historic battlefields on the list have been subject to further investigation, such as documentary and historical research or non-invasive and invasive fieldwork.

Developments may directly impact on historic battlefields by involving works to the site, and may also have the potential to impact on the setting of a historic battlefield, thereby affecting the understanding and appreciation of the historic battlefield. The presence of a historic battlefield near the development site may indicate the potential for archaeological remains and therefore for archaeological work to be undertaken (see Archaeology SPG).

List of Historic Place Names

The HER provides access to the statutory list of historic place names. The list is, primarily, used by the local authority when considering applications for the naming and renaming of streets and properties. This function is carried out by the Building Control section of the Council. The list is used as a basis for naming of new streets or other developments and is also used to inform decisions to re-name existing properties.

The list can also be a useful source of information when considering the impact of development for the historic environment. The list contains historic names of geographical features, settlements or individual properties and, therefore, provides useful information on the historical development of a community or place. Place names often reflect the origins of an area or building, or their location, and may provide an indication of past uses.

Photographs

The HER provides access to photographic records held by CPAT. This includes both black and white and coloured photography, which may be historic or more modern. The photographs may be of buildings or sites, and may show development in progress, or may be in the form of aerial photographs. The details alongside the photograph will give the title of the photograph, based on its location, and will indicate what the photograph shows. Photographs are useful in documenting the historical development of a particular building, site or area. Aerial photography is particularly useful as it provides a sense of the townscape and landscape, and patterns within them, and can also inform considerations of setting.

7.2.5 The HER provides access to a range of records, which may be relevant to the assessment of development proposals against planning policies. It will be particularly useful to inform judgements on whether the proposal respects the historic environment and local distinctiveness. The information on the HER may be used to inform the most appropriate approach towards developing a site, the materials and methods used, along with the proportions, layout and design details of a development. The HER contains records that may also be used to identify whether the development site has any archaeological potential and therefore, whether any preservation, assessment/evaluation or recording will be necessary (see the Archaeology SPG).

7.2.6 The HER should, firstly, be used by the LPA to identify whether a development has the potential to impact on any historic areas, sites or features. The information held on the HER can then be used to consider the significance of the area, site or feature, and to consider the likely impact of the proposal on that significance. Where a development is judged to impact on any non-designated historic assets recorded on the historic environment record, the LPA will consult with CPAT for advice on the use of the record in decision-making. CPAT also checks weekly planning lists against the HER database to identify where consultation is necessary.

7.2.7 Consultation with CPAT will inform the LPA's judgement on the significance of any area, site or feature of historical or archaeological interest and on the likely impact of the proposal on that significance. CPAT will also advise the LPA on how impacts on the historic assets identified could be avoided or mitigated. The LPA may request amendments to development proposals in order to avoid or mitigate harmful impacts on historic assets.

7.2.8 In considering the significance of a particular historic asset, it should be noted that whilst many of the records contained on the register may not relate to historic assets of national importance, these assets may be of local significance. Therefore, these local assets may be considered to be significant in terms of the contribution that they make towards local distinctiveness. Where possible, such assets should be retained and safeguarded within development proposals.

7.2.9 The acceptability of any development proposal affecting local historic assets will depend on the judgement made by the LPA, informed by CPAT advice, on their significance relative to other planning factors, including the need for the development. Measures may be needed to ensure preservation of the asset as part of the development proposal. Alternatively, sensitive restoration/alteration of the asset may be needed, or new developments may need to be designed to respect local character. In cases, where it is not possible to retain assets, it may be necessary to record the building or feature(s) before works can commence (an explanation of building recording and photographic surveys is provided in the Archaeology SPG).

7.2.10 The HER has already been used, through consultation with CPAT, at the plan-making stage of the LDP in order to assess the historic environment implications of sites that were put forward for allocation as part of the Powys LDP process. The implications of any sites taken forward as allocations into the adopted plan for the historic environment, including for archaeology, will need to be considered at the planning application stage. Where relevant to particular sites, these considerations are set out within the issues column of Appendix 1 of the LDP. It should be noted that the HER should continue to be checked for any updated information or new features that may have been added to the HER since the LDP was prepared.

7.2.11 The HER is also intended to be used to provide evidence to inform proposals to renovate abandoned dwellings under LDP Policy H8. This policy requires the design of the dwelling to take reference from any recorded evidence of the architectural or archaeological interest or, where this evidence is not available, to reflect the local vernacular. The use of the HER in these circumstances may provide site-specific information relating to the historical development and character of the former dwelling, which can be used to inform the design of the renovate dwelling. If this site-specific information is not available, the HER can be used to identify local characteristics and examples of other buildings of local vernacular to inform the design of the renovated dwelling.

8.0 Monitoring and Review

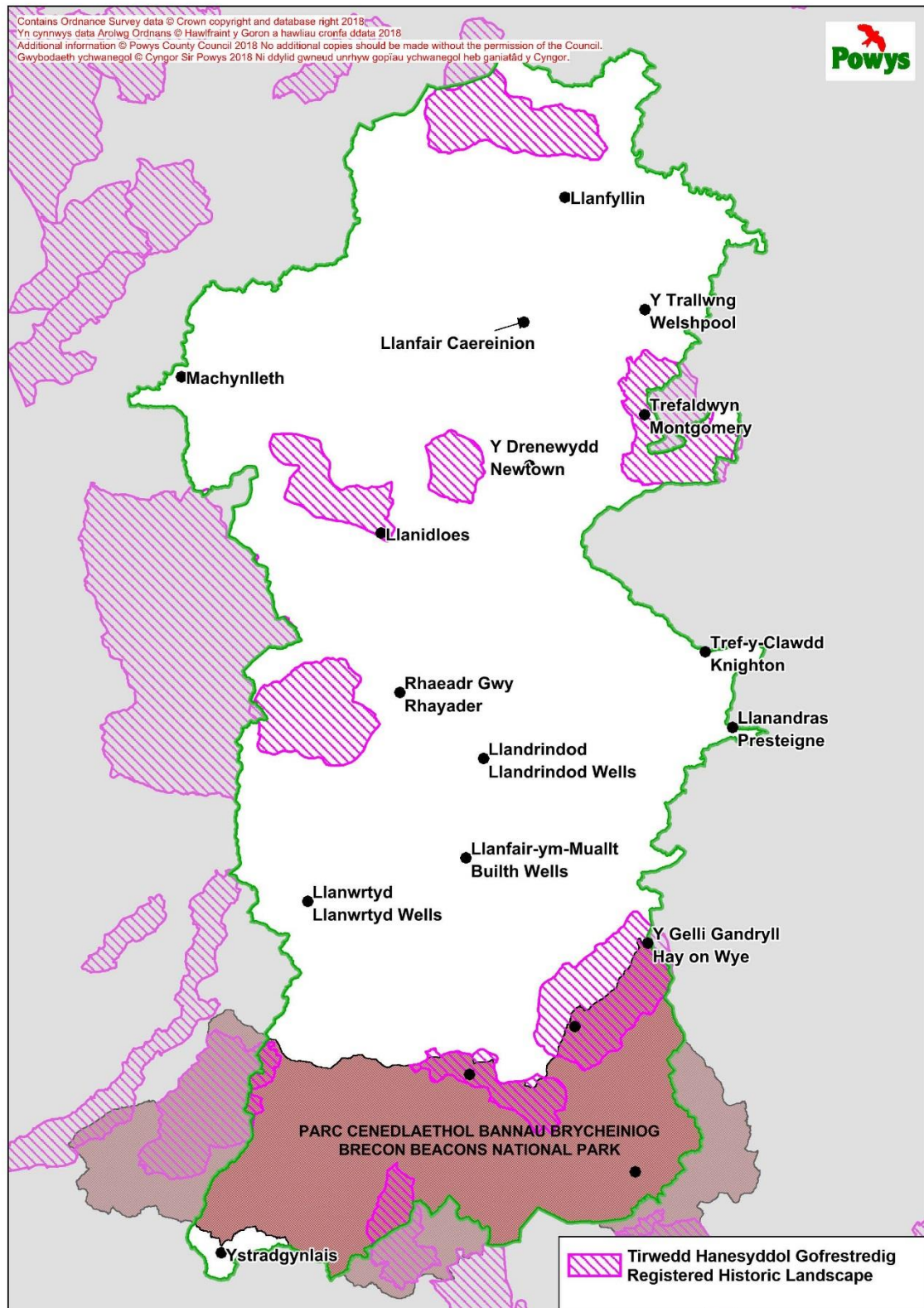
8.0.1 The implementation of the LDP's policies relating to the Historic Environment through developments permitted under the LDP will be monitored annually and reported in the LDP's Annual Monitoring Report (submitted to the Welsh Government by 31st of October each year following adoption of the LDP). This monitoring includes an indicator (AM43) that monitors developments permitted that affect the strategic assets and resources identified by policy SP7. In particular, developments permitted against the advice of a statutory consultee or relevant Council Officer will be captured through this monitoring. A separate indicator monitors developments within or affecting the setting of a Conservation Area.

8.0.2 The LDP's Strategic Environmental Assessment will monitor the longer term effects of delivery and implementation of the LDP, for instance, the impact on environment and resources, such as historic environment designations. It includes monitoring which will record the net gain or loss of historic environment designations, the proportion of scheduled monuments that are in stable or improved condition and the percentage of listed buildings that are neither vulnerable nor at risk.

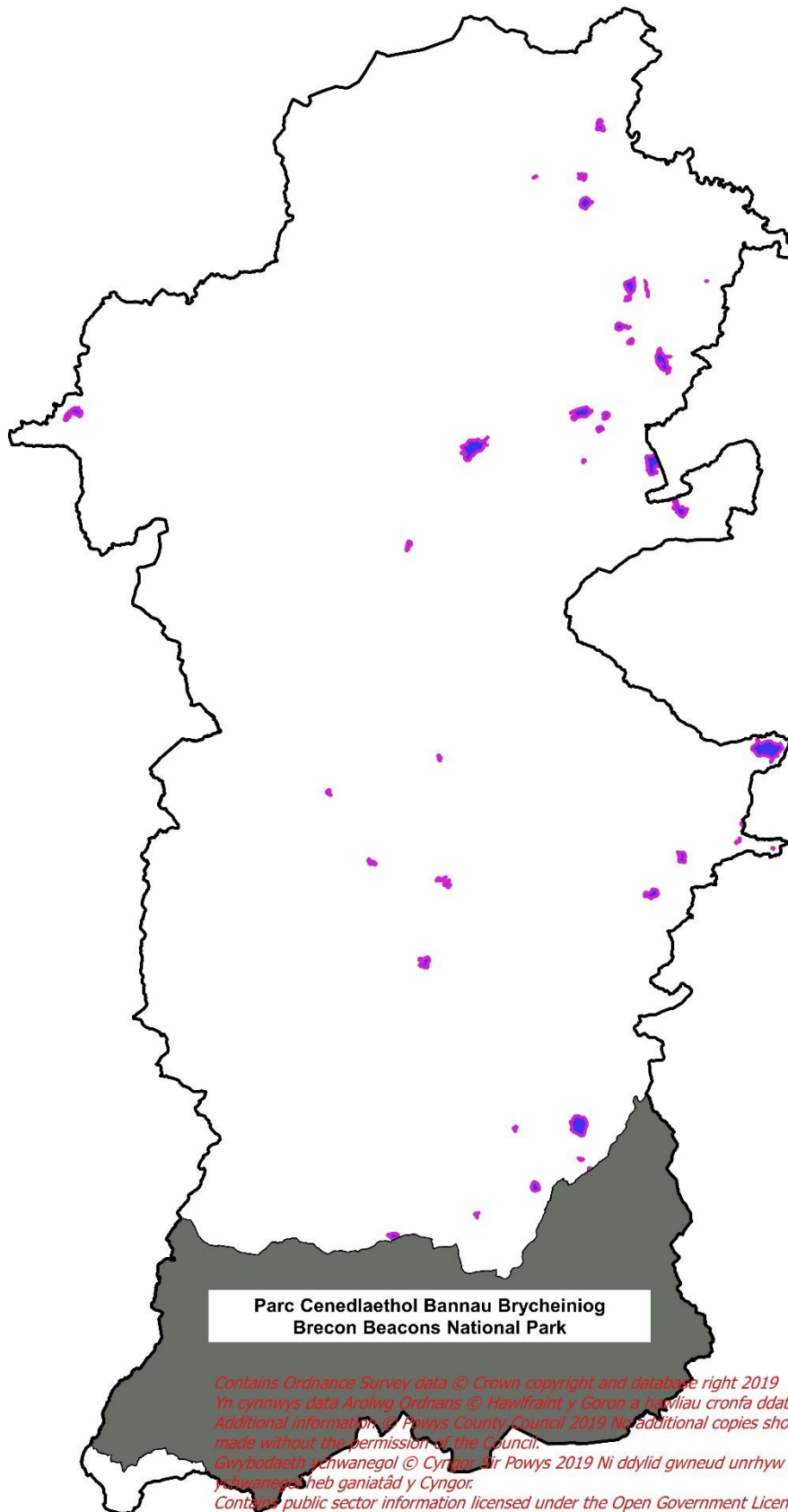
8.0.3 Consideration will be given to the correct use of the Historic Environment Record, along with the quality of Heritage Impact Statements and Design and Access Statements, through consultation responses received from Cadw, CPAT and the Built Heritage Conservation Officer, appeal decisions, and by comparing the assessments with completed developments.

8.0.4 The results of this monitoring will inform future review of the LDP's policy requirements relating to the Historic Environment. This will include consideration of any relevant changes to the national and local context. This SPG will be kept under review and, where necessary, updated to take into account changes in any relevant policy, guidance, evidence or circumstances, and in response to relevant issues raised with the SPG in practice.

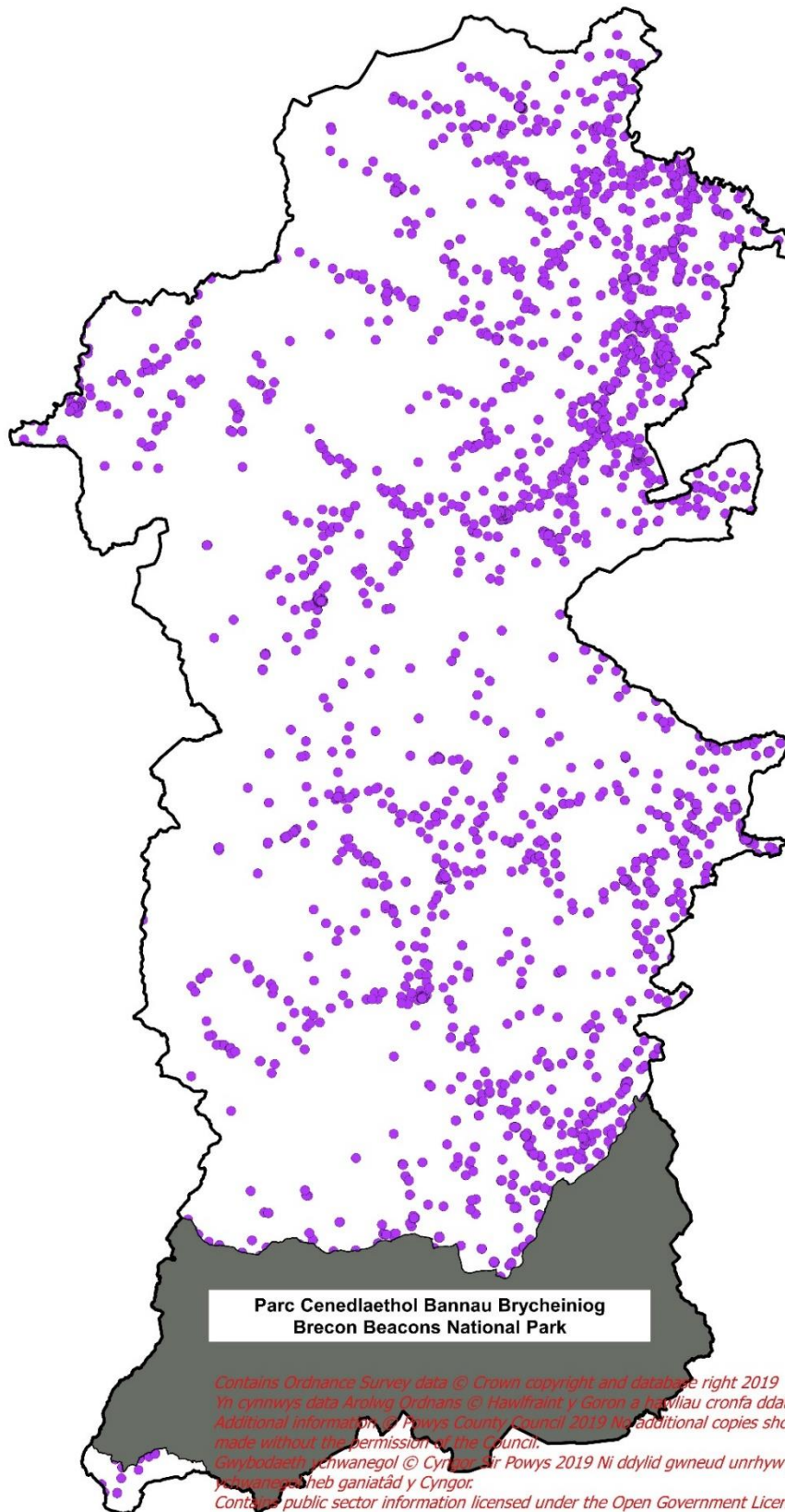
APPENDIX 1 Location of Registered Historic Landscapes in the Powys LDP area



APPENDIX 2 Location of Registered Historic Parks and Gardens in Powys LDP area



APPENDIX 3 Location of Listed Buildings in the Powys LDP area



APPENDIX 4 Planning-related assessments

Developments requiring Environmental Impact Assessment

A formal Environmental Impact Assessment (EIA) may be necessary for certain types of development (listed in Schedules 1 and 2 to The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017).

EIA is automatically required for any development listed within Schedule 1 of the regulations. In deciding whether EIA is required for Schedule 2 development, the selection criteria set out in Schedule 3 of the EIA regulations refers to landscapes of historical, cultural or archaeological significance. For instance, the location of a development within a Registered Historic Landscape indicates that it is within an environmentally sensitive location where there is potential for significant effects. In determining whether an EIA is necessary, the LPA may seek advice from Cadw, CPAT or NRW.

Where EIA is required, the developer must provide an Environmental Statement setting out the information specified in Schedule 4 of the regulations about the site and the likely significant effects of the proposed development on the environment. This should include a description of the aspects of the environment likely to be significantly affected by the development, including the architectural and archaeological heritage, and landscape.' Where Registered Historic Landscapes are concerned, assessors should follow the ASIDOHL2 process (see below). Cadw will advise on the scoping and the adequacy of the statement and assessment process in relation to information contained with the EIA regarding Registered Historic Landscapes.

ASIDOHL2

ASIDOHL stands for Assessment of Significance of the Impact of Development On Historic Landscapes. Reference to '2' reflects the revisions to the assessment process set out in the revised second edition of the [Guide to Good Practice on Using the Register of Landscapes of Historic Interest in the Planning and Development Process](#). Guidance on the methodology to be used for this staged assessment process is set out in the Technical Annex to the good practice guidance. Accompanying the guidance is a [Historic Landscapes Assessment Form](#) that can be used to summarise the assessment process. A professional archaeologist or landscape architect with expertise in historic landscapes should undertake the assessment.

The ASIDOHL2 process is mandatory for EIA applications with likely impacts on Registered Historic Landscapes. Where EIA is not required for a development, it will be a matter for the LPA to determine the level of assessment required of the impact on the historic landscape, which may in particular circumstances require a full ASIDOHL2 or part of the ASIDOHL2 process. Applicants should contact Cadw for guidance on the application of the process and technical requirements.

Developments requiring Heritage Impact Assessment

The Historic Environment (Wales) Act 2016 requires Listed Building Consent and Conservation Area Consent to be accompanied by a Heritage Impact Statement (HIS). This aims to ensure that the significance of the historic asset is taken into account when developing and designing proposals. The HIS is informed by the process of undertaking a Heritage Impact Assessment (HIA), which is aimed at assisting with the design of appropriate development by assessing the impact on significance. The process and

outcome of the stages explained in section 6 should be included in the HIS. Further guidance on HIA can be found in Cadw's best-practice guidance *Heritage Impact Assessments in Wales*.

Assessment for Development requiring DAS

The Town and Country Planning (Development Management Procedure) (Wales) Order 2016 requires applications for major development and, in Conservation Areas, development for one or more dwellings or for provision of buildings with floorspace of 100 square metres or more, to be accompanied by a Design and Access Statement (DAS). Where development affecting the historic environment is involved, the DAS must cover the standard aspects expected of a DAS, but it must also address how the proposal relates to its particular special context. Therefore, the DAS must consider the historic environments assets affected by the proposal. A DAS is required to demonstrate the steps taken to appraise the context of the development and how the design of the development takes the context into account. The process and outcome of the stages explained in section 6 should be included in the design development section of the DAS. Further detailed guidance on DAS can be found in the Welsh Government/Design Commission for Wales document *Design and Access Statements in Wales: Why, What and How*.

Assessment for other applications

For developments that do not require any of above-mentioned statements, this guidance encourages the use of Planning Statements to set out how proposals affecting the historic environment have been considered, designed and assessed. By following the process and principles set out in this guidance, this will assist applicants to design appropriate proposals and the LPA to make informed planning decisions. It should be noted that the LPA is able to request further information where the proposed development is likely to have an impact on a designated historic asset or on design matters. This may, in some instances, involve the need for a HIS or further design information similar to that expected of a DAS. Information requirements should be established and agreed in consultation with Cadw and CPAT at the pre-application stage.

Assessment of impact on setting

For developments that are likely to impact on the setting of historic assets, an assessment will need to be carried out of this impact. The assessment will require a visual assessment of the development from a range of viewpoints, including any important historic or modern viewpoints. Photomontages and maps showing zones of theoretical visibility may assist with this assessment. Details of proposals to mitigate any adverse impacts should also be included in the assessment. The results of the assessment of setting may form part of the Heritage Impact Statement (see above). Further detailed guidance on matters of setting can be found in Cadw's best-practice guidance *Setting of Historic Assets in Wales*.

APPENDIX 5 Contacts

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Welsh Historic Gardens Trust

<http://www.whgt.org.uk/>

National Amenity Societies

Council for British Archaeology

<http://new.archaeologyuk.org/>

Ancient Monuments Society

<http://ancientmonumentsociety.org.uk/>

Society for the Protection of Ancient Buildings

www.spab.org.uk/

Georgian Group

www.georgiangroup.org.uk1700

Victorian Society

www.victoriansociety.org.uk

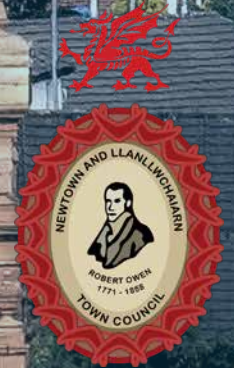
Twentieth Century Society

www.c20society.org.uk

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CYNLLUN LLE Y DRENEWYDD A LLANLLWCHAEARN
EIN TREF, EIN CYNLLUN!

NEWTOWN & LLANLLWCHAIARN PLACE PLAN
OUR TOWN, OUR PLAN!



*Created with
the
community*

DRAFT
OUR TOWN, OUR PLAN!
NEWTOWN & LLANLLWCHAIARN PLACE PLAN
2021-2036

Version 4.3
Adopted By Powys County Council As Local Development Plan,
Supplementary Planning Guidance, July 2021 (tbc)

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Foreword

I am pleased to introduce the Newtown and Llanllwchaiarn Place Plan.

Newtown has not been short of plans for its future. The Development Board for Rural Wales in the 1970s and 1980s shaped the town that we live in now. A succession of Local Development Plans since then established land use plans that are still current and influence current developments. These plans, drawn up by professionals in their fields, were strategic, top down and followed strict planning processes.

This Place Plan however is the first that comes from the people of Newtown. It has been brought together not by just consultation but by the town residents, businesses and organisations being fully involved in its production and its ideas. I very much hope that it will be instrumental in helping the town grow and develop in a way that its residents wish. It is interesting to note that residents are not seeking to restrict growth as may be the case in some areas, but are instead seeking changes that are sympathetic to Newtown's place as an employment and trading centre rooted to its unique position in Mid Wales.

The plan has already provided evidence to attract investment into the town. I hope and indeed expect that this will be a continuing and welcome result of its production.

I thank all those who have been involved in its production, in particular Cllr Richard Edwards and Sorelle White from Newtown and Llanllwchaiarn Town Council who led the process and without whose dedication this plan would just have been an unfulfilled "good idea".

More than anything, I look forward to Place Plan's ideas, and aspirations leading the development of our town for many years ahead.

Cllr David Selby
Mayor of Newtown and Llanllwchaiarn
(Jan 2021)



Cllr. David Selby
Mayor

When I first heard of the idea of Place Plans I thought this could be a useful tool for our community, to be used as a way to plan for and help shape the future of Newtown. There have been many plans for Newtown over the years and I have heard time and again from residents how, for example financial security, feeling safe, physical and mental well-being and being able to get out and about, are important to them and the community. It is easy to fall into the trap of thinking that because we feel we have no influence in particular areas of life in our communities we should not get involved in the very thing that would allow us such influence in the future. Happily this has not been the case here; over the 18 months of the consultation - listening to the residents' ideas and comments regarding Newtown - we had 48 local organisations contribute and over 7,000 comments received from individuals within the community. This really is "Our Town, Our Plan".



Cllr Richard Edwards
Lead Councillor,
Place Plan

Our plan will also fit in with and influence other plans in both Powys and Wales-wide using a bottom up community-led approach, working both regionally within Powys and at a strategic level for Wales as a whole. We must also look to the next Powys Local Development Plan and help shape that much more than our community has previously done. Will it make a difference? I believe so; from speaking to many residents it is plain that we want a town and community that is prosperous and resilient, to be a good place to live, raise our families and allow Newtown to develop in a way that is sustainable.

We started work on the Place Plan long before we had all unfortunately become familiar with Covid-19. Covid has thrown up new problems to solve, but it has also accelerated the change that was already taking place in Newtown, especially in the town centre.

A lesson from history shows that we have always been good at reinventing Newtown, be it with the first Newtown established in 13th Century, the coming of the canal and flannel and textile industry, the regeneration starting in the 1970s, and more recently with the new by-pass. Now it is necessary to do so again, looking to the trends of the 21st century; developing our town in a sustainable way that will promote, not hinder, economic development, but accepting the challenges and rising to them. And with this Plan we have built up policies, projects and an evidence base that can be used by local government, private businesses, organisations and individuals to plan projects and seek inward investment for Newtown. Of course it won't solve every problem, but it does suggest a way forward helping us to create a town where people want to live, work and visit.

Cllr Richard Edwards
Lead Councillor, Place Plan.

On behalf of the officers of the council may I welcome you to the first Place Plan for the community of Newtown and Llanllwchaiarn – indeed the first Place Plan to be adopted by the Powys Planning Authority.

With the backing of the community, the town council and the county council, the Plan is born of the community's own ideas and priorities for its own future. It is a product of the largest public participation exercise of recent years, and one cannot fail to be impressed by the enthusiasm and efforts of everyone who took part and embraced the idea of 'Our Town, Our Plan'.

Though starting out as something concerned only with land use and the built environment, the Plan has an expanded scope, taking in 'health, wealth, and well-being' so that it reflects the community's wider aspirations and intentions. Throughout the process the community has developed a sense of place and provided evidence of its own depth and breadth of community assets.

Looking forward, the Place Plan also provides a foundation for forming a Town Partnership of the Private-Public-Voluntary sectors in Newtown and Llanllwchaiarn – one which can influence far greater than each alone.

I would like to thank the town council officers for their dedication, commitment and sheer hard work which sometimes went well beyond day to day expectations. I also thank the town councillors for their support and patience during the preparations, the county council for its co-funding and professional advice, and Planning Aid Wales and Place Studio, for their expert support and guidance. Most significantly, it being a community-led plan, I acknowledge the members of the public and the business, voluntary and public sector organisations who have contributed to the work. To all of them I say thank you for making the work of the councillor and staff team more interesting, fulfilling, far-reaching, and I hope effective.

I hope you find it interesting, empowering, and useful.

E J Humphreys
Town Clerk



EJ Humphreys
Town Clerk

Thanks

"Our Town, Our Plan! Newtown & Llanllwchaiarn Place Plan" 2021-2036 produced by:
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Publication date: (to be added)

Access digital copies of the plan and supporting evidence at:
www.newtown.org.uk

Supported by: Powys County Council
Consultants: Planning Aid Wales and Place Studio

Thanks to:

- The people of Newtown & Llanllwchaiarn
- Stakeholder organisations (see list of organisations in "Community Involvement" section)
- Volunteers who contributed significant time collecting evidence
- The Place Plan consultants
- Powys CC, Planning Policy Team
- Powys CC, Regeneration Team
- Town Council Councillors & Officers
- The Newtown Community Action Plan Team
- Cyfathrebiadau Anwen Francis Communications

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Photos: Saul Beck (SB), Dan Boyington (DB), Tara Davies (TD), Dragon UAV (DU), Russ Edwards (RE), Newtown & District Civic Society (CS), Newtown & Llanllwchaiarn Town Council (TC), Open Newtown (ON), Sorelle White (SW).

Cover: Photo - Russ Edwards, Clock Tower Logo - Georgia Williams



Planning Aid **Wales**
Cymorth Cynllunio **Cymru**

Introduction

ABOUT NEWTOWN & LLANLLWCHAIARN

Newtown & Llanllwchaiarn is located in the county of Powys, within the historic boundary of Montgomeryshire, and on the picturesque upper reaches of the River Severn. It comprises two settlements: the larger market town of Newtown and the smaller settlement of Llanllwchaiarn. The combined population is 11,357 ¹.

Tounded by Edward I in 1297 as an administrative centre with Charter Market status and designated a new town in 1967, Newtown may be Britain's oldest "new" town! Newtown & Llanllwchaiarn benefits from location and size – on the junction of east-west / north-south road and rail links, and the largest town in Powys.

The community is an industrious one. The town grew strongly with the expansion of the woollen industry in the early 19th century. It was an international hub for the flannel industry.

The old Flannel Exchange survives to this day as an entertainment venue.

Social reformer and industrial pioneer Robert Owen was born in Newtown in 1771 and left to seek his fortune ten years later. He returned to the town shortly before his death on November 17th 1858. Owen's ideas have had worldwide influence and became the cornerstone of the international co-operative movement. There is a museum dedicated to Owen's memory in the town centre.

Renowned Welsh / Romani triple harpist, John Roberts, lived in Newtown in the mid 19th Century. He played for Queen Victoria and was awarded the title "Telynor Cymru" - Harpist of Wales.

Newtown is also famous for the birth of the mail order retail business which local entrepreneur Pryce Jones started in the mid nineteenth century by dispatching goods to Britain and Europe from Newtown. His Royal Welsh Warehouse still dominates the townscape. Amongst his customers were Queen Victoria and Florence

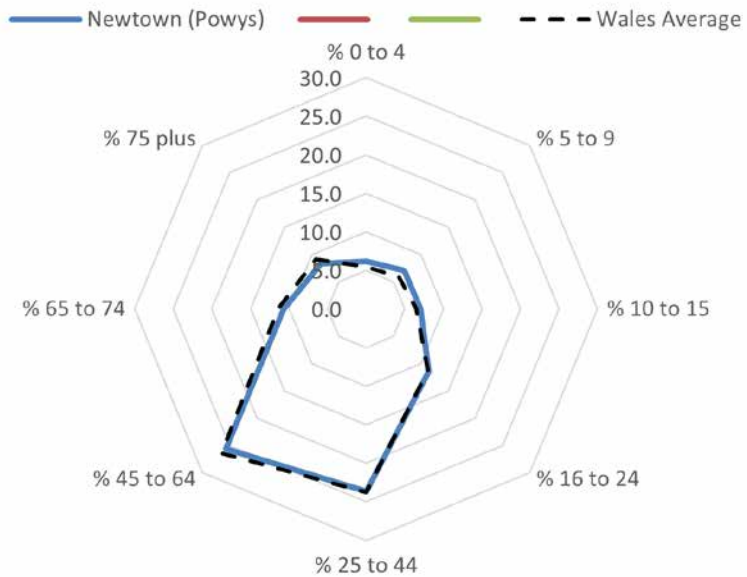


Photo: DU

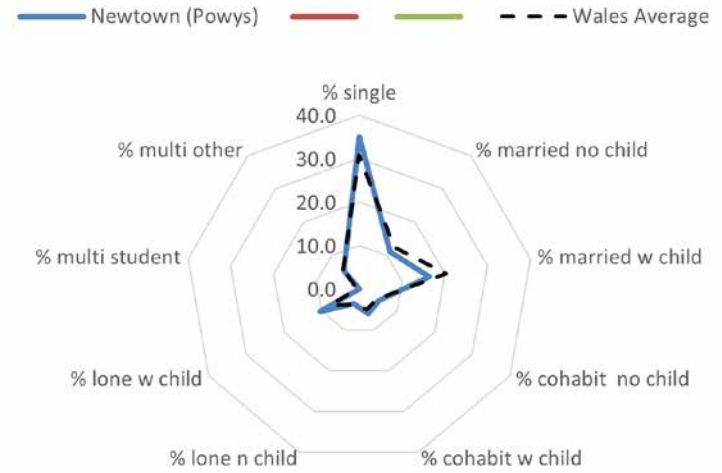
KEY DATA FOR NEWTOWN WITH WALES COMPARISON³

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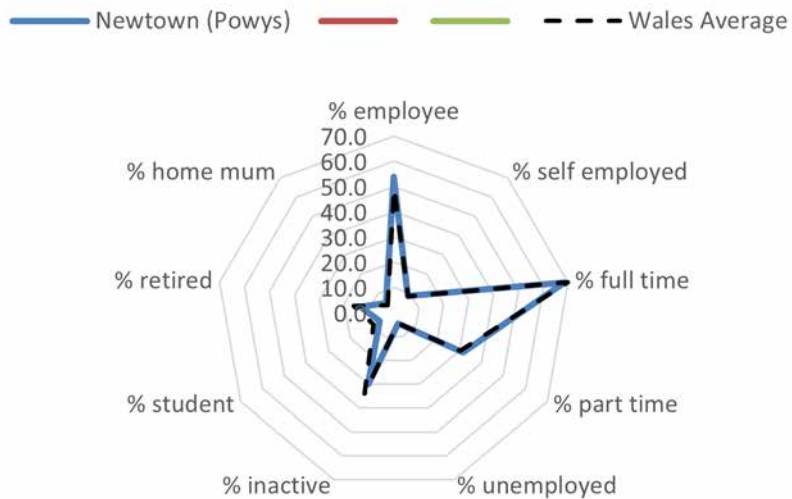
Age Distribution



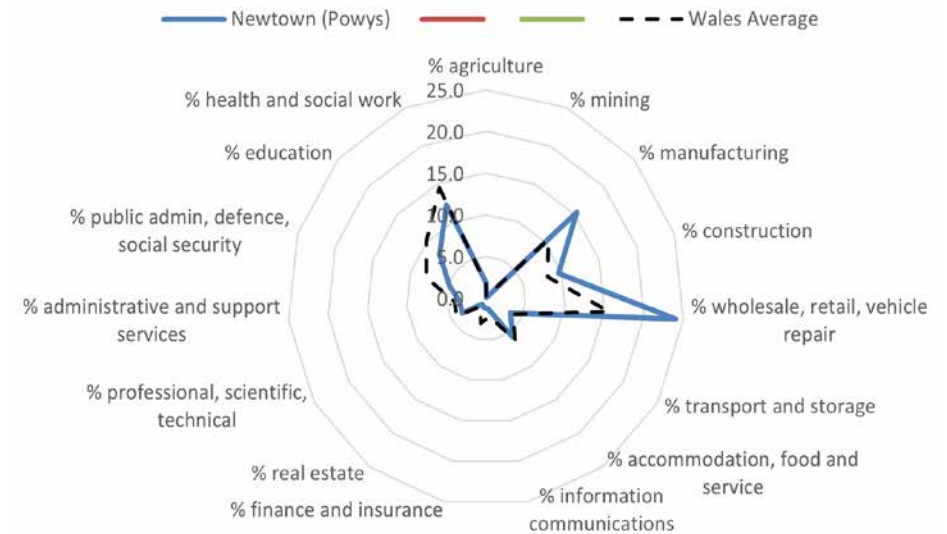
Household composition



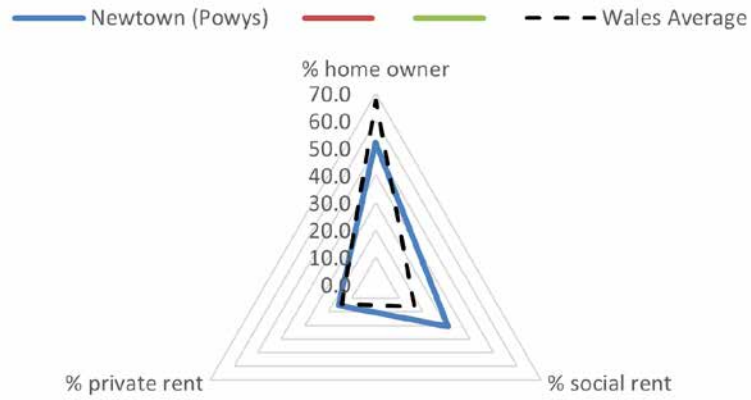
Economic activity



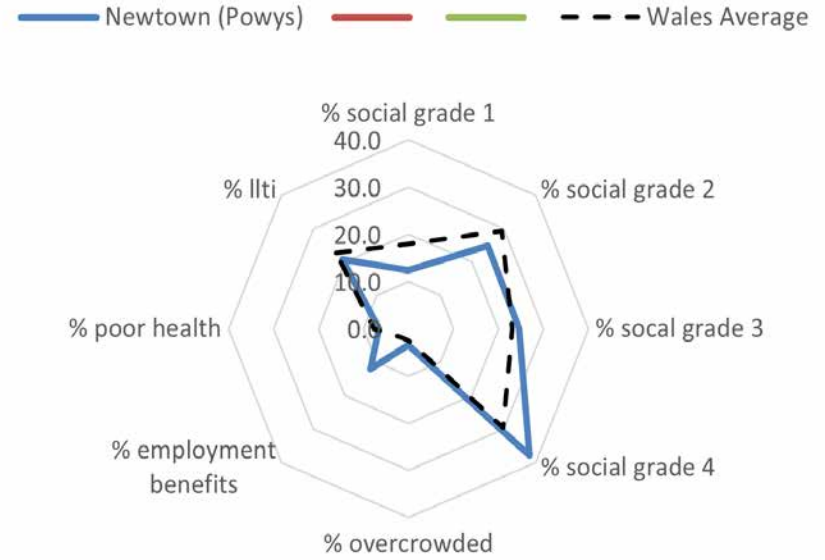
Industry of employment



Housing



Deprivation



A WORLD CHANGED BY COVID-19

“The crisis has drawn into sharp focus the importance of the communities in which we live and the essential services and infrastructure we rely on. Access to green spaces, the importance of local shops, the reliance on digital connectivity, the ability to work at home for those who can and to walk and cycle to work for those who can’t have caused us all to reflect on the things we really value about where we live.” Julie James, Minister for Housing and Local Government, July 2020

Much of the consultation and drafting for the Place Plan was carried out before the impact Covid-19 pandemic in March 2020. The full impact of the virus is yet to be understood, but the crisis has been felt here in Newtown and around the world, by us all: families, workers, care providers, businesses and the vulnerable. Many aspects of our lives and plans have altered dramatically in our new post-Covid-19 landscape. In addition to the challenges, there has also been some positive change in the way people live and work and benefits for the environment. Further details of the impact of Covid-19 in Powys, can be found in the topic chapters.

In Town Planning terms, Covid-19-recovery efforts are currently focused on protecting and expanding our public spaces, rethinking the scale and design of pavements, open spaces and community facilities such as libraries and meeting spaces.

Welsh Government planning priorities for recovery going forward include:

New and improved low carbon council and social housing; investment in local town centres; protection and enhancement of natural resources and investment in active travel. ⁴

“This is a once-in-a-generation opportunity for us to reset the clock and think again about the places we want to live, work and play in. We need to rebuild a greener, cleaner society with decarbonisation and social justice at its heart which respects our environment, whilst giving people good places to live in, which are accessible on foot, bike and public transport”. ⁵

It is likely that some of the policies and projects in the Place Plan will need to be tailored and re-prioritised to match a new way of life now and in the future. For example, where one talks about events, one needs to consider alternative ways of hosting them. There have already been changes to Newtown’s town centre streets to allow more space for people to pass safely and for businesses to make use of outside space. There has also been an increase in the numbers of people walking and cycling, so the quality of our footpaths & cycleways takes on a new importance. When reading the plan, the reader is asked to assume that policies, projects and actions will align with the latest legislation and government guidance, in order to keep the town thriving and the community as safe as possible.

Understanding the Impact of COVID-19 in Powys 'on a page'

In order to consider how Powys may look in the future, it is necessary to clearly see the current situation, what has changed or stayed the same and what this might mean for the County **over the short (6 months), medium (1 year) and long term (5 years).**



Economy

- Business Support** - £46.6m paid out to 4,020 businesses with a further support package to be made available for small charities in Powys
- Employment trends** - 23% of Powys' workforce (13,100 employees) furloughed. From March to May claimant count increased 156% (+2,225) in Powys
- Impact on key sectors** - Accommodation & food services have been the worst hit since COVID-19, with an estimated fall in GDP of 92%

- Short, medium, long term** March and April 2020 compared to 2018 Powys, it is estimated that:
 - Short term** Powys' GVA decreased by 24.5% with 25.2% fewer jobs
 - Medium term** Powys' GVA decreased by 11.8% with 18.1% fewer jobs
 - Long term** Powys' GVA decreased by 4.4% and 7.3% fewer jobs

Capable, confident & fulfilled residents

- Pupil and student trends** – 16 childcare hubs, 307 pupils accessing. 1,413 devices and MiFi dongles distributed
- Free school meals**- 14% increase in students who are eligible, 20% increase in free school meal take up since Sept 2019
- Well-being of pupils and students** - Demand for children and young people's counselling service increased by 60 referrals since lockdown to 190 active cases

Short, medium, long term
The impact on children, young people and education staff is yet unknown

Vibrant, connected & resourceful communities

- Volunteers** - 372 health and care volunteers across PCC and PTHB. 66% volunteer increase on powys.volunteering-wales.net
- Community provided services** - 5,504 vulnerable persons in Powys communities are recognised
- Environmental impacts** - massive reduction in airborne pollution, most noticeably reduction in Nitrogen Dioxide (NO2) and particulate matter

- Short, medium, long term**
 - Short term** Communities with high numbers of vulnerable persons continue to need additional help
 - Medium term** A possible rise in the need for food banks in the most 'financially stretched and urban adverse' areas
 - Long term** Risk that smaller Environmental NGOs may be lost without additional funding

High Performing & well run council

- Financial outlook for the council** - potential £16m deficit for financial year 2020/21. 201 staff furloughed recouping £206k March-May
- Service Performance Impacts** – Significant changes to the way the council is operating. +1,100% daily VPN connections, +634% in Teams activity
- Well-being of staff** – 562 staff have responded so far. 66% staff reported they have increased productivity and 70% have better work/life balance

Short, medium, long term
Short term Significant loss of income
Medium and long term Revisit our MTFs, austerity means we are likely to have a significantly worse financial settlement in future years

Residents start well, live well & age well

- Referral numbers** – Referrals to Adult social care increased by 11%. Children's referrals have reduced, mostly because of the schools closures (schools usually refer 10%) this could imply a safeguarding risk to young people
- Homelessness and housing impacts** – 112 homeless as at 29th May 2020, 119% increase compared to May 2019. 80% of those accommodated are single persons

- Short, medium, long term**
 - Short term** Adult support will continue, delivered virtually where possible
 - Medium term** Referrals will increase. More homeless once private landlords can enforce evictions
 - Long term** Adult social care needs will be met in the community. Increase in homelessness for family groups due to unemployment

Your Place Plan

PURPOSE & BENEFITS OF THE PLAN

Place Plans are a mechanism introduced by Welsh Government for communities to engage creatively with the planning process and for planners to support in place-making initiatives with local people. ⁷

They give communities more of a say in local planning decisions and the development of their local area.

To devise the Newtown & Llanllwchaiarn Place Plan, the Town Council worked with the community, to gather views and evidence on several topics suggested by the community. With the help of planning experts, the Town Council identified ways in which both council and community could address those issues together, through making policies and setting out projects and actions for the next 15 years.

The Place Plan will:

- Influence future planning decisions in the town.
- Identify priorities for investment
- Create a body of evidence that can be drawn on to attract investment into the town
- Direct the future work of organisations in the town, including the Town Council.

Influencing Future Planning Decisions

The Place Plan will be submitted to the Planning Authority (Powys County Council) for adoption as Supplementary Planning Guidance (SPG). SPG provides *“detailed planning guidance for policies and proposals in the adopted Powys Local Development Plan. Once approved, these will become material planning considerations in the determination of planning applications.”*⁸ So, the Place Plan, as SPG, will provide the County Council with a more detailed understanding of Newtown & Llanllwchaiarn, on which to base its planning decisions. The Place Plan can also help to influence the development of future Local Development Plans.

760 hrs

Estimated hours contributed by the community to the preparation of this plan



The views of the Newtown & Llanllwchaiarn community are at the core of the Place Plan.

Every policy & project in the plan is based on suggestions from the community.



“our Town, our Plan”

Place Plan Boundaries

The Place Plan covers the Community of Newtown & Llanllwchaiarn, as indicated on the map.

There are 5 electoral wards in Newtown & Llanllwchaiarn:

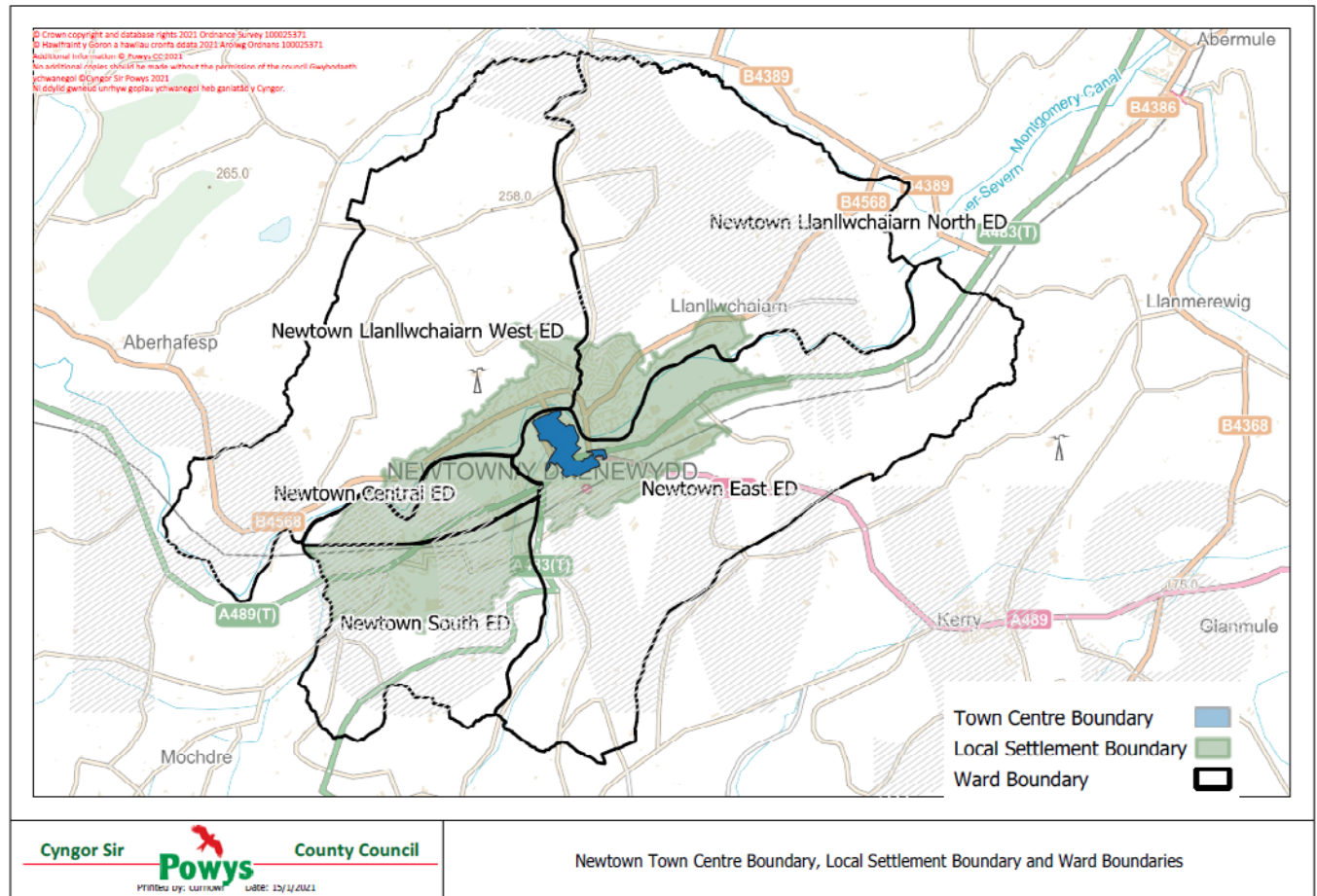
- Newtown & Llanllwchaiarn North
- Newtown & Llanllwchaiarn West
- Newtown Central
- Newtown East
- Newtown South

Many statistics including census data, are based on geographical boundaries called Middle Layer Super Output Areas (MSOAs) and Lower Layer Super Output Areas (LSOAs):

As illustrated in the map in the Appendix, 2 MSOAs cover the Place Plan area:

- Newtown North-East
- Newtown South-West

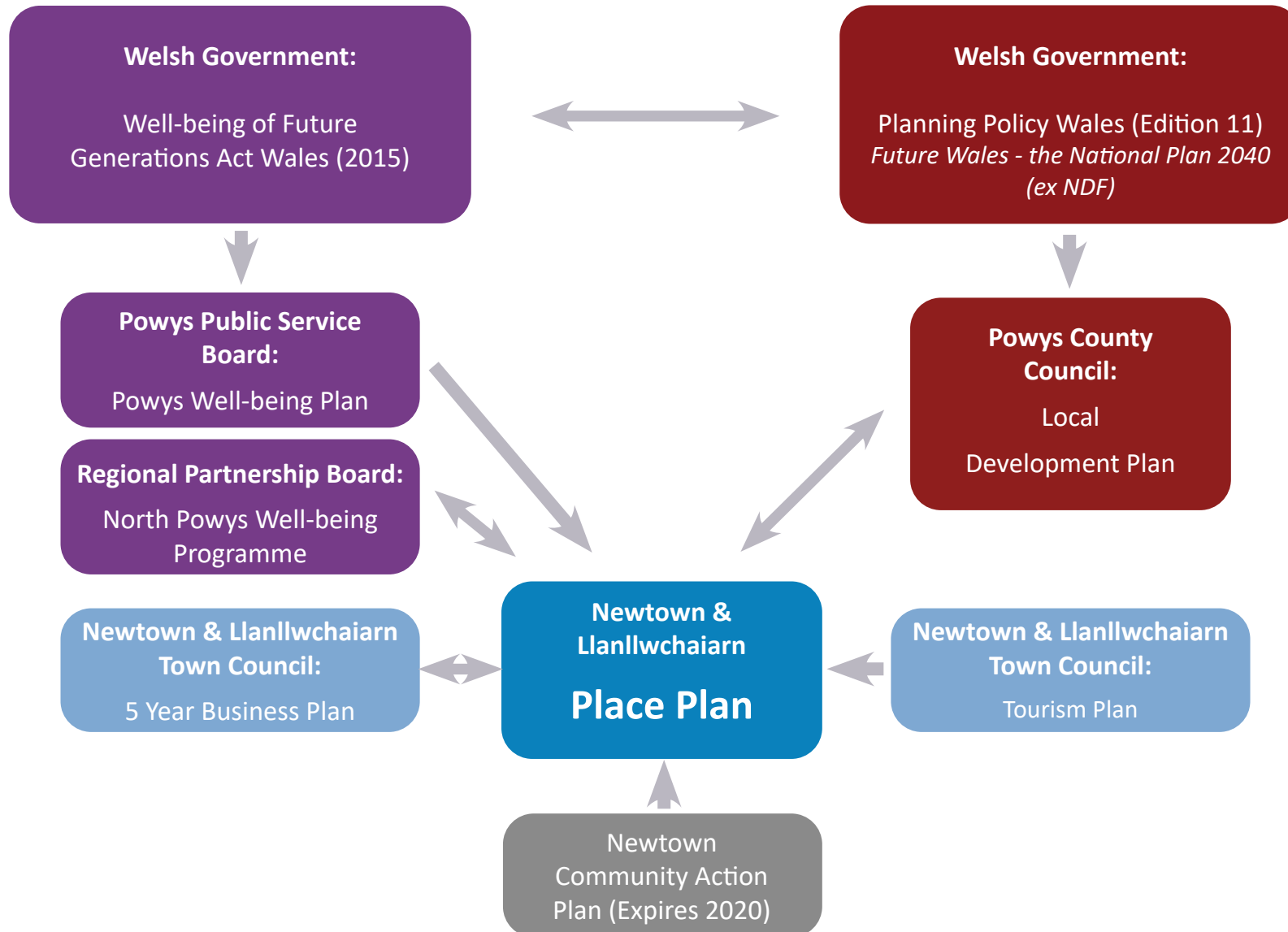
The LSOA areas correspond with the electoral wards.



Map: Newtown & Llanllwchaiarn Community Boundary, Local Settlement Boundary & Town Centre Boundary

Links to other plans

Newtown & Llanllwchaiarn Place Plan - Links to County and National Planning & Well-being Plans



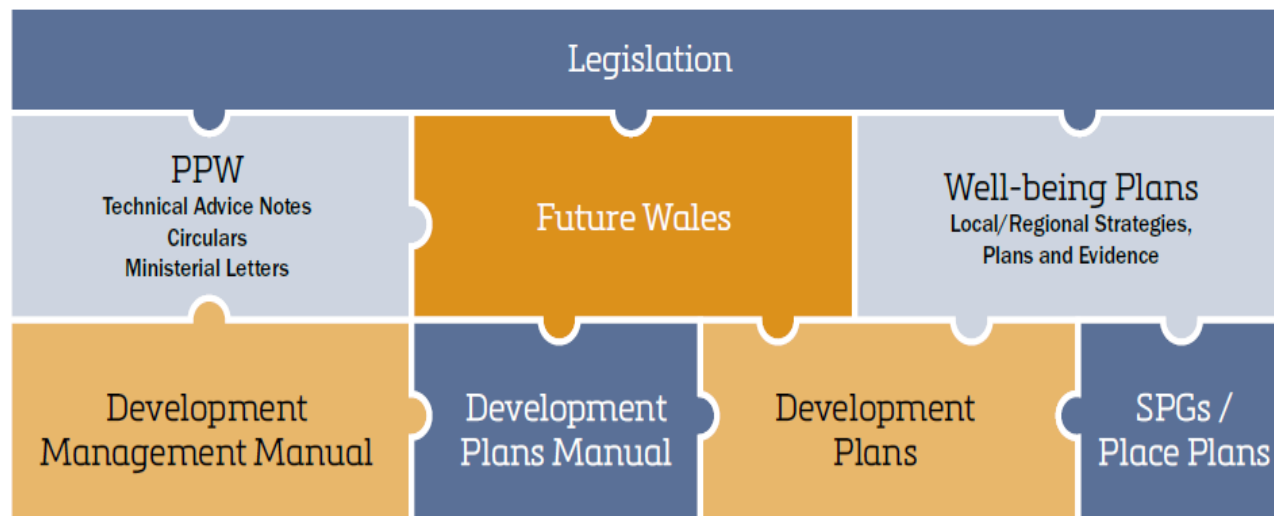
At **NATIONAL LEVEL**, Welsh Government issues national planning policy (currently Planning Policy Wales Edition 11 - [PPW]) and Future Wales – the National Plan 2040. (previously called the *National Development Framework* [NDF]). Sitting alongside these is the Well-being of Future Generations legislation, setting out the national 7 Well-being Goals.

Alongside national Wellbeing and Planning plans and legislation sits the Environment (Wales) Act. These 3 together form a framework for “managing Wales’ natural resources and to improve the social, economic, environmental and cultural well-being of Wales.”³³

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The National Planning Framework⁹

(Planning Policy Wales Edition 11, Welsh Government)



Future Wales – the National Plan 2040 was published in 2021. In the document, Newtown is identified as part of the Bro Hafren “Regional Growth Area”:

*The Welsh Government supports sustainable growth and development in a series of inter-connected towns across the region. Development in these Regional Growth Areas should meet the regional housing, employment and social needs of Mid Wales. The Regional Growth Areas (include): ...Bro Hafren including Welshpool & **Newtown** (from Future Wales – The National Plan 2040).¹⁰*

At **COUNTY LEVEL** sits Powys County Council’s Local Development Plan plus the Powys Well-being Plan and the North Powys Wellbeing Programme. As a larger council, Newtown & Llanllwchaiarn Town Council must by law, take all reasonable steps towards meeting the objectives in the Powys Well-being Plan and report annually on how it did so.

At **TOWN LEVEL** sits:

Town Council 5-Year Business Plan

In 2018, after consultation with the community, the Town Council published its first 5-Year Business Plan. This sets out what the Town Council intends to do each year on a number of different themes, and the Council reports each year, on whether it met its objectives. When the current 5-year plan expires in 2023, it will be replaced by a subsequent 5-year plan, informed by the projects and actions in the Place Plan. The Place Plan differs from the Town Councils own business plan in two key ways:

- it focusses on land use and is intended to be adopted as Supplementary Planning Guidance by the Planning Authority
- it highlights issues and solutions that cannot be addressed solely by the Town Council and which will require partnership working to deliver.

Newtown Community Action Plan (NCAP)

In December 2015, a Newtown Community Action Plan (NCAP) was published by a group of organisations, businesses and individuals under the sponsorship of Powys County Council. It was based on extensive consultation with the public on their priorities and set out what various parties in the town could do between 2016-20. The Town Council delivered on several of the NCAP actions and details of this work can be found in the Town Council's Annual Report 2018/19.

In many ways, the Place Plan follows on from NCAP and the work of the "I Love Newtown" group, in consulting widely with the community, creating more up to date evidence of the needs and aspirations of the town and commencing in 2021, when NCAP comes to an end.



Photo: DU

How did we get here?

Nov 2018: Project Start



Jan 2019: Stakeholder Event

Representatives from local organisations attend a first meeting to share their expertise and suggest what should be included in the Place Plan.



Page 6 of 25

Jan - Sep 2019: Community Engagement

Drop In Events

Workshops

Public Survey

Evidence Collection

Members of the public and stakeholder organisations share their local knowledge, ideas, concerns and aspirations at drop-in events, workshops and a survey. In addition, volunteers go out and collect specific evidence relating to the topics (more details below).



Oct - Nov 2019: Stakeholder Evidence Review

Stakeholders organisations attend 3 meetings to review the gathered evidence and identify priorities for each topic for a first draft of the Place Plan.



Dec 2019 - Feb 2020: Drafting

A first draft of the plan is produced in close consultation with Planning Aid Wales and the Powys CC Planning Policy Team.

How did we get here?

Feb - Mar 2020: Stakeholder Review

Stakeholder organisations give feedback on a first draft of the Place Plan.



Apr - Jun 2020: Project Paused Due to COVID-19 Response Work



Jul - Dec 2020: Drafting

Final draft of plan produced and submitted by the Town Council to Powys CC.



Jan - Mar 2021: Public Consultation

Powys CC issue the Place Plan for public consultation as Supplementary Planning Guidance. Comments are reviewed and appropriate revisions made.



Summer 2021: Adoption & Publication

Powys CC adopt the Place Plan as Supplementary Planning Guidance. The Town Council adopt and publish the Place Plan.

Further details of activities during the different stages of the process, can be found in the consultants reports in the "Supporting Evidence".

Community Involvement



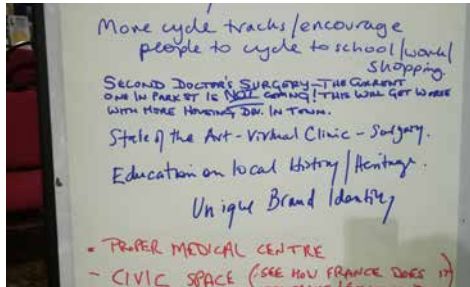
321 event attendances
106 survey responses



Page 684



48 local organisations involved



7,000 comments received (est.)



11 events and **10** stakeholder meetings



The key principle of Place Plans is to put the community at the centre of the planning process. The community of Newtown & Llanllwchaearn were involved from the very beginning of the 2-year process. Consultants, Place Studio, created an effective programme to engage local people.

How Did The Community Get Involved?

- 4 Public Drop in Sessions
- Public Survey
- 2 Youth Workshops
- Stakeholder Events & Meetings
- Volunteers collecting specific evidence

Stakeholders: Shaping and Reviewing The Plan

- At the beginning of the project, over 80 local organisations were invited to contribute to the place Plan. 47 organisations requested to join the mailing list of “stakeholders”. Individuals representing 36 local organisations, then met at Newtown Football Club and laid the foundations for what should be in the Place Plan by suggesting issues that should be addressed. They also started to map out the different areas of the town.
- Later, over several meetings, the stakeholders looked at the collated evidence and used their expertise to identify key points and proposals for addressing the issues raised.
- A first draft of the plan was sent to stakeholders in Feb 2019, to tell us if the information was accurate or had anything missing. 154 comments were returned. These were reviewed by The Town Council, Planning Aid Wales and the Powys CC Planning Policy team and revisions made to the draft plan. All the comments can be seen in the Supporting Evidence.



Photos: TC. Drawings: Treowen CP School Pupils

Sharing Views and Information

- Local people shared their opinions and knowledge at 4 drop-in sessions held between Mar and May 2019 at All Saint’s Church, Newtown High School, Treowen Hall and the Waggon & Horses. Interactive exercises included highlighting on large maps “the good, the bad and the ugly” aspects of the town. Views were also invited on open spaces, play areas, community facilities, housing, footpaths and aspects lacking from the neighbourhood.
- Over 80 young people took part in 2 separate workshops. Representatives from the school councils of 7 local primary and secondary

- schools informed us of the issues they felt were important. Over 50 GCSE geography students shared their knowledge about footpaths, community facilities and open spaces and their aspirations for the town.
- Drawing on all of the previous feedback, a community survey was drafted and open to the public from June to September 2019. The responses helped us gather more evidence for existing topics plus additional subjects such as wildlife, climate, health provision, safety. It also gave local people an opportunity to put forward community projects.

List of Organisations Actively Involved

The following organisations attended an event or meeting, collected evidence or submitted comments on a draft of the Place Plan:

Action For Children (Our Space)	Newtown Youth Club
Bike To The Future	Newydd Housing Association
Bryn Walking	Northside Residents Association
Business Improvement District	Open Newtown
Celf Able	Oriel Davies Gallery
Chamber of Trade	PAVO
Climate Action Newtown	Penygloddfa CP School
Clwyd Powys Archaeological Trust	Ponthafren Association
Cultivate	Powys CC, Active Travel
Cwm Harry Land Trust	Powys CC, Children First
Dementia Friendly Newtown	Powys CC, Cllr David Selby
Disability Powys	Powys CC, Cllr Joy Jones
Friends of the Earth Montgomeryshire	Powys CC, Cllr Daniel Rowlands
Hafren Cycling Club	Powys CC, Education
Hafren Junior School	Powys CC, Highways
Heritage Hub 4 Mid Wales	Powys CC, Housing
Hughes Architects	Powys CC, Planning Policy
Maesyrhandir Primary School	Powys CC, Regeneration
Menter Iaith Maldwyn	Powys Teaching Health Board
Mid & North Wales Destination Network	River Severn Custodians
Mid Wales Housing	Russell George MS
Montgomery Canal Partnership	SharEnergy
Morris, Marshall & Poole	St Michaels School, Kerry
Natural Resources Wales	Theatr Hafren
Newtown & District Civic Society	Treowen CP School
Newtown High School	Wales Co-op
Newtown Library	Walking Newtown
Newtown Rugby Club	
Newtown Sports Clubs	
Newtown Women's Institute	

Gathering Specific "Field" Evidence

Volunteers were provided with questionnaires relating to specific topics in the plan and went out into the town to record detailed information. Types of information that was gathered by the volunteers included:

- Character Area Surveys (photos / observations of features of individual areas of the town)
- Footpaths and cycle paths audits
- Bike racks audit
- Green spaces and play areas audits
- Town centre accessibility survey
- Community Facilities surveys (a record of neighbourhood shops, schools, community halls, churches etc)

Key Numbers!

- No. of events Jan - Dec 2019 **11**
- Additional meetings with stakeholders **10**
- No. of attendances at events **321**
- No. of responses to public survey **106**
- No. of organisations actively involved **48**
- No. of comments received (estimated): **over 7,000**
- Estimated hours contributed by the community: **760**

Plus Town Council / County Council Officers & Councillors time over 2 years.

Delivering Well-being

The **Well-being of Future Generations Act 2015** gives a legally-binding common purpose – the seven well-being goals – for national government, local government, local health boards and other specified public bodies. It details the ways in which these bodies must work, and work together, to improve the well-being of Wales.

Welsh Government's latest Planning Policy Wales Edition 11 also places a strong focus on well-being. It makes it clear that the purpose of the planning system, including LDPs, is to manage the development and use of land in the public interest, contributing to improving the economic, social, environmental and cultural well-being of Wales, to accord with the Well-being of Future Generations (Wales) Act 2015

In its Covid-19-related guidance for the planning system, Welsh Government identifies Local Development Plans as a crucial mechanism for support well-being in the future:

*"The Covid-19 response means that we need to plan effectively for future crises and take a long-term view to improve health and well-being for all. In the planning system it is our local development plans (LDPs) which do this the best."*⁴



Well-being In Newtown & Llanllwchaiarn

Powys residents think of well-being as:

- Being healthy in both body and mind
- Having financial security
- Feeling safe
- Connecting with others
- Being able to get out and about
- Being able to take part in enjoyable activities

They say, the things that promote their well-being are:

- Access to their GP
- Local services like libraries, banks, chemists, leisure facilities, good schools, local shops and restaurants
- A good job, good housing, financial security
- Access to nature and community groups and activities
- Support for the vulnerable ¹¹







Photo: TD

Each of the Place Plan policies and projects will contribute to the delivery of one or more of our well-being objectives.

The well-being objectives are set out below and align with those in the “Powys Well-being Plan”.

Throughout the plan, the icons below will indicate which well-being objective(s) the policies and projects will support.

(Table showing how the Place Plan and the Town Council 5 Year Plan, align with the local objectives of the Powys Well-being Plan and the 7 national well-being goals.)

<p>Local Objectives from 'Towards 2040, the Powys Well-being Plan', - applied to Newtown & Llanllwchaiarn</p>	<p>Town Council 5 Year Plan 2018-2023 Topic Areas</p>	<p>Place Plan – 2021-2036 Topic Areas</p>
 <p>People in Newtown & Llanllwchaiarn will experience a stable and thriving economy</p> <p>Prosperous, Resilient, Healthier, More equal, Cohesive Communities, Language and Culture</p>	<ul style="list-style-type: none"> • Town Centre • Visitors & Marketing • Culture Arts & Events • After The Bypass 	<ul style="list-style-type: none"> • Character & Heritage • Housing and Future Development • Community Facilities • Business, Learning & Employment • Town Centre Experience • Tourism, Culture & Attractions
 <p>People in Newtown & Llanllwchaiarn will enjoy a sustainable and productive environment</p> <p>Prosperous, Resilient, Healthier, Cohesive Communities, Language and Culture, Globally responsible</p>	<ul style="list-style-type: none"> • Green Spaces and the Environment • Residential Areas • Visitors & Marketing • Young People • Culture, Arts and Events • After the By-Pass • Sport and Recreation 	<ul style="list-style-type: none"> • Character & Heritage • Housing and Future Development • Health and Well Being • A Safe & Tidy Town • Open spaces • Active Travel • Climate Change and Biodiversity • Town Centre Experience • Tourism, Culture & Attractions
 <p>People in Newtown & Llanllwchaiarn will be healthy, socially motivated and responsible</p> <p>Prosperous, Healthier, More equal, Cohesive Communities, Globally responsible</p>	<ul style="list-style-type: none"> • Town Centre • Young People • Heritage • Culture, Arts and Events • Sport and Recreation 	<ul style="list-style-type: none"> • Community Facilities • Business, Learning & Employment • Health and Well Being • Open spaces • Active Travel • Climate Change and Biodiversity • Tourism, Culture & Attractions
 <p>People in Newtown & Llanllwchaiarn will be connected by strong communities and a vibrant culture</p> <p>Prosperous, Resilient, More equal, Cohesive Communities, Language and Culture.</p>	<ul style="list-style-type: none"> • Residential Areas • Visitors & Marketing • Young People • Heritage • Culture, Arts and Events • Sport and Recreation 	<ul style="list-style-type: none"> • Character & Heritage • Housing and Future Development • Community Facilities • Business, Learning & Employment • Open spaces • Town Centre Experience • Climate Change and Biodiversity • Tourism, Culture & Attractions

Vision

By 2036 in Newtown & Llanllwchaiarn...

The town has attracted further significant financial investment and has developed as a part of a “Regional Growth Area” as identified in the Welsh Government’s *Future Wales – the National Plan 2040*, with adequate infrastructure to host major services such as the North Powys Wellbeing programme.

People continue to feel **safe** in the town and proud of the level of **cleanliness**. Residential areas are attractive places to live with opportunities to play, relax, and socialise. People of all ages enjoy a range of all-weather / year-round sports and recreational activities.

Residents have increased local access to a wider range of **health** services and access to adequate opportunities and **facilities** to lead active, healthy lives and feel involved in their local communities, including community halls, neighbourhood shops and spaces for young people to meet.

A mix of new **housing** is developed to meet demand with consideration given to developing new areas between the existing **development** boundary and the bypass.

Businesses are supported to provide more sustainable **employment** opportunities. Private and public sector employers continue to work with education and training providers to produce a skilled local workforce.

The vibrant cultural scene is enjoyed by residents and, also contributes to the economy by attracting significant numbers of visitors.

Private, public and voluntary sector organisations are working in partnership for the benefit of the town.

Transport infrastructure and services balance the needs of both the economy & environment.

Place Plan Themes & Objectives

A great place to live, learn & work



1.1 **Character & Heritage**

1.2 **Housing and Future Development**

1.3 **Community Facilities**

(community centres, youth centres, libraries, leisure centres, public swimming pools, indoor recreational facilities, museums, art galleries, theatres, places of worship, colleges, schools, hospitals, surgeries, emergency service stations, courts & neighbourhood shops)

1.4 **Business, Learning & Employment**

1.5 **Health and Well-being**

A Safe & Tidy Town

Green Newtown



2.1 **Open spaces** (includes play areas, outdoor sports facilities & allotments)

2.2 **Active Travel** (walking and cycling) **& Transport**

2.3 **Climate Change and Biodiversity**

Destination Newtown

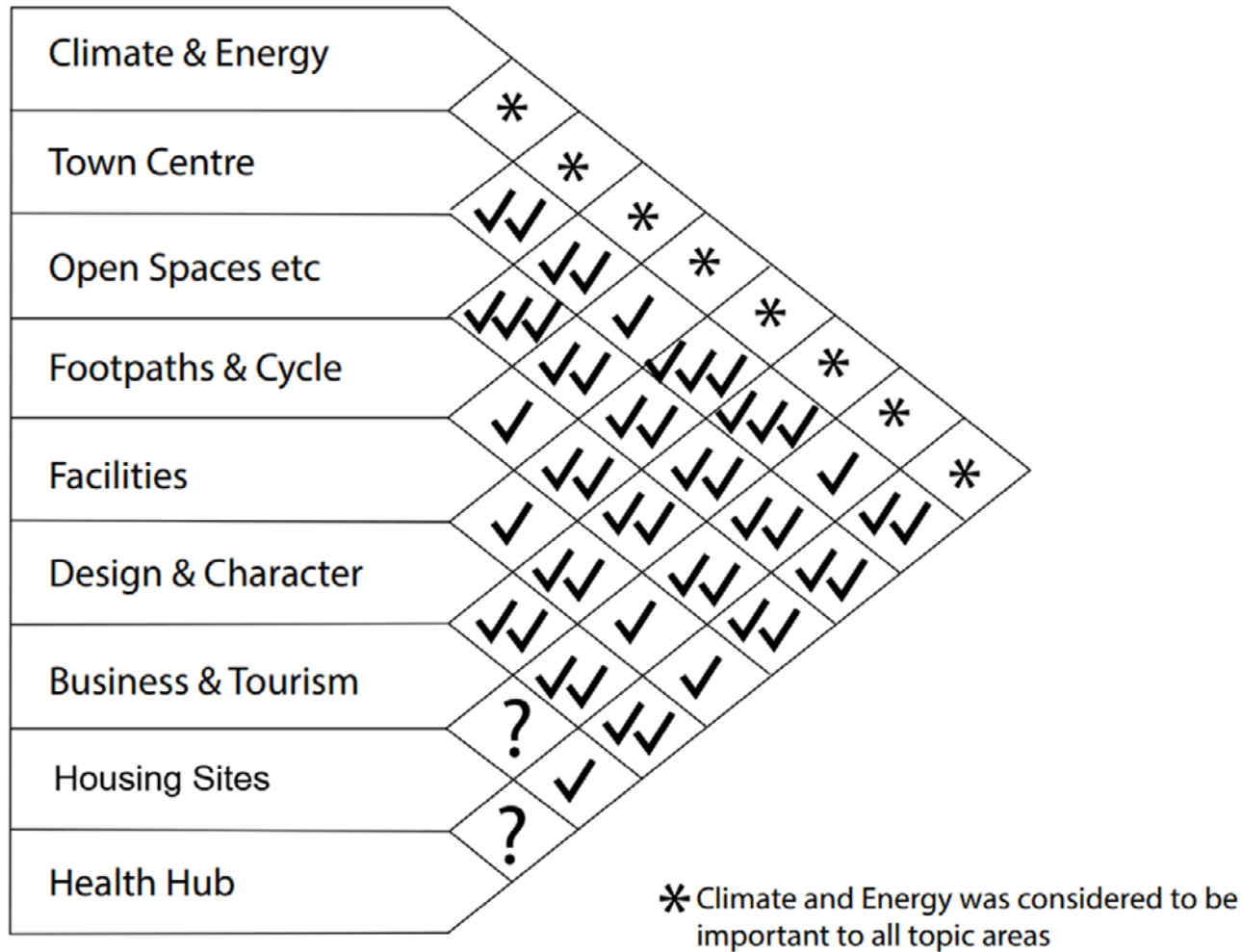


3.1 **Town Centre Experience** (Shops, services, accessibility, pedestrian signage)

3.2 **Tourism, Culture & Attractions**

How do the topics link?

As expected, the topics in the Place Plan are interlinked and their contents cross reference. At one of the stakeholder meetings we asked those assembled, to tell us how much each topic related to the others. Their responses are set out in the diagram below:



How do Place Plan policies link to the LDP policies?

One of the main purposes of a Place Plan is to add an additional layer of local knowledge, to the planning authority's Local Development Plan. We have indicated in each of the topic chapters, the relevant, corresponding policies in the Powys Local Development Plan (LDP). Full descriptions of the corresponding Powys LDP policies can be seen in the "Supporting Evidence"

The Planning Policy team at Powys County Council have been closely involved throughout the development of the Place Plan. They have contributed a significant number of hours work over the 2 years, giving specialist advice, attending stakeholder events, scrutinising the contents of each draft of the plan and giving detailed advice on how the Place Plan policies can best align with the policies in the Powys LDP.

The intention is for the Newtown & Llanllwchaiaran Place Plan to be adopted by Powys County Council as Supplementary Planning Guidance to the Powys LDP.

It is important therefore, that the contents of the Place Plan do not contradict or over-ride what is written in the Powys LDP. Some ideas, proposals and views raised by the Newtown & Llanllwchaiarn community, do indeed fall outside of the remit of the current Powys LDP.

Where this is the case, these items have been included in a separate chapter entitled "The Next Local Development Plan". These items will be put forward for consideration to Powys County Council, for when they start the review process for the next LDP.



Powys
Local Development Plan
2011 – 2026
1/4/2011 to 31/3/2026
Written Statement
Adopted April 2018

(Proposals & Inset Maps published separately)

This document is also available in Welsh



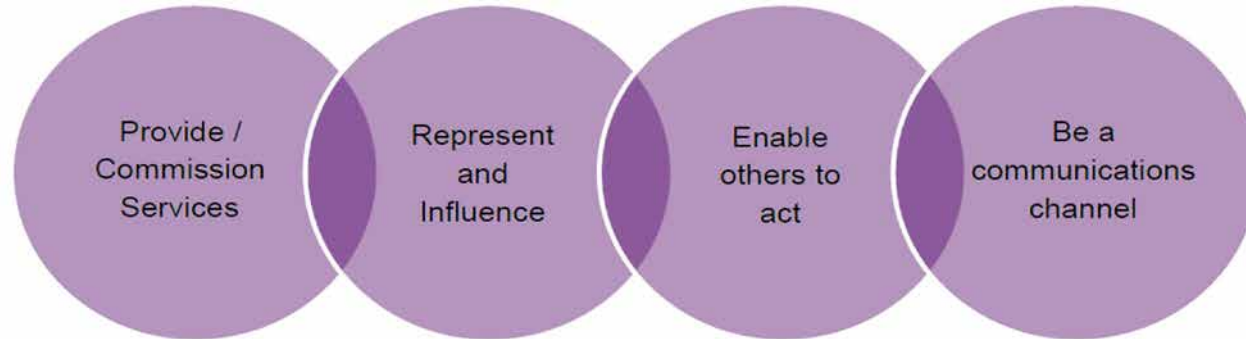
The role of the Town Council

Newtown & Llanllwchaiarn Town Council is the lead organisation producing the Place Plan. While the Town Council has an elected role and democratic mandate to lead in the community, the contents of the plan are based on the views and aspirations of the whole community. In this way it hopes that the Place Plan belongs to the wider community. "Our Town, Our Plan".

The Town Council will share the role of delivering on the plan, with many other organisations in the town.

Town & Community Councils are limited in the specific things they can do. They have duties (things they must do) and powers (things they may do) set out in law. A local council must not do anything unless it has a legal power to do so. If it acts outside the list of its duties and powers (even if it would be popular with the community) the Town Council could be challenged for acting beyond its powers.

Local councils have four basic roles...



Source: Independent Review Panel 2018

Town Council's Role: Planning Policies

The Town Council is consulted on each planning application in Newtown & Llanllwchaiarn by the local planning authority (Powys County Council), before they make their decision. The Town Council will use the Planning Policies in this document (representing the community's wishes), when responding to each of these consultations.

Town Council's Role: Projects & Actions

Within the limits of its legal duties and powers, The Town Council commits to either:

- Delivering projects and actions (D) or
- Enabling others to deliver projects and actions (through a grant for example) (E) or
- Influencing others to deliver projects and actions (I)

as marked in the individual Projects & Actions details.

Town Council Increased Powers

At the time of publication, the Town Council does not have the powers required to deliver some of the Projects / Actions denoted with (D). However, it is expected that this will be remedied by 2022, when new legislation is expected to allow the Town Council to have enhanced powers through the introduction of the new "General Power of Competence".

Inclusive access principles

The Powys Local Development Plan refers to accessibility in terms of access to services and open space, and supports accessible design of developments. LDP policy DM13 (7) requires proposed developments to be 'inclusive to all, making full provision for people with disabilities'.

The intention with the Place Plan policies and projects, is to strive towards the broadest possible definitions of access and inclusion, not limited to disabled access. For example, Place Plan community evidence highlighted the needs of the elderly, people living with dementia and those with sensory loss.

In 2010, Disability Wales's Welsh Government funded, "Way To Go" project worked to equip planning officers, and disability and access organisations, with the practical tools to work together to ensure a fully inclusive built environment in Wales. Their definition of "Inclusive access", is one that the Place Plan aligns with:

"Inclusive access ensures that everyone can get to, into and around developments, and take part in activities and services provided. 'Everyone' includes parents with buggies, older people, people with less than perfect sight, less than perfect hearing, less than perfect mobility or less than perfect understanding of the world around them." ¹²

Newtown: A great place to live, learn & work

Page 696

Photo: DU

1.1 Character & Heritage



Why is this topic important to Newtown?

Newtown is rich with industrial heritage, distinctive architecture and blessed with beautiful natural surroundings. These features make the town unique and enjoyable for residents and visitors alike.

Key Facts

Green spaces and trees are key features in many areas of the town and views out to the valley sides, are noted frequently.

Architecture is varied and reflective of the various eras and stages of the town's growth, but commonality in materials is noted across the various styles. St Mary's Church in the town centre is the one surviving medieval building. There are a number of timber framed buildings in the town centre, such as The Buck and The Bank. Several buildings such as the Black Boy have older internal cores hidden by their Georgian or Victorian frontages. Newtown is also home to three structures by innovative architect, Thomas Penson – St David's Church, The Flannel Exchange, and the Long Bridge. Other buildings of note include the Royal Welsh Warehouse, Brisco House and the iconic Town Clock.

Newtown has two designated conservation areas: Town Centre and Penygloddfa and 206 Listed Buildings. (see Appendix for map & Supporting Evidence for a list of the buildings). Scheduled monuments in the town include the prehistoric Bryn Bank Hillfort and two medieval mottes: one in the town park and the other at the Gro to the east of the town.

The area has been home to several social and industrial pioneers:

- Laura Ashley (1925 – 1985) - textile, home furnishing and fashion pioneer and significant rural employer.
- Robert Owen (1771-1858) philanthropic social entrepreneur, education reformer and creative of international significance.
- David Davies (1818-1890) - coal & railway pioneer, and his philanthropic family - Lord Davies; Gwendoline & Margaret Davies.
- Pryce Pryce-Jones (1834-1920)- pioneer of international mail order and home shopping, purportedly the initiator of Royal Mail Parcel Post and inventor of the modern sleeping bag.



Photo: TC



Photo: TC

What's Been Happening Recently?

New information has been collated for the Place Plan. The community identified 16 distinct areas of the town (See Appendix for maps)

1. Town Centre
2. Canal Area
3. Llanllwchaiarn
4. Riverside
5. Vastre & Dyffryn Industrial Estate
6. Barnfields & Bryn Lane
7. Penygloddfa
8. Milford Road
9. Vaynor
10. College & Mochdre Industrial Estate
11. Maesyrhandir / Maesyddail
12. Llanidloes Road Area
13. Garth Owen
14. The Station & New Road
15. Trehafren
16. Treowen

Character Surveys

Detailed survey forms and photos have been collated for 10 of the 16 areas (Areas 1, 2, 3, 5, 6, 7, 8, 10, 12 & 14. See Supporting Evidence). Newtown & District Civic Society generously adapted their previous work to provide character area surveys for 5 areas: Town Centre, Canal Area, Penygloddfa, Milford Rd and The Station & New Rd.

Vacant Buildings

The Town Council researched the following key vacant buildings in the town and wrote to their owners in August 2019, enquiring about intentions for the buildings and inviting dialogue. One reply was received regarding the Old Fire Station:

- St David's Church
- Bethel Chapel
- United Reform Church
- Old Fire Station
- The Grapes
- No.2 Commercial St.
- Former Flannel Factory, Bryn Street

(see Appendix: Vacant Buildings & Buildings At Risk Audit)

The audit confirms:

- Owner(s) details (removed for data protection),
- if the building is listed or in a conservation area,
- if the building is on the "listed buildings at risk register 2014"



Architectural heritage - photos: Left top to bottom (TC, TD, CS), Right (TC)

A green infrastructure project is currently underway in the town, delivered in partnership by Powys CC and the Town Council and supported by Welsh Government funding. The focus is on rejuvenating four areas: Back Lane and High Street junction, High Street, Severn Square, and Gas Street Car Park.

Safeguarding and increasing tree cover in towns and cities is a priority in both the Welsh Government's "Woodlands for Wales Action Plan" and the Future Generations Commissioner's Manifesto. In the latter, is a recommendation for a commitment to achieving 20% tree canopy cover in every town and city in Wales by 2030.

LDP Policies & Other Planning Guidance

(see Supporting Evidence for full details)

- LDP Strategic Policy SP7 - Safeguarding of Strategic Resources and Assets
- LDP Policy DM13 - Design and Resources
- LDP Appendix 6 - Historic Environment Information
- LDP Draft Conservation Areas SPG
- Powys County Council Residential Design Guide (Newtown Appraisal)
- TAN 24
- The Historic Environment (Wales) Act 2016,
- Welsh Government: Planning Policy Wales (11) – Chapter 6
- Welsh Government/CADW best practice guidance

Other Relevant Documents

- Newtown & District Civic Society (2018), *Explore Newtown – The Historic Town Centre - Buildings and Character*
- Newtown & District Civic Society (2013), *The Canal Area Character Appraisal*
- Canal & River Trust / Montgomery Canal Partnership (2016), *The Montgomery Canal: Regeneration through Sustainable Restoration*
- Heritage Hub 4 Mid Wales (2019) *Powys Pioneers Digital Heritage Feasibility Study*
- Welsh Government (2007), *Manual For Streets*
- Urban tree cover data - <http://lle.gov.wales>
- C. Ryan-Ridout - *Beautiful Newtown versus Buildings at Risk*
- C. Ryan-Ridout - *Newtown – First Impressions, Later Observations*
- Historic England (2016), *Stopping the Rot*

New Place Plan Evidence

- Map: Conservation Area and Listed Buildings - Penygloddfa
- Map: Conservation Area and Listed Buildings - Town Centre
- List of Listed Buildings in Newtown & Llanllwchaiarn
- List of Buildings of Significance To The Community
- Character Area Surveys (Town Centre, Canal Area, Llanllwchaiarn, Vastre & Dyffryn, Barnfields / Bryn Lane, Penygloddfa, Milford Rd, College & Mochdre Ind Est, Llanidloes Rd, Station & New Rd.)
- Map: Character Areas
- Map: Character Areas - Development Types
- Character Surveys Overview
- Vacant Buildings And Buildings At Risk
- Community Comments: Character & Heritage

What did you tell us?

Character & Heritage: Community Comments

A summary from the consultation events and public survey
(see Supporting Evidence for full details)

“Make more of the historic buildings in Newtown - we have a lot of heritage to celebrate and to encourage tourism”

“More greening and tree planting is needed ... in and around the bus station and car park, so that something of the character of the country park could be returned”

“Environmental sustainability and attractive design are important for new housing in our town”

Page: 700

Popular Themes

- Conservation & development of key areas and buildings
- Protecting the valued views of open countryside
- Promote and educate people of our history, archaeology and heritage
- Improve and do more with the neglected important buildings

Ideas For The Future

- Celebrate towns industrial heritage (guided walks, trails.)
- Improved signage to areas of interest
- Better promotion of the Robert Owen, WHSmith and Textiles museums
- Festival to celebrate pioneers such as Robert Owen and Laura Ashley
- Re-use of deteriorating former churches
- Better use of the Pryce Jones building
- Preservation of the conservation’s areas
- Eco friendly housing and sustainable design for new developments
- Improve quality, affordability and energy efficiency of private housing stock
- Pedestrianise Broad Street
- Celebrate strong musical heritage – more opportunities for performances

Key Feedback

- 66% agreed that Newtown has a unique heritage
- 29.2% were satisfied that aspects, features and historic buildings are looked after and will be preserved.
- The Conservation Areas of Penyglodfaa and the Town Centre are important assets for the town – though Pengloyddfa conservation area was noted as being in decline.
- Views through to the hills from Broad Street are unique to Newtown
- Historic buildings throughout the town are mentioned regularly
- The distinctive use of materials such as brick and slate were noted as an asset for the town
- The need for eco-friendly houses was noted a number of times and one person cited “The Wintles” in Bishops Castle as a good example.
- Canal Road Area is another of our assets – like the old Wool Board building – red brick, green alongside river, grass on the square
- The area around the railway station has some beautiful buildings but has many opportunities for improvement
- A strong consensus on finding solutions to empty and run-down landmark buildings such as St David’s Church and Bethel Chapel on New Road.

How Will We Address The Issues?

Character & Heritage Planning Policies

The Town Council will use these Policies when responding to consultations about local planning applications. If adopted as Supplementary Planning Guidance they will also be used by Powys County Council when assessing planning applications.

No.	POLICIES	SUGGESTED LOCATIONS? (where applicable):
CH-a	All new development and redevelopment within Newtown and Llanllwchaiarn should contribute positively to the character & local distinctiveness of the character area, as mapped and described in the evidence (Map: Character Areas - Development Types in Appendix X and Character Area Surveys in Supporting Evidence)	Areas of the town as identified by stakeholders and shown on Appendix Map: Character Areas (1) Town Centre, (2) Canal Area, (3) Llanllwchaiarn, (4) Riverside, (5) Vastre & Dyffryn Industrial Estate, (6) Barnfields & Bryn Lane, (7) Penygloddfa, (8) Milford Road, (9) Vaynor, (10) College & Mochdre Industrial Estate, (11) Maesyrrhandir / Maesyddail (12) Llanidloes Road, (13) Garth Owen, (14) The Station and New Road, (15) Trehafren, (16) Treowen
Page 701 CH-b	Development proposals within Newtown and Llanllwchaiarn's Town Centre and Penygloddfa Conservation Areas and developments that affect the towns listed buildings and their settings, must show how they enhance and preserve the characteristics and special qualities that make up their architectural and historic character.	Town Centre and Penygloddfa Conservation Areas The towns Grade II and Grade II* listed buildings (see Supporting Evidence)
CH-c	Other areas of local heritage importance together with buildings or structures that are unlisted local heritage assets as defined in the evidence should demonstrate what consideration has been given to retaining: the asset itself; the positive elements of its setting and immediate surrounds; and, the contribution the asset and its setting makes to the character of the local area (whether in the Conservation Area or not).	See Appendix: Buildings of Significance To The Community
CH-d	Developments that facilitate the appropriate re-use of vacant / underused buildings associated with the heritage of Newtown will be supported where: They are designed to complement and/or enhance the character of the building, but also taking into account any listed building or conservation area requirements that may be associated with them	Including: St David's Church, New Rd; Bethel Chapel, New Rd United Reform Church, Church St; Old Fire Station, New Rd; The Grapes, Commercial St; No.2 Commercial St.; Former Flannel Factory, Bryn Street

No.	POLICIES	SUGGESTED LOCATIONS? (where applicable):
CH-e	Developments that protect or enhance the historic environment in Newtown and Llanllwchaiarn to support business growth and tourism will be supported.	
CH-f	Proposals for the repair and sensitive restoration of the Montgomery Canal that seek to minimise loss of the existing fabric together with compatible and alternative uses for associated historic buildings will be supported. (Canal policies and projects also feature in topics: Tourism, Health & Well-being & Climate & Biodiversity).	

Character & Heritage Projects / Actions

Town Council's role: (D) = Delivering, (E) = Enabling others to deliver and (I) = Influencing others to deliver.

No.	PROJECT / ACTION	Timescale No. of years to complete S - up to 3 M - up to 7 L - up to 15	Suggested Collaborators
702	<p>Consider "Newtown – First Impressions, Later Observations" and other Place Plan supporting evidence and identify partners & funding opportunities for projects which will conserve, improve, maintain and promote the character and history of the town including:</p> <ul style="list-style-type: none"> The Penygloddfa area (including the historic Crescent and adjacent roundabout) The area around Pryce Jones to include the station & St David's Church Greening and tree planting in and around the bus station and car park and other aspects of reclaiming the former Country Park Greening of the area around the flats in St Mary's Close Improvements to and potential uses for the alleyways leading off Broad Street Improvements to the architecturally significant buildings such as St David's and The Flannel Exchange. 	L	Town Council (D, E) PCC, Civic Society, Building owners, Cadw
CH2	Discuss with Powys CC and investigate additional funding for the repair & renovation of Long Bridge (links with Tourism policy & projects).	S	Town Council (I), PCC
CH3	Discuss with Powys CC and investigate additional funding for the repair & renovation of Dolerw Bridge	M	Town Council (D, E), PCC

No.	PROJECT / ACTION	Timescale No. of years to complete S - up to 3 M - up to 7 L - up to 15	Suggested Collaborators
CH4	Identify partners & funding opportunities for “Discover Newtown” / projects to support, celebrate and showcase the architecture & heritage of the town.	S	Town Council (D, E), Civic Society, Heritage Hub For Mid Wales, Cadw, CPAT, PCC
CH5	Install gateway signage at entrances to the town, to reflect the character & heritage.	S	Town Council (D, E), PCC
CH6	“Green” the town – through planting – street scene and entrance / gateway routes, to contribute to the Future Generations Commissioner’s target of 20% tree canopy cover in every town and city in Wales by 2030.	M	Town Council (D, E), PCC, Open Newtown
CH7	Install improved signage to areas of interest	M	Town Council (D, E), PCC, Open Newtown
CH8	Develop projects relating to the 4 local pioneers: Laura Ashley, Robert Owen, David Davies and Pryce Pryce-Jones: <ul style="list-style-type: none"> • Festival 2021 - an ambitious, year-long arts, • culture and heritage festival tied to the 250th anniversary of Robert Owen’s birth and the 60th anniversary of the opening of Laura Ashley’s first shop; • Digital projects to ensure the conservation of collections held in private ownership across Mid Wales. • Promotional and educational awareness of the pioneers to develop their profile and impact on the future of Mid Wales, and to drive entrepreneurship. • A permanent exhibition plus permanent object and archive store in Newtown. 	M	Heritage Hub For Mid Wales
CH9	Develop other events and attractions that celebrate local heritage & culture (wool, textiles etc)	M	Town Council (E), Voluntary Sector / PAVO.

CH10	<p>Identify partners & funding to implement solutions to key empty / run down buildings:</p> <p>i) Short Term – Refer to the Place Plan Vacant Buildings Audit and “Beautiful Newtown versus Buildings at Risk” and create a priority list of those buildings in most urgent need of repair.</p> <p>ii) Short Term - Refer to Historic England’s “Stopping The Rot” publication and develop an action plan for finding partners, funding and solutions to the priority run down buildings.</p> <p>iii) Medium term – Implement the Action Plan.</p>	S S M	Town Council (D, I), PCC, building owners
CH12	Investigate partners willing to use the character work undertaken as a basis for preparing formal Conservation Area Character Appraisals along with Conservation Area Management Plans for the town’s Conservation Areas.	L	Civic Society
CH13	Investigate with Powys CC, the designation of the area around Pryce Jones to include the station & St David’s Church as a Conservation Area	L	Town Council (D), PCC
CH14	Publication of a new book about Newtown, North of the River Severn (including the Penygloddfa area)	S	Civic Society

1.2 Housing & Future Development



Why is this topic important to Newtown?

Housing development is needed to accommodate the growing and changing household needs of Powys and Newtown. There is a particular need to consider affordable housing for our young people and accommodation for the elderly.

Key Facts

Welsh Government's "Future Wales The National Plan 2040" identifies Newtown as part of the Bro Hafren "Regional Growth Area", which should meet the housing needs of Mid Wales.

The plan identifies that an additional 1,800 homes are needed in the Mid Wales region until 2039. At the time of writing, in the sub-market area of the Severn Valley, the number of units required to be affordable is 20% (Powys LDP, Affordable Housing SPG, 2018).

3 sites are identified in the LDP for housing:

- P48 HA2 - Hendidley 15 units
- P48 HA3 South of Heol Treowen Extension 70 units
- P48 HA4 South of Heol Treowen / Great Brimmon 136 units

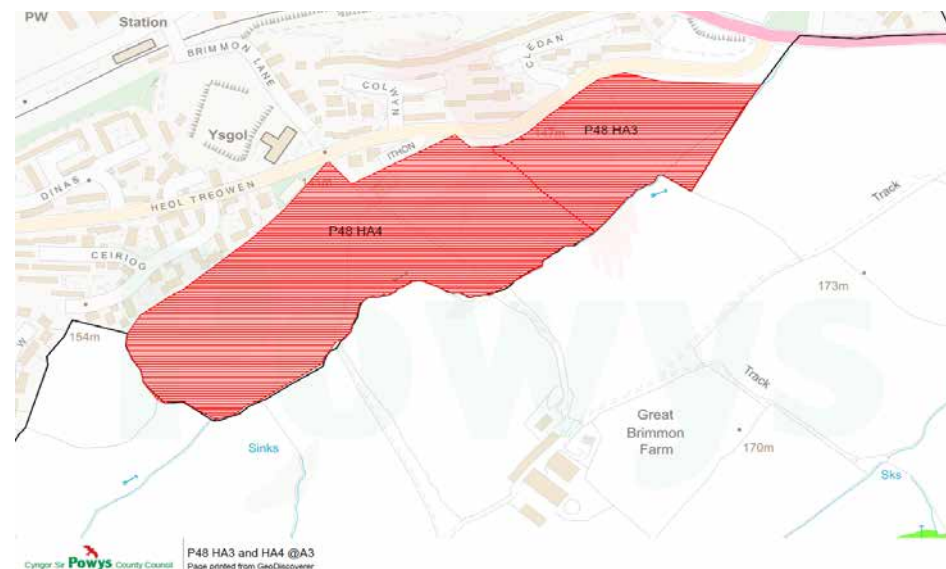
The LDP also includes sites P48 HC1 to HC10 in Newtown, all of which had already secured planning permission at the date the Plan was drawn up.

What's Been Happening Recently?

As of 24th June 2020, there were 407 applicants on the Common Housing Register, seeking social rented accommodation in Newtown. This figure represents only applicants who have indicated Newtown as their first choice of location.¹³

Two new developments of affordable housing for social rent by applicants on the common housing register are underway at:

- Former Bowling Green, Back Lane
- Former Red Dragon and Youth Centre Site, Plantation Lane, Maesyrrhandir.



Source: Powys County Council

Land at the former Robert Owen House site is also secured for affordable housing.

Outline planning permission has been granted for housing sites at Land To The West Of Mochdre Brook:

- a) South Of the A489 (up to 60 dwellings)
- b) Land To The North Of A489 (up to 30 dwellings).

These developments are outside of the current town boundary

but important to mention because residents living there would use future Active Travel routes & town facilities.

Existing LDP Housing Allocations

Of the sites that are already allocated for housing in the LDP, 2 sites at Treowen HA3 & HA4, together form one of the largest sites in the LDP. The community are therefore, encouraged to develop a "site brief" for these sites. A

site brief can put forward the community's views on aspects such as the housing mix and density, housing style, layout and boundary treatment, landscaping, vehicular and pedestrian access, and open space provision.

Initial discussions took place about a site brief for the P48 HA3 & HA4 allocations, at a Place Plan event in October, with stakeholders including representatives from the Treowen Community Hall. Their initial suggestions for the site (see Supporting Evidence) are included in Policy HF-b and the completion of the Site Brief is scheduled in Project HF1.

Suggested Housing Sites

At the 5 Place Plan community engagement events, members of the public were asked to suggest small sites that may be suitable for housing development. Each of these was reviewed by the Planning Policy team at Powys CC. The sites taken forward in the policies and projects section of the plan are listed in the Appendix. The full list of suggestions is in the Supporting Evidence.

The Impact of Covid-19

Figures for Powys in May 2020, showed a 119% increase in homelessness, with further increases expected due to unemployment plus the lifting of restrictions on private landlords enforcing evictions.⁶

LDP Policies & Other Planning Guidance

(see Supporting Evidence for full details)

- LDP Strategic Policy SP1 - Housing Growth (pg33)
- LDP Strategic Policy SP3 - Affordable Housing Target
- LDP Strategic Policy SP5 - Settlement Hierarchy
- LDP Strategic Policy SP6 - Distribution of growth across the settlement hierarchy
- LDP Policy H1 - Housing development proposals
- LDP Policy H2 - Housing sites
- LDP Policy H3 - Housing Delivery
- LDP Policy H4 - Housing Density
- LDP Policy H5 - Affordable Housing contributions
- LDP Policy H6 - Affordable Housing exception sites
- LDP Policy H7 - Householder development
- LDP, Affordable Housing SPG (2018)
- Welsh Government (2021) Future Wales - National Plan 2040
- Welsh Government: Planning Policy Wales (11)

Other Relevant Documents

- Welsh Government (forthcoming), Mid Wales Economic Strategy
- Growing Mid Wales Partnership (2019), *Strategic Economic Priorities for the Mid Wales Region*
- Marches Local Economic Partnership & Welsh Government (2018) *The Marches & Mid Wales Freight Strategy*
- Place Making Wales (2020), *Placemaking Guide*

New Place Plan Evidence

- Map: Housing Sites - Community Suggestions
- Housing Sites To Take Forward
- Housing Sites Suggestions - Full List
- Treowen HA3 & HA4 - Stakeholder Comments and Site Ideas
- Community Comments: Housing & Future Development

What did you tell us?

Housing & Future Development: Community Comments

A summary from the consultation events and public survey

(see Supporting Evidence for full details)

“More quality affordable housing for youngsters - encourage buying rather than renting.”

“More sheltered accommodation like Llys Glan yr Afon close to the town centre”

“Schemes to get homeless and disabled people into safe housing.”

Popular Themes

- More appropriate family homes
- More affordable / social housing/ flats/ bungalows
- More help to buy schemes
- More environmentally sustainable homes
- Address empty properties

Ideas For The Future

- More and better sustainable employment opportunities with better range and wages
- Infrastructure provision: No more housing until there are more doctors, dentists, support services etc.
- Look to build between the by-pass in the town.
- Better public transport
- Provision of mixture of housing in the town centre as well as the edges of town to create a balance (not just social housing)

Key Feedback

Satisfaction with housing provision for younger people:

Extremely Satisfied: 2.8%
Satisfied: 13.2%
Neutral: 48.1%
Dissatisfied: 23.6%
Extremely Dissatisfied: 11.3%

Satisfaction with housing provision for elderly people:

Extremely Satisfied: 2.8%
Satisfied: 25.5%
Neutral: 54.7%
Dissatisfied: 12.3%
Extremely Dissatisfied: 2.8%

Satisfaction with housing provision for disabled people:

Extremely Satisfied: 0.9%
Satisfied: 19.8%
Neutral: 62.3%
Dissatisfied: 11.3%
Extremely Dissatisfied: 4.7%

Satisfaction with housing provision for people on low incomes:

Extremely Satisfied: 2.8%
Satisfied: 17.0%
Neutral: 49.1%
Dissatisfied: 21.7%
Extremely Dissatisfied: 7.5%

How Will We Address The Issues?

The Town Council will use these Policies when responding to consultations about local planning applications. If adopted as Supplementary Planning Guidance they will also be used by Powys County Council when assessing planning applications.

Housing & Future Development Planning Policies

No.	POLICIES	SUGGESTED LOCATIONS? (where applicable):
HF-a	<p>The Place Plan supports the following key principles for new housing developments in Newtown and Llanllwchaiarn:</p> <ul style="list-style-type: none"> • An appropriate mix of housing types and tenures are encouraged to meet local needs • The delivery of affordable homes will be supported to meet the future needs of the town • Provision to be made for the health and well-being of future residents such as play areas, cycle paths, open spaces and allotments and links to footpaths & public rights of way, where appropriate • New development to have regard to the character and quality of the surrounding townscape and to reflect the existing form of development (See character area surveys – Supporting Evidence) • High quality design is encouraged to enhance local character and distinctiveness • High standards of energy efficiency and sustainable construction principles to be encouraged including green infrastructure such as electric hook up points where appropriate. 	<p>All locations including:</p> <ul style="list-style-type: none"> • Treowen housing allocation (P48 HA3 & HA4) • Hendidley housing allocation (P48 HA2) • Former Bowling Green, Back Lane • Former Red Dragon and Youth Centre Site • Former Robert Owen House site
HF-b	<p>For Powys LDP Allocations P48 HA3 and P48 HA4 (total 206 units), Treowen, the following specific criteria should be applied. It is noted that a Design Brief for Treowen is included as a future project (HF1) in the Place Plan.</p> <p>Key principles to include:</p> <ul style="list-style-type: none"> • Community engagement (eg the development of a design brief) is encouraged by the developer in advance of pre-application consultations. Community engagement in all stages of the design process would be desirable. • A mix of housing to meet local needs, should be provided to cater for young and elderly people and a target of 20% affordable housing. Lifetime Homes Standards will be supported. • Mixed use opportunities to be considered on site eg. Café, launderette, community hub • Strong pedestrian, cycle and vehicular linkages should be made to the town centre including links to Newtown Bypass if appropriate • Active Travel routes should connect to the town (see Place Plan topic 2.2) • Development proposals should consider renewable energy sources and communal heating systems. • New or improved community facilities will be encouraged in accordance with Place Plan Policy CF-c 	<p>Treowen housing allocation (P48 HA3 & HA4) (See Supporting Evidence: Stakeholder Comments and Site Ideas)</p>

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Housing & Future Development Projects / Actions

Town Council's role: (D) = Delivering, (E) = Enabling others to deliver and (I) = Influencing others to deliver.

No.	PROJECT / ACTION	Timescale No. of years to complete S - up to 3 M - up to 7 L - up to 15	Suggested Collaborators
HF1	Consult community & prepare detailed site brief for LDP Housing Allocations HA3&4 at Treowen.	S	Town Council (D), PCC
HF2	In line with LDP policy, where possible pursue change of use of vacant buildings or redevelopment of vacant sites, to residential or other appropriate uses. (See Appendix - <i>Housing Sites To Take Forward & Map</i>)	L	Town Council (I), PCC, Building Owners
HF3	Support the community to develop design briefs for other existing housing allocations.	L	Town Council (I), PCC
HF4	Identify partnership & funding opportunities to develop Community-led housing schemes. Seek advice from Wales Co-operative Centre.	M	Town Council (E), Community sector
HF5	Ensure the following items are submitted to Powys CC Planning Policy for consideration for LDP2: <ul style="list-style-type: none"> community suggestions for housing (candidate) sites as identified in the Appendix - <i>Housing Sites To Take Forward & Map</i>. The items identified in the "Next LDP" section of the Place Plan 	S	Town Council (D), PCC

1.3 Community Facilities



(community centres, youth centres, libraries, leisure centres, public swimming pools, other indoor recreational facilities, museums, art galleries, theatres, places of worship, colleges, schools, hospitals, surgeries, emergency service stations, courts plus neighbourhood shops.)

Why is this topic important to Newtown?

Access to the appropriate necessary facilities for day to day living is important for quality of life and maintaining one's health and well-being through social interaction, access to food, learning and recreation.

Key Facts

Community facilities in all areas of the town were audited as part of the evidence gathered for Place Plan. The results were plotted on a map (see Appendix).

Information was also gathered for several facilities regarding their condition, accessibility and usage. (see Supporting Evidence).

Brief information was also gathered on three of the town's community halls regarding their condition, accessibility and usage. A fourth hall is currently undergoing a major refurbishment.

At the drop-in events, the following facilities were identified by the community as "good":

- Oriel Davies Gallery - regional / national importance
- Community Centres / Halls across the town where various groups can meet / activities are hosted
- Allotment
- Hospital
- Schools / the College
- Theatre - regional / national importance
- Leisure Centre
- Library
- Textile Museum
- Football Club
- Cinema
- Scout Hut
- Skate Park
- Cricket club & ground
- Rugby club and grounds
- Tennis club and grounds
- Golf course



Drawing: Treowen CP School Pupil. Photos: TD, Google

Key meeting places for young people were identified as:

- Football Club
- Leisure Centre
- Cinema
- Scout Hut
- Skate Park
- Many facilities - especially sports are run by volunteers

What's Been Happening Recently?

- Some local neighbourhood facilities have been lost - the youth centre, the shop at Treowen, the closed pubs at Maesyrrhandir and Heol Vaynor.

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There are currently 14 health service locations in the local area. There are issues with GP recruitment at the town's medical practice. Proposals for the new health hub in the town are expected to incorporate alternative methods of healthcare delivery using new technologies and allow for services to be housed in one location.

- A "school's transformation" scheme is underway which may impact on the locations of schools.

A new welsh medium school was constructed in recent years.

Impact of Covid-19

Due to Covid-19 restrictions, the majority of community facilities, were forced to close their doors. The government has recently announced a £26 million support package for the whole of Wales, intended to provide grants of £10,000 to eligible small charities within retail, leisure and hospitality. Powys County Council will administrate the grants provision which it is hoped will support a wide range of organisations that up until now have not qualified for financial support including charity shops, sports clubs and community centres.⁶



Photo: TD

LDP Policies & Other Planning Guidance

(see Supporting Evidence for full details)

- LDP Policy DM11 - Protection of Existing Community Facilities and Services
- LDP Policy C1 - Community Facilities and Indoor Recreation Facilities
- LDP Policy DM12 - Development in Welsh speaking strongholds
- Welsh Government: Planning Policy Wales (11)


New Place Plan Evidence

- Map: Community Facilities
- Community Facilities Surveys
- Community Comments: Community Facilities


What did you tell us?

Community Facilities: Community Comments


A summary from the consultation events and public survey
(see Supporting Evidence for full details)



"We need a large community hall with a good kitchen and plenty of parking. The existing halls are small, or don't have good parking, or are church halls with usage restrictions."



"We need a free Wi Fi hotspot with a roof and somewhere safe. So we can go there and be ourselves."



"Create a "one stop" shop for information about events and local activities"

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Popular Themes

- A strong need was voiced for more facilities and activities for teens / young people – recreational and educational
Accessibility to services is key - including travel to the facilities and within the premises themselves.
- Need for accessible spaces for the whole community to meet
 - Several community spaces exist but some are difficult to access or in poor condition
 - Many requested a broader range of activities available for all ages
 - Also a need to increase access to and promotion of existing activities and community venues.
 - There are very few facilities in Treowen and further housing is expected in this area. Other housing areas also low on facilities.

Key Feedback

- 49.1% were satisfied with the provision of community facilities in Newtown with 1.9% extremely satisfied
- 42.5% were dissatisfied with the facilities for younger people
- Young people report wanting more football pitches, sports facilities and activities

What's Good?

- Oriel Davies Gallery
- Community Centres / Halls across the town for groups / activities
- Conference Centre
- Allotment
- Hospital
- Schools / the College
- Theatre
- Leisure Centre
- Library
- Textile Museum

Ideas For The Future

- More youth clubs
- A large community hall with a good kitchen and parking provision
- Venue for music, sports and arts events
- Services for the aging community e.g. Lunch clubs
- Have a toilet with a lift for disabled people
- More activities for younger children e.g. soft play, creative activities

How Will We Address The Issues?

Community Facilities Planning Policies

The Town Council will use these Policies when responding to consultations about local planning applications. If adopted as Supplementary Planning Guidance they will also be used by Powys County Council when assessing planning applications.

No.	POLICIES	SUGGESTED LOCATIONS? (where applicable):
CF-a	Where a continuing need is demonstrated, proposals that will result in the loss of existing community facilities will be strongly resisted, unless there is sufficient justification for the development, including the exploration of alternative solutions to keep and maintain the existing facility.	Map identifies a range of existing facilities (Appendix)
CF-b	Proposals that provide new community facilities or improve the quality, accessibility and connectivity of existing facilities will be supported.	
CF-c	New development proposals should be encouraged to provide community facilities and infrastructure onsite or contribute to the delivery of facilities and / or projects identified within this Place Plan, appropriate to the scale and location of the development.	Housing allocation at Treowen (P48 HA3 & HA4)
CF-d	New developments that provide appropriate indoor facilities for young people will be strongly supported.	
CF-e	New community facilities will be supported provided that: <ul style="list-style-type: none"> • They are located within / adjoining the settlement boundary • They are accessible by public transport, walking and cycling and accessible to all • There are opportunities to integrate services • They would not have an adverse effect on residential amenity 	<ul style="list-style-type: none"> • Settlement boundary map • Housing allocation at Treowen (P48 HA3 & HA4)

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Community Facilities Projects / Actions

Town Council's role: (D) = Delivering, (E) = Enabling others to deliver and (I) = Influencing others to deliver.

No.	PROJECT / ACTION	Timescale No. of years to complete S - up to 3 M - up to 7 L - up to 15	Suggested Collaborators
CF1	Undertake further audit work to identify any issues or gaps in provision of community halls (are they accessible, of adequate quality and promoted sufficiently?)	S	Town Council (D)
CF2	If a need is highlighted through the audit work (project CF1), identify partners and funding to develop an accessible community centre, re-using an existing public building where possible.	M	Town Council (E), PCC
CF3	Identify partners to review Place Plan evidence (see Community Comments in Supporting Evidence) and source funding (such as Participatory Budgeting Scheme, Flow & Town Council Community Grants) for: improved activities for teens, including focus on skills development. New activities for younger children; soft play etc. (links with Projects CA1 & CA2)	S	Town Council (E), PCC Youth Services, Open Newtown, Schools, College, Vol & Business Sector via Chamber of Trade / Chamber of Commerce .
CF4	Increase promotion of existing activities and community venues. Investigate partners & funding to establish a central source of information for the town such as a Directory / What's On listing (links with project HW3).	S	Town Council (D,E), PCC Youth Services & Tourism, Voluntary Sector c/o PAVO, Magik Incorporated
CF5	Development of an Activity Hub at Trehafren Hill. A new start-up / expansion of an existing business, in the form of an Activity Centre, to complement nearby Mountain Bike Trail and BMX Pump Track facilities, with development of canoe and bike hire enterprises, along with coaching opportunities, climbing wall development, youth and family recreation, tourist destination, with refreshments and welfare facilities available on site, with a secure compound area for maintenance teams and a visitor car park	M	Open Newtown and partners yet to be determined.

1.4 Business, Learning & Employment



Why is this topic important to Newtown?

A thriving economy is key to the prosperity of all towns and the well-being of its community. The Covid-19 pandemic has had a detrimental effect on jobs and businesses and there is an urgent need to focus on the economic recovery of the town.

Key Facts

Powys has very few large employers (i.e. businesses with 250+ employees) outside the public sector. The majority of businesses are small, 93% having less than 10 employees in 2013 and there are many one person enterprises. Self-employment and part-time employment are also high.¹⁴

The Business Register and Employment Survey for 2012 showed that excluding Agriculture, Forestry and Fishing, the three largest employment sectors in Powys by percentage of jobs were Health (16.4%), Retail (11.6%) and Manufacturing (10.6%).

The public sector, comprising Health, Education, Public Administration and Defence is one of the largest employers and accounted for 34% of the employment.¹⁴



Photos: TD

In Powys there is a dominance of micro and small businesses and high levels of new business start-ups in the county.¹⁴

What's Been Happening Recently?

- Prior to the Covid-19 pandemic, many town centre businesses were concerned about the negative effects of the decline of the high street and competition.
- A Business Improvement District scheme was launched but was not progressed. A need has been highlighted by public and voluntary sector organisations in the town for improved engagement with the business sector.
- In 2018, £55 million of UK Government funding was confirmed towards a growth deal in the Mid Wales region. The Growing Mid Wales Board was established and a Strategic Economic Plan and Growth Deal Road Map has been drafted. It is hoped that a total investment of up to £165 million will be secured for the region.

The Impact of Covid-19

The pandemic has had a dramatic effect on the economy to date. The UK officially entered recession in August 2020, based on the announcement by the Office for National Statistics that the economy had fallen by a record 20.4 per cent between April and June.

The sectors hardest hit by the pandemic in towns in England and Wales are: Accommodation; Non-food Retail; Pubs and Restaurants; and Arts and Leisure. ¹⁵

30% of workers in Newtown are employed in Wholesale, Retail, Hotels & Catering. ¹⁵ And Newtown has 50 businesses registered in the Arts, Entertainment and Recreation industry. ⁶

At September 2020, £5,469,150 in government grants had been issued to 453 businesses in the Newtown locality. ¹⁷ The government has also been subsidizing the salaries of 23% of workers in Powys. ⁶ Unemployment figures are set to increase as furlough schemes come to an end and employers assess the viability of their businesses. It is expected that there will be between 7-25% fewer jobs in the local economy between 2020-2025. ⁶

As you would expect of the county's largest town, Newtown area has the highest number of new benefits claimants in Powys but other towns have a higher percentage increase. ⁶ Several hundred jobs have also recently been lost due to the closure of the Laura Ashley business.

The timeline for economic recovery is uncertain as it depends on the persistence of Covid-19 during the months and years ahead. It is estimated that while several sectors will make a 100% recovery within 5 years, those most at risk sectors may only see a 50% recovery in that time. ¹⁸ In August 2020, Powys County Council set out its commitment to supporting local retailers and businesses and developing "new look" town centres in its plan

#SupportLocalPowys with safe and resilient towns:

By working with businesses and local town and community councils, the aim will be to open up space for people to enjoy and improve the retail and social experience for shoppers and encouraging visitors to stay longer. ¹⁹

One of the positive outcomes for some employers and employees is the increase in home-working and ability to undertake business effectively online. The crisis could also be used as an opportunity to kick-start the green economy in order to reverse the effects of climate change.

The Impact of Covid-19 on Learning

There has been a great deal of disruption to children and young people's education and training: the closure of schools and colleges, the move to online



Photo: TD

learning, the cancellation of exams and last-minute changes of policy on awarding grades. There is still much uncertainty around the future of education, training and how this will affect the labour markets.²⁰

Brexit

The UK left the European Union on 31st January 2020, at the time of writing, negotiations are still underway regarding future trade deals between the UK and Europe ahead of the end of the transition period on 31st December 2020

The impact of Brexit is currently uncertain but it will likely impact in the following areas:

- Impact on Public Services will depend on a number of factors, such as: the amount of tax revenue and borrowed funds the UK government has to spend and migration of overseas workers for example, from health and social care sectors.
- Trade - 40% of Welsh exports go to the EU and many jobs depend on those exports.
- Loss of funding: Wales receives substantially more EU funding per head than other UK countries: £628 per person, compared to England £102 per person: farming subsidies of over £350 million per year and £1.9 billion of EU structural funds between 2014-2020. Also funds from the European Investment Bank, which have subsidised projects in Powys such as road upgrades. Much will depend on whether the UK Government decides to make up any funding shortfall to Wales. Negotiations between the UK and Welsh governments about future funding will be key.²¹

LDP Policies & Other Planning Guidance

(see Supporting Evidence for full details)

- LDP Vision
- Strategic Policy SP2 - Employment Growth
- LDP Policy DM11 - Protection of existing community facilities and services
- LDP Policy DM16 - Protection of existing employment sites
- LDP Policy E1 - Employment Proposals on allocated employment sites
- LDP Policy E2 - Employment proposals on non-allocated employment sites
- LDP Policy E4 - Safeguarding employment sites
- LDP Policy E7 - Homeworking
- Welsh Government: Planning Policy Wales (11)

Other Relevant Documents

- Business Improvement District Survey Responses
- Powys CC (2020) COVID-19 Powys industries impact and recovery estimates
- Powys CC (2020), #SupportLocalPowys with safe and resilient towns
- Powys CC (2016) Powys Employment Needs Assessment (including Newtown Site Inventory)
- Powys CC (forthcoming) Employment Land and Premises Review
- Powys CC (2011, updated 2015) Economic Needs Assessment Study
- Edge Foundation (2020). The Impact of Covid-19 on Education: evidence on the early impacts of lockdown.
- Welsh Government (forthcoming), Mid Wales Economic Strategy
- Growing Mid Wales Partnership (2019), Strategic Economic Priorities for the Mid Wales Region
- Marches Local Economic Partnership & Welsh Government (2018) The Marches & Mid Wales Freight Strategy
- Federation of Small Businesses (2018) The Future of Town In Wales

New Place Plan Evidence

- Community Comments: Business, Learning & Employment

What did you tell us?

Business, Learning & Employment: Community Comments

A summary from the consultation events and public survey

(see Supporting Evidence for full details)

"We need smaller spaces for start-ups"

"More skills development and training opportunities. Work placements and apprenticeships. College to work with businesses to see what skills are needed."

"We need new industrial units that are fit for 21st Century...."

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Popular Themes

- Lower business rates
- Improved signage off the bypass
- Tidying up the industrial estates (particularly unauthorised signage)
- More business support
 - More active business forum
 - More spaces for new businesses
 - More training / skills development opportunities

Ideas For The Future

- Re-use vacant buildings for business incubators
- More work placements and apprenticeships
- Lower parking charges
- Create a USP for the town
- More publicity for Newtown's businesses
- Better signage on industrial estates
- Need a good second-hand book shop and toy shop
- Lower shop rents – promote new shops to come to the town
- Encourage growth of Tuesday market – particularly green grocers
- Upcycling shop – combined with artists / refashioned items

Key Feedback

From Business Improvement District Survey (32 responses)

- 72% rated Newtown as a good place to do business with 13% citing it as bad
- 44% said that investing in improved signage on the bypass, bringing people into town was critical to their business
- 44% said that Improving Newtown as an attractive place to come to live and for families to raise children was critical to their business with 28% saying it was very important.
- 25% said that encouraging pop-up and meanwhile uses for vacant commercial / retail properties was very important to their business.

From Place Plan Survey (106 responses)

- 39.6% were satisfied with the provision for business growth in Newtown (with 23.6% extremely satisfied).

How Will We Address The Issues?

The Town Council will use these Policies when responding to consultations about local planning applications. If adopted as Supplementary Planning Guidance they will also be used by Powys County Council when assessing planning applications.

Business, Learning & Employment Planning Policies

No.	PLANNING POLICIES	SUGGESTED LOCATIONS? (where applicable)
BL-a	<p>The expansion of Newtown's existing employment sites, the development of new local employment opportunities and homeworking will be supported by the Place Plan provided they:</p> <ul style="list-style-type: none"> • Are in accordance with LDP Policy E2. • Give priority to the re-use of brownfield sites, or the conversion of existing buildings • Are of a scale appropriate to the immediate surroundings • Do not have a detrimental impact on surrounding residential amenity • Do not lead to the loss of public open space • Are located close to existing highways and do not have an unacceptable impact on traffic. 	
BL-b	<p>The Place Plan supports proposals for the conversion of existing buildings for the provision of start-up incubator businesses providing they do not have a detrimental impact on residential amenity.</p>	

Business, Learning & Employment Projects / Actions

Town Council's role: (D) = Delivering, (E) = Enabling others to deliver and (I) = Influencing others to deliver.

No.	PROJECT / ACTION	Timescale No. of years to complete S - up to 3 M - up to 7 L - up to 15	Suggested Collaborators
BL1	Identify partners & funding to explore collaboration opportunities and further development of business incubator and conferencing facilities in the town	L	Town Council (E), Business Sector via Chamber of Trade / Chamber of Commerce / Mid Wales Manufacturing / Federation of Small Businesses, PCC
BL2	Explore the feasibility of a town partnership between the business, public and voluntary sectors in the town, in order to support the economy & environment for example via tourism and climate change initiatives	S	Town Council (D,E), Business Sector via Chamber of Trade / Chamber of Commerce / Mid Wales Manufacturing / Federation of Small Businesses / Public / Voluntary Sector / PAVO
BL3	Liaise with Welsh Government and Powys CC about provision for "bypassed communities", in order to invest in improved signage on the bypass, bringing people to destinations in Newtown.	S	Town Council (I), Welsh Government, PCC, Business Sector via Chamber of Trade / Chamber of Commerce / Mid Wales Manufacturing / Federation of Small Businesses

1.5 Health & Well-being

Why is this topic important to Newtown?

Health and well-being are central to everyone's quality of life. For the majority of us, the Covid-19 pandemic has presented the most significant healthcare challenge that we have known in our lifetimes. How we will keep ourselves healthy, well and thriving post-Covid, is a vital topic for communities everywhere.

Key Facts

Powys Teaching Health Board is responsible for meeting the health and well-being needs of the people of Newtown and Powys as a whole. Due to the rural nature of the county, many services are provided locally through GPs and other primary care services, community hospitals and community services.

There is no District General Hospital in Powys, so these services are provided elsewhere out of county in Wales and England. The nearest District General Hospital for Newtown residents is the Royal Shrewsbury Hospital.

After a lengthy NHS review of health services in Shropshire, Telford and Mid Wales (Future Fit), it was announced in Jan 2019 that emergency hospital care for Newtown & Llanllwchaearn residents, would remain located at the Royal Shrewsbury Hospital.

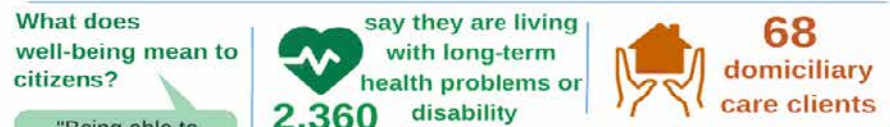
It is well evidenced that the following have a key role to play in supporting the health and well-being of the community: Nature, Gardening, Open Spaces (including waterways), Arts & Culture and Sport. This topic therefore links with the following other topics in the plan: *Open Spaces, Community Facilities, Active Travel, Culture & Attractions.*

What's Been Happening Recently?

In recent years, the medical practice in Newtown has experienced challenges in recruiting GPs. With significant housing developments planned just outside the town boundary, there is a concern that health services in their current form,



Newtown Town Council well-being fact sheet



will be oversubscribed. The community has a strong interest in long-term plans for a new health & well-being campus to be located in the town (North Powys Wellbeing Programme).

North Powys Wellbeing Programme

The North Powys Wellbeing Programme will deliver a significant change in the way health and care services are provided by promoting well-being, early help and support, and utilising social and green prescribing opportunities. The programme aims to encourage people to take greater responsibility for their health and well-being, and actively plan for their future health needs.

The project aims to:

- Enable citizens, staff and partners to be actively involved in the design and delivery of a new integrated model of health and care in north Powys.



Photo: TD

Page 721 Improve equity of service to both urban and a rural population through integrated health and care pathways, including commissioned services from neighbouring counties.

721 Enable more people to live independently and remain at home safely through technology enabled independence and care; and more integrated working to prevent needs from escalating and immediate intervention at time of crisis.

- Ensure joined up care involving neighbourhood teams and communities working together so that citizens have a more seamless service when they need it.

In May 2019, the Powys Regional Partnership Board (PRPB) received £2.5m of funding from Welsh Government to invest in new ways of delivering health and social care services within north Powys.

As part of the Programme, a Multi-agency Well-being Campus in the heart of Newtown, is proposed. The preferred site for the campus is adjacent to Park Street, Newtown. Services currently on the site include the Park Day Centre, Newtown Integrated Family Centre (formerly Ysgol Dafydd Llwyd) health services and two (soon to merge) primary schools, Ysgol Hafren and Ladywell Green.

The campus could host a new state of the art Rural Regional Centre serving the North Powys catchment. This may offer pre and post-operative care, day case procedures, diagnostics outpatients and rehabilitation services plus primary education, social care and supported accommodation.

In addition, a separate Community Well-being Hub could be sited on the campus. A place where different local partners can provide services for the

residents of Newtown & Llanllwchaiarn.²³

The programme is still at visioning and planning stage but has the potential to create significant change not only in terms of health and social care but also jobs, infrastructure, visitor numbers, facilities and services in the town.

The Impact of Covid-19

Between March and June 2020, a significant number of Newtown residents received Welsh Government sponsored food parcels and continue to need additional help with food and basic needs, as the economic impact of Covid-19 is felt and Welsh Government or Council support becomes less available.⁶

In addition to physical needs, the pandemic has also impacted on residents' mental health. Of particular concern has been the emotional wellbeing of young people who have been isolated and some facing other adversities at home.

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In immediate response to the pandemic, a group of Newtown organisations (Town Council, PAVO / Community Connectors, Ponthafren Association, The Salvation Army / Foodbank, All Saints Church) came together as "Newtown Network", to respond to the well-being needs of residents as they arose. It supported the establishment of a network of over 100 informal volunteers, who provided help such as shopping, prescription collection and delivery of hot meals. A printed information directory was produced and delivered to every house in the town.

It is expected that vulnerable people will continue to need additional support and the need for food banks will increase. Also the level of referrals to social care will increase.²³

Newtown Network has been joined by Citizens Advice Powys and Powys County Council Families First and will continue to respond to ongoing needs caused by Covid-19 and the economic downturn. It is currently formalising its membership, in order to continue its purpose of collaborating "to support the residents of Newtown and Llanllwchaiarn, Powys in various ways to have healthy and fulfilled lives."

LDP Policies & Other Planning Guidance

(see Supporting Evidence for full details)

- LDP Objective 16 – Community Well-being
- LDP Policy DM3 - Public Open Space
- LDP Policy W2 - Waste Management Proposals
- LDP Policy C1 - Community Facilities and Indoor Recreation Facilities
- LDP Policy DM1 - Planning Obligations
- Welsh Government: Planning Policy Wales (11)

Other Relevant Documents

- Well-being of Future Generations Act 2017
- Welsh Government (2019), A Healthier Wales
- Powys CC Well-being Information Bank
- Powys Public Service Board (2018) Towards 2040: Powys Well-being Plan
- Powys CC & Powys THB (2017), The Health & Care Strategy For Powys

New Place Plan Evidence

- Stakeholders Comments on the Health Hub
- Community Comments: Health and Well Being

What did you tell us?

Health & Well-being: Community Comments

A summary from the consultation events and public survey
(see Supporting Evidence for full details)

“The nursing staff at the doctors are very good and the wait for an appointment to see them is not too long.”

“The BIGGEST challenge will be about how we build a new culture towards our health... how do we invest in and deliver a health service that is about prevention not cure.”

“Whilst we have most of the facilities that we need as a community, they are overstretched”

Popular Themes

- To have access to medical centres and hospitals
- To have an emergency hospital close by
- To be able to get an NHS doctor's appointment when needed
- To have access to a dentist and appointment when needed
- Importance of access to green spaces for health and well-being
- Better access to mental health services

Key Feedback

Satisfaction with facilities to support health, care and well-being in Newtown:

- Extremely Satisfied: 2.8%
- Satisfied: 23.6%
- Neutral: 23.6%
- Dissatisfied: 33.0%
- Extremely Dissatisfied: 14.2%

Ideas For The Future

- Improved hospital services
- GP's surgery with short waiting times.
- More outdoor activities / leisure facilities to encourage exercise e.g. health spas, active travel, outdoor activities for schools, a central cafe hub in the park, better waterside access ,
- clean air zones and dark skies at night, better playground facilities, riverside relaxing areas and GPs should prescribe time to join the walking / park run groups.
- 24-hour minor injuries unit
- More Doctors
- More support for mental health support groups, community clubs such as walking, arts and games clubs.
- LGBTQIA support services / groups.

How Will We Address The Issues?

Health & Well-being Planning Policies

For policies relating to Health & Well-being, please refer to *Community Facilities* topic, which includes health centres.

Health & Well-being Projects / Actions

Town Council's role: (D) = Delivering, (E) = Enabling others to deliver and (I) = Influencing others to deliver.

No.	PROJECT / ACTION	Timescale No. of years to complete S - up to 3 M - up to 7 L - up to 15	Suggested Collaborators
HW1	Ensure that residents' views collected for the Place Plan and relating to Health and Well-being, is shared with the North Powys Wellbeing Programme team. (See Community Comments and Stakeholders Comments on the Health Hub in Supporting Evidence)	S	Town Council (D), Powys T Health Board
HW2	Strongly encourage the North Powys Wellbeing Programme team to continue to work with the local community on site design and other appropriate aspects of the proposed campus.	S	Town Council (D), Powys T Health Board
HW3	Investigate partners & funding to establish a central source of information (such as a Directory / What's On listing – ref project CF4) to promote engagement in sport, nature, creativity and social engagement as a means of keeping well.	S	Town Council (D,E), Powys CC, Powys T Health Board, Open Newtown, Voluntary Sector C/o PAVO, Business Sector via Chamber of Trade / Chamber of Commerce
HW4	Provide a "Changing Places" Toilet either as part of the new "Well-being Campus" or elsewhere in the town.	M	Town Council (I), Powys T Health Board / Accessibility Powys
HW5	Walking Newtown is promoting and seeking funding for a project to construct an accessible path up and around Trehafren Hill in conjunction with the already built cycle track.	S	Walking Newtown
HW6	Continue joint working through the Newtown Network, "to support the residents of Newtown and Llanllwchaiarn, Powys in various ways to have healthy and fulfilled lives."	S	Town Council (D), Powys CC, Ponthafren Association, PAVO, Salvation Army / Foodbank, All Saints Church, Citizens Advice

Other Projects / Actions that will contribute towards positive health & well-being are at CA4

1.6 A safe & tidy town



Why is this topic important to Newtown?

Attractiveness, cleanliness and safety are vital to people's positive experience of living and working in and visiting the town. These key aspects have a profound effect on people's community pride and well-being plus the economic prosperity of the town. Therefore, it is essential to get them right. Since the Covid-19 pandemic, safety in the town takes on an additional meaning and level of importance.

Key Facts

Safety

On the whole, residents feel safe in the town: Extremely or very safe: 37.7%, Somewhat safe: 34.9%, Not so safe / not at all safe: 20.8%

Tidiness:

In the public survey (106 responses) 49.1% described the town as "Somewhat clean", 8.5% as "Very clean".

What's Been Happening Recently?

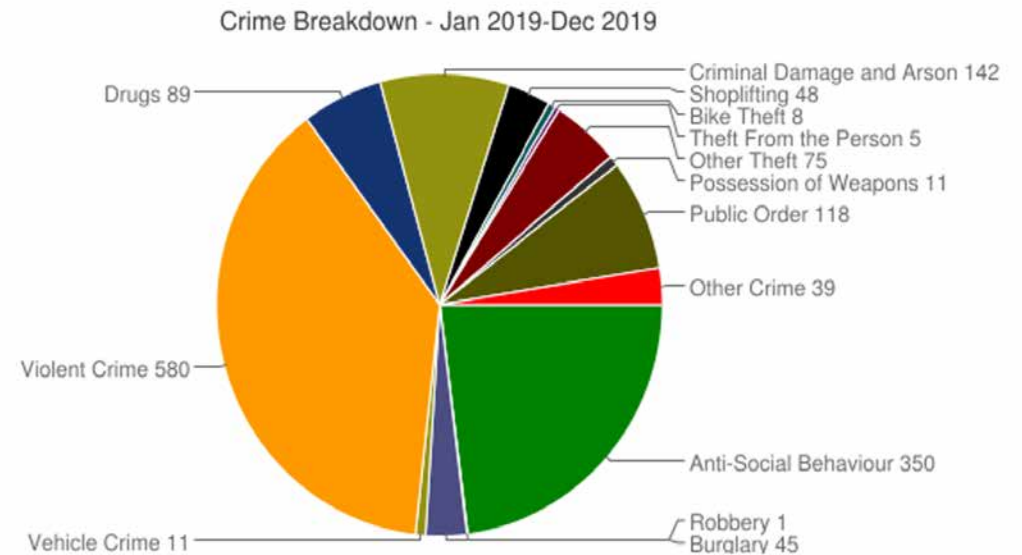
Safety

- There have been safety concerns following some violent attacks and an increase in drugs associated "county lines" activity in the town.
- Dyfed-Powys Police have recently installed CCTV at key town centre points.

Tidiness

- Several incidents reported of unattractive, overflowing bins in the town centre, particularly at weekends and bank holidays when high visitor numbers.
- The Town Council has been in discussion with Powys CC regarding a potential transfer of street cleaning services.
- The Town Council has written to the owners of key vacant buildings in the town to enquire about their status and future plans (see Appendix - Vacant Buildings & Buildings At Risk)

Crime and Anti-social Behaviour Incident (ASBs) numbers for Newtown for 2019. ²⁴



The Impact of Covid-19

Safety in the town has taken on a critical significance during the Covid-19 pandemic. Changes to the way in which we navigate around the town centre are currently taking shape, allowing adequate space for pedestrians to move safely and maintain safe social distances.

In August 2020, Powys County Council shared their new approach for “safe and resilient towns” in its plan *#SupportLocalPowys with safe and resilient towns*:

With the support and financial backing from Welsh Government, Powys County Council will work with town and community councils, local businesses, chambers of trade and residents to design and install bespoke measures to create safe public areas for citizens to access freely and for businesses utilise to reopen and remain viable.



Photo: TC

LDP Policies & Other Planning Guidance

(see Supporting Evidence for full details)

- LDP Policy DM13 - Design and Resources
- Welsh Government: Planning Policy Wales (10)

Other Relevant Documents

- Powys CC (2020), *#SupportLocalPowys with safe and resilient towns*
- UK Crime Stats Website, www.ukcrimestats.com

New Place Plan Evidence

- Community Comments: A Safe & Tidy Town

What did you tell us?

A Safe & Tidy Town: Topic Community Comments

A summary from the consultation events and public survey

(see Supporting Evidence for full details)

"The concrete wall alongside Ha'penny Bridge could be made more attractive."

"Generally pretty good but there are hotspots where people really let it down and sometimes lack of bin emptying over weekends / bank holidays makes the town a bit of an embarrassment tourism wise."

"Always felt safe in Newtown although crime appears to have increased in last 5 years. County lines is a problem."

Popular Themes

Safety:

- More and well monitored CCTV,
- More police presence on the street,
- Existing street lights switched back on plus additional lighting in the residential estates.
- Action to address drugs and alcohol related issues and anti-social behaviour.

Tidiness:

- There is an overwhelming consensus requesting better litter management in the town and suggestions for
- schemes and funding to keep places clean.
- Dog mess is a regular concern

Key Feedback

On the whole, residents feel safe in the town:

Extremely or very safe: 37.7%,

Somewhat safe: 34.9%,

Not so safe / not at all safe: 20.8%

- 49.1% described the town as "Somewhat clean", 8.5% as "Very clean".
- Some make the link between anti-social behaviour and the need for more activities for young people in the town.
- Safety concerns reported regarding road crossings in areas such as Canal Road and Milford Road.

Ideas For The Future

- Activities / spaces for teenagers
- Solutions to improve street lighting
- Review public bin provision / more public recycling bins/ more dog waste bins
- review household rubbish collection to prevent fly tipping.
- Continue litter-picking / schemes to address litter "hotspots"
- Work with food businesses to consider solutions:
- Community skip days sponsored by the fast-food retailers
- Promotion & education work to encourage tidiness
- Regular reviews of maintenance needs - gardens, flowerbeds, benches, grass cutting, bridges
- Dilapidated buildings such as Bethel Chapel, need addressing.

How Will We Address The Issues?

The Town Council will use these Policies when responding to consultations about local planning applications. If adopted as Supplementary Planning Guidance they will also be used by Powys County Council when assessing planning applications.

A Safe & Tidy Town Planning Policies

No.	POLICIES	SUGGESTED LOCATIONS? (Where applicable)
ST-a	Development proposals which deliver improvements to the public realm and enhance community safety within Newtown and Llanllwchaiarn, will be supported.	

A Safe & Tidy Town Projects / Actions

Town Council's role: (D) = Delivering, (E) = Enabling others to deliver and (I) = Influencing others to deliver.

No.	PROJECT / ACTION	Timescale No. of years to complete S - up to 3 M - up to 7 L - up to 15	Suggested Collaborators
1	Address community concerns regarding lack of lighting and uneven paths, by working with PCC Officers to identify safety priorities, based on Place Plan evidence (to include footpaths, cyclepaths and public rights of way - see Supporting Evidence: Footpaths & Cycle Paths Audit Summary & Map)	S	Town Council (I), PCC
ST2	Work with partners to consider undertaking community consultation on appropriate levels of street lighting.	M	Town Council (E), PCC
ST3	Work with PCC Officers to consider improvements to road crossing facilities, including Canal Road and Milford Road by reviewing Place Plan evidence (see Supporting Evidence - Footpaths & Cycle Paths Audit Summary & Map)	M	Town Council (I), PCC
ST4	Identify partners and funding to address litter and dog mess at identified "hot spots" in the town (see Supporting Evidence – Community Comments) Suggested ideas include "litter pick walks".	M	Town Council (I), PCC / Open Newtown / Keep Wales Tidy / Bryn Litter Pickers

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No.	PROJECT / ACTION	Timescale No. of years to complete S - up to 3 M - up to 7 L - up to 15	Suggested Collaborators
ST5	Work with PCC's Senior Waste Awareness and Enforcement Officer to consider the community's concerns about unattractive "hot spots" such as fly-tipping and buildings / structures needing maintenance, by reviewing the Place Plan evidence. (see Supporting Evidence – Community Comments)	M	Town Council (I), PCC, Problem Properties Board
ST6	Identify partners and funding for schemes to reduce specific food litter in the town centre, open spaces and residential areas.	S	Town Council (E), Food businesses / PCC / Open Newtown / Keep Wales Tidy / Bryn Litter Pickers
ST7	Identify partners and funding for promotional and educational schemes about keeping the town clean	S	Town Council (E), PCC / Open Newtown / Keep Wales Tidy / Schools / College / Library
ST8	Investigate transfer of "street scene" cleaning service from Powys CC to Town Council	S	Town Council (D), PCC
ST9	Create an overall "street scene" design for the town incorporating street furniture, planting etc	S	Town Council (D), PCC
ST10	Work with PCC, Professional Lead - Trading Standards, Community Safety and Emergency Planning Officer to obtain information on forthcoming highways works in the town and share the information with the local community.	S	Town Council (D), PCC

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Green Newtown

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Photo: ON

2.1 Open Spaces



Includes: Public Parks & Gardens, Natural & Semi-Natural Green Spaces, Waterways, Outdoor Sports Facilities, Amenity Green Space, Play Areas, and Allotments.

Why is this topic important to Newtown?

Newtown is fortunate to have the scenic River Severn running through its centre, in addition to many open spaces and the Montgomery Canal route. These assets are greatly valued by local people and can contribute to a good quality of life, health and well-being as well as attracting visitors, to keep the economy thriving. Allotments have many benefits including local food production, contributing to health and well-being and tackling social isolation.

Key Facts

Newtown hosts a series of football, rugby and cricket pitches, tennis courts, a bowling green and an athletics track. There is a large amount of amenity, natural and semi-natural green space, plus a range of play areas. A detailed breakdown of the town's open spaces can be found in Powys CC's Open Space Assessment (2018). Figures from it show that:

- Newtown features over 3 times the recommended amount of informal open spaces such as parks and gardens and other green spaces.
- 79% of people in the town live

within the recommended distance of an equipped play area

- Less than half (44%) of the recommended amount of equipped play spaces are provided.
- Just under 100% of the Newtown population live within the recommended 1.2km of an outdoor sports pitch.
- There are 36 allotment plots, covering 0.99 hectares of allotment space and 25 people on a waiting list.²⁵

The 1969 Thorpe Report recommends a minimum allotment provision equivalent to 15 per 1,000 households. There are an additional 40 micro-allotments at Cultivate Community Garden (equivalent to 1-2 full size allotments) – the site of which has doubled in the last 3 years.

Green spaces provide several important functions to society including:

- Supporting biodiversity
- Storing and removing carbon / reducing pollution
- Keeping soil healthy
- Reducing and preventing flooding / cleaning water



Photos: TC

- Connecting with nature / keeping us healthy and happy. ²⁶

What's Been Happening Recently?

- In 2018, 130 acres of riverside land in Newtown, was transferred under a 99-year lease from Powys County Council, to the Town Council and then on to a social enterprise organisation, Open Newtown. This was one of the largest community asset transfers of amenity land in Wales. Open Newtown manage the land under contract.

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The construction of a new destination playpark in the town park, has recently completed.

- The Town Council has entered discussions with Powys CC regarding the potential transfer of the allotment service.

A new audit of Open Spaces in the town was undertaken as part of the Place Plan. Walking Newtown contributed a significant amount of time auditing on this topic. (see Appendix Sport & Play Facilities and Supporting Evidence Open Spaces & Play Areas Audits & Map).

- A range of spaces were identified, some very good and well used but some in need of maintenance and others unusable.
- There are many small play areas around the town especially within housing estates. Some of these no longer have play equipment on them.
- A possible lack of amenity green space is highlighted in south ward (areas 11 & 13).

The community evidence highlighted a list of open spaces that are of value to local people (see Appendix - Open Spaces of Importance To The Community)

The Impact of Covid-19

Some public open spaces are being reimagined and considered as locations for open air dining and safe socialising.

LDP Policies & Other Planning Guidance

(see Supporting Evidence for full details)

- LDP Objective 14 – Healthy Lifestyles
- Strategic Policy SP7 - Safeguarding of Strategic Resources and Assets
- LDP Policy DM1 - Planning obligations
- LDP Policy DM3 - Public Open Space
- LDP Policy DM13 - Design and Resources
- LDP Open Space Assessment
- LDP Policy H3 - Housing Delivery
- TAN16 - Sport, Recreation and Open Space
- Welsh Government: Planning Policy Wales (11)

Other Relevant Documents

- The Land Trust (2017), The Hidden Value of Our Green Spaces
- National Assembly (2010), Allotment Provision in Wales
- Welsh Government (2014), Consultation on improving the availability of allotments and community gardens
- Walking Newtown (2018), Proposals for an accessible walk and community space on Trehafren Hill

New Place Plan Evidence

- Map: Open Spaces & Play Areas Audit
- Open Space Audits
- Play Areas Audits
- Sport & Play Facilities
- Open Spaces of Importance To The Community
- Map: Suggested Sites For Next Open Space Assessment
- Community Comments: Open spaces

What did you tell us?

Open Spaces: Community Comments

A summary from the consultation events and public survey

(see Supporting Evidence for full details)

“Treowen needs a play park, benches. Something needs to be done to the shop.”

“Newtown has fantastic green spaces – we are privileged and should make more of them.”

“Dolerw Park – a cherished open space for walking and thinking – aim for as little change to this as possible”

Popular Themes

- Page 733
- People want to protect their open spaces
 - Improving and making more of the river and green spaces
 - More outdoor leisure facilities along the river (cooking areas / picnic places)
 - More outdoor activities eg exercise classes, events

What's Good?

- Dolerw Park and the new orchard
- Motte and Bailey (The Mound)
- The River
- Canal path
- Porthouse Woods
- Countryside within easy reach of the town
- Skate Park
- St Marys Close
- Trehafren Hill
- River Dulas meets River Severn (spot for wildlife)
- Allotments
- Cultivate Community Garden
- St Marys Church
- “Sheep Fields”
- Robert Owen gardens
- Barnfields amenity open space
- Maesyhandir green spaces / “Alec’s Hill”

Key Feedback

- Consultation for the Newtown Community Action Plan revealed that “Green Spaces, environment and energy are considered the most important topics for the people of Newtown”....
- Young people report wanting more areas to relax and wifi spots in the green spaces

Ideas For The Future

- Outdoor events at The Mound
- Improve accessibility at Dolerw Park
- Company sponsorship of grass cutting at Dolerw Park
- Utilise the river for more recreational activities
- Bridge to Dolerw Park needs painting and lighting
- Use our open spaces for outdoor activities, events for families, public announcements (electronic screens)
- Improve open space provision at Maesyhandir estate
- Large greenhouses at Dolerw Park to grow flowers & plants, a Butterfly Farm to bring in tourists!
- Treowen needs a play park and more benches
- Keep fit equipment in the open spaces
- Open spaces to encourage youth engagement / Places for teenagers to go
- Barnfields open space to be retained
- Utilise the space at St Marys Church grounds

How Will We Address The Issues?

open Spaces Planning Policies

The Town Council will use these Policies when responding to consultations about local planning applications. If adopted as Supplementary Planning Guidance they will also be used by Powys County Council when assessing planning applications.

No.	POLICIES	SUGGESTED LOCATIONS? (where applicable):
OS-a	Development that would result in the loss or affect the use of public open space will not be supported, unless there is sufficient justification for the development including acceptable mitigation of the loss/harm to the public open space.	Locations as identified in LDP Open Space Assessment for Newtown. Plus Public Rights of Way (see local PROW map in Supporting Evidence). Also see project OS1.
OS-b	Any new development that will result in the loss of existing allotments and community growing spaces will not be supported, unless there is sufficient justification for the development including the provision of equivalent or enhanced alternative spaces to compensate needs.	
OS-c	Developments that provide new or extensions to existing allotments / community growing spaces will be supported	
OS-d	Proposals that provide new or improved play areas or sports facilities where required will be supported.	Play areas map
OS-e	Where Section 106 contributions are secured from developments towards open space, the Place Plan evidence will be used to inform decisions as to where and how monies are spent' (see Supporting Evidence Open Spaces & Play Areas Audits & Map)	

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open Spaces Projects / Actions

Town Council's role: (D) = Delivering, (E) = Enabling others to deliver and (I) = Influencing others to deliver.

No.	PROJECT / ACTION	Timescale No. of years to complete S - up to 3 M - up to 7 L - up to 15	Suggested Collaborators
OS1	With reference to NRW's Greenspace toolkit, Green Infrastructure Data Set and the Green Flag Award standards, review the Place Plan evidence for green spaces suggested for protection (see Next LDP section) and submit these for consideration into the next review of Powys CC's "Open Space Assessment"	S	Town Council (D), PCC

OS2	<p>Projects to enhance the use of the river, public rights of way and open spaces balanced with allowing wildlife to flourish:</p> <p>a) More activity trails, marked out pitches and tracks for outdoor exercise, outdoor gymnasiums</p> <p>b) Improve vehicular access to Dolerw Park for events</p> <p>c) More leisure facilities by the river such as picnic benches, barbeque areas</p> <p>d) Retain natural wild areas for enjoyment, quiet & reflection</p>	M	Town Council (E), Open Newtown / Mont Wildlife Trust / Nat Resources Wales / Walking Newtown.
OS3	<p>Use the:</p> <ul style="list-style-type: none"> Place Plan evidence (Supporting Evidence Open Spaces & Play Areas Audits & Map) Accessible Natural Green Space Standards (ANGs) plus Fields in Trust standards (FITs) <p>to review the provision of small playparks (for example within the housing estates & Penygloddfa) and draw up a list of priorities for play areas and other open spaces to be funded by Section 106 money.</p>	S	Town Council (D), CC
OS4	Encourage action on outstanding play area commitments (such as Woodland Way)	S	Town Council (I), PCC, Developers
OS5	Gather evidence of the local demand for allotments	S	Town Council (E), PCC , Open Newtown, Social Farms & Gardens
OS6	If demand exists Projects should seek to establish new allotments .	M	Town Council (D), PCC, Open Newtown, Cultivate
OS7	Seek to transfer allotment services from PCC to NLTC	S	Town Council (D), PCC
OS8	Identify partners and funding to develop a food strategy for the town	M	Town Council (E), PCC, Social Farms & Gardens, Cultivate, Open Newtown, Mid Wales Food & Land Trust, Urban Agriculture Consortium.
OS9	Identify partners and funding to obtaining Green Flag Awards status for well managed parks and green spaces.	M	Town Council (E), Open Newtown, Keep Wales Tidy, Powys CC

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2.2 Active Travel & Transport



(Includes: Footpaths, cycle paths, public rights of way, parking)

Why is this topic important to Newtown?

Active Travel means making journeys in ways that are physically active, such as walking or cycling rather than using motorised transport. An increase in walking/cycling would improve residents' health & well-being & community cohesion. Improvements to walk/cycle routes would encourage visitors and the use of local shops and services. A reduction in car use would lower harmful carbon emissions.

Key Facts

Newtown & Llanllwchaiarn Car Ownership Statistics¹

% households with no car or van: 26.3%
% households with 1 car or van: 46.9%
% households with 2 or more cars or vans: 26.8%

- Respondents to a local survey in 2019, said they would increase their walking if they had better knowledge of walking routes, paths were better maintained, accessible and felt safe.²⁷
- There are concerns around traffic congestion and parking at school run times. (Particularly Penygloddfa and Treowen).
- Welsh Government plan to implement 20 mph as the default residential area speed limit, by 2023. Community engagement work is expected at the time of its introduction.
- Newtown has 105 public rights of way, stretching 61km. The majority are public footpaths (97) with 8 bridleways.

Numbers of commuters travelling between Newtown and nearby towns (2011)³



What's Been Happening Recently?

- Following the completion of Newtown Bypass, the de-trunking of the main A483 Pool Rd/ New Rd/ Llanidloes Rd will create more walking and cycling opportunities
 - A re-configuration of schools programme is being undertaken by Powys CC, which may bring about a change in school locations / active travel routes
 - Community group "Walking Newtown" promote and maintain several walking routes in and around the town and host an annual walking / outdoor festival
 - Footpaths and cycleways audit work began as part of the Place Plan evidence gathering
 - Students at Treowen School have carried out traffic survey as part of their curriculum work
 - There is strong commitment from the community on this topic. Key stakeholder organisations (Walking Newtown, Open Newtown), have volunteered significant time to submit evidence to the Place Plan. They are keen to be engaged, share their knowledge and expertise and be involved in future decision-making.
- Active Travel schemes and facilities planned for the town by Powys County Council, the Town Council and Open Newtown include:
- a cycle hub, more cycle racks and repair station
 - A new cycle/ pedestrian bridge downstream of the Cambrian Bridge
 - A new scheme to provide safer shared cycle and pedestrian access under Nantoer Bridge on Llanidloes Rd
- Management of the volunteers who maintain local public rights of way will transfer from Powys County Council to the Town Council.

LDP Policies & Other Planning Guidance

(see Supporting Evidence for full details)

- LDP Policy T1 - Travel, Traffic and Transport Infrastructure:
- LDP Policy TD1 - Tourism Development
- LDP Policy DM3 - Public open space:
- LDP Policy DM1 - Planning Obligations:
- LDP Policy DM13 - Design and Resources
- Welsh Government: Planning Policy Wales (11)

Other Relevant Documents

- Open Newtown (2019), "Newtown Walking Project" (Draft Report)
- River Severn Custodians (2014), Survey of River Users
- The Active Travel (Wales) Act 2013
- Welsh Government (2011), National Transport Plan
- Welsh Government (2010), Creating an Active Wales
- Information on the National Cycle Network Routes in Powys: www.powys.gov.uk/en/roads-transport-and-parking/active-travel/ and www.sustrans.org.uk/wales/our-work-wales
- Powys CC (2016) Active Travel: Existing Route Map (ERM)
- Powys CC (2016) Active Travel: Integrated Network Map (INM)
- Powys CC Active Travel: Draft programme of improvements work for Newtown (INM Scores)
- Powys CC Active Travel: Pedestrian footpath and cyclepath audit records
- Powys CC: Local Rights of Way map (data.gov.uk)
- Powys CC: Rights of Way Improvement Plan 2018-2028

New Place Plan Evidence

- Footpaths, Cycle Paths & Bike Rack Audit Map
- Footpaths & Cycle Paths Audit Summary
- Footpaths & Cycle paths Audits - original notes and maps
- Stakeholder Active Travel proposals
- Community Comments: Active Travel

The Impact of Covid-19

The lockdown restrictions have led to an increase in walking and cycling as people travelled short distances in their local area, for exercise or shopping. Powys CC has underlined their commitment to Active Travel:

“The coronavirus pandemic has shown that reduced traffic levels generally encourages and/or facilitates opportunities for people to feel happier to cycle and walk within their local areas. By introducing cycle lanes, pedestrianised areas and allowing people to safely walk and cycle around our towns gives them the confidence to engage in healthier lifestyles choices and benefit from improved physical and mental well-being.”²⁸

What did you tell us?

Active Travel & Transport: Community Comments

A summary from the consultation events and public survey

(see Supporting Evidence for full details)

"We need more bus routes to outer areas of town like Morrison's, Poundstretcher etc and transport on Sundays"

"Should have cycle routes throughout town like they have in Europe not just by the river."

"Very happy with the train service but the platform is far, far too low when getting on and off the train with a pushchair and young children. It's actually dangerous."

Popular Themes

- Page 739
- Walking and cycling routes should be well maintained, safe and accessible.
 - More cycle routes and facilities needed
 - Schemes needed that would encourage people to change their habit of using the car for short local journeys.
 - Strong desire for the route from the train station into the town to be improved
 - A call for better public transport

Key Feedback

In the public survey (106 responses)

- 15.1% of people were extremely satisfied with walking and cycling provision in Newtown with 50.9% satisfied.
- 24.5% were satisfied with the provision of public transport in Newtown with 41.5% being neutral and 20.8% being dissatisfied.

Young People Would Like:

- More lighting on existing cycle paths and footpaths paths
- More bike paths, bike locks and cycle racks
- Google / You Tube routes – not paper maps!

Ideas For The Future

- Electric bike renting
- A Bike Hub, with lockers, showers, secure bike store and changing facilities and better signage
- Improved cycle routes and better signage.
- A leaflet to show locations of all cycle routes
- Improvements to footpaths around Treowen, Maesyddail, Maesyrrhandir, Millfields and Barnfields
- Paths to be accessible for young and old (buggies and wheelchairs)
- More bike racks
- Incentives to avoid short car journeys (encourage cycling to school, work, shopping)
- Circular walks and paths to link areas of the town with the countryside
- A mountain bike loop starting and ending at the proposed new hub buildings
- More parking at rail station

How Will We Address The Issues?

Active Travel & Transport Planning Policies

The Town Council will use these Policies when responding to consultations about local planning applications. If adopted as Supplementary Planning Guidance they will also be used by Powys County Council when assessing planning applications.

No.	POLICIES	SUGGESTED LOCATIONS? (Where applicable)
AT-a	Any new development should incorporate pedestrian and cycle-way linkages between existing active travel routes, existing housing, public open space and local services.	● Treowen housing allocation (P48 HA3 & HA4)
AT-b	Where funding and developer contributions can be sought, new pedestrian and cycle routes or improvements to existing networks should be provided, including appropriate signage	(various locations identified in Supporting Evidence: Footpaths & Cycle Paths Audit Summary & Map)
AT-c	The Place Plan encourages the protection of informal pedestrian paths and shortcuts to ensure that they continue to provide alternative passable pedestrian routes.	As above

Active Travel & Transport Projects / Actions

Town Council's role: (D) = Delivering, (E) = Enabling others to deliver and (I) = Influencing others to deliver.

No.	PROJECT / ACTION	Timescale No. of years to complete S - up to 3 M - up to 7 L - up to 15	Suggested Collaborators
AT1	Continue to work with the Active Travel department at Powys CC to develop the Active Travel network for Newtown. In particular consider the audit work and other Place Plan evidence submitted by the community, when identifying priorities for investment. (See Supporting Evidence: <i>Stakeholder Active Travel Proposals</i> and <i>Footpaths & Cycle Paths Audit Summary & Map</i> and <i>Community Comments</i>)	S	Town Council (D), PCC
AT2	Continue the Place Plan footpath & cycle paths audit work. Prioritise locations already identified by the Active Travel Officer at Powys CC (e.g Barnfields)	M	Town Council (E), PCC, Walking Newtown, Open Newtown, Bike To The Future
AT3	Set up a Newtown Active Travel working group, including community stakeholders and schools	S	Town Council (E), PCC, Walking Newtown, Open Newtown, Bike To The Future, Schools, College, Powys Ramblers, Local Access Forum.

No.	PROJECT / ACTION	Timescale No. of years to complete S - up to 3 M - up to 7 L - up to 15	Suggested Collaborators
AT4	Encourage a feasibility study into additional active travel bridges: e.g: * river crossing at the West end of the town * footbridge across the railway line – near fire Station to connect up the town * Trehafren fields to Dolerw park to make a circuit	M	Town Council (D), PCC. Walking Newtown, Powys Ramblers & River Severn Custodians as consultees.
AT5	Request a feasibility study into residents parking zones to address the parking issues in Crescent Street, Bryn Street, Commercial St.	M	Town Council (D), PCC
AT6	Provision of cycling training such as Cycling Proficiency and other confidence building schemes.	S	Schools, Open Newtown, Bike To The Future.
AT7	Encourage more walking and cycling by publicising the locations of routes and paths and providing free, led walks and cycle rides.	S	Town Council (E), Walking Newtown, Open Newtown, Bike To The Future, Schools, College, Powys Ramblers
AT8	Encourage a review of the community need (as identified in the Place Plan evidence - see AT1) for: <ul style="list-style-type: none"> • ecologically sensitive improvements to lighting, • improved maintenance and reductions in overgrown greenery • improved signage on existing footpath and cycle routes 	S	Town Council (E), PCC, Natural Resources Wales, Walking Newtown, Housing Associations, Powys Ramblers
AT9	Partnership working to maintain and improve existing paths & create more routes linking town centre to countryside walks including: <ul style="list-style-type: none"> • Footpaths and walks to link in with the new footbridge to be built over the river and adjoining Pool Road • A new shared use active travel route from the south side of Trehafren hill into town as well as an accessible path (see project HW5) • Identifying the community's priorities for work on the public rights of way network 	L	Town Council (E), PCC Active Travel, PCC Countryside Services and Outdoor Recreation, Walking Newtown, Open Newtown , Natural Resources Wales, Hafren Dyfrdwy, Canal & River Trust (where associated with the canal corridor), Housing Associations, Powys Ramblers

No.	PROJECT / ACTION	Timescale No. of years to complete S - up to 3 M - up to 7 L - up to 15	Suggested Collaborators
AT10	Investigate the use of Definitive Map Modification Orders to protect informal paths, including those identified in the Place Plan evidence.	M	Town Council (E), PCC, Walking Newtown, Powys Ramblers
AT11	Improvements to access opportunities linked to the Montgomeryshire Canal: to secure funding for improvements to both the canal towpath itself, and to linking public rights of way. Including improved signage and interpretation, and improved infrastructure (links with Projects AT9 & T6).	M	PCC Countryside Services and Outdoor Recreation team, PCC Active Travel, Canal and River Trust, Powys Ramblers
AT12	Review the School Crossing patrols & consider the most appropriate locations with reference to schools re-configuration and the detrunking of the A483.	M	Town Council (I), PCC
13 Page 742	Identify partners and funding for community transport projects such as: <ul style="list-style-type: none"> • car share schemes, • electric car & campervan pools, • communal school bus/bike, • car-free zones, • traffic free days, • walking bus for children, • cheaper public transport • reduced cost parking for car-shares & electric vehicles • Event planning which actively promotes use of public transport (links with Project CA4) 	S	Town Council (E), Voluntary, Business Sector via Chamber of Trade / Chamber of Commerce , Transport for Wales, PCC, Schools, College, Newtown Climate Action Group, Open Newtown
AT14	Request improvements to public transport links in order to reduce car use (e.g reinstatement of the currently disused bus stop at train station)	M	Town Council (I), PCC, Transport for Wales, Shrewsbury to Aberystwyth Rail Passengers Association, Shrewsbury to Aberystwyth Railway Liaison Committee, Cambrian Railway Partnership.

2.3 Climate Change & Biodiversity



Why is this topic important to Newtown?

"Wales' natural resources provide our basic needs; the air we breathe, the water we drink, and the food we eat. They give us energy, prosperity and security; they protect us and make us healthier and our lives better... When our environment is working at its best, society as a whole thrives."³³

With the impending global risks that climate change brings, this topic is of importance to all towns and cities and Newtown would like to play its part in reversing the damage for the benefit of future generations.

Biodiversity means the diversity of living organisms. It is important because it underpins the health and resilience of all of our ecosystems. In turn, these support all life on Earth. Ecosystems that are more biodiverse tend to be more resilient and are better able to adapt to the pressures and changes we face, for example through the impacts of climate change.

Key Facts

Climate Change

Human activities are estimated to have caused approximately 1.0°C of global warming above pre-industrial levels, with a likely range of 0.8°C to 1.2°C. Global warming is likely to reach 1.5°C between 2030 and 2052 if it continues to increase at the current rate (IPCC Report). Left unaddressed, the rise in temperatures will lead to further damage including:

- Further extreme weather events (heat waves, wildfires, floods, droughts)
- Further melting of the ice caps & further sea level rise / coastal submersion
- Further habitat destruction, biodiversity loss, species extinction
- Increase in pollution
- Crop failures
- Human migration

The proximity of the River Severn to the town poses a significant long-term flood risk, which is exacerbated by climate change. However, the existing flood defences, erected in 1967, after the severe floods in 1960 and 1964, reduce the flood risk in the town centre.²⁹



Photos: TD & SW.

For a time, the levels of Nitrogen Oxide (NO₂) on New Road, exceeded the objective level set out in the UK Air Quality Strategy. Following the designation of an Air Quality Management Area (AQMA) in 2007, the levels of Nitrogen Oxide fell, allowing the AQMA to be revoked in March 2017.¹⁴

Biodiversity

One in six species of wildlife, plants and fungi is at risk of disappearing from Wales. The “State of Nature” 2019 report³⁰ found that:

- Of the 6,500 species found in Wales, 523 (8%) were threatened with extinction from Great Britain
- Out of 3,902 species assessed for their likelihood of disappearing from Wales 666 (17%) were threatened with extinction from Wales, with another 73 having been lost already.

The saving of the Red Kites from extinction in the 1980s is a conservation success story that still resonates with local people. The Powys County Council logo features a Red Kite and the birds are regularly spotted in the area.

Green Infrastructure refers to a network of multifunctional green spaces, bodies of water and routeways, urban and rural, that is capable of delivering a wide range of environmental and quality of life benefits for local communities and biodiversity.

In the Newtown area the Montgomery Canal is protected by SAC designation (Special Area of Conservation) and the River Severn is linked to the wider Severn Estuary SAC. In accordance with LDP policy, developers will be expected to provide sufficient information in order for a Habitat Regulation Assessment to be undertaken on all relevant proposals to ensure there is no adverse effect upon the SAC.

What’s Been Happening Recently?

- There is now an obligation for Town Councils to report how they are addressing biodiversity objectives as set out in section 6 of the Environment Wales Act 2016
- In May 2019 the Town Council approved a motion to declare a ‘Climate Emergency’ (see Supporting Evidence), then in December 2019, it hosted a joint meeting with Montgomeryshire Friends of the Earth. A draft Climate Change Action Plan has been produced from that meeting. (see Supporting Evidence)

Natural Resources Wales has recently published “The Second State of Natural Resources Report (SoNaRR2020)” It looks towards taking a greener pathway out of the global Covid-19 pandemic, and to seize the opportunity to re-imagine how we use our natural assets to address the dual threats from the climate and nature emergencies.

In 2020, NRW also published its Mid Wales Area Statement with the following guiding principles:

- Improving biodiversity – responding to the nature emergency
- Sustainable land, water and air
- Reconnecting people and places – improving health, well-being and the economy
- Forest resources – managing timber resources effectively
- Climate emergency – adaptation and mitigation across four themes.

Impact of Covid-19

Recent UK wide lockdown restrictions

caused a halt to many of our activities outside the home. This in turn, reduced the levels of airborne pollution. Although these levels are likely to increase again as more normal activities resume, the change in lifestyles such as more people working from home and walking and cycling, may have a longer lasting effect.

LDP Policies & Other Planning Guidance

(see Supporting Evidence for full details)

- LDP Objective 4 – Climate Change and Flooding
- LDP Policy DM2 - The Natural Environment
- LDP Policy DM13 - Design and Resources
- LDP Policy RE1 - Renewable Energy (pg107 LDP)
- LDP Policy DM14 - Air Quality Management
- Powys CC: LDP Supplementary Planning Guidance: Biodiversity and Geodiversity
- TAN15 – Flooding
- Welsh Government: Planning Policy Wales (11)

Other Relevant Documents

- Town Council Climate Emergency Declaration
- Draft Newtown Climate Emergency Plan
- Natural Resources Wales, Flood Risk Assessment Wales Map
- Natural Resources Wales, Introduction to Sustainable Management of Natural Resources
- Natural Resources Wales (2020), The Second State of Natural Resources Report
- Natural Resources Wales (2020), Mid Wales Area Statement
- State of Nature Partnership (2019), State of Nature Report
- Oxfordshire County Council et al (2012), Community & Parish Guide To Biodiversity
- Environment Wales Act (2016)
- National Transport Plan (2011)
- BBC (2019), Briefing: Energy
- Centre for Sustainable Energy (2020), Neighbourhood Planning In A Climate Emergency
- Government Business Website, www.governmentbusiness.co.uk (2019), The Race To Zero Carbon
- SharEnergy (2017), Draft Report: Options For Land Based Community Energy Projects in Newtown
- Community Housing Cymru (2019), Better Homes, Better Wales, Better World

New Place Plan Evidence

- Community Comments: Climate Change and Biodiversity

What did you tell us?

Climate Change & Biodiversity: Community Comments

A summary from the consultation events and public survey

(see Supporting Evidence for full details)

"Maybe have a nature reserve in Dolerw or Trehafren but maybe it would get wrecked?"

"Using small shops regularly instead of bulk buying weekly at the supermarket helps reduce food waste and reliance on plastic packaging."

"I really like the wind turbine trees they have in Paris"

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Popular Themes

- More sustainable forms of travel (public transport & active travel)
- Community orientated solutions for energy, resources, food, land and transport
- Improve the infrastructure to encourage more walking and cycling for local journeys.
- Protect existing green spaces
- Allowing more areas to be left wild
- Protecting wildlife / wildlife habitats / enabling wildlife corridors
- Allow for maximum planting and landscaping in new developments
- Educational activities encouraging lifestyle change
- Alternative / community energy schemes
- New & existing housing to be more environmentally sustainable
- Minimising waste / Upcycling schemes
- Encourage circular economy development
- Encourage use of electric vehicles
- Encourage low carbon food

Ideas For The Future

- Recycle bins in town centre
- Dialogue with landowners about sustainable land management
- Work with other councils to make a bigger impact
- Encourage walking and cycling
- Community energy schemes e.g. Hydro
- Free bus travel around the town
- Walking bus for children for school runs
- Zero-waste shops
- Rewards schemes for green practice e.g. Discounts on local products, veg box schemes
- Car share schemes
- Car free zones
- Rooftop solar panels
- Lights off scheme overnight and weekends for businesses
- More electric car hook ups
- Retrofit housing stock to make more energy efficient
- Wildflower meadows
- Find sponsors for particular areas – look at solar energy
- PVs on rooves of industrial buildings
- Water "refill stations"

How Will We Address The Issues?

Climate Change & Biodiversity Planning Policies

The Town Council will use these Policies when responding to consultations about local planning applications. If adopted as Supplementary Planning Guidance they will also be used by Powys County Council when assessing planning applications.

No.	POLICIES	SUGGESTED LOCATIONS? (where applicable):
CC-a	Any new development in Newtown and Llanllwchaiarn will only be supported where it demonstrates sustainable and efficient use of resources or can be reasonably argued that it contributes towards the mitigation of the effects of climate change.	
CC-b	Developments will be supported where they facilitate greater use of public transport and/or active travel.	
CC-c	Proposals that provide electric vehicle charging infrastructure will be supported.	
CC-d	New development proposals should take account of flood risk and be designed in accordance with the latest national and local guidance on development, flood risk, and sustainable land drainage. Suitable new development and the re-use of buildings in flood risk areas of Newtown will be encouraged and supported provided flood risk issues are properly addressed.	
CC-e	Development that will result in the creation of new Green Infrastructure (GI) and/or contribute to the protection, management, enhancement and connecting of existing GI and individual GI assets and priorities will be supported.	
CC-f	<p>i) Any developments that would adversely affect the Montgomery Canal's status as a Special Area of Conservation would not be supported.</p> <p>ii) Any upstream development proposals concerning the River Severn that would adversely affect the Severn Estuary's status as a Special Area of Conservation would not be supported.</p> <p>iii) Schemes that assist in removing barriers to fish migration within the River Severn and which enhance the river and riparian habitat will be supported.</p>	
CC-g	Developments that prevent additional storm runoff into the river, will be supported.	
CC-h	Developments that include measures to achieve the supply of electricity and heat from renewable sources will be supported.	

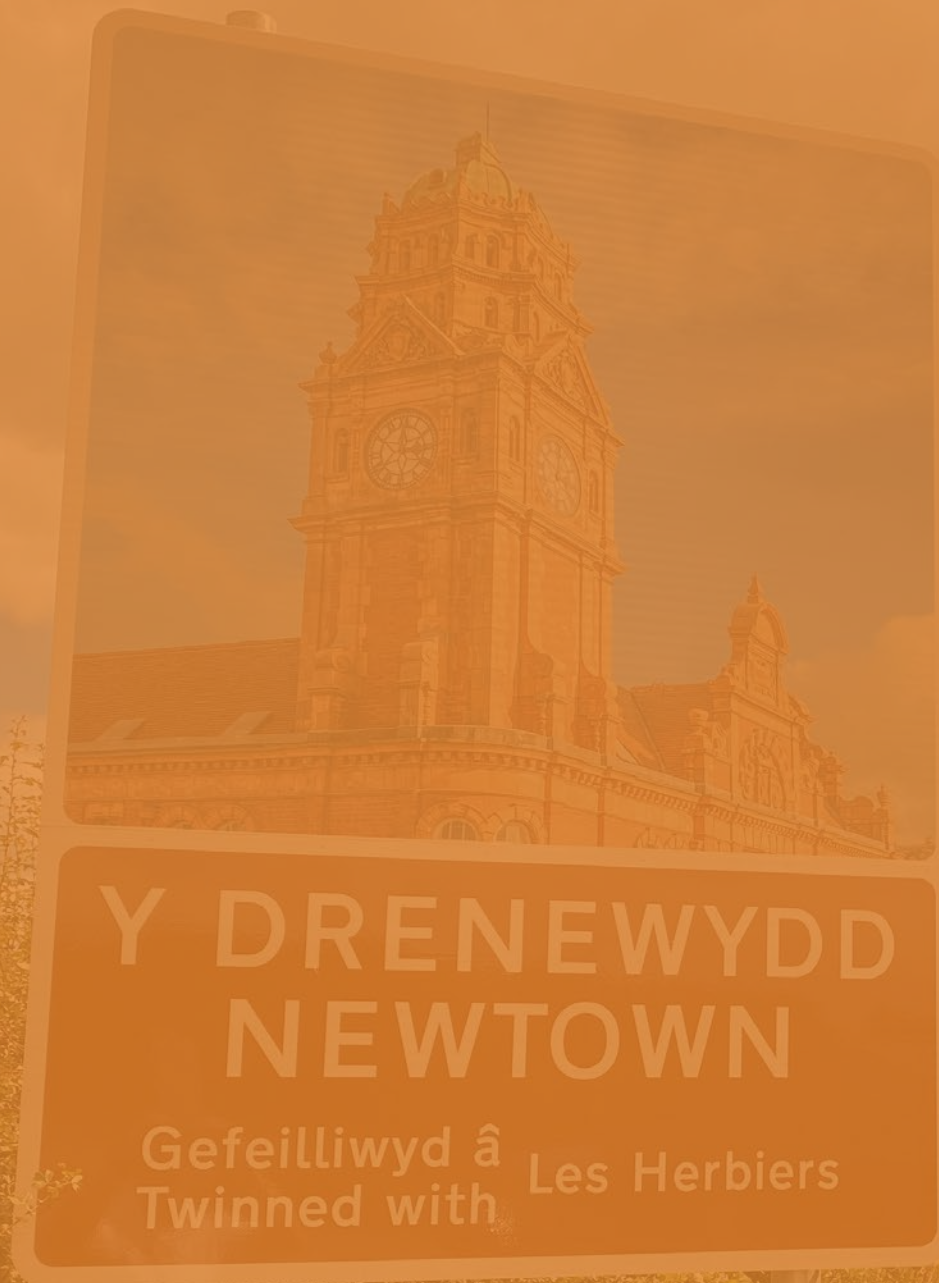
Climate Change & Biodiversity Projects / Actions

Town Council's role: (D) = Delivering, (E) = Enabling others to deliver and (I) = Influencing others to deliver.

No.	PROJECT / ACTION	Timescale No. of years to complete S - up to 3 M - up to 7 L - up to 15	Suggested Collaborators
CC1	Identify partners and funding to develop community-led energy schemes	M	Town Council (E), Newtown Open Energy, Voluntary Sector / PAVO, Newtown Climate Action Group, Community Energy Wales
CC2	Identify partners & funding for measures to reduce waste, conserve energy, reduce consumption and promote a circular economy including: <ul style="list-style-type: none"> • upcycling schemes, • repair cafe, • deposit schemes, • library of things, • low carbon food, • educational workshops. 	S	Town Council (E), Magik Incorporated, Circular Economy Mid Wales, Newtown Climate Action Group, Keep Wales Tidy.
CC3	With reference to resources such as Natural Resources Wales: "Healthy for Bees: Healthy for People - Managing the grounds of public buildings for pollinators", improve the town's green infrastructure and biodiversity (more trees /shrubs /wild areas/patches of wildflowers/wildlife corridors/bird boxes/rewilding of areas / tree planting on approaches into town / integration with the "Unlocking The Severn" project).	M	Town Council (D), PCC, Voluntary Sector / PAVO, Business Sector via Chamber of Trade / Chamber of Commerce, Canal & River Trust (where related to the Montgomery Canal [or the former line of]), River Severn Custodians, Open Newtown
CC4	Discover & record new information about habitats and species throughout Newtown & Llanllwchaiarn area by hosting a "bioblitz" event	S	Town Council (E), Montgomeryshire Wildlife Trust, River Severn Custodians, Open Newtown, Biodiversity Information System.
CC5	Support Climate Change & Biodiversity education projects including achieving Welsh Government "Bee Friendly" status.	S	Town Council (E), Montgomeryshire Wildlife Trust, River Severn Custodians, schools & college, Newtown Climate Action Group.
CC6	Contribute Place Plan evidence to PCC's Green Infrastructure Assessment during the LDP review.	S	Town Council (D), PCC

Destination Newtown

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3.1 Town Centre Experience



Photo: TC

Why is this topic important to Newtown?

What visitors experience when they visit the town centre is critical to their impression and enjoyment. Ensuring that they can find their way into the town centre and move around with ease in an environment that is engaging and prosperous, will lead to longer visits, return visits and word of mouth recommendations. This can enhance the economic prosperity of the town.

For people that live and work in the town, to be able to experience a thriving, well-functioning and maintained environment enhances quality of life, mood, health and well-being.



Key Facts

The LDP identifies Newtown as an **Area Retail Centre**.

- The MHE (Management Horizons Europe Shopping Index 2008) ranks Newtown as the main centre in Powys
- Newtown serves the catchment of the North West of Powys

- Newtown has a key role for Convenience Shopping / Comparison Shopping / Services / Entertainment / Community Facilities.³¹
- The current allocation of primary and secondary shopping frontages can be seen on the map in the supporting evidence. Primary Frontage is usually retained for

shops, restaurants and cafes, to preserve the appeal and convenience of the town centre for shoppers. Secondary frontages are those that make an important contribution to the vitality, viability and attractiveness of the centre but with a wider mix of uses.

What's Been Happening Recently?

Shopping

As in many towns, there was already a noticeable decline in prosperity of the high street. Several national chains and independent shops have closed.

Accessibility

A small consultation was undertaken in partnership with Celf-Able, regarding accessibility in the town centre. It identified the need for more and better disabled parking and access to town centre premises. It also highlighted the need for a more detailed audit to be carried out (“Accessibility Survey Responses” in Supporting Evidence).

A green infrastructure project is currently underway to make improvements to the town centre (as described in the Character & Heritage section).

Impact Of Covid-19

The pandemic has exacerbated the issue of too-quiet town centre streets and vacant premises. Local Development Orders are highlighted by Welsh Government as a potential means of changing use of town centre vacant properties to bring back vibrancy to the town centre.⁵ Welsh Government are also expected to offer some financial support to help town centres thrive. The first is a Strategic Sites Acquisition Fund, which will enable local authorities to acquire land and high street premises in local town centres, the second is a co-investment scheme, with local authorities, to enhance the attractiveness of town centres which may see increased footfall as a result of the increased propensity to work from home.⁴



Photo: TC

LDP Policies & Other Planning Guidance

(see Supporting Evidence for full details)

- Strategic Policy SP4 - Retail Growth
- LDP Objective Growth 1 - provide land for retail (pg 25)
- LDP Policy R1 - New Retail Development
- LDP Policy R3 - Developments within town centre areas
- Welsh Government: Planning Policy Wales (11)

Other Relevant Documents

- Disability Wales (2010) Planning for Inclusive Access in Wales: Good Practice Guidance Toolkit
- Glasu (2012), Powys High Street Feasibility Study
- Nathaniel Litchfield and Partners (2012), Powys Retail Study
- C. Ryan-Ridout - Newtown – First Impressions, Later Observations.
- Newtown Town Centre Primary & Secondary Frontages (data.gov.uk)
- Also see “Business” section.

New Place Plan Evidence

- Accessibility Survey Responses
- Community Comments: Town Centre Experience

What did you tell us?

Town Centre Experience: Community Comments

A summary from the consultation events and public survey

(see Supporting Evidence for full details)

"We need to be creative and find new ways to fill the empty shops. I think a mixture of unique independent shops plus community uses.."

"More welcoming routes needed from train station and back lane car park into town."

"Better crossing points for disabled people. Pavements need to be improved because of risk of tripping."

Popular Themes

- Improve accommodation offer - visitors and businesses
- Car parking charges
- Increase in medium / big scale events
- EV charger infrastructure
- Improved TIC / Improved promotion
- Fewer empty shops,
- A better mix of shops (less charity shops, more independent shops and larger chain stores)
- Addressing the key vacant / derelict buildings

Key Feedback

- A strong consensus for pedestrianisation of some areas within the town centre, to create more pleasant, social spaces.

Shopping

- 34.9% were dissatisfied with the shopping experience in Newtown with 24.5% satisfied
- 11.3% were extremely dissatisfied with the towns shopping experience.
- There is major concern about the decline of traditional high street, the challenging economic environment for town centre businesses and the number of empty shops.

Accessibility

- Accessibility consultation key themes were:
- Uneven pavements
- Lack of or blocked dropped kerbs
- Several buildings inaccessible
- Insufficient and unsuitable disabled parking

Ideas For The Future

- Free parking (or free for first 2 hours)
- Pedestrianise High Street / Broad Street
- Create more social places for visitors, seating, information boards
- More flower beds and displays / trees within the streetscene
- More litter bins to keep the town centre streets clean
- Improved parking with wider spaces and more disabled spaces
- Reduce shop rates / pop up shops
- A better range of shops: children's clothes, toy shop, art shop, quality clothes, plastic free shops.
- Improved bus routes to shops
- Local loyalty card
- Improved pedestrian and cycle routes – a clear route from the station to the centre
- A free Hop on and off shuttle bus around the town centre
- Allow redundant shops to become / remodel as residential? Many were in 19th Century
- Shop signage / frontages could be improved to enhance the historical features.
- Unique brand / identity for the town?
- Identify locally important unlisted heritage assets?
- Make Newtown a more accessible place for people with disabilities
- More benches/ seating en route from big car park to the town.
- Improve signage between the Station and the town centre.

How Will We Address The Issues?

The Town Council will use these Policies when responding to consultations about local planning applications. If adopted as Supplementary Planning Guidance they will also be used by Powys County Council when assessing planning applications.

Town Centre Experience Planning Policies

No.	POLICIES	SUGGESTED LOCATIONS? (Where applicable)
TC-a	Proposals that maintain and enhance the vitality and viability of Newtown Town Centre, will be supported.	Town Centre boundary
TC-b	Development that encourages Town Centre shopping, services and employment facilities that are convenient, safe and accessible to all and meet the day to day needs of residents will be supported.	
TC-c	Improvements to the supply and quality of short and long stay car parking to support the Town Centre will be supported.	
TC-d	Proposals that result in improvements to the free flow of pedestrian, cycle and vehicular traffic in the Town will be supported.	High Street, Broad Street, Shortbridge St, New Road

Town Centre Experience Projects / Actions

Town Council's role: (D) = Delivering, (E) = Enabling others to deliver and (I) = Influencing others to deliver.

No.	PROJECT / ACTION	Timescale No. of years to complete S - up to 3 M - up to 7 L - up to 15	Suggested Collaborators
TC1	<p>Create a working group to develop & implement a cohesive strategic plan for town centre usage and design, fit for the mid 21st century. To incorporate the needs of retail, leisure, hospitality, residential, health, social care, education & infrastructure (roads, parking).</p> <p>(This project pulls together and cross references with projects CH1, CH6, CH7, CH10, HF2, BL2, HW2, ST9, AT1, AT14, CC3, TC2, TC3, TC4, TC5 & TC6. "Newtown – First Impressions, Later Observations" is a useful resource).</p>	S-L	Town Council (D), PCC, , Powys Teaching Health Board, Voluntary Sector / PAVO, Business Sector via Chamber of Trade / Chamber of Commerce (i.e future Town Partnership ref project BL2)

TC2	Explore the feasibility and implement if appropriate, the full or part time pedestrianisation of parts of the town centre.	L	Town Council (I), PCC, Voluntary Sector / PAVO, Business Sector via Chamber of Trade / Chamber of Commerce
TC3	Improve the accessibility of the town centre by: * reviewing the Place Plan evidence (Accessibility Survey Responses) * carrying out a more detailed accessibility audit * undertaking necessary work to help improve access to the town's facilities.	L	Town Council (E), PCC, Accessibility Powys Voluntary Sector / PAVO, Business Sector via Chamber of Trade / Chamber of Commerce
TC4	Create more safe town centre social spaces, street trees, Sustainable Drainage Systems, rain gardens, seats, information boards, better links to green spaces	M	Town Council (D,E), PCC
TC5	Audit the existing pedestrian signage on key routes into the town centre (see TC6), including reviewing existing Place Plan evidence	S	Town Council (D), PCC Highways, PCC Active Travel
TC6	Improvement of signage, attractiveness and connections on key pedestrian, cycle and public transport routes including: The train station to the town centre Back Lane Car Park to the town centre Gravel car park to the town centre	S	Town Council (D,I), PCC, Transport for Wales, Shrewsbury to Aberystwyth Rail Passengers Association, Shrewsbury to Aberystwyth Railway Liaison Committee, Cambrian Railway Partnership.

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3.2 Tourism, culture & Attractions



Why is this topic important to Newtown?

Tourism has been one of the largest employers, increasingly rivalling agriculture in its economic importance across the county economy. Culture and attractions are vital aspects of tourism, which supports the prosperity of the town. They also contribute to the quality of life for local people, with a positive impact on their health and well-being.

Key Facts

Tourism contributes £720 million in income per annum in Powys.³² Visiting friends and family remains a key reason for trips within Mid Wales (16%, 2014-16), complemented by outdoor activities (12%) and taking part in sports (19%). 2.1 million, took part in sports in 2014-2016, making it the most popular activity undertaken on a Tourism Day visit to Mid Wales (compared to 3% in Wales overall).²

A high percentage of visitors to the current tourist information centre are not visiting Newtown necessarily as a destination, but are either:

- passing through en route to or from perhaps the coast or
- are staying in accommodation out of town and have some into town to explore.
- a small number of coach parties stop of en route – seeing it as convenient stop off point due to the facilities (large car park, public conveniences, cafes etc.).²

Newtown specific data is expected in the near future.

Key attractions in the town include:

- Robert Owen Museum
- Textile Museum
- Hafren (Theatre)
- Oriel Davies Art Gallery
- Leisure Centre
- Historic urban architecture
- Over 20 published walking routes (Walking Newtown)
- River Severn and Severn Way
- The Montgomery Canal
- Open spaces / Dolerw Park
- Destination Playpark
- Skate Park
- Mountain bike trail & BMX pump track
- Bowling alley
- Miniature railway
- Regent Cinema

“Newtown needs to keep itself alive by offering something different to attract more people into town”



Photos: TC



Photo: DB

- Glanhafren Market Hall
- Pwll Penarth nature reserve
- Town heritage trail
- Key events: Park Run, Carnival, Food Festival, Outdoor Festival, Fireworks display, Lights Switch on
- Newtown also provides a base to explore the surrounding countryside.

What's Been Happening Recently?

- The opening of the Newtown bypass in 2019, has increased the need to address what the town has to offer visitors.

- In 2018, the Town Council consulted with local, regional and national tourism stakeholders including local businesses, Powys County Council Tourism, the Mid & North Wales Destination Network and Visit Wales, to produce a Tourism Plan "Finding A New Route" and associated Action Plan, which runs from 2019-2023. The plan's progress is reviewed annually.

- In October 2015 the Town Council resolved to work with the Canal and River Trust, the Montgomery Canal Partnership

and others to lobby for the restoration and re-watering of the Montgomery Canal to Newtown for navigable use. The line of the Canal including the dry bed and in-filled sections between Freestone Lock and the town is protected under LDP policy TD3 as identified on Inset Map P48F and Proposal Map PR08.

Attractions that have been completed recently or are currently in development include:

- The destination playpark
- The mountain bike trail
- The BMX pump track
- The Riverside Venue (in development)

LDP Policies & Other Planning Guidance

(see Supporting Evidence for full details)

- LDP Policy TD1
- LDP Policy TD3
- Welsh Government: Planning Policy Wales (11)

Other Relevant Documents

- Newtown & Llanllwchaiarn Town Council (2019), Finding A New Route & Action Plan
- Powys CC: LDP Supplementary Planning Guidance: Historic Environment
- Canal & River Trust / Montgomery Canal Partnership (2016), The Montgomery Canal: Regeneration through Sustainable Restoration
- Waterway Routes (2020), Extract from Cruising Map Montgomery Canal - Issue 103

New Place Plan Evidence

- Community Comments: Tourism, Culture & Attractions

What did you tell us?

Tourism, Culture & Attractions: Community Comments

A summary from the consultation events and public survey

(see Supporting Evidence for full details)

"If we are to encourage our youngsters to stay in Mid-Wales and if we are to attract people to move to the area we will need to support the development of a contemporary nightlife economy."

"Promote a "tourism offer" of a day out / overnight package to include attractions in the town and opportunities for traffic free bike rides for all abilities (flat terrain for young children)"

"A general museum showcasing all aspects of the town would be good... could include war history, buildings' history, Abermule rail crash, roman site found under tesco, POW camp, wool industry.."

Popular Themes

- Improve accommodation offer - visitors and businesses
- Car parking charges
- Increase in medium / big scale events
- EV charger infrastructure
- Improved TIC / Improved promotion

- Dolerw Park – events
- Glanhafren Market Hall

Key Feedback

58.5% said that there were not adequate facilities in Newtown for tourists.

Ideas For The Future

- More fetes / fairs / Arts / Music festivals
- Celebrate local historical figures
- Family oriented events
- Better leaflets / signage
- Better public toilets
- An adventure park
- Promote Free car parking
- All weather attractions: indoor climbing wall, ice rink, large soft play, refurbished swimming pool
- A big glass geodome with indoor activities and beautiful views, would attract locals and visitors
- Use of River for tourism - particularly for cyclists – improved cycle paths, café
- A Cycle Sportive. Newtown used as a start and finish point.
- Model boating lake in the park / rowing boats on the river
- The Mound – great potential for outdoor events
- Electric bike renting
- St Marys Close – publicise and information needed
- Cultural Heritage Hub – St David's
- St Marys – Robert Owen state of the art museum
- Conference centre / hall for events

Young People Want:

- hotels
- new campsite
- more places for people to visit
- trampoline park
- water park
- zipline
- play areas for 10yrs plus
- airport
- Art / Graffiti Wall

What's Good?

- College
- Theatre
- Oriel Davies Art Gallery
- Textile Museum
- Leisure Centre
- Historic urban architecture
- Canal Walk / open spaces
- Skate Park

How Will We Address The Issues?

Tourism, Culture & Attractions Planning Policies

The Town Council will use these Policies when responding to consultations about local planning applications. If adopted as Supplementary Planning Guidance they will also be used by Powys County Council when assessing planning applications.

No.	POLICIES	SUGGESTED LOCATIONS? (where applicable):
T-a	<p>The Place Plan supports development proposals that actively encourage tourism within Newtown and Llanwchaiarn including:</p> <ul style="list-style-type: none"> Hotels and holiday rental accommodation (particularly where they re-use existing buildings and cater for families). Facilities that promote arts, culture and our industrial and Welsh heritage. New venues that cater for music, events, sports & recreation New Tourist Information / Resource Centre (Riverside Venue). The sensitive repair, sustainable restoration and protection of the line of the Montgomery Canal back to the town (beyond Freestone Lock), which will help promote the canal as an important tourism and well-being asset and recreational route (multi-functional resource) (see Appendix - Map: Character Areas - Development Types) Sports & recreation equipment hire . Better signposting for tourists to venues, open spaces and activities (See TC6). 	
CA-a	<p>Development which involves the loss of key attractions (see list) will not be supported unless the current or previous use is no longer viable demonstrated by financial and marketing evidence over a 6 month period.</p>	<p>Key attractions includes: Robert Owen Museum, Textile Museum, Hafren (Theatre), Oriol Davies Art Gallery, Leisure Centre, Historic urban architecture, Over 20 published walking routes (Walking Newtown), River Severn and Severn Way, Canal route, Dolerw Park, Skate Park, Bowling alley, Miniature railway, Glanhafren Market Hall, Pwll Penarth nature reserve, Escape Rooms, BMX Pump Track, Mountain Bike Trail, Town Heritage trails, The Riverside Venue (in development), Trehafren Hill Activity Hub (in development)</p>
CA-b	<p>Developments that facilitate the provision of events and attractions in Newtown will be supported.</p>	<p>Key events: Park Run, Carnival, Outdoor Festival, Food Festival, Fireworks display, Christmas Lights Switch on, Marching Bands Open Air Competition.</p>

Tourism, Culture & Attractions Projects / Actions

Town Council's role: (D) = Delivering, (E) = Enabling others to deliver and (I) = Influencing others to deliver.

No.	PROJECT / ACTION	Timescale No. of years to complete S - up to 3 M - up to 7 L - up to 15	Suggested Collaborators
T1	Establish a unique brand and identity for Newtown; "Discover Newtown".	S	Town Council (D), PCC, Mid Wales Tourism
T2	Develop and promote a year-round calendar of events with indoor and outdoor activities: <ul style="list-style-type: none"> Incorporating and adding to the annual events listed in CA-b and Working with partners listed in Project CA4. Addressing any events infrastructure requirements 	M	See Project CA4
T3	Identify partners and funding to support the enhancement of the accommodation offer in the town (see project BL2).	M	Town Council (E), PCC, Tourism Businesses
Page 759	Deliver actions in "Finding A New Route" tourism plan until 2024, review and update the plan.	M	Town Council (D), PCC, Tourism Businesses, Voluntary Sector / PAVO.
	Progress with the next stages of the Town Council's Project Initiation Document for restoration of the canal back to the town including: <ul style="list-style-type: none"> Install canoe access points Repairs to Dolfor Lock Hut seeking partners and funding Carry out a feasibility study Identifying a suitable location for a new terminal basin If Restoration goes ahead, consider an iconic structure as a tourist attraction similar to the Falkirk wheel 	L	Town Council (D,E), Canal & River Trust, Montgomery Canal Partnership, Natural Resources Wales, Montgomery Waterway Restoration Trust, River Severn Custodians
T6	Identify partners and funding for improved signage from the town centre to the canal path and illustrated signs promoting the heritage, along the former route of the canal. (links with Project AT11).	S	Civic Society, Canal & River Trust

No.	PROJECT / ACTION	Timescale No. of years to complete S - up to 3 M - up to 7 L - up to 15	Suggested Collaborators
T7	Development of an Activity Hub at Trehafren Hill. To complement nearby Mountain Bike Trail and BMX Pump Track facilities, with development of canoe and bike hire enterprises, along with coaching opportunities, climbing wall development, youth and family recreation, tourist destination, with refreshments and welfare facilities available on site, with a secure compound area for maintenance teams and a visitor car park.	M	Open Newtown and partners yet to be determined.
CA1	Increase the range of attractions for teens / young people: (zipline, trampoline park, water park, climbing walls) (see Supporting Evidence: Community Comments). (Links with project CF3).	S	Town Council (E), Business Sector via Chamber of Trade / Chamber of Commerce, Magik Incorporated, PCC, Voluntary Sector C/o PAVO
CA2	Improve attractions for other age groups: (indoor soft / play centre, improved miniature railway etc.) (see Supporting Evidence: Community Comments). (Links with project CF3).	M	Town Council (E), Business Sector via Chamber of Trade / Chamber of Commerce, Magik Incorporated, PCC, Voluntary Sector C/o PAVO
CA3	Develop more all weather attractions, particularly those that make use of existing buildings. (see Supporting Evidence: Community Comments)	M	Town Council (E), Business Sector via Chamber of Trade / Chamber of Commerce, Magik Incorporated, PCC, Voluntary Sector C/o PAVO
CA4	Increase the number and range of regular events to facilitate use of the town, park, canal and river for locals and tourism - e.g cycling training / racing, music / arts events (links with Project AT13). (see Supporting Evidence: Community Comments)	M	Town Council (E), Open Newtown, Walking Newtown, River Severn Custodians, Welsh Cycling, Scouts, Newtown Paddlers, Oriol Davies, Newtown Garden Club, Rotary Club, Food Festival CIC, Newtown Carnival, Wales GB Rally, Silver Band, Gregynog Festival, Magik Incorporated, Alliance Theatre, Celf Your Health.

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The Next Local Development Plan

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The next Local Development Plan

These items will be submitted to Powys County Council for Consideration for the Next LDP.

1. Review of Town Boundary (size)

Consider increasing the size of the settlement boundary as befits the town's status as part of a "Regional Growth Area" in Welsh Government's *Future Wales – the National Plan 2040*. Expansion is possible for example, where land exists between the current boundary & the new bypass road.

2. Town Centre and Housing

Consider means of permitting change of use to residential, for vacant town centre properties, in order to mitigate the effects of the decline in high street retail & the impact of the covid-19 pandemic.

3. Inclusivity & Accessibility

There is increasing acknowledgement in planning policy that the design of the built environment can have health impacts. For instance, Planning Policy Wales now requires Health Impact Assessments to be carried out at the LDP stage, and therefore this will be required for the next LDP.

Re. Accessibility - Consider a wider definition than the current LDP policy DM13 (7) which requires proposed developments to be 'inclusive to all, making full provision for people with disabilities. Consider inclusivity, not limited to the physically disabled. For example, the needs of the elderly, people living with dementia and those with sensory loss. There are opportunities to work on this with Dementia Friendly Groups and Accessibility Powys.

4. Energy

Request that new developments incorporate electric charging points for properties with off street parking

5. Open Spaces of Importance To The Community

Several open spaces were highlighted by the community to be of value for recreation and well-being (Appendix: Open Spaces of Importance To The Community). The majority of those listed, already feature in Powys CC's current Open Space Assessment (OSA). The following are not featured

in the OSA and are intended to be submitted to Powys CC for consideration as part of the next Open Space Assessment – Project OS-1

For Consideration in the next Open Spaces Assessment – (see Appendix: Suggested Sites For Next Open Space Assessment Map)

- 1. Porthouse Woods, Llanllwchaiarn
- 2. Cultivate Community Garden
- 3. Green space between Maesyrrhandir estate and the Mochdre Industrial Estate (south of 18 on OSA map)
- 4. Infill South of Brimmon Road (land at Severn Hts)
- 5. The land containing the electricity sub-station between Mochdre roundabout and Mochdre Lane plus sections to west of Maesyrrhandir primary school proposed as a green corridor / potential allotment site.
- 6. Woodland to east of pump house (in the Canal Area, as

marked on Open Spaces Audit map)

- 7. Space between Brimmon Close and Meadow View.
- 8. Small green at Cae Cymric, bordered by housing and lower Canal Road.
- 9. Land between Mochdre Industrial Estate (Heol Ashley) and Black Hall Hill (south of no. 15 on OSA map).

6. Establish a requirement for developers of all multiple housing sites to work with the community to produce a design brief.

7. Land East of Dolfor Rd and North of Milford Road, identified as potential housing site. Both outside of current settlement boundary. Consider as candidate sites in the next LDP.

8. Car park next to Riverside / Halfpenny Bridge – if currently earmarked for housing development, change to parking in next LDP.

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Powys Local Development Plan

2011 - 2026

**Supplementary Planning Guidance
(SPG)**

Consultation Statement
Third Edition: October 2019
Fourth Edition: July 2021

DRAFT



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- 3 Representations from the Public Consultation on the third set of SPG (October 2019)
- 4 Representations from the Public Consultation on the fourth set of SPG (~~date pending,~~ March 2020)
- 5 Representations from the Public Consultation on the Newtown & Llanllwchaiarn Place Plan (March 2021)

PART A**1. Introduction**

1.0.1 The Powys Local Development Plan (LDP) 2011-2026 was adopted by Full Council in April 2018. Whilst the LDP contains policies and proposals which form the basis for decision-making on planning applications for the Powys Local Planning Authority area, it avoids excessive detail. Therefore, certain policies in the LDP are being supported by a set of guidance documents called Supplementary Planning Guidance (SPG) to assist in understanding, interpretation and application of the policy in making planning decisions.

1.0.2 The preparation of SPG documents has been prioritised according to both subject matter and available time and resource. The Council is required to monitor its performance on preparing and adopting SPG against the following agreed programme:

Table 1: The Powys Local Development Plan SPG Programme

SPG Topic Area		Link to Powys LDP Policy	Target Timescale following LDP Adoption	Target Date for SPG Adoption
Set 1	Planning Obligations	DM1	Within 6 months	October 2018
	Affordable Housing	H5, H6, SP3		
	Biodiversity	DM2, SP7		
Set 2	Landscape	DM4, SP7	Within 12 months	April 2019
	Renewable Energy	RE1, DM13		
Set 3	Conservation Areas	DM13, SP7	Within 18 months	October 2019
	Open Space	DM3		
	Residential Design Guide	DM13		
Set 4	Archaeology	SP7	Within 24 months	April 2020
	Historic Environment – including the Historic Environment Records	DM13, SP7		
	Land Drainage	DM6		

1.0.3 Powys County Council commenced the preparation of the Powys LDP in January 2011. The Delivery Agreement¹ for the LDP was first published in November 2010 and revised in March 2013, February and October 2015. This set out the timetable for

¹ LDP Delivery Agreement <http://www.powys.gov.uk/ldp>

preparing the LDP and a Community Involvement Scheme (CIS) describing how and when the County Council would involve interested persons and organisations in the LDP's preparation.

1.0.4 The Community Involvement Scheme for SPG preparation has been updated from the LDP Delivery Agreement CIS and is tailored for the SPG process. This means that the community engagement approach is developed to be reflective of and proportionate to the detail and content of SPG work and suitable for the parties expected to be involved, whilst meeting the preparation timeframes. The agreed CIS for the preparation of SPG is included in the Protocol for the Preparation and Adoption of Supplementary Planning Guidance² approved by the Council in June 2018 (hereafter referred to as the SPG Protocol).

1.0.5 In accordance with the SPG Protocol, this Consultation Statement summarises for each stage of SPG preparation:

- Who has been involved.
- A summary of Reference Group and Topic Stakeholder engagement.
- The steps taken to publicise the consultation.
- The total number of representation forms received from the public consultation.
- A summary of the main issues raised as part of the public consultation.
- The Council's responses to the main issues raised and any agreed changes to the SPG to address these.

1.0.6 Section 2 of this Consultation Statement is set out chronologically to accord with each stage of the SPG preparation and adoption procedure as laid out in the SPG Protocol:

Stage 1 - Review

Stage 2 - Reference Group, Topic Stakeholders and Working Draft SPG

Stage 3 - Consultation Draft SPG

Stage 4 - Public Consultation

Stage 5 - Final SPG

Stage 6 - Adoption

² Protocol for the Preparation and Adoption of Supplementary Planning Guidance
<http://www.powys.gov.uk/en/planning-building-control/local-development-plan/ldp-supplementary-planning-guidance-spg/>

2. Information on SPG Preparation Stages

2.0.1 In accordance with the SPG Protocol, the following stages of preparation are common to all SPG:

2.1 Stage 1 – Review

2.1.1 A review of national, regional and local legislation, policy and guidance was undertaken in order to form the background and context for the SPG and identify issues of relevance. Where considered appropriate, the Council has sought the involvement of specialist stakeholders with the aim of building consensus.

2.2 Stage 2 – Reference Group, Topic Stakeholders and Working Draft SPG

2.2.1 At an early stage in the SPG preparation process, professional stakeholders were contacted to form a Reference Group for each SPG and relevant Topic Stakeholders were identified. Following Reference Group involvement in the production of a Working Draft SPG, the Draft was shared with Topic Stakeholders to seek initial feedback. The details of the Reference Group and Topic Stakeholders contacted during the preparation of each SPG are shown in the relevant section in Part B below.

2.3 Stage 3 – Consultation Draft SPG

2.3.1 The Council's LDP Working Group, comprised of nine County Councillors, and chaired by the Council's Portfolio Holder for Economy and Planning, is used to scrutinise and approve the Draft SPG for Public Consultation. The agendas, reports and minutes of past LDP Working Group meetings are available for viewing on the Council's website via the following link:

<http://www.powys.gov.uk/en/democracy/council-committees-and-meetings/>

2.3.2. The first set of SPG were approved for the consultation stage by the LDP Working Group on 22nd June 2018.

2.3.3 The second set of SPG were approved for the consultation stage by the LDP Working Group on 19th December 2018.

2.3.4 The third set of SPG were approved for the consultation stage by the LDP Working Group on 21st of June 2019.

2.3.5 The fourth set of SPG were approved for the consultation stage by the LDP Working Group on 18th of December 2019.

2.3.6 An additional SPG, the Newtown & Llanllwchaiarn Place Plan, was approved for the consultation stage by the LDP Working Group on 10th December 2020.

2.4 Stage 4 – Public Consultation

2.4.1 SPGs have been subject to a six week public consultation period in accordance with the SPG Stakeholder and Community Involvement Scheme (see Appendix 1 of the SPG Protocol). Additionally, Town and Community Councils were provided with advance notice of the consultation period in accordance with the Protocol to enable them to publicise the SPG process in their own communities. The dates of the six-week

public consultation period are shown in the relevant section for each SPG in Part B of this document.

2.4.2 Each SPG consultation document posed a series of questions for representors to respond to. This Consultation Statement records responses on a question by question basis and provides the Council's agreed responses to the issues raised.

2.4.3 The Council considers each representation carefully in order to draft a response which may include a recommendation to change or alter the SPG. Consultation responses are drafted with the assistance of Reference Group members where relevant and agreed by the LDP Working Group before being reported to Cabinet. A detailed set of representations will be appended to the Consultation Statement for each SPG.

2.5 Stages 5 and 6 – Final SPG and Adoption

2.5.1 The Cabinet are required to formally adopt the SPG before it is published and used for development management purposes. Part B of this Statement will record this process and will be updated as further SPG is prepared and approved by Cabinet.

2.6 SPG Impact Assessments

2.6.1 Whilst SPG documents are not formal policy in themselves they will be used to support the implementation of adopted Local Development Plan policy and therefore have been assessed informally as a matter of good practice using the Council's Impact Assessment Toolkit.

PART B

3. Public Consultation on the first set of SPG

3.0.1 In accordance with the SPG programme agreed for the LDP (in Table 1 above), the first three SPGs prepared for public consultation were:

- **Planning Obligations**
- **Affordable Housing**
- **Biodiversity and Geodiversity**

3.0.2 In accordance with Stage 4 of the SPG Protocol, the Consultation Draft SPG were published for public consultation over 6 weeks with the consultation period running from 11th July to 21st August 2018.

3.0.3 County Councillors, Town and Community Councils and all representors on the Powys LDP database were informed of the consultation and the documents were available to view on the LDP pages of the Council's website.

3.0.4 Notice of the consultation period was publicised on the Council's News page, the LDP webpage, and via social media. A press release was issued to the local press.

3.0.5 Hard copies of the consultation documents were made available to view in the Council's main offices at:

- County Hall and The Gwalia, Llandrindod Wells.
- Neuadd Brycheiniog, Brecon.
- Neuadd Maldwyn, Welshpool.

3.0.6 Hard copies were made available to view in all Powys Public Libraries.

3.0.7 Representations were invited either by letter /email and the use of a standard representation form was encouraged.

3.0.8 Table B1 below shows how many representors made comments in relation to each SPG. A more detailed report of the responses received for each SPG can be found in the relevant appendices.

Table B1: Number of Representatives making consultation comments on the first set of SPG

Consultation Draft SPG	No. of Representatives who made Representations
Planning Obligations	7
Affordable Housing	7
Biodiversity and Geodiversity	10
Total	24

3.0.9 The main issues arising from the consultation are set out for each SPG in the tables below, together with the Council's response.

3.1 Planning Obligations SPG

3.1.1 Reference Group

3.1.2 In order to prepare the Planning Obligations SPG, the Council sought participation and involvement with various Topic Stakeholders, from which the Council formed a Reference Group.

3.1.3 The Reference Group comprised 14 members, which included either one or more representatives from the following Council services:

- Planning Policy
- Development Management (Planning and Monitoring Officer)
- Schools
- Housing
- Leisure and Recreation
- Highways and Transport
- Regeneration
- Welsh Language
- Finance
- Legal Services

3.1.4 Engagement with the Reference Group during the preparation of the draft SPG is summarised in table B2:

Table B2 – Reference Group Involvement (Planning Obligations SPG)

Date	Who and How?
Early May 2018	Contact made proposing an initial meeting, although this was followed up by written correspondence instead. The Reference Group were

	provided with the details of the SPG scoping exercise, the Draft SPG Protocol and a list of proposed Topic Stakeholders, and feedback was invited.
Late May 2018	Working Draft SPG circulated for feedback.
June 2018	Revised Working Draft SPG circulated to Reference Group and Topic Stakeholders. This was followed up by officer led discussions on various planning contribution topic areas to collate up to date evidence especially surrounding figures/costings for any “set” contributions. Individual meetings were held with Officers from Leisure and Recreation, Schools and Welsh Language. The purpose of this was to engage stakeholders so as to fill any remaining gaps in the Working Draft SPG. Suggested changes were considered and taken into account in the Consultation Draft SPG.
July 2018	Notice of public consultation period circulated to LDP Database. 6 week public consultation period from 11th July to 21st August.
July 2018	A reminder email was circulated to the group which included notification of key dates going forward.
Early August 2018	Involvement of the Welsh Language Officer re: targeting relevant interest groups. Following this, contact was made with a targeted list of Welsh language stakeholders (including those Town and Community Councils identified as Welsh Speaking Strongholds and Welsh Language interest groups) to highlight awareness of the public consultation.
August 2018	Representations received to the public consultation shared and discussed with relevant Reference Group members.
September 2018	Consultation Draft SPG showing proposed changes presented to the LDP Working Group shared with the Reference Group. The Reference Group was informed of any issues raised by the LDP Working Group before the SPG was finalised for Cabinet approval.

3.1.5 Topic Stakeholders

3.1.6 The larger Topic Stakeholder group included an additional 18 members, including representatives from the following services:

- Ecology
- Minerals
- Land Drainage and
- Active Travel;
- Additionally, Council Portfolio Holders with responsibility for Finance, Transport, Learning and Welsh Language, Highways, Housing and Economy and Planning were copied in to the Topic Stakeholder correspondence.

3.1.7 These stakeholders were invited to provide informal feedback on a working draft of the SPG prior to the formal public consultation stage, although no specific comments were received.

3.1.8 LDP Working Group

3.1.9 The Draft SPG was considered by the LDP Working Group on 22nd June 2018 and approved for Public Consultation.

3.1.10 SPG Consultation

3.1.11 The public consultation period ran from 11th July to 21st August 2018 and representations were received from the following:

Representor Name (Representor No.)

- Canal & River Trust in Wales / Glandwr Cymru (5704)
- Homebuilders Federation (78)
- Hughes Architects (Newtown) (1552)
- New Radnor Community Council (131)
- Mochdre with Penstrowed Community Council (516)
- Montgomery Town Council (517)
- Presteigne and Norton Town Council (525)

3.1.12 The main issues arising from the consultation and the Council's responses to these are set out in Table B3 below.

3.1.13 The representations and Council draft responses were considered by the LDP Working Group at its meeting on the 7th September 2018, and subsequently by the Council's Cabinet at its meeting on 9th October 2018.

Table B3 – Main Issues from the Public Consultation (Planning Obligations SPG)

Question 1: PO1 - Do you agree with the Council's approach not to pursue a CIL Charging Schedule at this point in time? If not, please explain why.	
Issue	Council Response
Community and town councils should have greater involvement in S106 agreements, and that further consultation should be undertaken on planning obligations later in the process. (Rep 131, Rep 525)	Opportunities exist for involvement at the pre-application and application stages where communities can raise issues. Unfortunately it would not be practical to formally consult on planning obligations separate to the planning application process.
The position or need for CIL should be kept under review to ensure infrastructure needed is being delivered. (Rep 517)	The Council will continue to monitor the suitability of introducing a CIL as explained in para, 4.17 of the SPG.
Developers should contribute towards necessary improvements to mitigate the adverse impact of development upon the Montgomery Canal infrastructure. (Rep 5704)	Planning obligations will be sought where they comply with the tests and this could include contributions towards the Canal. Specific reference to the Canal within the SPG is not considered appropriate because it has been

	written to refer to infrastructure generically.
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Question 2: PO2 - Do you agree that, in the interests of avoiding duplication, this SPG only cross references to policies in the LDP and does not repeat them? Would you prefer the SPG to include the applicable policies? Is so, should they appear in the main document or in an Appendix?

Issue	Council Response
Relevant LDP policies should be included in an appendix, or cross-reference with web links. (Rep 516, Rep 5704, Rep 1552)	Include hyperlinks in the SPG to assist readers.

Question 3: PO3 - Due to the nature of planning obligations, this SPG cannot include every scenario/detail. Do you think the document is clear in this respect? Do you agree that it enables officers, stakeholders and developers to understand that additional or alternative obligations may be sought? If not, please explain why.

Issue	Council Response
Examples should be given of the circumstances in which additional obligations may be sought. (Rep 1552)	Para 5.5 explains that additional obligations will be sought where there is sufficient robust evidence to justify obligations.
Refer to the pre-application stage in para 5.6 as an opportunity to make developers aware of planning obligation requirements. (Rep 5704)	Agreed. Early awareness is important. This point has also been elaborated in revised wording to the Step by Step Flowchart.

Question 4: PO4 - Do you agree that “major” development should be the development that most often triggers obligations? If not, please explain why. Please detail any changes towards seeking obligations that you think may be suitable and relevant for Powys citing examples from other planning authorities where known. Nb. Definite targets/thresholds, where set within the LDP, are not negotiable at this point and would only be re-assessed at the Plan Review stage.

Issue	Council Response
Whilst agreeing with para. 5.11, it is not needed in the SPG. (Rep 78)	It is considered that para 5.11 should be retained because it is important to set out the expectation that planning obligations are likely to be sought for major developments, even though they may not eventually be required.
It should be made transparent that planning obligations may be required for any development. (Rep 517)	The position is correct, providing the tests for planning obligations are met. Para 5.11 states that each case will be considered on its merits so no amendment is considered necessary.
To avoid doubt, applications requiring pre-application consultation should be added as a trigger for an obligation. (Rep 517)	Major applications are those subject to pre-application consultation so no amendment to para 5.11 is considered necessary.

Question 5: PO5 - Do you consider the Step by Step Flowchart in Figure 1 to be clear and accurate? If not, what changes would you suggest? If you have

experience of the process within Powys County Council, does this flowchart mirror your experience?	
Issue	Council Response
The flowchart should include flexibility for a developer to draft the S106. (Rep 78)	Agreed that this is an option but recommend that para 5.9 is amended to explain this rather than any change to Figure 1.
The flowchart should include the pre-application consultation stage which enables early involvement of town and community councils. (Rep 517)	Noted, but no amendment needed because pre-application consultation is included at the end of the first paragraph in Figure 1. The Council recommends that the flowchart wording in Box 2 is strengthened by amending the wording to read: "The Case Officer makes an initial assessment of S.106 implications having regard to any discussions held or comments arising from the pre-application stage.
Consultation on planning obligations with community and town councils should be included. (Rep 525)	Opportunities exist for involvement at the pre-application and application stages where communities can raise issues. Unfortunately it would not be practical to formally consult on planning obligations separate to the planning application process.
Informal dialogue and informal pre-application discussions are valuable alongside the more formal chargeable pre-application enquiries. This is not emphasised in the flowchart. (Rep 1552)	Noted, but no change to the SPG is considered necessary. The pre-application service lies outside the scope of the SPG and is operated in accordance with Welsh Government Regulations.

Question 6: PO6 - Do you agree with the approach that it is the Affordable Housing SPG and not this SPG which includes the arrangements for assessing the financial viability of a specific development?

Issue	Council Response
Disagree because the viability of a scheme can be affected by any S106 requirement not just affordable housing. (Rep 78)	Comment noted, but no change deemed necessary because the Affordable Housing SPG addresses that point.
Include a hyperlink to the Affordable Housing SPG. (Rep 1552)	Agreed.

Question 7: PO7 - Whilst there is no statutory requirement to specify a time period in which planning contributions should be spent, do you agree with the suggested 10 year (maximum) period? If not, please explain why.

Issue	Council Response
Object to the proposed ten year period as unreasonable and recommends a five year period unless otherwise agreed with the developer. (Rep 78)	The Council is aware that other authorities have successfully operated a 10 year period, but accepts that para 6.17 should make it clear that this is a matter for

	negotiation.
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Question 8: PO8 - Do you consider that the five main topic areas set out in Part 3 are the right topic areas for this document? If not, please explain what changes you would like to see and why.

Issue	Council Response
Community facilities could be a separate topic. (Rep 78)	Noted, but given that community facilities are likely to be site specific and addressed on a case by case basis it is considered that they should remain in the 'Other Topic Areas' category.

Question 9: PO9 - Do you agree that the detail provided in Part 3 for the various topic areas is relevant and sufficient to inform S.106 negotiations? If not, what changes would you like to see and why?

Issue	Council Response
Affordable Housing topic Make it clearer that there is an Affordable Housing SPG that should be used. (Rep 78)	Noted but no change considered necessary because the synopsis includes such a reference.
Education topic 1. Should Welsh medium schools be included in the list of schools supported by contributions? 2. The financial contributions in Table E2 are higher than those charged by other authorities and should be compared. 3. New security and safety measures should not be funded in full. (Rep 78)	1. Welsh medium schools are already accounted for and there is no need to list them separately. 2. The Council has applied BCIS figures which is considered to be accurate and appropriate for Powys, and can be updated more frequently. 3. The wording will be amended to refer to Security and safety improvement measures to provide a safe environment (including) to adequately facilitate an increase in pupil places.
Leisure, Recreation and Open Space topic 1. Object to the Council not adopting open space as this will lead to the creation of management companies and add costs to all residents including those in affordable housing. (Rep 78) 2. Town and Community Councils could establish trust funds to maintain open space and community facilities in perpetuity. (Rep 517) 3. Specific mention to improvements to the towpath of the Montgomery Canal should be included. (Rep 5704)	1. Noted but no change. The Council's decision not to adopt new open space lies outside the SPG; alternative management methods will be addressed in the preparation of the Open Space SPG. 2. The suggestion is appreciated and will be considered in the preparation of the Open Space SPG. 3. Planning obligations will be sought where they comply with the tests and this could include contributions towards the Canal. Specific reference to the Canal within the SPG is not considered

	appropriate because it has been written to refer to infrastructure generically.
<p>Transportation and Access topic</p> <p>1. Travel plans and / or transport assessments are only likely to be required for major developments. (Rep 78)</p> <p>2. Specific mention to improvements to the towpath of the Montgomery Canal should be included. (Rep 5704)</p>	<p>1. Amend the wording in the synopsis to read “Schemes that may generate significant amounts of traffic or travel will be required to demonstrate....”.</p> <p>2. Planning obligations will be sought where they comply with the tests and this could include contributions towards the Canal. Specific reference to the Canal within the SPG is not considered appropriate because it has been written to refer to infrastructure generically.</p>

Question 10: PO10 - Do you agree with the methods and formulae (where provided) for calculating the required financial contributions as set out in Part 3? If not, please explain why.

Issue	Council Response
No issues raised.	Comments noted

Question 11: PO11 - If you have any other comments you want to make which are not covered by the above questions please include them here:

Issue	Council Response
Reference should be made to the fact that the Council will keep a public register of S106 agreements once signed and this will include a list with details of each contribution. (Rep 78)	The register of S106s is referenced in paragraph 6.18 so no further change is considered necessary.
Para 5.34 - on second line replace the word 'will' with 'could' as S106's will not always be sought. (Rep 78)	The sentence refers to seeking a planning obligation so the word 'will' is considered suitable.
Para 5.38 - the wording suggests that the thresholds are for negotiation on each application which is contrary to para 5.34 table 1 which sets the thresholds. This para should just refer to the trigger points for payment/ implementation of works being negotiated on a site by site basis. (Rep 78)	It is considered that para 5.38 makes it clear that there is a process of negotiation to be had and therefore considers no alteration is required.
Para 6.11 - this suggests that reviews of S106 contributions should be triggered by a change in the economy, although this is common practice recent work carried out by the HBF in relation to Swansea LDP showed that over a two year period although house prices had doubled build costs had gone up by three times the amount over the same period. The paragraph should explain that all factors and cost associated with the development will be considered as part of any review of viability.	The information is noted and the Council accepts that developers may wish to present more up to date viability evidence and that the S106 may need to be adjusted as a result. However, this section refers to situations where viability resulted in nil or reduced contributions and enables the Council to 'check' this position should viability improve. As such, it is not recommended that the

(Rep 78)	paragraph is amended.
Include contact details of the Council's S106 officer. (Rep 78)	Para. 6.18 refers to the Planning and Monitoring Officer who can be contacted via the email address in Appendix A.
It is not sensible to rely on developers to maintain play areas and their long term future must be addressed. (Rep 525) . This representor also welcomed a dedicated monitoring/compliance officer and asked that this continues.	Comments noted. The Council agrees that the future maintenance of play space is important and recognises that developers are not ideally placed for this long term role. Alternative methods are set out in the Leisure, Recreation and Open Space topic and this will be addressed further in the Open Space SPG.
<p>Could new industrial and commercial development be required to contribute towards affordable housing or other infrastructure? (Rep 1552)</p> <p>Also issue of capacity for the S106 officer - caution re: overwhelm or at least slow down the process.</p>	<p>All applications will be considered on their own merits in line with national and local policies. Both levels of policy set the context for securing affordable housing and do not require commercial development to provide affordable housing. Contributions to local infrastructure such as transport improvements are possible, but will be considered at the application level.</p>

3.2 Affordable Housing SPG

3.2.1 Reference Group

3.2.2 In order to prepare the Affordable Housing SPG, the Council sought participation and involvement with various Topic Stakeholders, from which the Council formed a Reference Group.

3.2.3 The Reference Group comprised 7 members, which included representatives from the following Council services:

- Planning Policy
- Development Management
- Housing Strategy
- Affordable Housing
- Legal Services

3.2.4 Engagement with the Reference Group during the preparation of the Draft SPG is summarised in table B4:

Table B4 – Reference Group Involvement (Affordable Housing SPG)

Date	Who and How?
May 2018	Meetings and correspondence with members of the Reference Group to discuss updated topic-related and planning information to inform the background and context of the SPG, to discuss the scope of the SPG and process involved, and to identify and agree a list of Topic Stakeholders to seek feedback from prior to public consultation.
June 2018	Initial working drafts of the SPG shared and discussed with the Reference Group to agree content of the working draft to be circulated to Topic Stakeholders. Initial feedback received from the Topic Stakeholders and suggested changes shared with the Reference Group. Specific issues raised by Topic Stakeholders discussed with the relevant members of the Reference Group. Comments from the Reference Group taken into account in preparing of the Consultation Draft.
July 2018	Notice of public consultation period circulated to LDP Database. 6 week public consultation period from 11 th July to 21 st August.
August 2018	Representations received to the public consultation shared with the Reference Group and specific issues discussed with the relevant members of the Reference Group. Any changes proposed to the SPG in response to the representations received also shared with the Reference Group and any outstanding issues discussed further.
September 2018	Consultation Draft SPG showing proposed changes presented to the LDP Working Group shared with the Reference Group. The Reference Group was informed of any issues raised by the LDP Working Group before the SPG was finalised for Cabinet approval.

3.2.5 Topic Stakeholders

3.2.6 The following Topic Stakeholders were involved:

- Registered Social Landlords operating in the area
- Grwp Cynefin (hosts of the Tai Teg Affordable Housing Register)
- Community Housing Cymru
- National Community Land Trust Network
- District Valuations Services
- Home Builders Federation
- Country Landowners Associations
- Council for Mortgage Lenders/UK Finance
- Principality Building Society
- Brecon Beacons National Park Authority
- Welsh Government Local Plans.

3.2.7 These stakeholders were invited to provide informal feedback on a working draft of the SPG prior to the formal public consultation stage.

3.2.8 A working draft of the SPG was also shared with Strategic Housing Partnership (SHP) and also presented to the SHP at a meeting on the 6th of June 2018.

3.2.9 Comments received from the Topic Stakeholders were considered and responded to, with further discussion taking place on specific issues where necessary. The input from Topic Stakeholders was used to inform changes to the working draft of the SPG.

3.2.10 LDP Working Group

3.2.11 The Draft SPG was considered by the LDP Working Group on 22nd June 2018 and approved for Public Consultation.

3.2.12 SPG Consultation

3.2.13 The public consultation period ran from 11th July to 21st August 2018 and representations were received from the following:

Representor Name (Representor No.)

- Homebuilders Federation (78)
- Hughes Architects (Newtown) (1552)
- Mid Wales Housing Association (4628)
- Mochdre with Penstrowed Community Council (516)
- Montgomery Town Council (517)
- Abermule with Llandyssil Community Council (542)
- Presteigne and Norton Town Council (525)

- Canal & River Trust in Wales / Glandwr Cymru (5704)

3.2.14 The main issues arising from the consultation and the Council's responses to these are set out in Table B5 below.

3.2.15 The representations and Council draft responses were considered by the LDP Working Group at its meeting on the 7th September 2018, and subsequently by the Council's Cabinet at its meeting on 9th October 2018.

Table B5 – Main Issues from the Public Consultation (Affordable Housing SPG)

Question 1: AH1 - Do you agree that the affordable housing definitions and types as set out are relevant to the Powys LDP area? If not, please explain why.	
Issue	Council Response
Requesting clarification on whether and in what circumstances self-build would be included in the definition of affordable housing. (Rep 1552)	Self-build is referred to under the definition of 'intermediate affordable housing for sale'. In order to qualify as affordable housing for planning purposes, self-build will need to comply with the definition provided and subject to the relevant restrictions and mechanisms. No changes recommended.
Question 2: AH2 - Do you agree with the data sources and calculations used to work out the affordability level for Powys? If not, please explain why.	
Issue	Council Response
Questions whether the average house price fairly represents the affordable level due to the range of houses in the Authority's area. Suggests calculation that does not include the most expensive housing would be more appropriate. (Rep 78)	The figure used for the average house price is based on the Land Registry's House Price Index, which is calculated in a way that reduces the weighting given to high value properties and is close to the median figure. It is considered to be appropriate to use this figure to compare with income levels, in order to demonstrate housing affordability issues in the area. No changes recommended.
Disagrees with the figures used as they do not reflect local variations in prices and wages. (Rep 525, Rep 1552)	The figures used are based on the data available from official government sources, and there are limitations on the data available at a more local level. The availability of data will be kept under review, particularly in connection with the review of the Local Housing Market Assessment. No changes recommended.
Disagrees with the average wage used, given primarily agricultural and light industrial employment at national minimum	The figures used are based on the data available from official government sources, which are based on

<p>wage. (Rep 516)</p>	<p>averages. It is not possible to account for specific wage levels or types of employment in the calculation of the affordability level. However, the range of affordable housing types provided for are aimed at meeting the varying needs of households, and individual circumstances will be taken into account in assessing local housing need. No changes recommended.</p>
<p>Disagrees with the gross disposable household income figure being based on two full-time workers - does not account for single parent families, part-time employment or where only 1 in full-time employment. (Rep 516, Rep 542, Rep 525)</p>	<p>The figures used are based on the data available from official government sources, which are based on averages, and therefore it is not possible to account for all household situations or employment arrangements. However, the range of affordable housing types provided for are aimed at meeting the varying needs of households, and individual circumstances will be taken into account in assessing local housing need. No changes recommended.</p>
<p>Calculations do not take account of build costs. Only RSLs/SHA capable of financing affordable housing and implications for viability where not possible to secure involvement of RSL or the Council. (Rep 1552)</p>	<p>The calculation is based on the cost of purchasing a house and is aimed at establishing the level at which households, on average, are able to afford to purchase housing. Build costs are not relevant to this calculation, however these costs have been taken into account in the LDP's viability assessment and policy targets. Where involvement of an RSL or SHA cannot be secured, the SPG allows for financial contributions to be made in lieu of on-site provision. No changes recommended.</p>
<p>The figure of numbers of persons in need of affordable housing in East Radnor is too low. Refer to Presteigne and Norton Town Council's own housing survey in 2011 identifying 80 people in need and PCC housing register in 2011 had 158 in need. (Rep 525)</p>	<p>The figures referred to in the SPG are taken from the Local Housing Market Assessment (2010, updated 2014), which is in the process of being reviewed. It is recommended that a note is included after the table explaining this and cross-referring to para. 6.6.5 of the SPG in relation to evidence used in decision-making.</p>

Question 3: AH3 - Do you agree with the approach towards seeking affordable housing contributions from specialist market housing developments? If not, please explain why.

Issue	Council Response
<p>There are more likely to be viability issues having regard to the additional design features required of certain specialist</p>	<p>Site specific viability issues, where evidenced, will be taken into account in determining the level of affordable</p>

provision. (Rep 1552)	housing contribution that can be secured from specialist housing schemes. No changes recommended.
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Question 4: AH4 - Do you agree with the examples given of circumstances where alternative provision to on-site provision may be considered? If not, please explain why.

Issue	Council Response
Support for the prevention of subdivision/phasing of development sites to avoid contributions and in defining the density of sites to avoid 4 homes being provided rather than five on a 0.25 hectare site. (Rep 525)	This support is noted.
Request for the monies received to be spent within the same community as the original site. (Rep 525)	Financial contributions will be spent on schemes available within the same settlement, however in case of situations where there are no schemes available within the same settlement, the cascade set out in para. 6.5.7 of the SPG will be applied. This will ensure that contributions are spent locally where possible, or if not, are spent in a way that continues to support the provision of affordable housing in the LDP's area. No changes recommended.
Request for further information on who will be required to provide evidence (and in what form) that a contribution in a different location would have a greater contribution towards meeting local affordable housing. (Rep 1552)	The Council will decide whether alternative provision to on-site provision is appropriate and justified in specific circumstances. The developer may propose alternative provision and provide evidence to support this, however the Council will determine the appropriateness of any proposals. No changes recommended.
Suggestion that the last example box at para. 6.3.4 emphasises the potential role of RSLs as they are increasingly involved in market development. (Rep 1552)	The last example box referred to relates to intermediate housing for rent or sale and does not refer to market development as such. The involvement of RSLs in market developments through developer transfer of units/land is covered in the first two example boxes. No changes recommended.

Question 5: AH5 - Do you agree with the approach used to determine whether off-site provision would be appropriate? If not, please explain why.

Issue	Council Response
Requesting clarity on arrangements where site is not within the same ownership, and on the section 106 arrangements, legal and	The option of providing affordable housing on an alternative site is only intended to apply where other suitable

financial negotiations involved in this. (Rep 1552)	land is within the control of the developer, as explained in para. 6.4.1. The use of off-site contributions will not be appropriate where the land is not within the same ownership. Any permission involving off-site provision would be subject to a section 106 agreement as explained in para. 6.4.2. No changes recommended.
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Question 6: AH6 - Do you agree with the method and formulae for calculating the required financial contribution? If not, please explain why.

Issue	Council Response
Affordable housing need figures not felt to be even close to correct. See previous response to AH2. (Rep 525)	This response is referring again to the figures of local housing need included in the LHMA. The use of evidence of local housing need to determine the type of dwelling that would have been required on-site is referred to in para. 6.5.2. See response to Question AH2 regarding this matter.
There may be a risk that, where it is possible for them to do so, developers will seek sites in areas where there is less requirement for affordable housing. (Rep 1552)	The financial contribution will reflect the % target required by policy H5 for the sub-market area where the planning application is located. The representation appears to be referring to the policy requirements that have already been set out and approved in the LDP, and therefore this is not a matter for the SPG. No changes recommended.

Question 7: AH7 - Do you agree with the examples given as to how the Council may spend financial contributions and with the cascade to be applied? If not, please explain why.

Issue	Council Response
Suggestion to include cross-reference to the Planning Obligations SPG in respect of specifying a time period for using contributions. Objection to the 10 year period for spending contributions as it is far too long with regard to affordable housing. (Rep 78)	It is recommended that a cross-reference to the detail regarding the process for handling financial contributions in the Planning Obligations is included after para. 6.5.7. The comments regarding the 10 year period for spending contributions relate to the content of the Planning Obligations SPG and are responded to separately.
The cascade applied to spending commuted sums should also be applied to other types of provision. (Rep 78)	This representation is aimed at applying the cascade to off-site provision on an alternative site to enable a developer to provide affordable housing on an alternative site outside of the local area. The off-site option is only intended for

	situations where there is another site available in the locality within the control of the developer, and therefore it would not be appropriate to allow the area to be widened out by using a cascade. No changes recommended.
Spend should be strictly limited to immediate locality rather than potentially cascaded out, as it is difficult to see how financial contributions could not be applied given housing requirements, potential for upgrading existing or derelict stock, and the commitment to building Council houses. (Rep 517)	Financial contributions will be spent on schemes available within the same settlement, however in case of situations where there are no schemes available within the same settlement, the cascade set out in para. 6.5.7 will be applied. This will ensure that contributions are spent where possible, or if not, are spent in a way that continues to support the provision of affordable housing in the LDP's area. No changes recommended.
BBNPA forms part of the SHA as the rest of the County. Contributions should be able to be spent in adjoining settlements within the BBNPA. Suggests reciprocal agreement with BBNPA. (Rep 1552)	The wording of a) and b) of the cascade already allows for contributions to be spent in the same settlement and, where no schemes are available, within the same community, which means that contributions may be spent within settlements/ communities that cross over the boundary between the Powys LPA area and the BBNP area. It is recommended that the wording of f) is amended to clarify that this final stage applies to the remaining areas of the BBNP. The cascade is compatible with the cascade used by the BBNP.

Question 8: AH8 - Do you agree with the sources of evidence to be used by the Council to determine local housing need? If not, please explain why.

Issue	Council Response
LHMA is already four years out of date. Suggest that para. 6.6.5 clearly states the updated 2018 evidence will be used as soon as it is available and to state time period for next update. (Rep 78)	The SPG states that updated evidence will be referred to by the Council, therefore, it will be used once it is made available for use in decision-making. The expected timescales for further updates i.e. every 2 years, is considered to be clear. No changes recommended in response to this representation, however it is recommended that the timescale stated in para. 6.6.5 for the review of the LHMA is updated as it is now expected by April 2019.
Support for review of the LHMA, noting from local knowledge some data may be	The LHMA is in the process of being reviewed as explained in the SPG and will provide updated evidence on local

inaccurate. (Rep 517)	housing needs. No changes recommended.
Subject to overhaul of Common Housing Register, developing and promoting the affordable housing register, and transparent, timely mechanisms for conducting local housing need surveys to meet information gaps. LHMA provides only a snap shot and cannot drill down to any meaningful level to inform site specific applications. (Rep 1552)	This representation refers to issues with the sources of evidence listed by the SPG to be used in negotiations, and refers to actions that go beyond the scope of this SPG. These matters have been referred onto the SHA. The SPG promotes the use of the Tai Teg Affordable Housing Register in the planning process, and the LHMA is to be used to inform planning decisions. No changes are recommended.

Question 9 AH9 - Do you agree with the arrangements and information requirements for assessing the financial viability of a specific development and proposals for reviewing viability? If not, please explain why.

Issue	Council Response
Support for the rigorous approach to ensuring affordable homes are constructed as required by the S106 and agree that affordable and market housing to be built concurrently and market homes not to be completed first. If developer considers this unviable, application should be withdrawn. (Rep 517)	The SPG makes it clear that the completion of all open market housing prior to the completion of the affordable homes will not be acceptable, whilst allowing for a proportion of market housing to be built. This flexible approach is aimed at enabling developments to remain viable. No changes recommended.
Require reassurance of Council capacity and expertise to undertake viability assessment and suggests perhaps SHA could lead on this. (Rep 1552)	It is explained that the financial viability appraisal will be assessed by the Council, but only where possible (para. 6.6.9) and therefore this will be dependent on the capacity and expertise available within the Council at the time. Where this is not possible, the DVS will be commissioned. Development Management are expected to lead on negotiations. No changes recommended.
Does not follow argument on reducing timescales for development unless specifically to ensure development achieved within policy timeframes, and not for reasons of financial viability. (Rep 1552)	As explained in para. 6.6.10, the purpose of reducing timescales for development where a lower/nil contribution has been agreed is to enable the position on viability to be kept under review. Otherwise a site could continue to benefit from an extant or implemented permission over a long period of time, however in the meantime development viability may have improved or changed. No changes recommended.

Question 10 AH10 - Do you agree with the guidance on assessing the

appropriateness of the location, scale and type of affordable housing on exception sites in Towns and Large Villages? If not, please explain why.	
Issue	Council Response
Providing infrastructure can accept such developments and that logical extensions up to 5 houses should also be assessed in terms of impact on integrity of the settlement, transport/highways infrastructure, landscape/heritage site impacts and impact on amenity of existing dwellings. (Rep 517)	Consideration will be given to these matters, where relevant, in assessing proposals for all types of exception sites. The SPG should be read in conjunction with the policies of the LDP, which includes policies relating to these matters. No changes recommended.
Considers there to be a case for exception sites in rural locations. Difficulties for dwelling to be built on farmland by family members, precluding younger farmers remaining on the land. (Rep 517)	Dwellings on farmland for farmers, referred to in planning as Rural Enterprise Dwellings, are dealt with under national guidance (PPW and TAN6). The SPG does not provide guidance on Rural Enterprise Dwellings as they do not fall within the definition Affordable Housing and are assessed differently from a planning point of view. No changes recommended.
Wording of para. 7.4 regarding consideration of harm to the character and appearance of the surrounding landscape – this should apply whether affordable housing on exception sites or not. (Rep 1552)	The guidance within para. 7.4 is aimed at ensuring that regard is given to landscape/visual impact in selecting exception sites for affordable housing, avoiding the most sensitive sites and considering alternative sites. The assessment process set out within para. 4.2.32 relating to LDP Policy DM4 will apply to exception sites as they lie outside the boundaries of Town and Large Villages. No changes recommended.

Question 11: AH11 - Do you agree with the guidance on determining whether a site should be viewed as infill or as a logical extension in Small Villages? If not, please explain why.

Issue	Council Response
Noting that only development of less than 5 units/0.25 will be considered, and consider this sensible in view of needs and infrastructure of Small Villages. (Rep 1552)	This support is noted. The guidance within the SPG supports LDP policy H1 in respect of affordable housing in Small Villages.

Question 12: AH12 - Do you agree with the guidance on the tests to be used to determine whether a proposal is located within a Rural Settlement? If not, please explain why.

Issue	Council Response
Emphasises the need for robust and reliable local affordable housing register information to determine whether or not appropriate to provide affordable housing in these areas. (Rep 1552)	Evidence of the local housing need of specific individual households will be needed to justify affordable housing in Rural Settlements, and the Affordable Housing Register (Tai Teg) will be

	used, as explained in Appendix C. No changes recommended.
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Question 13 AH13 - Do you agree with the guidance and principles to be used in assessing Affordable Housing Schemes? If not, please explain why.

Issue	Council Response
Requesting further clarity on self-build or specialised accommodation. (Rep 1552)	An example of requirements of an Affordable Housing Scheme for developing a single intermediate house for sale by an individual (self-build) is included in Appendix F of the SPG. The SPG refers to arrangements for specialist market housing, however it is not possible to provide detailed guidance on Affordable Housing Schemes for such bespoke schemes as part of the SPG. No changes recommended.
Requesting consideration to be given to larger accommodation for extended households by reviewing the maximum size of the property or other arrangements (e.g. allowing semi-detached units to be used as a single unit, and then reverting back to two units when no longer needed). (Rep 1552)	The size of an affordable dwelling is required to reflect the identified local housing need. The maximum size set out in the SPG is based on a household size of 7 persons, and therefore is expected to cover need in the majority of circumstances. The assessment of local housing need will take into account the needs of the households involved. The appropriateness of any arrangements will need to be considered in planning terms. No changes recommended.
Requesting ACG information in respect of flatted accommodation given demand for this type of housing. (Rep 1552)	It is recommended that the ACG notional floor area for flats is added into the table under para. 8.16.

Question 14: AH14 - Do you agree with the process for assessing the local housing need of proposed occupiers? If not, please explain why.

Issue	Council Response
Support for strengthening guidance for meeting local housing need and maintaining occupancy restrictions unless incontrovertibly proved no longer required. (Rep 517)	This support is noted.
Majority of recent developments are 2 or 3 bed, small third bedroom, with inadequate room for growing family, need for family accommodation. SPG does nothing to encourage sustainable homes to retain families in the villages. (Rep 542)	Para. 8.16 of the SPG expects affordable housing on market developments to be of a range of sizes and to give regard to ACG space standards. The local housing need assessment (Appendix C) also allows for existing owners of affordable housing to transfer to other affordable housing to meet changing circumstances. No changes

	recommended.
See comments under AH13. (Rep 1552)	See response for AH13 above.

Question 15: AH15 - Do you agree with the approach towards ensuring the provision, affordability and availability of affordable housing at each stage of the planning process? If not, please explain why.

Issue	Council Response
Divergence from LDP stating affordable / local needs can be a home for life, and need to reflect this in considering future applications to modify unit, but keeping within defined parameters. (Rep 517)	The SPG at para. 8.18 explains that planning applications for future extensions will be assessed on a case by case basis taking into account the local need and effect on affordability. No changes recommended.
Support for withdrawal of permitted development rights, ability to refuse applications on underdevelopment, and simultaneous building of market and affordable housing. Requirements to be effectively and rigorously enforced and request for detail of monitoring arrangements to ensure compliance. (Rep 517)	Development Management has responsibility for enforcement and monitoring processes, including planning conditions and obligations. Reports of any breaches will be investigated and enforcement taken where necessary, as stated in section 8.32 of the SPG. No changes recommended.
Detrimental effect of capping the re-sale price at 72% of open market value, disadvantage for first time buyers wanting to move up the ladder, deterrent to moving on, and on releasing dwelling back onto the market. (Rep 542)	The TAN 2 definition of intermediate affordable housing requires prices/rents to be below market housing prices or rents. By restricting the sale/re-sale value of an affordable dwelling, this provides a mechanism for ensuring that the housing is and remains accessible to those in local housing need. No changes recommended.
Subject to capacity within the system. Requesting clarification on the S106 Officer's role and capacity to deal with this and other planning obligations. (Rep 1552)	Development Management has responsibility for the planning processes described in this part of the SPG. The role of the Planning and Monitoring Officer in relation to section 106 agreements is explained in the Planning Obligations SPG. No changes recommended.

Question 16: AH16 - If you have any other comments you want to make which are not covered by the above questions please include them here:

Issue	Council Response
Regarding the guidance on time limited permissions to enable review of viability, sites may also become less viable. Comments on the WG S106 guidance (2009) and suitability of the review mechanisms. Notes that the wording of the SPG provides flexibility. Request for cross-reference to the WG guidance. (Rep	It is considered to be appropriate (at para. 6.6.10) to apply a reduced time limit for commencement and/or control over completion in order to enable viability of a development to be kept under review, and the Council is aware of appeal decisions that support this approach. The WG guidance on

<p>78)</p>	<p>delivering affordable housing using section 106 agreements referred to is included in Appendix A of the SPG. No changes recommended.</p>
<p>Worth noting in the document that WG are currently reviewing Affordable Housing and therefore there may be changes in the next few years. (Rep 78)</p>	<p>Recommend reference is made to the Affordable Housing Review under Monitoring and Review in para. 9.2 of the SPG.</p>
<p>Deliverability is a fundamental issue. The Council and its strategic partners need to consider further options to stimulate the 5 year land supply, identify and bring forward suitable sites, and other means to meet strategic objectives on housing delivery. (Rep 1552)</p>	<p>This support and comments are noted. This SPG is aimed at assisting the delivery of affordable housing through the LDP's planning policies. The actions called for by the Representor go beyond the scope of this SPG. These matters have been referred onto SHA. No changes recommended.</p>
<p>Requesting clarification on how applications for 100% affordable housing provided by RSLs are processed and conditioned at planning application stage, as current inconsistencies (examples provided). Prefer no restrictions due to effects on borrowing. (Rep 4268)</p>	<p>Recommend adding note after para. 8.6 to clarify the requirements in relation to RSL development. This means that where an RSL is developing a site within their ownership within the development boundary, conditions attached relating to affordable housing will only require the % of affordable housing required under policy H5. This approach is acceptable to the representor.</p>

3.3 Biodiversity and Geodiversity SPG

3.3.1 Reference Group

3.3.2 In order to prepare the Biodiversity and Geodiversity SPG, the Council sought participation and involvement with various Topic Stakeholders, from which the Council formed a Reference Group.

3.3.3 The Reference Group comprised 6 members, which included representatives from the following Council services and outside organisations:

- Planning Policy
- Development Management
- Countryside
- Natural Resources Wales

3.3.4 Engagement with the Reference Group during the preparation of the Draft SPG is summarised in table B6:

Table B6 – Reference Group Involvement (Biodiversity and Geodiversity SPG)

Date	Who and How?
Early April to early May 2018	Contact made with Reference Group members, to confirm membership, discussion and agreement of role and timetable etc.
May 2018	Discussion of suggested scope of SPG, aims, structure and key components. Writing of first draft ready for Topic Stakeholder consultation. Teleconference with Reference Group on 10 th May. Email to Topic Stakeholders to alert them to pending consultation period.
May and June 2018	Circulation of first draft to Topic Stakeholders for consultation period from 25 th May to 8 th June, 2018.
June to July 2018	Teleconference with Reference Group on 13 th June to consider Topic Stakeholder responses. Also to confirm timetable for remainder of the process. Communicating with Reference Group to consider and confirm appropriate revisions. Amending draft SPG ready for public consultation period. Draft SPG presented to LDP Working Group for approval prior to public consultation period.
July 2018	Notice of public consultation period circulated to LDP Database. 6 week public consultation period from 11 th July to 21 st August.
August to September 2018	Teleconference with Reference Group 29 th August to discuss representations and agree required changes. Also to confirm timetable for remainder of the process. Amending draft SPG ready for adoption.
September 2018	Consultation Draft SPG showing proposed changes presented to the LDP Working Group shared with the Reference Group. The Reference

	Group was informed of any issues raised by the LDP Working Group before the SPG was finalised for Cabinet approval.
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3.3.5 Topic Stakeholders

3.3.6 The larger Topic Stakeholder group included an additional 41 members, consisting of representatives from the following outside organisations:

- Biodiversity Information Service (BIS)
- Botanical Society of the British Isles
- Brecknock Bird Group
- Brecknock Dragonfly Group
- Brecknock Geology Group
- Brecknock Mammal/Bat Group
- Brecknock Moth Group
- Brecknock Wildlife Trust
- British Geological Survey
- Butterfly Conservation
- Canal and River Trust
- Central Wales RIGS Group
- Clwyd Powys Archaeological Trust
- Coed Cymru
- Glandwr Cymru - Canal & River Trust in Wales
- Llandinam Lives/Powys Species Habitat Protection Group
- Montgomery Canal Partnership / Canal & River Trust
- Montgomeryshire Barn Owl Group
- Montgomeryshire Moth Group
- Montgomeryshire Wildlife Trust
- Natural England
- Natural Resources Wales
- Plantlife
- Radnorshire Invertebrate Group
- Radnorshire Mammal Group
- Radnorshire Moth Group
- Radnorshire Wildlife Trust
- Rhayader By Nature
- RSPB Cymru
- The Inland Waterway Association
- The River Wye Preservation Trust
- The Woodland Trust Wales/Coed Cadw
- Welsh Government
- Welsh Kite Trust
- Wye & Usk Foundation
- Environment Agency England
- British Trust for Ornithology
- Amphibian and Reptile Conservation
- Bat Conservation Trust
- Vincent Wildlife Trust
- Severn Rivers Trust

3.3.7 These stakeholders were invited to provide informal feedback on a working draft of the SPG prior to the formal public consultation stage.

3.3.8 Comments received from the Topic Stakeholders were considered and responded to, with further discussion taking place on specific issues where necessary. The input from Topic Stakeholders was used to inform changes to the working draft of the SPG.

3.3.9 LDP Working Group

3.3.10 The Draft SPG was considered by the LDP Working Group on 22nd June 2018 and approved for Public Consultation.

3.3.11 SPG Consultation

3.3.12 The public consultation period ran from 11th July to 21st August 2018 and representations were received from the following:

Representor Name (Representor No.)

- Clwyd Powys Archaeological Trust (27)
- Elan Valley Trust (222)
- Mochdre with Penstrowed Community Council (516)
- Abermule (with Llandyssil) Community Council (542)
- The Coal Authority (1481)
- Powys Wildlife Trusts (5201)
- Canal & River Trust in Wales / Glandwr Cymru (5704)
- Sarah Bond (6160)
- CPRW (Brecknock and Radnor Branch) (6235)
- Natural Resources Wales (7076)

3.3.13 The main issues arising from the consultation and the Council's responses to these are set out in Table B7.

3.2.14 The representations and Council draft responses were considered by the LDP Working Group at its meeting on the 7th September 2018, and subsequently by the Council's Cabinet at its meeting on 9th October 2018.

Table B7 – Main Issues from the Public Consultation (Biodiversity and Geodiversity SPG)

Question 1: BG1 - Is the information in the Biodiversity and Geodiversity SPG presented in a clear and logical format for the different audiences (i.e. professional developers and domestic (non-professional) planning applicants)?	
Issue	Council Response
Large document likely to feel overwhelming particularly for public seeking permission for small-scale domestic development. Needs to be made clear which sections applicants for different types of development need to read. (Rep 5201)	Comments noted. Clarification to be added to start of Section 8 'Biodiversity and Geodiversity in the Planning Process'.
Table 1 – for clarity, include a bold horizontal line between the sub-sections of sites, habitats and species. (Rep 5201)	Table 1 will be revised to make it clearer.
Paragraph 6.31 – suggest moving this paragraph below Table 1 to make it stand out. (Rep 5201)	Agreed.

Subject to specific comments, the document would appear to be appropriate. Images may help. (Rep 5704)	Comments noted.
No, it is of concern that it is considered that the SPG is only for planning applicants when it will be a material consideration when determining planning applications and is of relevance to Planning Officers, Planning Inspectors and the general public. (Rep 6160)	Comments noted. The Council is content that the SPG makes clear it is relevant advice and an important material consideration to all parties involved in the planning process.
The text needs amending to address: <ul style="list-style-type: none"> • numerous repetitions. • poor paragraph ordering of some topics. • poor or muddled wording in some paragraphs • errors in cross referencing to paragraph numbers including Appendix C. • worrying omissions. (Rep 6160) 	Comments noted. Editing will be undertaken to address these concerns.
Confused by the two versions of the SPG available on the Powys website. (Rep 6235)	The correct version for public consultation was available on the main LDP web page, and labelled as such, from the beginning of the consultation period.
The text is sometimes vague, long-winded and repetitive. (Rep 6235)	Comments noted. Editing will be undertaken.
The audience includes all interested parties. It should concentrate on clarifying how existing legislation, policy and guidance on biodiversity and geodiversity is incorporated into the Powys planning process in order to help all interested parties. Audiences need to know exactly how responsibilities in the planning process are allocated between PCC and NRW. This is not clear and we suggest detailed discussion and agreement with NRW to establish this. (Rep 6235)	The Council will review the SPG to make sure roles are clearly defined.
The overall format is well thought out and follows a logical progression. (Comments on details provided in a tracked changes version of the SPG). (Rep 7076)	Comments noted.

Question 2: BG2 - Is the language and terminology used in the SPG appropriate for these different audiences?

Issue	Council Response
Throughout the document, the phrase “proposed development site” should replace “development site”. (Rep 5201)	Comments noted. The text to be amended accordingly.
Table 1 – The final six columns of this table are confusing. For example, the applicant may be left	Comments noted. The Council has reviewed Table 1 and has clarified the

thinking that a site listed under " <i>No Statutory Protection</i> " can be ignored. We recommend that the final six columns are removed from Table 1. (Rep 5201)	purposes of the columns by rewording the text in the column headers and adding a footnote.
Welcome the inclusion of Wildlife Trust Reserves, however, it seems odd that other NGO nature reserves are absent, notably those of the Woodland Trust & RSPB. If changed, paragraph 6.18 would also need updating. (Rep 5201)	Comments noted. This change may be possible at a future date, but no change required at the moment.
References to the Powys LBAP should be amended to refer to the Powys Nature Recovery Action Plan (NRAP) including Paragraphs 6.33 - 6.35, Appendices B & C, etc. (Rep 5201)	Comments noted. Whilst the Council agrees with the desirability of the proposed change, the LBAP is, until the NRAP is adopted, still the appropriate Plan for applicants to consult. Removal of references to the LBAP at this stage would therefore create the potential for this important source of local information to be omitted from an applicant's preparatory research. No change required.
Appendix A - Section 42 'important (priority) habitat and species' no longer exists and should be referred to as 'Section 7'. (Rep 5201)	This reference in the Glossary is provided for clarity as the term 'Section 42', and references to the NERC Act, are still in use and often seen in documentation. The superseding of Section 42 by Section 7 is explained in the text under this entry in the Glossary. No change required.
<ol style="list-style-type: none"> 1. Subject to specific comments the document would appear to be appropriate. (Rep 5704) 2. Yes with proviso that glossary expanded – e.g., NRAP, SoNaRR. (Rep 6160) 3. The language used within the document is appropriate for the target audience. (Rep 7076) 	<ol style="list-style-type: none"> 1. Comments noted 2. Comments noted. Both NRAP and SoNaRR are cited and explained in Appendix C. 3. Comment noted.
The language is sometimes verbose making the SPG unnecessarily long. E.g. Paragraph 6.7 SPAs could read: " Special Protection Areas (SPAs): a European designation for the conservation of birds. Three SPAs are wholly or partially within the Powys planning area and another two are close enough to be at risk from development within the planning area. Developers should be aware of ranging and foraging buffers around SPAs ". (Rep 6235)	Comments noted. The opportunity has been taken to review the document and wherever necessary changes have been made.

Question 3: BG3 - Is there any content missing from the SPG, or parts that could be improved?

Issue	Council Response
1. Paragraph 6.16 – Amend to read: "These are assessed and selected using specific criteria which recognise their wildlife value, developed and agreed by members of the Powys Nature	<ol style="list-style-type: none"> 1. Agreed. 2. Agreed, plus the additional wording 'and many carry statutory designations' to be made.

<p>Partnership (see Appendix A)".</p> <p>2. Paragraph 6.18 – Amend to read: “The three Wildlife Trusts in Powys also own, lease and manage land as Wildlife Trust Reserves (WTRs). These protect locally or nationally rare or vulnerable wildlife or habitats and many carry statutory designations. In Powys there are...” (Rep 5201)</p>	
<p>1. Table 1 - Section 7 habitats and species and Veteran Trees are missing from Table 1 and should be added.</p> <p>2. Paragraph 6.27 – should include the Ancient Woodland Inventory’s four categories: * Ancient Semi-Natural Woodland (ASNW) * Plantation of Ancient Woodland Sites (PAWS) * Restored Ancient Woodland Sites (RAWS) * Ancient Woodland Site of Unknown Category (AWSU)</p> <p>3. Paragraphs 6.30 & 6.31 - Powys has internationally important areas of veteran trees / historic parkland which should be emphasised e.g. the Elan Valley. (Rep 5201)</p>	<p>1. Agreed.</p> <p>2. Agreed. All Categories to be included in the SPG.</p> <p>3. Comment noted. Having reviewed the text, the current wording is considered adequate so no change required.</p>
<p>1. The SPG should be stronger in recognising that non-statutory sites can have biological features of international significance, in the same way that not all sites of SSSI quality end up being designated SSSI. For example biologically rich ponds should be included. The Freshwater Habitats Trust has recognised that parts of Powys are ‘Internationally Important Areas for Ponds (IAPs) e.g. ‘mawn’ pools found on common land across North Brecknock and Radnorshire. These lack statutory protection yet are areas of significant biodiversity value and have high populations of important species, such as the Great Crested Newt.</p> <p>2. It is important to remember that the national network of SSSIs forms a representative suite of the country's very best wildlife and geographical sites; this needs to be emphasised in paragraph 6.12. (Rep 5201)</p>	<p>1. Comments noted. Add new para. to include reference to non-statutory sites containing features of international significance and using mawn pools as an example.</p> <p>2. Agreed. Add the following ‘and as such form a representative suite of the country's very best wildlife and geological sites.’</p>
<p>1. Paragraph 6.32 – it is important to retain the significance of the difference</p>	<p>1. Comments noted. Include reference to the Wales</p>

<p>between nationally important and locally important sites. Either list the Section 7 habitats here (could remove any that aren't relevant for Powys) or refer the reader to the Wales Biodiversity Partnership for the list.</p> <p>2. Paragraph 6.33 - Depending on how paragraph 6.32 is dealt with, either list the NRAP habitats or refer the reader to the Powys NRAP for the list. (Rep 5201)</p>	<p>Biodiversity Partnership.</p> <p>2. The Powys LBAP is still extant until the NRAP is adopted, so the reference to the LBAP Habitats should remain.</p>
<p>1. Paragraphs 7.7 & 7.8 – Environmental Permits (EPRs) are not mentioned and could be included here.</p> <p>2. Table 2 – emphasise the need for Phase 2 vegetation surveys, at the appropriate time of year if the preliminary ecological appraisal identifies interesting habitat. This is relevant for the top 10 development sites in the table.</p> <p>3. Paragraph 7.27 - further surveys should include those for priority habitats and species as well as EPS.</p> <p>4. Table 3 – amend the dormouse survey optimal period to May to October inclusive, whilst the rest of the year would be sub-optimal. (Rep 5201)</p>	<p>1. Comments noted.</p> <p>2. Table 2 – additional clarification will be provided.</p> <p>3. Insert additional text: ‘such as those for priority habitats and species and EPS.</p> <p>4. Agreed, amend Table 3 accordingly.</p>
<p>Paragraph 8.26 - when saying that “compensation does not necessarily need to be like for like replacement” it should be emphasised that the replacement gain should have integrity and value within the ecological landscape it sits in. (Rep 5201)</p>	<p>Comments noted. The text will be revised.</p>
<p>Intensive Livestock Units</p> <p>Paragraphs 9.16 - 9.20– in the Chief Planning Officer letter (12/6/18) from Welsh Government, the impacts of intensive agricultural developments were emphasised. The appropriate wording of this section is a great opportunity to improve the current decision making process.</p> <p>PCC is urged to take heed of recent advice from the Welsh Government regarding the importance of a wide range of consultees when considering these developments. (Letter from Lesley Griffiths AM, Cabinet Sec for Energy, Planning and Rural Affairs, 30/4/018). (Rep 5201)</p>	<p>Comments noted. The Council is familiar with the clarification letters cited and considers it already follows the advice. Having reviewed the Intensive Livestock Units section it is not felt necessary to make any changes.</p>
<p>1. Paragraph 6.42 – refers to “Section 4.4 below”, but this section does not exist.</p> <p>2. Paragraph 8.18 - refers to Sections 5.5 and 5.6, but these do not exist.</p>	<p>Comments noted. The cross-references will be updated, a reference to ‘bat bricks’ included in Table 5, and the SPG will be edited.</p>

<p>3. Paragraph 8.23 – remove “However” from the start of the second sentence and insert “For example,” instead.</p> <p>4. Paragraph 8.30 – in the second bullet point, please include ‘bat bricks’.</p> <p>5. Paragraphs 9.13 & 9.15 – these make reference to section 6.5 which does not exist. (Rep 5201)</p>	
<p>Section 7 could be moved to an appendix. (Rep 5704)</p>	<p>Noted, but the Council considers this is an important section to retain in the body of the SPG.</p>
<p>Paragraph 4.1 – Amend to read “....consider the potential impacts of proposals upon these interests on or near development sites”. (Rep 6160)</p>	<p>Noted. The words ‘and beyond’ will be added.</p>
<p>Paragraph 4.7 states, “<i>As a consequence of its extent, it has a considerable diversity of habitat types</i>”. This statement is misleading. It is not because of Powys’ extent but its geodiversity and man’s interaction that there is considerable diversity of habitats. (Rep 6160)</p>	<p>Comments noted. Add the word ‘Partly’ to the beginning of the paragraph..</p>
<p>Table 2 - is inconsistent when describing surveys. As a result the text following this table becomes confusing about the status of species, e.g. 7.29 to 7.36 discusses EPS but then bats are discussed separately at 7.41. (Rep 6160)</p>	<p>Comments noted. Table 2 has been reviewed and editing amendments made as necessary.</p>
<p>Paragraph 7.27 – Refers to CIEM guidance, but guidance is regularly updated. (Rep 6160)</p>	<p>Agreed. Insert the text:”or any updated”.</p>
<p>1. Para. 7.37 - This paragraph is unacceptable because it totally dismisses many protected avian species in Powys. Most other raptors are Schedule 1 birds, as are some other species which may be affected by development in Powys.</p> <p>2. Paras 7.37 and 7.38 should be moved and amalgamated with para 8.48 in section 8.</p> <p>3. Para 7.39 should have a new heading, e.g. ‘avian surveys’, and include discussion about nesting birds and protected birds. (Rep 6160)</p>	<p>1. Comments noted. The Council disagrees. Barn Owls are detailed in the SPG as they commonly nest and roost in buildings so are an example of a species that may be at risk from development. Many other Schedule One birds are found in Powys however these will be covered by surveys already included in the SPG. No change required.</p> <p>2. & 3. It will be made clear that these surveys are examples. A new sub-heading will be inserted.</p>
<p>Paragraph 7.39 “.....<i>Areas of dense vegetation (e.g. hedgerows, or long-derelict land) are also important for other nesting birds</i>” This statement whilst correct is an oversimplification. It ignores ground nesting birds and in particular the critical status of curlew which nest in damp habitats and are</p>	<p>Comment noted. Whilst the Council disagrees that this para. ignores ground nesting birds, the words ‘<u>or open</u>’ and ‘<u>or agricultural</u>’ will be added, and the word ‘or’ be removed.</p>

<p>particularly susceptible to the types of agricultural development being applied for and the solar LSAs. (Rep 6160)</p>	
<ol style="list-style-type: none"> 1. Amend 8.2 - to read "biodiversity and geodiversity interests affected by development sites". 2. Paragraph 8.27 - should explain compensatory measures will be conditioned. 3. Paragraph 8.34 - It is of great concern that this document has been put forward for public consultation with this illustration missing. 4. Paragraph 8.38 - omits reptiles from the list of fauna e.g. slow worms. 5. Paragraph 8.44 - Should read, "affected by development proposals". 6. Paragraph 8.45 "..... <i>If a planning application is likely to directly impact on a pond, canal, ditch or cellar a great crested newt survey may be required.</i>" This is incorrect advice and contradictory to advice on EPS at 7.23 A survey for great crested newts is required if: <ul style="list-style-type: none"> * there are historical records of newts within or close to the site proposed for development. * there's a pond within 500 metres of the application site boundary even if it only holds water some of the year * the development site includes refuges (eg log piles or rubble), grassland, scrub, woodland or hedgerows. (Rep 6160) 	<ol style="list-style-type: none"> 1. Comments noted. The opening paragraphs will be revised for clarity. 2. Agreed. Add following wording: "Compensatory measures may also be subject to planning conditions and ongoing monitoring." 3. Comment noted but the diagram was only for illustrative purposes. 4. The list of species is not intended to be exhaustive. 5. The comment is noted. It is recommended that the change be made accordingly. 6. Agreed. The word 'directly' will be removed.
<ol style="list-style-type: none"> 1. Paragraphs 4.2 and 4.5, 6.16, 6.25, 6.26, 6.27, 7.35 – Repetitious. 2. Paragraph 6.20 - Omit NB – unnecessary. 3. Paragraphs 6.42, 7.33, 8.8. 8.14. 8.18, 8.39, 8.41.8.43, 9.13, 9.15 - Incorrect cross refs. (Rep 6160) 	<p>Comments noted. The SPG will be subject to further editing.</p>
<ol style="list-style-type: none"> 1. Prior to section '5.0 LDP policies', The Environment (Wales) Act Part 1, Sections 3, 4 and 6 should be set out as they are in the Act. 2. Section 5.0 LDP policies - Should make it clear that the LDP is an integrated document and other policies besides SP7 and DM2 are relevant to Biodiversity and Geodiversity. For instance: <ul style="list-style-type: none"> • DM7 on light pollution • DM13.13.v. on protection of soils • DM14.2 Air quality management 	<ol style="list-style-type: none"> 1. The Council disagrees with this representation. The Environment Act is summarised in Appendix C. No change required. 2. This point is made already in the introduction to the document. It is also repeated in Appendix C which already lists the key LDP Policies that are likely to have a bearing upon Biodiversity and Geodiversity. No change required.

<ul style="list-style-type: none"> DM15 Waste within developments (Rep 6235) 	
<p>Major elements missing from the SPG:</p> <ol style="list-style-type: none"> Importance of State of Nature Wales report: urgency of reversing decline in Biodiversity. Discussion of Protection of Soils. Discussion of Cumulative impacts. Informative discussion about Intensive Livestock Proposals, regulatory framework and PCC role. (Rep 6235) 	<p>Comments noted. The following changes be made to the document:</p> <ol style="list-style-type: none"> Insert reference to 'State of Nature' report. Agreed. Add new section on 'Soils' within the Geodiversity and Development Proposals section. Agreed. Add new section on 'Cumulative and In Combination Effects' within the Biodiversity and Geodiversity in the Planning Process section. The Council has already included a section on Intensive Livestock Units which is considered adequate. No change required.
<p>SPG to include additional information on:</p> <ol style="list-style-type: none"> Ancient semi natural woodland. The Birds directive. Associated legislation not regulated under planning. (see comments on page 17 of SPG draft attached). NRW role in flood defence. Consideration of long term post construction issues. Clarification over INNS legislation and biosecurity requirements during the planning process. Public Authorities duties including Powys LPA to report and monitor on the Nature Recovery Action Plan under Section 6 of the Env't. Act. (Rep 7076) 	<p>Comments noted. Amend SPG to include:</p> <ol style="list-style-type: none"> Additional information on Ancient Woodlands. Text concerning SPAs and a link to more information on the Birds Directive inserted into Appendix B. Comments noted, however the Council believes this information to be unnecessary. Requirement to consult NRW inserted Agreed. Text amended in a number of places to reflect this Text regarding INNS inserted into Section 9. Text inserted in Appendix C under the Environment (Wales) Act regarding LPA duties. The SPG already contains a number of paras regarding unlawful activity and these have been placed under a new heading to draw attention to them, so no change is felt to be necessary.

Question 4: BG4 - Section 6 covers a complex topic. Could the layout or contents of this section be improved? If so how?

Issue	Council Response
<ol style="list-style-type: none"> The layout is good (Rep 542) It is clearly laid out. (Rep 5201) It could be condensed or detail placed in an appendix. The introduction of images may help. Some terms are duplicated in 	<ol style="list-style-type: none"> & 2. Comment noted. – 11. Comments noted. Section 6 has been reviewed and necessary changes made.

<p>the glossary. (Rep 5704)</p> <ol style="list-style-type: none"> 4. Paragraphs 6.25- 6.27 are repetitive. 6.27 and 6.28 discuss wood pasture but fail to explain what it is - does it include old orchards or ffridd? 5. Paragraph 6.31 - Suggest para has a title, e.g. 'designated sites mapping'. 6. Paragraph 6.43 - discusses UK protected species but fails to explain how plants are protected. (Rep 6160) 7. Section 6 could be improved in its layout and structure of headings. Bold Headings for the designations would help. e.g. 6.11, 6.13, 6.16, 6.17, 6.18, 6.19, 6.21. 8. The section is very confusing. Terms need to be used carefully and consistently. Careful explanation is needed for: "designation" and "statutory"; "protected" and "important"; devolution to Wales of some planning functions; what information applicants need to provide about woodland and LBAP categories; what regard PCC will have to LBAP categories in planning determinations. 9. In the sub-sub-headings, LBAP habitats and species are only "<i>important</i>", however, in Table 1, LBAP Habitats and Species do have statutory protection but RVNRs and AW do not have statutory protection. 10. It needs to be clear that the duty to enhance and maintain biodiversity everywhere where there is no national or international designation lies with Powys CC. 11. For International and Nationally designated sites, PCC is responsible for considering cumulative impacts. PCC is also responsible for considering cumulative impacts on all other biodiversity interests. (Rep 6235) 	
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Question 5: BG5 - Would the sections on 'Incorporating Resilience into Development Proposals' and 'Green Infrastructure and Resilience' (paras 8.67 to 8.77) be better embedded within the 'Design' section (8.17 to 8.34)?

Issue	Council Response
1. Yes. (Rep 516, 5704, 6160, 6235, 7076)	1. Comment noted. The paragraphs will be moved.
2. Yes; also suggest rationalising this section by removing Table 5 and	2. The Council disagrees and considers that Table 5 has a role to

paragraphs 8.70 & 8.71 as this is all mentioned elsewhere and is likely to mean very little to an applicant. (Rep 5201)	play in the SPG. An explanation is provided in the following paras. No change required.
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Question 6: BG6 - Would the inclusion of a checklist or flowchart for incorporating biodiversity and geodiversity in the planning process be of use to summarise the process, or could this oversimplify important considerations?

Issue	Council Response
<p>1. Yes, an indicative graphical illustration, such as a flowchart, is likely to be very helpful for applicants. Perhaps an app could be developed, as this would allow the detail to be retained. (Rep 516; Rep 5201, 5704 7076)</p> <p>2. No. This would just duplicate text and oversimplify considerations and would not be available for public consultation. In general the text could be tightened and sometimes shortened to underline exactly what a developer has to do. (Rep 6160, 6235)</p>	<p>1. and 2. Comments noted. An indicative flowchart will be included.</p>

Question 7: BG7 - Does Appendix C tie in to and support other parts of the SPG adequately enough, or should the legal context (i.e. the reason why something is required) be reinforced?

Issue	Council Response
<p>1. Yes. (Rep 516) Appx C is adequate. (Rep 6160)</p> <p>2. Appendix C could be reinforced through referencing in other parts of the document. (Rep 5201)</p> <p>3. Reference is provided within the main document to appendix C, e.g. at paragraphs 2.1, 7.2, 8.13. Given the length of the document it may be useful to elaborate upon the legal context within section 2.0 of the document. (Rep 5704)</p>	<p>1. The comment is noted.</p> <p>2. Extra references to Appendix C will be inserted wherever appropriate.</p> <p>3. Comment noted, however it is considered that Section 2 and Appendix C provide this elaboration already.</p>
<p>1. The WBFGA is much less clear and specific about Biodiversity and Geodiversity than the Environment (Wales) Act section 6 duties which are key to this SPG and their text is a serious omission. The description in Appendix C is not good enough and these should be set out in full earlier in the document. (Rep 6235)</p> <p>2. Relevant legislation should be mentioned within the SPG because it helps to clarify what is a legislative requirement and what is best practice / guidance. Appropriate</p>	<p>1. Comments noted, however the Council considers that the content relating to Environment (Wales) Act and the WBFGA is sufficient and in the right place. No change required.</p> <p>2. Comments noted</p>

reference to Appendix C should be made for additional details. (Rep 7076)	
To avoid confusion, clarification is needed in Appendix C in relation to Schedule 2 projects of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations (2017). (Rep 542)	The Regulations are not matters within the control of the Council, so no change to the SPG is required.

Question 8: BG8 – If you have any other comments you want to make which are not covered by the above questions please include them here:

Issue	Council Response
CPAT welcomes this SPG. It may be worth noting that there is some cross over between biodiversity and the historic environment and there may be occasions when historic environment policies might be brought to bear to assist biodiversity issues. For example peat bogs, hedges and boundaries, field systems, veteran trees, ancient woodland, parkland, caves, rivers, streams, lakes and ponds, etc. have an historic environment dimension which might be useful allies to biodiversity. Mention might be made of this cross over. (Rep 27)	Comment noted. Mention of this overlap will be included.
It is good that policy DM7 is referenced, given Powys's important dark skies and the benefits of dark skies to biodiversity. A robust lighting management policy should be incorporated into the planning process. (Rep 222)	Comments noted. LDP Policy DM7 does cover light pollution and refers to dark sky designations. No change required.
Paragraph 6.17, Appendix B – the Powys wildlife trusts names and contacts need correcting. (Rep 5201)	Agreed.
<ol style="list-style-type: none"> Paragraph 4.7 - should include 'canals', within the list of habitats, especially given the Montgomery canal is designated as a SAC and SSSI. Paragraph 8.30 – Amend wording to read “<i>Creation of a buffer zone along natural watercourses planted with native species (where appropriate)</i>”. This would provide flexibility in respect of development adjacent to the canal. Paragraph 9.11 - should refer to the Montgomery canal designated as a SAC. (Rep 5704) 	<ol style="list-style-type: none"> Agreed. With development alongside man-made waterways already being covered by related regulations, it is felt that inserting 'where appropriate' alongside the use of the word 'natural' would unnecessarily weaken the guidance. The paragraph will be amended to refer to Table 5. Agreed.
Geodiversity - Despite the LDP at DM13 referring to protection of soils as resources providing ecosystem services this is not expanded upon in this SPG. (Rep 6160)	A new section on soils will be included.
1. Water Framework Directive (WFD) - The WFD requirements should be made to dovetail better with biodiversity beyond phosphate pollution. It also ties in with	Comments noted and the WFD paragraphs will be reviewed and changes made accordingly.

<p>geodiversity and protection of soils. (Rep 6160)</p> <p>2. This WFD section fails to set out the LPA role in achieving the objectives of the WFD, under which it has duties as a competent authority to protect water quality in Powys. The SPG suggests that all responsibility lies with NRW however NRW has published an advice note “Local Authority services and the water environment” https://naturalresources.wales/media/2627/wfd-docs-eng.pdf In order to fulfil this role, LPAs must have the relevant information about the water environment. Suggest adding: <i>“Applicants must provide <u>contour maps with clearly mapped details of all water features on the development site and surrounding land wherever any flooding or pollution risks may occur.</u>”</i> (Information on Scimap included). (Rep 6235)</p>	
<p>1. Intensive Livestock Units (ILUs) - Relegating the discussion of requirements for intensive livestock proposals to “other considerations” is unacceptable and illogical. Logically, ILUs should sit next to householder applications in Section 8.</p> <p>2. Paragraph 9.18 - This is misleading. NRW only responds to emissions impacts on internationally / nationally designated sites. It is for the local authority to consider effects on other biodiversity interests. It is therefore for the LPA to consider effects of, e.g., bryophytes in ancient woodland.</p> <p>3. Application documents - The SPG has not seized the opportunity to enforce best practice for application documents to aid the LPA’s environmental statutory duties. E.g. (a) poultry ranging plans with contours which NRW have stated is a requirement. Scimapping should be a requirement. E.g. (b) manure management plans are accepted without contour plans. Land put forward as enough acreage for the waste from the ILU could all be on slopes that should only have seasonal spreading. Colour coded manure management plans should be a standard requirement. (Rep 6160)</p> <p>4. Paragraphs 9.16 to 9.20 – The ILU section is unsatisfactory and misleading. The Council has not explained its own responsibilities in determining ILU planning applications. It is essential that the SPG:</p> <ul style="list-style-type: none"> • is factually right and in sufficient detail. 	<p>Comments noted, however the Council is content that sufficient information is provided on intensive livestock units so no changes are considered necessary.</p>

<ul style="list-style-type: none"> • accords with WG and NRW advice. • explains the roles of NRW and PCC in enhancing and maintaining biodiversity in the planning process. • is crystal clear to PCC officers, applicants and the general public. • informs all parties how planning conditions will be monitored and by whom • is not published until any unclear issues are resolved. <p>(Detailed comments were provided by the Represor – Please refer to Appendix 1). (Rep 6235)</p>	
<ol style="list-style-type: none"> 1. Paragraph 2.1 - The SPG is important for all stakeholders and Powys residents. The first bullet point should be amended to: <i>“Set out the way in which LDP planning policy is to be interpreted and applied to protect biodiversity and geodiversity in the public interest.”</i> The second bullet point should read: <i>“applicants and all developers, consultants and other agents involved in preparing planning applications.”</i> 2. Paragraph 4.1 - The ecological impacts of development do not stop at the site boundary. Amended wording to: <i>“It is essential to consider the potential impacts of each proposal upon the ecology of the development site and also the ecology beyond the development site”</i>. 3. Paragraph 4.2 - It would be clearer to explain at the outset that: (a) the LDP sits within over-arching International/EU and National legislation and policy which is already reflected in the latest version of Planning Policy Wales. (b) LDP policy re bio/geodiversity, which is mainly set out in SP7 and DM2, does not directly repeat PPW (PPW9 2.3.1). (c) The SPG therefore expands the guidance in the LDP by setting out the requirements for planning decisions derived from all of these sources to make them clear and accessible for all. 4. Paragraph 4.3 – amend last sentence to: <i>“biodiversity and geodiversity have been assessed and accommodated....”</i> 5. Paragraph 4.5 - Two simple definitions are: <i>“totality of genes, species and ecosystems of a region”</i>; <i>“a biological community of interacting organisms and their physical environment”</i>. 	<ol style="list-style-type: none"> 1. Comments noted, however the Council does not consider any change is required to the bullet points. 2. The words <u>‘and beyond’</u> will be included. 3. The wording in Paragraph 4.2 will be amended to shorten the explanation. 4. Para. 4.3 will be revised. 5. Noted, but no change to the SPG. 6. Comments noted. The SPG will be edited, and a new section will be included on un-designated sites.

<p>6. This introductory section needs further explanation - enhancing and maintaining biodiversity cannot be achieved by only protecting nature reserves and certain species categories whether of international, national or local importance. The ecosystem duty applies to biodiversity throughout Powys and this will be taken into account in planning determination. (The SPG statement Biodiversity in Powys 4.9 “<i>designations alone cannot guarantee the integrity and prolonged existence of these valuable resources</i>” is not clear and forceful enough). We do not understand the full extent of negative impacts of our development activities. Therefore we should exercise the “precautionary principle”. However we do know that improving and preventing loss of existing natural habitats and creation of new ones is the best way to avoid loss of species. (Rep 6235)</p>	
<ol style="list-style-type: none"> 1. Table 1 - A note on mapped / unmapped categories would be useful. 2. Paragraph 6.32 - Section 7 of Env.(Wales) Act imposes the duty to create a list but does not contain the habitat or species lists which are published by the Wales Biodiversity Partnership (but under the name of the WG) as is described in 6.3.4 for species). Suggest: <u>“The Welsh Government publishes a list of habitats of importance for the conservation of Biodiversity in Wales as required by the Environment (Wales) Act (2016).”</u> 3. Paragraph 6.38 – Amend wording from “<i>if it is absent then it may delay determination</i>” to <u>“This information is required to be submitted with the application documents prior to determination”</u> (Rep: 6235) 	<ol style="list-style-type: none"> 1. Table 1 will be amended for clarification. 2. Comment noted, the wording will be amended. 3. The existing wording will be revised to refer to the refusal of planning permission.
<ol style="list-style-type: none"> 1. Paragraph 7.2 - This section on Environmental Impact assessment should be improved. It is vague and misleading and should refer to and explain “Schedule 1” and “Schedule 2” development of the EIA regulations. 2. Paragraph 7.3 - it should be more precise and say that there are a listed variety of development types to which specific criteria and thresholds are applied to determine if the project counts as Schedule 2 development. Any Schedule 2 development must be screened by the LPA (or WG or NRW as appropriate) to determine if there are likely significant impacts which indicate that an EIA is required. (Rep: 6235) 	<ol style="list-style-type: none"> 1. & 2. Comments noted. Further clarification will be made to the EIA section.
HRA	1. Comments noted. The HRA

<ol style="list-style-type: none"> 1. Paragraph 7.16 - The stringency of the HRA test should be made clear. Suggest: <u>“Consent cannot be granted unless the results of the <i>Appropriate Assessment</i> show <i>beyond reasonable scientific doubt</i> that the proposal will not have a significant <i>adverse effect</i> on the integrity of the protected site”</u> 2. Paragraph 7.18 - Unable to trace this reference so a better easily located reference needs to be provided. The SPG should also explain here that, irrespective of site boundaries or buffer zones, significant air and water pollution can occur far beyond a development site. (Rep: 6235) 	<ol style="list-style-type: none"> section will be reviewed. 2. Amend Appendix B to provide a link to this mapping.
<p>Biodiversity Surveys</p> <ol style="list-style-type: none"> 1. Paragraph 7.20 - Surveys are not necessary for every development. Suggest: <u>“<i>It is often necessary to carry out desk-top or field surveys to understand which protected sites, habitats and species will be affected on the site or beyond the application site</i>”.</u> 2. Paragraphs 7.21-7.23, Table 2 - This is confusing. 7.23 mentions EPS which a reader might equate with “<i>protected species surveys</i>”. Then Table 2 mentions two general types of survey: “<i>preliminary ecological appraisal</i>” and “<i>protected species surveys</i>” but for Watercourses we have “<i>fish</i>” and “<i>birds</i>” and for Woodlands we have EPS and “<i>badgers, birds</i>”. 3. Table 2 - Needs revision. There is no mention of plants or potential important habitats. There is no guidance as to what species are considered “<i>protected</i>”. The duty to maintain and enhance biodiversity cannot be fulfilled by a limited checklist approach. 4. Paragraph 7.23 - Suggest: <u>“<i>When a development proposal is on land, or has an impact on land beyond the site, in one of the categories in Table 2, it is likely that an ecological survey will be required. This survey may need to extend beyond the site boundary.</i>”</u> 5. Paragraphs 7.30 to 7.36 - This is repetitive. Suggest: <u>“<i>if a proposal is likely to affect EPS on or beyond the application site, all relevant survey information and assessment of the likely impacts on EPS must be submitted in a survey report as part of the planning application. The report must include mitigation proposals for any adverse impacts, and details matching the mitigation requirements in the Survey Report must be clearly shown on any submitted plans and</i></u> 	<ol style="list-style-type: none"> 1. Comments noted. The text in the following paragraphs will be amended. 2. Amendments will be made to address the comments. 3. Amendments will be made to Table 2. 4. Paragraph 7.23 will be reviewed. 5. The paragraphs will be reviewed along with the EPS and HRA sections of the SPG. 6. The tests reflect the wording of Policy DM2 (criterion 1.B) and should be retained. 7. Noted the SPG will be reviewed and edited as appropriate. 8. Agreed. 9. The wording will be reviewed.

<p><u>drawings. The survey, survey reportlicensed surveyor</u></p> <p><u>The LPA needs sufficient information to assess the information against the Habitat Regulations and to decide whether the proposal would pose a risk to maintaining the Favourable Conservation Status of the species at risk (the “FCS test”). NRW is usually consulted for comments on the content and conclusions of the ecological report and advice about planning conditions to protect biodiversity if permission is granted.</u></p> <p><u>If EPS are present and significant damage or disturbance to individuals, their habitat or resting places is likely and cannot be sufficiently mitigated, the LPA must either refuse the application, or, in exceptional circumstances, apply three derogation tests.”</u></p> <p>6. The second of the three LPA derogation tests (FCS test) is wrong: the tests are “no alternative”, “IROPI”, “necessary compensation for network of European sites”. Copy the tests from http://www.assembly.wales/research documents/17-038/17-038-web-english.pdf</p> <p>7. It would be clearer to write about permission first and then about the need for an NRW licence.</p> <p>8. Paragraphs 7.37-7.43 - these could be labelled “<u>examples of specific surveys</u>” because there are many other types of survey as shown in Table 3.</p> <p>9. Paragraph 7.48 - confusing repetition of 7.33 in EPS section and then introduction of “<u>conservation licence</u>” in UKPS section so reader can’t tell if a “<u>development licence</u>” only applies to EPS or not. Suggest policy and licensing professional from NRW reviews and helps amend this section. (Rep: 6235)</p>	
<p>Step-wise Approach</p> <p>1. Paragraph 8.5 - suggest adding: “<u>The LPA will need to consider evidence for whether the new features or habitats will lead to sufficient biodiversity gain to mitigate, off set or compensate for the adverse impacts of the development.</u>”</p> <p>2. Paragraph 8.14 - Repeats points already made so heading is confusing. Suggest delete heading and retain 8.15 as third para.</p>	<p>Comments noted.</p> <p>1&2. The Council will review the wording of this section.</p> <p>3. Agreed to amend the heading. The wording will be reviewed.</p> <p>4. Agreed.</p> <p>5. The wording of para 2.81 will be reviewed</p> <p>6. It is recommended that the wording be amended to refer to</p>

<p>of Pre-Application discussions saying: <i><u>“Where pre-application discussions suggest the need for ecological surveys, up-front.....(see Table 3) and early surveying could minimise delays in the application process.</u></i></p> <p>3. Paragraph 8.16 - suggest delete heading and make this fourth para. of Pre-Application discussions saying: <i>“In some cases.....needed <u>however</u> Developers should..... that <u>in other cases</u> additionalapplication.”</i></p> <p>4. Paragraphs 8.12 - 8.13 - Suggest new heading: <i>“<u>Unlawful Activity</u>”</i></p> <p>5. Paragraph 8.21 - This is unacceptable. If <i>“the land take for construction”</i> involves any earthworks, habitat, species or geological disturbance, it <u>should be within the red line</u> shown on the application form. The ecological impact should be taken into consideration in the biodiversity assessment and any mitigation and restoration plans should be described.</p> <p>6. Paragraphs 8.24–8.30 - Welcome the text but would like a proviso that the gains are evidence-based and subject to condition and monitoring because in our experience they do not always happen. (Rep: 6235)</p>	<p>compensatory measures being subject to planning conditions and ongoing monitoring.</p>
<p>Incorporating Biodiversity into a Domestic Application</p> <p>1. Paragraph 8.50 - Reads as if author ran out of steam. E.g. <i>“Further advice can be sought from... the internet.”</i></p> <p>2. This section could be tightened up and simplified. E.g. Suggest Para. 8.38 reads: <i>“<u>Bats and birds, especially..... martins and barn owls may nest or roost in buildings. Great crested newts may be found in cellars or, more commonly, outdoors in ponds, canals or ditches and among stones”</u></i></p> <p>3. Suggest all the headings re-ordered to put EPS first, mammals, then GCNs, then non-EPS bird categories. If they were presented as e.g. <i><u>Hazel Dormouse (EPS)</u></i> there would be no need to say <i>“this is an EPS”!</i></p> <p>4. Paragraphs 8.51 to 8.58 - Vague and does not inspire confidence in information presented or management of these issues. People need to know how to find out/who to ask about these things because the SPG is where they will expect precise detailed advice.</p> <p>5. Paragraph 8.59 - Misunderstanding of</p>	<p>1. Comments noted. The reference to the internet was inserted previously at the request of a topic stakeholder but will be deleted.</p> <p>2. Comments noted but no change considered necessary.</p> <p>3. It is recommended that the headings / sections be re-ordered.</p> <p>4. -7. The wording will be reviewed.</p>

<p>“enhancement and maintaining”. Promoting, learning about and publicising Geodiversity is desirable but <u>not</u> the same as enhancing and maintaining it.</p> <p>6. Paragraph 8.67 – Disagree that this is “<i>relatively easy</i>”. It is extremely difficult to get applicants, particularly those for the larger scale proposals, to “<i>target their actions</i>” to these attributes. On the whole, habitat and species destruction from development and modern agricultural practices far outweighs any of these measures. While we fully support all these resilience measures, this document is SPG and there is nothing in this add-on section to make us feel confident that these resilience ambitions will be incorporated into the planning system.</p> <p>7. Agree that these measures should be incorporated into the design phase where they will attract better scrutiny. (Rep: 6235)</p>	
<p>Missing Sections</p> <p>1. The SPG should include sections at the beginning of the document on:</p> <p>(a) State of Nature (Wales) Report</p> <p>(b) Environment (Wales) Act Part 1, Section 3: Sustainable Management of natural resources; Section 4: Principles of Sustainable Management of natural resources; Section 6: Biodiversity and resilience of ecosystems duty.</p> <p>2. Section 5.0 - Should make it clear that the LDP is an integrated document and other policies besides SP7 and DM2 are relevant to Biodiversity and Geodiversity. For example: DM7 on light pollution, DM13.13.v. on protection of soils, DM14.2 Air quality management, DM15 Waste within developments.</p> <p>3. Cumulative impacts on biodiversity and geodiversity.</p> <p>4. <u>Soils</u> - DM13.13.v.Protects soils and particularly peat which are geodiversity features. This policy is not mentioned in the SPG and the only specific mention of soils is in relation to woodland. Carbon soils, including peat provide a valuable carbon sink and specific soil types support unique ecosystems. (Rep: 6235)</p>	<p>1. Comments noted. Reference to the State of Nature Report will be added, but Appendix C is considered sufficient to explain the legislative requirements.</p> <p>2. The introduction explains this and Appendix C which already lists the key LDP.No change required.</p> <p>3. & 4. New sections will be added on on:</p> <ul style="list-style-type: none"> • Cumulative and In Combination Effects • Soils.
<p>Comments on Section 6</p> <p>1. Paragraph 6.1 - explains that the section follows the format of DM2, but in the material which follows the main headings are</p>	<p>1. The Council will review the structure of section 6.</p> <p>2. Headings will be reviewed.</p> <p>3. These terms will be reviewed.</p>

<p>inconsistent</p> <ul style="list-style-type: none"> - <u>Designated Sites</u> - Habitats <u>of principal importance</u> - <u>Protected and important Species</u> <p>Geodiversity is combined with Biodiversity and a new level of “Regional” is introduced. It would be better to treat Geodiversity separately from Biodiversity in this section.</p> <p>2. The structure of headings needs to be clear and consistent. Bold <u>headings</u> should be used to guide reader clearly through different designations instead of scattering specific designations within paragraph text eg 6.11, 6.13, 6.16, 6.17, 6.18, 6.19, 6.21.</p> <p>3. Section 6 - is confusing. Terms and format need to be used clearly and consistently: “designation” vs “statutory”, “protected” vs “important”, devolution to Wales of some planning functions, what information applicants need to provide about woodland and LBAP categories, what regard PCC will have to LBAP categories in planning determinations. In the sub-sub-headings, LBAP habitats and species are only “<i>important</i>”, however, in Table 1, LBAP Habitats and Species have <u>statutory</u> protection but RVNRs and AW do not.</p> <p>4. It needs to be clear that the duty to enhance and maintain biodiversity) <u>everywhere</u> where there is no national or international designation lies with Powys CC. For International and Nationally designated sites, PCC is responsible for considering cumulative impacts. PCC is also responsible for considering cumulative impacts on all other biodiversity interests. A similar statement is needed for geodiversity (especially soils). (Rep 6235)</p>	<p>4. The Section 6 duty of the Environment Wales (Act) will be included in the SPG.</p>
<p>1. Section 8 - It could be explained that some sites are not suitable for development and for developers / applicants to seek professional advice.</p> <p>2. It would be useful to provide a framework to applicants for how it might be justified that the benefit of development proposals may significantly outweigh the effects on the environment. (Rep 7076)</p>	<p>1 & 2 The comments are noted. No change required.</p>

3.4 Approval and Adoption of the first set of SPG by the Council

3.4.1. Having considered the issues and comments received and scrutinised the Consultation Draft SPGs, the Cabinet approved the three SPGs at its Cabinet meeting on 9th October 2018.

4. Public Consultation on the second set of SPG

4.0.1 In accordance with the SPG programme agreed for the LDP (in Table 1 on page 1 of this document), the second set of SPG to be prepared for public consultation are as follows:

- **Landscape**
- **Renewable Energy**

4.0.2 In accordance with Stage 4 of the SPG Protocol, the Consultation Draft SPG were published for public consultation over 6 weeks with the consultation period running from 14th January to 24th February 2019.

4.0.3 County Councillors, Town and Community Councils and all representors on the Powys LDP database were informed of the consultation and the documents were available to view on the LDP pages of the Council's website.

4.0.4 Notice of the consultation period was publicised on the Council's News page, the LDP webpage, and via social media. A press release was issued to the local press.

4.0.5 Hard copies of the consultation documents were made available to view in the Council's main offices at:

- County Hall and The Gwalia, Llandrindod Wells.
- Neuadd Brycheiniog, Brecon.
- Neuadd Maldwyn, Welshpool.

4.0.6 Hard copies were made available to view in all Powys Public Libraries.

4.0.7 Representations were invited either by letter /email and the use of a standard representation form was encouraged.

4.0.8 Table B8 below shows how many representors made comments in relation to each SPG. A more detailed report of the responses received for each SPG can be found in the relevant appendices.

Table B8: Number of Representors making consultation comments on the second set of SPG

Consultation Draft SPG	No. of Representors who made Representations
Landscape	9*
Renewable Energy	26**
Total	29***

* 2 of the 9 representations were 'no comment'.

** 1 of 26 representations was 'no comment'

** 6 Representors made Representations to both SPGs

4.0.9 The main issues arising from the consultation are set out for each SPG in the tables below, together with the Council's response.

4.1 Landscape SPG

4.1.1 Reference Group

4.1.2 In order to prepare the Landscape SPG, the Council sought participation and involvement with various Topic Stakeholders, from which the Council formed a Reference Group.

4.1.3 The Reference Group comprised five members, which included the following representatives:

- Planning Policy
- Development Management – Planning Officer
- Development Management – Built Heritage Officer
- Natural Resources Wales
- Clwyd-Powys Archaeological Trust (CPAT)

4.1.4 Engagement with the Reference Group during the preparation of the draft SPG is summarised in table B9:

Table B9 – Reference Group Involvement (Landscape SPG)

Date	Who and How?
Early October 2018	Contact made proposing an initial meeting and requesting involvement in the preparation of the SPG.
Late October 2018	Initial Draft Paper circulated to the reference group.
Early November 2018	Individual meetings or written correspondence with reference group members discussing the content and changes required to the initial draft SPG.
Late November 2018	Revised draft circulated to the reference group at the same time it was circulated to the topic stakeholders. Ongoing correspondence throughout this stage as the paper progressed and to inform them of key dates.
December 2018	Ongoing engagement as the paper progressed following stakeholder feedback, particularly with Natural Resources Wales, up to the LDP Working Group.
Early January 2019	Circulation of the Draft Landscape SPG prepared for consultation detailing the consultation dates.
March 2019	Circulation of final SPG prepared for LDP Working Group along with the issues raised from the consultation.

4.1.5 Topic Stakeholders

4.1.6 The larger Topic Stakeholder group included an additional seven members, including representatives from the following:

- Brecon Beacons National Park
- Campaign Protection of Rural Wales (Montgomeryshire)
- CADW
- Snowdonia National Park
- Neighbouring Authorities with AONBs (Wrexham and Shropshire)
- Homebuilders Federation

4.1.7 These stakeholders were invited to provide informal feedback on a working draft of the SPG prior to the formal public consultation stage.

4.1.8 LDP Working Group

4.1.9 The Draft SPG was considered by the LDP Working Group on 19th December 2019 and approved for Public Consultation.

4.1.10 SPG Consultation

4.1.11 The public consultation period ran from 14th January to 25th February 2019 and representations were received from the following:

Representor Name (Representor No.)

- CPRW Brecon & Radnor Branch (5466)
- Mid Wales Arts Centre (5815)
- Scottish Power (5911)
- Pennant Walters (6264)
- Innogy Renewable Energy Ltd (6323)
- Canal & River Trust in Wales / Glandwr Cymru (5704)- No Comment
- Snowdonia National Park Authority (6746)
- Land Quality Advisory Service (7085) - No Comment
- Peter Richards Ltd (7086)

4.1.12 The main issues arising from the consultation and the Council's responses to these are set out in Table B10 below.

4.1.13 The representations and Council draft responses were considered by the LDP Working Group at its meeting on the 29th March 2019, and subsequently by the Council's Cabinet at its meeting on 30th April 2019.

Table B10 – Main Issues from the Public Consultation (Landscape SPG)

Issue	Council Response
General comments about SPG needing to be clearer, more authoritative, less repetitive etc. Representor; 5466.P1	Comments noted. The document is guidance to support the LDP policy it does not aim to reproduce the Guidelines for Landscape and Visual Impact Assessment. The SPG promotes a thorough consideration of landscape by applicants in the design process, this should then be followed by assessment. As different sections of the document may be referred to at a time (rather than reading cover to cover) the areas of repetition are considered necessary.
Wording of para 2.1 needs revision, with changes to paras 1.2 and 2.2. Representor; 5466.P2	This section follows a standard format set out in the previous tranche of SPG. The guidance is not just about the assessment of landscape impact it is also about promoting design that enables the successful integration of proposals within the landscape (as required by Policy DM4). Landscape impacts will be considered by Officers but they should also be considered by applicants at the design stage, this enables schemes to be amended or

	mitigation identified at an early stage in the process.
Queries meaning of 'special status' in para 3.3. suggests rewrite. Representor; 5466.P3	Amendment made to paragraph 3.3 to remove reference to 'special status'.
Para 4.1 needs rewriting to provide clarity and remove contradiction. Representor; 5466.P4	Amendment made to provide clarity to paragraph 4.1.
Suggests insertion of European Landscape Convention definition, and how all landscape is valued and protected. Representor; 5466.P5	No change considered necessary there is enough detail in this section without it being added to.
Amending para 4.4 to underline value of landscape to well-being of residents and visitors. Representor; 5466.P6	Amendment made to paragraph 4.4 to include reference to visitors..
Suggests insertion of text to qualify lack of Special Landscape Areas in Powys. Representor; 5466.P7	No change considered necessary there is enough detail in this section without it being added to.
For paras 4.6 to 4.18 there should be a separate heading before an indented 4.7. Representor; 5466.P8	Amendment made to formatting.
Recommend moving explanatory text in Section 5. Policy. Representor; 5466.P9	Disagree this format has been used in the other SPG.
Suggest insertion of full text of Policy SP7 1 to 3. Representor; 5466.P10	Amendment made to presentation of Policy SP7.
Suggest presentation in full of policies DM2, DM3 and DM7. Representor; 5466.P11	Disagree. This guidance should be read alongside the plan there is no need to repeat these three policies within the SPG.
Suggest, due to importance of message, para 5.8 be moved to beginning of Section 5. Representor; 5466.P12	Disagree, no change required.
Suggest alternative text for para 5.9. Representor; 5466.P13	Amendment made to aid clarification of text in paragraph 5.9.
Remove brackets from para 6.4. Representor; 5466.P14	Amendment made to remove brackets from paragraph 6.4.
Clarification in para 6.5 of who undertakes site visits. Representor; 5466.P15	Amendment made to clarify who undertakes site visits in paragraph 6.5.
Suggestions for rewording 6.8 Step by Step guide. Representor; 5466.P16	6.8 is a diagram, the definitions of the terminology used is explained in detail underneath. The purpose of this guidance is to promote consideration of landscape in the design process in the first instance followed by landscape assessment. A table titled " <i>Details of Information to be Submitted for Different Development Types if the Proposals Fall</i>

	<i>Outside of a Settlement.</i> ” has been inserted to make it clearer what is expected to be submitted for each development type.
Suggests alternative wording for para 6.14 to make the SPG clearer. Representor; 5466.P17	A table titled “ <i>Details of Information to be Submitted for Different Development Types if the Proposals Fall Outside of a Settlement.</i> ” has been inserted to make it clearer what is expected to be submitted for each development type.
Suggesting changes to paras 6.22 to 6.32 concerning LVIA etc. Representor; 5466.P18	Disagree. Guidelines for Landscape and Visual Impact Assessment refers to ‘Appraisal’ where not part of an EIA.
Seeking changes to para 6.40. Representor; 5466.P19	A table titled “ <i>Details of Information to be Submitted for Different Development Types if the Proposals Fall Outside of a Settlement.</i> ” has been inserted to make it clearer what is expected to be submitted for each development type, this removes the need for this section to be amended.
Questioning the redaction to the OS Map in Section 7. Representor; 5466.P20	To avoid over analysis of the area chosen.
Seeks to remove repetition from paras 8.9-10, 8.26-27, 8.33-34 and 8.41-42 and to reference relevant guidance. Representor; 5466.P21	No Change. Reference has been made to NRW guidance where considered appropriate. Different sections of the document may be referred to at a time (rather than reading cover to cover) the areas of repetition are considered necessary
Fig 2 in Section 9 requires amendment. Representor; 5466.P22	Amendments made to Figures 2 and 3 as necessary.
Raises questions about the detail contained in Section 10 Monitoring. Representor; 5466.P23	The monitoring is largely determined by what is in the Annual Monitoring Framework. The text has been amended to show this.
Querying the absence of Landscape Capacity and Sensitivity Assessments within SPG as a whole. Representor; 5466.P24	No change considered necessary.
Comment about PCCs Enforcement and the need for mitigations to be monitored. Representor; 5466.P25	No Change. Not relevant enforcement is a development management issue outside of the scope of the SPG.
SPG needs to explain that Non Material Amendment (NMA) which alter original assessment conclusions will not be allowed. Representor; 5466.P26	No Change considered necessary each NMA will be considered on a case by case basis as to whether the amendment complies with the policies in the LDP.
Comment in support of the SPG and the importance of valuing landscape Representor; 5815.P1	Support noted.

Questioning why area around Caersws is not registered as being of historic importance. Representor; 5815.P2	CADW are responsible for the designation of Registered Historic Landscapes not the Local Planning Authority it is therefore beyond the scope of this SPG.
Concern about proliferation of static caravan sites and their impact upon landscape. Questions why there is no special guidance for static caravans. Representor; 5815.P3	Amendment made, section inserted for holiday parks into Appendix 1 - Key Things to Consider for a Sample of Development Types.
Approach in para 1.4 implies only a protective approach to landscape at odds with NRW Guidance. Representor; 5911.P1	Amendment made to paragraph 1.4 to remove reference to protection in line with LDP Policy.
Focus on para 2.1 should be on acceptability of changes, so suggest a text change to reflect this. Representor; 5911.P2	Amendment made to terminology used in paragraph 2.1.
Concerns over the attributes of landscape in para 4.1. Representor; 5911.P3	Amendment made to descriptive text used in paragraph 4.1.
SPG needs to recognise that Powys landscape will change through provision of national Renewable Energy development. Representor; 5911.P4	Disagree. The purpose of the SPG is to provide guidance on how Policy DM4 applies to development proposals including Renewable Energy.
SPG needs to reference NRW Guidance from Aug 2018. Representor; 5911.P5	Disagree. The NRW guidance from August was in draft form only at this time it is unclear what the final document will look like.
Apparent contradiction between para 4.14 and 4.15 requires clarification. Representor; 5911.P6	Amendment made to provide clarification in paragraph 4.14.
SPG terminology should better reflect that of DM4 with regard to 'unacceptable adverse/negative impacts'. Representor; 5911.P7	Amendments made to terminology used in the SPG with regard to 'unacceptable adverse/negative impacts' where appropriate. .
Suggests changes to Fig 1. on page 11. suggest that the process outlined acknowledges that landscape is only one of a wide range of considerations that may influence the siting and design of development in the countryside Representor; 5911.P8	Not appropriate to add to fig 1 but have inserted additional text at para 6.23 that acknowledges that landscape is only one of a wide range of considerations that may influence the siting and design of development in the countryside
Concern re apparent conflict with existing recognised UK assessment processes. Representor; 5911.P9	The document is guidance to support the LDP policy it does not aim to reproduce the Guidelines for Landscape and Visual Impact Assessment. The SPG promotes a thorough consideration of landscape by applicants in the design process, this should then be followed by assessment. The document does not go into detail on how to carry out a landscape assessment as there are

	recognised UK assessment processes. The focus is on looking at landscape in siting and design to aid integration and identifying the level of landscape assessment required. However there is some overlap and difference between what is required under the EIA regulations and what is required to comply with LDP Policy DM4.
Recommends usefulness of referencing guidance issued by Scottish Natural Heritage and widely used across UK. Representor; 5911.P10	Not considered appropriate as this is part of Scottish Policy Framework. However this does not undermine its usefulness and appropriateness when considering development proposals.
Concerns about the application and interpretation of LVIA in para 6.23. Representor; 5911.P11, 6264.P1	Amendments made to terminology in paragraph 6.23.
Disagreeing with wording in para 6.31 with regard to non-EIA LVIA (Appraisal). Representor; 5911.P12, 6264.P2	Amendments made to terminology in paragraph 6.31.
Seeks clarification in para 6.35 in the interpretation of LVIA and the determination of acceptability/unacceptability. Representor; 5911.P13	This is the wording in Policy DM4. It is for applicants to consider how development proposals meet LDP Policy prior to the submission of a planning application. Where applicants have not checked that their proposals meet LDP Policy there is a higher risk of schemes being refused.
Concerns about the use of "unacceptable adverse effects" in para 6.36 Representor; 5911.P14	Amendments made to terminology in paragraph 6.36.
Concerns about the subjectivity of para 6.38 (<i>areas of high/ outstanding value that are likely to be harmed by the development proposal</i>) and application and interpretation of LVIA. Representor; 5911.P15, 6264.P3	Some amendments made however Policy DM4 states proposals must be appropriate and sensitive in terms of integration, siting, scale and design to the characteristics and qualities of the landscape. This section is giving an idea of what is unlikely to be successfully integrated within the landscape for development proposals not requiring a LVIA.
Issue with National Policy wording "where adverse effects on landscape character cannot be avoided, it will be necessary to refuse planning permission" Representor; 5911.P16	This is a direct quote from Planning Policy Wales (Ed 10). No changes are considered necessary.
Concern that figs. 2 & 3 process charts on page 29 and 30 do not adequately reflect best practice guidance, and need clarification and cross referencing to be checked. Representor; 5911.P17, 6264.P4	Some amendments made to terminology used and cross referencing. However, the document is guidance to support the LDP policy it does not aim to reproduce the Guidelines for Landscape and Visual Impact Assessment. The SPG promotes a thorough consideration of landscape by applicants in the design process, this should then be followed by assessment.

	The document does not go into detail on how to carry out a landscape assessment as there are recognised UK assessment processes. The focus is on looking at landscape in siting and design to aid integration and identifying the level of landscape assessment required. However, there is some overlap and difference between what is required under the EIA regulations and what is required to comply with LDP Policy DM4.
Suggest referencing on page 37 the well-developed advice from Scottish Natural Heritage's guidance, used in Wales previously. Representor; 5911.P18	Not considered appropriate as this is part of Scottish Policy Framework. However this does not undermine its usefulness and appropriateness when considering development proposals.
Seeks clarification and more detail regarding wording in para 10.1. Representor; 6264.P5	The monitoring is largely determined by what is in the Annual Monitoring Framework. The text has been amended to show this.
Suggests changes to terms used in the Glossary. Representor; 6264.P6	Amendments made to the Glossary.
Suggests changes to elements within Appendix 1. Representor; 6264.P7	Amendments made to Appendix 1
Querying the wording in para 6.23 relating to apparent confusion between 'significant' (in EIA terms) and 'acceptability' (in planning). Suggests alternative wording. Representor; 6323.P6	Amendments made to terminology in paragraph 6.23.
Suggests additional wording to para 6.26, to include Screening Directions carried out by Welsh Ministers. Representors; 6323.P7	Additional wording added to paragraph 6.26, to clarify that Screening Directions are carried out by Welsh Ministers.
Supporting the exclusion of anemometry masts from requiring LVIA. Representor; 6323.P8	Support noted.
Concern over wording in para 6.38 (similar to concern in Rep P6) relating to the role of informal assessments in the determination of 'acceptability'. Representor; 6323.P9	Amendments made to terminology in paragraph 6.38.
As a consequence of Reps P6 and P9, Figures 2 and 3 of Section 9 should be altered to include suggested alternative wording. Representor; 6323.P10	Amendments made to terminology in Figures 2 and 3, but consideration must be given to meeting the requirements of Policy DM4.
No comment Representor; 6395.P2, 7085.P1	Noted
Supports para 5.4 Representor; 6746.P1	Support noted
Supports para 6.7	Support noted

Representor; 6746.P2	
Supports para 6.24 Representor; 6746.P3	Support noted
No clear guidance on what constitutes a development which does not require a Landscape Impact Assessment. Representor; 7086.P1	Table inserted on page 20 and amendment made to paragraph 6.36 to clarify what constitutes a development which does not require a Landscape Impact Assessment
Clearer clarification on project types and what is required will make the planning process more simple. Representor; 7086.P2	Table inserted on page 20 to clarify what applicants should submit as part of a planning application for different development types.

4.2 Renewable Energy SPG

4.2.1 Reference Group

4.2.2 In order to prepare the Renewable Energy SPG, the Council sought participation and involvement with various Topic Stakeholders, from which the Council formed a Reference Group.

4.2.3 The Reference Group comprised 5 members, which included either one or more representatives from the following:

- Planning Policy
- Development Management
- Regeneration
- Community Renewable Energy
- Renewable Energy

4.2.4 These stakeholders were invited to provide informal feedback on a working draft of the SPG prior to the formal public consultation stage.

4.2.5 Engagement with the Reference Group during the preparation of the draft SPG is summarised in table B11:

Table B11 – Reference Group Involvement (Renewable Energy SPG)

Date	Who and How?
Early October 2018	Contact made requesting involvement in the preparation of the SPG.
Early November 2018	Individual meetings or written correspondence with reference group members discussing the content of initial draft.
Late November 2018	Working draft circulated to the reference group. Ongoing correspondence throughout this stage as the paper progressed and to inform them of key dates.
December 2018	Revisions to working draft to finalise as Consultation Draft
Early January 2019	Circulation of the Draft Renewable Energy SPG to Reference Group as prepared for consultation and detailing the consultation dates.
March 2019	Circulation of final SPG prepared for LDP Working Group along with

	the issues raised from the consultation.
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4.2.8 LDP Working Group

4.2.9 The Draft SPG was considered by the LDP Working Group on 19th December 2019 and approved for Public Consultation.

4.2.10 SPG Consultation

4.2.11 The public consultation period ran from 14th January to 25th February 2019 and representations were received from the following:

Representor Name (Representor No.)

- Clwys Powys Archaeological Trust (27)
- Llangorse Community Council (495)
- Welshpool Town Council (537)
- NATS (4589)
- Scottish Power Energy Networks (4601)
- Savills (4911)
- CPRW Brecon & Radnor Branch (5466)
- David Bellamy (5831)
- Scottish Power (5911)
- Sarah Bond (6160)
- CPRW Montgomeryshire (6193)
- Innogy Renewable Energy Ltd (6323)
- Canal & River Trust in Wales / Glandwr Cymru (5704)
- George Harris (6445)
- Jenny Keal (6513)
- Open Space Society (6724)
- Snowdonia National Park Authority (6746)
- Azra Dale (6758)
- Caroline and Jamie Martin (6827)
- Njord Energy Ltd (6847)
- Richard Martin (6871)
- Marcia Gibson Watt (6936)
- The Green Valleys (6967)
- Peter Richards Ltd (7086)

- Stephen and Lynne Sephton (7087)
- Name Withheld upon request (7088)

4.2.12 The main issues arising from the consultation and the Council's responses to these are set out in Table B12 below.

4.2.13 The representations and Council draft responses were considered by the LDP Working Group at its meeting on the 29th March 2019, and subsequently by the Council's Cabinet at its meeting on 30th April 2019.

Table B12 – Main Issues from the Public Consultation (Renewable Energy SPG)

Issue	Council Response
Notification of impending revisions to the boundaries of Registered Historic Landscape (RHL) areas, and a subsequent need to bear these revisions in mind with regard to the boundaries of LSAs Representor; 27.P5	Your representation is noted. Additional text highlighting RHL areas and ASIDOHL2 procedures have been incorporated into the document.
Queries the lack of consideration within the SPG for the infrastructure required to support the transition to electric vehicles. Representor; 495.P1	Your representation is noted. However, the Renewable Energy SPG relates to developments generating energy by renewable and low carbon technologies and therefore no changes are considered necessary. Electric vehicle charging points will be included in the forthcoming design guide SPG.
Supports inclusion of LSA but recommends additional hedgerow planting to scheme any solar PV development proposal Representor; 537.P1	Your support is noted and additional clarification with regards hedgerows included in the reference to the specific LSA
Request to pass on to, or use the SPG to draw the attention of windfarm developers to the presence of, information relating to NATS Aviation Infrastructure. Representor; 4589.P1	Your representation is added. Additional information is provided under para 9.1 and the FAQ has been included as a new Appendix.
Seeking amendment to 1st sentence of para 9.6.1 concerning the determination of technical aspects of grid connection Representor; 4601.P1	Thank you for your comment and the changes suggested have been incorporated into the document.
Seeking to add new sentence to end of para 9.6.1 to qualify the preference for	Thank you for your comment and the changes suggested have been

sub-surface connections. Representor; 4601.P2	incorporated into the document.
Seeks new para to be added at 9.6.2 covering grid connections and the need for engagement between LPA and network operators. Representor; 4601. P3	Thank you for your comment and the changes suggested have been incorporated into the document.
Representor seeks further engagement with PCC with regard to the contents of the SPG Representor; 4601.P4	Your comment is noted.
SPG should better reflect the strategic direction of national policy and guidance that is outlined in the SPGs policy context section 4. Representor; 4911.P1	Your comment is noted. The SPG recognises national policy direction, and to support this the Council prepared a renewable Energy assessment published in 2017 which informs the opportunities for renewable and low carbon energy across Powys.
SPG should include targets in line with PPW para 5.7.18. Representor; 4911.P2	Your comment is noted. The Powys LDP and the SPG is informed by deliverable opportunities as identified in the Powys REA
SPG needs to consider how the technologies it lists will be better accommodated in future given the dynamism and innovation of the sector. Representor; 4911.P3	Your comment is noted. However, no change is considered necessary as the SPG makes reference to other technologies such as storage and hydrogen generation.
SPG needs to better reflect PPWs positivity and provide better guidance to maximise RE potential. Representor; 4911.P4	Your comment is noted. However, the Council considers that the LDP policies and SPG provide the appropriate policy framework and guidance to enable RE opportunities across Powys and thus the balance is appropriate.
General opening comments about the overall shortcomings of the SPG. Representor; 5466.P27	The Council disagrees with this representation. The Council considers that the SPG provides the appropriate balance and guidance in the context of the policy framework.
Entire UK Policy context section can be deleted as Wales WG policy is now primary legislation. Representor; 5466.P28, 6160.P10	The Council disagrees with this representation. The wider legislative and policy framework with respect to renewable energy remains valid.
The section on renewables obligation requires updating as it is now closed to new applicants. Representor; 5466.P29	The Council notes your representation and the text in relation to the renewables obligation has been revised.
Three paras in 4.2 require editing to	The Council disagrees with this

remove superseded documents or targets. Representor; 5466.P30, 6160.P11	representation. These documents have not been withdrawn and are considered in an appropriate context.
Requires deletion of superseded or repetitive detail in four paras in 4.3. Representor; 5466.P31, 6160.P12	The Council disagrees with this representation. These documents have not been withdrawn and are referenced in an appropriate context.
Superseded detail re EIA in paras 7.7.4, 7.6.6 and 9.5.1 needs to be deleted. Representor; 5466.P32	The Council notes your representation and the text has been amended.
Headings in Section 7 require clarification to remove confusion about types of, and search areas for RE. Representor; 5466.P33	The Council disagrees with this representation. The SPG layout is informed by the LDP policy which considers SSAs, LSAs then all other forms of RE technology.
Section 9 omits odours and air pollution. Representor; 5466.P34	The Council notes this representation. Pollution is included in para.9.1 and odours has been added.
Seeks clarification about who undertakes LSCA. Representor; 5466.P35	The Council notes this representation and additional clarification has been included.
Querying inclusion of LSCA within Section 9. Representor; 5466.P36	The Council disagrees with the representation. LSCA allows for initial assessment of search areas prior to a detailed proposal with an LVIA. The NRW guidance has not been published.
Querying why Cumulative Impact issues are confined to visual issues in para 9.4.3. Representor; 5466.P37	The Council notes this representation and additional clarification has been included.
Queries why there is no mention of protecting historic landscapes in para 9.7.3. Representor; 5466.P38	The Council notes this representation and additional clarification has been included.
Wind section needs to describe the increase in turbine size over time since TAN8 was written. Representor; 5466.P39	The Council notes this representation and references to technological advances and increases in turbine size have been added to section 7.2.
Queries the ignoring of Aecom's findings re Wind LSAs from section 7, whereas the solar findings are set out in para 7.3. Representor; 5466.P40	The Council disagrees with this representation. Policy RE1 which informs the SPG recognised that wind local search areas were not identified but the policy enables wind proposals to come forward if appropriate locations can be identified and as a result Policy RE1 accords with national policy.

1st bullet of para 4.3.11 - notes that Powys has never established separation distances. Representor; 5466.P41	The Council notes this comment but does not agree that any changes are necessary.
Queries lack of specific advice about stand alone turbines in para 7.7.2, Representor; 5466.P42	The Council notes this representation in relation to permitted development and a cross reference to the relevant appendices added.
Queries the conclusions re the use of EIA within Table 3 in section 9.5. Representor; 5466.P43	The Council disagrees with this representation. As is stated in Table 3, these are indicative thresholds and an individual development may still require EIA.
Requiring consistency in referencing of the LSA, and more detail required in Table A1. Representor; 5466.P44, 6160.P25	The Council notes this representation and referencing has been revised and additional clarification added to support Table A1.
Paras 7.5.2, 7.5.3 and 7.5.5 variously require more detail, clarification, qualification and/or rewording. Representor; 5466.P45	The Council notes this representation and the text has been revised.
Queries the omission of detail concerning LPA planning permission from Appendix 2. Representor; 5466.P46	The Council does not agree with this representation. Appendix 2 and 3 are not comparable. It is clearly stated that Appendix 2 refers to AD regulations.
Apparent confusion being caused because Appendix 3 is about something that is different to Appendix 2 OR Appendix 3 requires clarification to avoid confusion when compared to Appendix 2. Representor; 5466.P47	The Council does not agree with this representation. Appendix 2 and 3 are not comparable. It is clearly stated that Appendix 2 refers to AD regulations whilst Appendix 3 relates to domestic permitted development.
Concerns about apparent lack of transparency in SPG preparation and lack of detail re the Impact Assessment in paras 3.0.2 & 3.0.3. Representor; 5466.P48	The Council disagrees with this representation. The process for SPG preparation has been previously agreed by the Council.
Para 4.3.11 should be clarified and reconciled with para 9.12. Representor; 5466.P49, 6160.P24	The Council notes this representation and para 9.12 has been revised.
Comment re the importance of supportive local policies in order to realise national intentions. Representor; 5911.P19	Your comment is noted. The Council consider that Policy RE1 provides the necessary supportive policy framework.
SPG needs to be more cognisant of the changing national policy context (NDF) etc, rather than the out of date TAN8.	Your comment is noted. The Council is aware of the developing NDF. However, at the present time TAN8 has not been

Representor; 5911.P20	withdrawn and the Council considers that the SPG provides the appropriate balance and support to enable renewable energy development within the current national policy framework and stated Welsh Government aspirations. Should there be a change in national policy context, the SPG may require revising to reflect such changes.
Supports the inclusion of repowering paras within the SPG, eg para 9.10.2 Representor; 5911.P21	Your support is noted
General comments re the SPGs failings. Representor; 6160.P9	The Council disagrees with this representation. The Council considers that the SPG provides the appropriate balance and guidance in the context of the policy framework.
Inclusion of 'national in para 6.1.3, and storage as a technology in para 6.1.4. Representor; 6160.P13	The Council disagrees with this representation. Para 6.1.3 is not considered to require changing in the context of national planning policy, and storage was not a technology included in the REA.
Requires deletion of passage within para 7.1.1. Representor; 6160.P14	The Council disagrees with this representation and does not consider that para 7.1.1 requires amendment as it covers the Policy approach within the SSAs.
Superseded detail re EIA in para 7.7.4. Representor; 6160.P15	The Council notes your representation and the text has been amended.
Amendments to para 7.7.5 re EIA screening opinion. Representor; 6160.P16	The Council notes your representation and the text has been amended.
Remove reference to outdated policy in para 7.8.6. Representor; 6160.P17	The Council disagrees with this representation. These documents have not been withdrawn and are referenced in an appropriate context.
Para 7.9.4 regarding storage should also consider strategic resources as in SP7. Representor; 6160.P18	The Council notes your representation and the text has been amended to make reference to Policy SP7.
Clarify application of EIA in para 9.1.3 (and typo in para 9.1.2). Representor; 6160.P19	The Council notes your representation and the text has been amended.
Recognition that significant receptors may not be local people in para 9.3.2. Representor; 6160.P20	The Council notes your representation and the text has been amended.
Clarification re the purpose of an LVIA	The Council notes your representation

required in para 9.3.3. Representor; 6160.P21	and the text has been amended.
Suggestion to reword para 9.3.4 to reflect regular updating of guidance referred to. Representor; 6160.P22	The Council notes your representation and the text has been amended.
Paras 9.5.1 and 9.5.2 refer to superseded EIA regs or outdated guidance. Representor; 6160.P23	The Council notes your representation and the text has been amended.
General criticism of the document, relying on overmuch recitation of policy, with more specific guidance needed as well as information on what constitutes 'acceptable' Representor; 6193.P1	The Council disagrees with this representation. The Council considers that the SPG provides the appropriate balance and guidance in the context of the policy framework.
A need for 'unambiguous cross-referencing' to parts of other SPGs (esp Landscape) and LDP Policies, such as Tourism and Cultural Heritage. Representor; 6193.P2	The Council disagrees with this representation. Other SPG are referenced and para 7.2.6 acknowledges that all national and local plan policies apply. This has been further clarified in para 5.01.
In light of the importance of landscape, Representor seeks wording to be inserted stating that there is no further capacity for windfarms in Powys outside the SSAs. Representor; 6193.P3	The Council does not agree with this representation and Policy RE1 does not prevent windfarm schemes coming forward outside the SSAs if the necessary policy criteria are met.
Seeks qualification to sentence in para 6.1.1 by saying that Powys is well located for renewable energy for small community projects, and that larger commercial projects will be limited by the absence of grid connection. Representor; 6193.P4	The Council does not agree with this representation. Although grid capacity may at the current time limit connections, opportunities e.g. direct supply could enable larger schemes to come forward.
In light of the age of TAN8 there is a need for full assessment processes (to include tourism, heritage assets, highways and access, carbon storage and dark soils, watercourses and absorption) for RE developments of any size. Representor; 6193.P5	The Council does not agree with this representation. TAN8 remains part of national policy and all the criteria highlighted by the representor are included in the criteria for consideration in para. 9.1.
Seeks preference in paras 7.4 to 7.10 for schemes producing energy for local use, and schemes that do not involve transfer of materials for long distances. Representor; 6193.P6	The Council does not agree with this representation. To restrict schemes as proposed would not be in accordance with national planning policy.
Para 7.9.4 requires more guidance and cross referencing to the Landscape SPG. Representor; 6193.P7	Your representation is noted. A reference to the Landscape SPG has been included in para 7.9.4.

Endorses large parts of 9.1, however seeks inclusion of Public Rights of Way to avoid any doubt and provide clarity. Representor; 6193.P8	Your representation is noted and a reference to “public rights of way” added to provide clarity.
Seeks specific inclusion of Conservation Areas under the Historic Environment bullet point in 9.1.2, and specific mention of the impact of transmission infrastructure on heritage assets in para 9.1.4. Representor; 6193.P9	Your representation is noted and a reference to Conservation areas has been added.
Welcomes the requirement for LSCA and an LVIA. Representor; 6193.P10	Your support is noted.
In order to align with Landscape SPG, para 9.3.2 should clearly state views and panoramas both into and out of the proposed development will be important considerations. Representor; 6193.P11	Your representation is noted and a reference to has been added.
Welcomes the requirement for cumulative assessment. Representor; 6193.P12	Your support is noted.
Requires the sentence under Table 3 to have more prominence by being given its own numbered paragraph. Representor; 6193.P13	Your representation is noted and this sentence has been separately numbered.
Para 9.6 is wholly insufficient. Seeks inclusion of expanded criteria (that includes impacts upon communities, tourists, residential amenity and PRoW) that are to be considered laid out as in para 9.1. Representor; 6193.P14	Your representation is noted. The Council disagree that criteria should be added to para. 9.6. However, para. 9.1 has been clarified to indicate that the criteria apply to transmission and ancillary structures as well as the RE development itself.
Para 9.10.1 needs to specifically include the removal of grid and transmission infrastructure, and in para 9.1 the inclusion of wording concerning the impact of any permanent infrastructure on ecology and hydrology. Representor; 6193.P15	The Council notes your representation. Para. 9.10.1 already includes removal of ancillary infrastructure, but additional clarification is added stating that assessments may be required to assess the impacts of those structures which cannot be removed.
Concern over the potential for financial considerations to have an impact upon decision making. And suggests clarification on this is required in para 9.12.2.	Your representation is noted. Paras 9.12.1 and 9.12.2 have bene revised and additional clarification provided.

Representor; 6193.P16	
Suggests that section 9.11 be kept under constant review in the eventuality of any relevant legislation relating to windfarms and lighting. Representor; 6193.P17	The Council disagree with this representation. The document will be reviewed should legislative and national policy changes require it to be so.
Seeks clarification on the overall focus of the SPG and apparent contradictions within the text, citing two examples, and requests that more attention be given to onshore wind within the document. Representor; 6323.P1	This representation is noted and the text amended to include onshore wind and correct the contradictions.
Para 4.1.4 needs to be updated to give accurate information regarding support mechanisms. Representor; 6323.P2, 5466.P29	This representation his noted and the text has been amended as suggested.
Seeks change of wording to better reflect industry terminology with regard to 'cabling'. Representor; 6323.P3	This representation his noted and the text has been amended as suggested.
Seeks reconsideration of the 'onerous obligations' being proposed for decommissioning. Suggests alternative wording. Representor; 6323.P4	This representation his noted and the text has been amended as suggested.
Seeks clarification in paras 9.12.1 and 9.12.2 regarding the issue of planning obligations, and the circumstances around how and what they can be used for, and seeks a more supportive approach to schemes that involve community and or shared ownership and suggests a rearrangement of this section of the SPG. Representor 6323.P5	This representation is noted. Paras 9.12.1 and 9.12.2 have been amended and additional text incorporated to provide clarity with respect to Community Benefit Funds.
Recognition that the effect any RE development (such as wind turbines) would have on the NP would be included within the Landscape SPG. Representor; 6746.P4	Your comment is noted. Additional references to landscape SPG have been incorporated into the document.
Seeks amendment to para 6.1.5. Representor; 6758.P2	Your representation is noted. The Council does not agree with your proposed change as some RE developments will be the responsibility of the Welsh Ministers for determination.
Seeks amendment on page 7 re Strategic Resources.	Your representation is noted, however the Council does not consider any

Representor; 6758.P3	change is required.
Amendment to para 9.1.2 re enforcement of items listed. Representor; 6758.P4	Your representation is noted, however the Council does not consider any change is required.
Opposed to wind turbines and solar in Powys landscape. Representor; 6827.P1	Your representation is noted, however the Council does not consider any change is required.
SPG does not provide adequate guidance to developers, lacks information on how prejudice is determined, and will hinder development, so is inconsistent with national guidance & policy. Representor; 6847.P1	The Council disagrees with this representation. Examples of prejudicial developments are included in para 7.2.5. It remains the case that the identified SSA capacities remain as targets and any development in excess of the target within SSAs would be required to meet national and local planning policies.
Use of the words 'should be' in para 7.2.4 does not properly reflect the wording of Policy RE1 or the intention of national policy. Representor; 6847.P2	Your representation is noted and the text amended to align with the Policy.
Opposed to implementation of search areas. Representor; 6871.P1	Your representation is noted, however the Council does not consider any change is required. The LDP has been adopted by the Council after it, and the evidence that underlies it, has undergone an Examination in Public. As the SPG explains, the Local Search Areas are identified and detailed in the LDP Policy RE1 and accompanying reasoned justification, and as such they cannot be altered or removed from the LDP at this stage.
Representation drawing the Council's attention to a newspaper article concerning Kent Council and the possibility of colouring off-shore wind turbines. Representor; 6936.P1	Your representation is noted. Additional text referring to the need for appropriate colour schemes to be included in the design has been incorporated into the document.
Overall support for the SPG. Representor; 6967.P1	Your support is noted
SPG should better recognise the potential benefits to economic regeneration and resilience arising from RE. Representor; 6967.P2	Your representation is noted and additional text recognising additional benefits has been incorporated into the SPG.
Ministerial ambition from Sept 2017 Statement) for local (or community)	Your representation is noted and additional text added to the SPG.

ownership should be recognised and referenced throughout the SPG. Representor; 6967.P3	
More info on agricultural and forestry PD Rights to be included in Appendix 3 as stated in para 8.1.1. Representor; 6967.P4	Your representation is noted and the reference corrected with additional text added.
para 9.6 could include more info and guidance on when and where PP is required for grid connection. Representor; 6967.P5	Your representation is noted and additional text added to the SPG.
Could include info in para 9.9 on policy implications of jointly owned/managed AD plants using poultry waste. Representor; 6967.P6	Your representation is noted. A reference to LDP waste policies W1 and W2 has been added as new para 9.9.6
Suggest removal of 25 year requirement to decommission in para 9.10.1 as this is unnecessary for schemes (such as Hydro) that are built to last much longer. Representor; 6967.P7	Your representation is noted. The text has been revised to reflect that operation lifespans can vary.
Para 9.12.1 welcomed but note it presents a good opportunity to underline community ownership / benefit as per Ministers statement (See also Rep P3). Representor; 6967.P8	Your representation is noted and additional text incorporated into the SPG.
Need for more info on potential role of AD systems and/or district heating systems in the candidate site assessment process, in delivering RE and waste reduction targets. Representor; 6967.P9	Your representation is noted and will be considered in future plan preparation. Developers are encouraged to investigate district heating through a variety of heat sources and these are outlined in section 7.10 of the SPG.
Recognises the relationship between the SPG and national policy. Representor; 7086.P3	Your comments are noted. Wording changes have been made throughout the SPG to ensure the environmental and other impacts of renewable energy development are considered by developers and properly mitigated to ensure they meet national and local policy requirements.
Opinions expressed towards individual LSAs (in favour and against). Representor; 5831.P1, 6445.P1, 6513.P1, 6724.P1, 6758.P1, 7087.P1, 7088.P1,	The SPG supports the LDP and individual policies within it. The LDP has been adopted by the Council after it, and the evidence that underlies it, has undergone an Examination in Public. As the SPG explains, the Local Search Areas are identified and detailed in the LDP Policy RE1 and accompanying

	reasoned justification, and as such they cannot be altered or removed from the LDP at this stage.
No Comment Representor; 6395.P1	Noted

4.3 Approval and Adoption of the second set of SPG by the Council

Having considered the issues and comments received and scrutinised the Consultation Draft SPGs, the Cabinet approved the two SPGs at its Cabinet meeting on 30th April 2019.

5. Public Consultation on the third set of SPG

5.0.1 In accordance with the SPG programme agreed for the LDP (in Table 1 on page 1), the third set of SPG to be prepared for public consultation:

- **Conservation Areas**
- **Residential Design**
- **Open Space (this SPG has been delayed and does not appear in Set 3).**

5.0.2 In accordance with Stage 4 of the SPG Protocol, the Consultation Draft SPG were published for public consultation over 6 weeks with the consultation period running from 9th August to 20th September 2018. It should be noted that the public consultation was delayed by a few weeks due to the Brecon and Radnor by-election.

5.0.3 County Councillors, Town and Community Councils and all representors on the Powys LDP database were informed of the consultation and the documents were available to view on the LDP pages of the Council's website.

5.0.4 Notice of the consultation period was publicised on the Council's News page, the LDP webpage, and via social media. A press release was issued to the local press.

5.0.5 Hard copies of the consultation documents were made available to view in the Council's main offices at:

- County Hall and The Gwalia, Llandrindod Wells.
- Neuadd Brycheiniog, Brecon.
- Neuadd Maldwyn, Welshpool.

5.0.6 Hard copies were made available to view in all Powys Public Libraries.

5.0.7 Representations were invited either by letter /email and the use of a standard representation form was encouraged.

5.0.8 Table B13 below shows how many representors made comments in relation to each SPG. A more detailed report of the responses received for each SPG can be found in the relevant appendices.

Table B13: Number of Representors making consultation comments on the third set of SPG

Consultation Draft SPG	No. of Representors who made Representations
Conservation Areas	8
Residential Design	9

Total	17
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5.0.9 The main issues arising from the consultation are set out for each SPG in the tables below, together with the Council's response.

5.1 Conservation Areas SPG

5.1.1 Reference Group

5.1.2 In order to prepare the Conservation Areas SPG, the Council sought participation and involvement with various Topic Stakeholders, from which the Council formed a Reference Group.

5.1.3 The Reference Group comprised six members, which included representatives from the following:

- Planning Policy.
- Development Management.
- Cadw.
- Clwyd-Powys Archaeological Trust.

5.1.4 Engagement with the Reference Group during the preparation of the Draft SPG is summarised in table B14:

Table B14 – Reference Group Involvement (Conservation Areas SPG)

Date	Who and How?
April 2019	Meetings and correspondence with members of the Reference Group to discuss updated topic-related and planning information to inform the background and context of the SPG, to discuss the scope of the SPG and process involved, and to identify and agree a list of Topic Stakeholders to seek feedback from prior to public consultation.
May 2019	Initial working drafts of the SPG shared and discussed with the Reference Group to agree content of the working draft to be circulated to Topic Stakeholders. Initial feedback received from the Topic Stakeholders and suggested changes shared with the Reference Group. Specific issues raised by Topic Stakeholders discussed with the relevant members of the Reference Group. Comments from the Reference Group taken into account in preparing of the Consultation Draft.
August 2019	Notice of public consultation period circulated to LDP Database. 6 week public consultation period from 9 th of August to 20 th September.
September 2019	Representations received to the public consultation shared with the Reference Group and specific issues discussed with the relevant members of the Reference Group. Any changes proposed to the SPG in response to the representations received also shared with the Reference Group and any outstanding issues discussed further.
October 2019	Consultation Draft SPG showing proposed changes presented to the LDP Working Group shared with the Reference Group. The Reference

	Group was informed of any issues raised by the LDP Working Group before the SPG was finalised for Cabinet approval.
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5.1.5 Topic Stakeholders

5.1.6 The following Topic Stakeholders were involved:

- Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW) .
- Society for the Protection of Ancient Buildings.
- Ancient Monuments Society.
- The Georgian Group.
- The Victorian Society.
- Twentieth Century Society.
- Council for British Archaeology.
- Welsh Historic Gardens Trust.
- Theatres Trust.
- CAPEL.
- Powyland Club.
- Radnorshire Society.
- Brecknock Society.
- Machynlleth and District Civic Society.
- Montgomery Civic Society.
- Newtown and District Civic Society.
- Home Builders Federation.

5.1.7 These stakeholders were invited to provide informal feedback on a working draft of the SPG prior to the formal public consultation stage.

5.1.8 Comments received from the Topic Stakeholders were considered and responded to, with further discussion taking place on specific issues where necessary. The input from Topic Stakeholders was used to inform changes to the working draft of the SPG.

5.1.9 LDP Working Group

5.1.10 The Draft SPG was considered by the LDP Working Group on 21st of June 2019 and approved for Public Consultation.

5.1.11 SPG Consultation

5.1.12 The public consultation period ran from 9th August to 20th September 2019 and representations were received from the following:

Representor Name (Representor No.)

- Cadw (5867)
- Canal and River Trust (7095)
- Councillor Stephen Hayes (409)
- Machynlleth Town Council (7094)

- Montgomery Town Council (517)
- Natural England (4177)
- Newtown and Llanllwchaearn Town Council (439)
- Presteigne and Norton Town Council (525)

5.1.13 The main issues arising from the consultation and the Council's responses to these are set out in Table B15 below.

5.1.14 The representations and Council draft responses were considered by the LDP Working Group at its meeting on the 9th of October 2019, and subsequently by the Council's Cabinet at its meeting on 21 January 2020.

Table B15 – Main Issues from the Public Consultation (Conservation Areas SPG)

Question 1: CA1 - Is it clear from the above that the guidance within this SPG is intended to be used where individual Conservation Area Character Appraisals are not in place? Is the approach towards carrying out Conservation Area Character Appraisals in collaboration with local communities supported? If not, please explain why.	
Issue	Council Response
A representor agreed. (Rep 7094)	This support is noted.
The principles for working with communities should perhaps be amended to counter communities' tendency to be hostile to all change. (Rep 409)	<p>The meaning of local communities could be clarified by adding in reference to town and community councils and local civic societies. It would also be appropriate to explain how the issues raised by the character appraisal will be addressed within a Conservation Area Management Plan, which will involve local property owners, businesses and other interest groups. Recommend para. 4.14 is amended as follows:</p> <p>4.14 It is anticipated that Powys County Council, where possible, will work with local communities, through town and community councils, local civic societies, and local history groups, in the production of appraisals/characterisation studies.... Conservation Area Character Appraisals will be accompanied by a Conservation Area Management Plan, which sets out the response to the issues raised by the character appraisal. This will be used to inform local planning policy and decision-making. The cooperation of local property owners, businesses and other interest groups will be sought in the preparation and</p>

	implementation of Conservation Area Management Plans.
Other stakeholders should also be involved. (Rep 7095)	See response to rep 409 above.
The central point that the SPG is to be used where detailed appraisals are not in place is not sufficiently clear as currently drafted. Requests amendments to para. 4.14. (Rep 5867)	Recommend amendments to para. 4.14 as follows: Character appraisals may be undertaken by communities as part of the preparation of a Place Plan. Communities are also encouraged to undertake character area appraisals as part of a Place Plan (see section 12 of the Residential Design Guide SPG for an explanation of Place Plans). In the meantime, the guidance within this SPG is to be relied upon when assessing character to inform the design of development proposals put forward through planning and other related applications. In the absence of detailed appraisals or management plans, this SPG provides generic guidance on the assessment of character that should accompany any development proposals put forward through planning and other related applications. The Council's position on this is explained in para. 4.2.77 of the LDP, which states that significant weight shall be given to Conservation Area Character Appraisals and Management Plans, however generic guidance is to be used in the absence of assessments for each individual Conservation Area.

Question 2: CA2 - Is the above summary of information sources relating to Conservation Areas useful? If not, please explain why. Are there any further information sources that should be referenced here? If yes, please provide details.

Issue	Council Response
Two representors agreed. No specific comments received. (Rep 7094, 7095)	This support is noted.
1) Reference should be made to Buildings of Wales volume for Powys published in 2013. 2) Query whether the Residential Design Guide provides character appraisals for all of the towns? 3) Request for wording of para. 4.30 regarding Cadw's characterisation studies to be amended. 4) It would be helpful to explain why each	1) Recommend that a new para. after 4.36 is inserted after as follows, but that reference is also made to the availability of other local history books: Buildings of Wales: Powys - Montgomeryshire, Radnorshire and Breconshire by R Scourfield and R Haslam (2013) 4.39 The Powys volume is part of a

<p>of the sources mentioned might be useful, as this has not been done for all sources. (Rep 5867)</p>	<p>series of publications of the Buildings of Wales, which looks at the historic counties of Montgomeryshire, Radnorshire and Breconshire. The book provides a summary of the history and character of the county's towns and covers a range of buildings. Applicants should also refer to other local history books that may be available relating to specific towns and villages.</p> <p>2) The Residential Design Guide does not include area appraisals for Montgomery and Llanwrtyd Wells. Recommend amend para. 4.29 as follows:</p> <p>4.29 ...carries forward character appraisals of each town (referred to as "Area Centres" in the previous Unitary Development Plan) in the Powys LDP area (apart from Montgomery and Llanwrtyd Wells) from the previous Residential Design Guide (2004).</p> <p>3) Recommend that para. 4.30 is deleted and replaced with the following text, as requested:</p> <p>Cadw has published studies on the historic character of 15 towns across Wales. These studies set out a detailed definition of local character, which can inform the management of change. Although no towns in the Powys area have been studied, Cadw's urban character reports are intended to be exemplars that show how historic character can be analysed.</p> <p>4) Recommend that additional text is inserted into para. 4.32 as follows:</p> <p>4.32 CPAT has also been involved in work examining the historic character of areas defined by the Register of Historic Landscapes in Wales. These studies provide detailed historical background and a general introduction to the broad elements of character for settlements included within the registered landscape areas....</p>
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<p>Question 3: CA3 – Do you agree with the key stages that are to be followed for proposals in or affecting Conservation Areas? If not, please explain why.</p>	
Issue	Council Response
<p>A representor agreed. (Rep 7095)</p>	<p>This support is noted.</p>

<p>The proposed process is bureaucratic. Whilst appropriate for large scale applications, the process is disproportionately demanding to smaller ones and will have the effect of discouraging all such applications within conservation areas.</p> <p>(Rep 409)</p>	<p>By setting out the key stages to follow, this is intended to assist applicants in preparing proposals ready for submission to the Local Planning Authority. All developments should follow the same general process. However, it is agreed that the guidance would benefit from more of an emphasis on proportionality, particularly with regard to the level of information that is expected of smaller schemes. See response to representations on question CA4, which is considered to address the issue of proportionality.</p>
<p>Town and Community Councils should be specified as well as the County Council.</p> <p>(Rep 7094)</p>	<p>Para. 6.2 refers to relevant guidance adopted by the Council, which reflects criterion 3 of LDP Policy DM13. Guidance which has only been adopted by a Town and Community Council and not the County Council is unlikely to carry significant weight in the decision-making process. It would, therefore, not be appropriate to refer to Town and Community Councils in this context. However, it is important to point out that Conservation Area Character Appraisals and Management Plans that Town and Community Councils are involved in preparing are more likely to carry weight in decision-making when formally adopted by the Council as SPG. It is recommended that para. 5.5 is amended as follows:</p> <p>5.5...In the event that individual Conservation Area Character Appraisals and Conservation Area Management Plans are undertaken in the future in respect of individual Conservation Areas, regard will also be given to these assessments, particularly where these documents have been formally adopted as Supplementary Planning Guidance by the Council.</p>
<p>The key stages are broadly appropriate, however following comments:</p> <p>1) Question the use of the word 'determining' in the title of stage 1. Suggest using the title 'Explaining Objectives' in line with the Heritage Impact Assessment process.</p> <p>2) Need to make clear that stage 2 is the equivalent of understanding significance by describing it as a statement of</p>	<p>1) The potential for this to be misinterpreted is understood and therefore, it is recommended that the title of stage 1 before para. 6.5 is amended to explaining objectives. Also, change references to this stage in Figure 1 and in section 8 Figure 7.</p> <p>2) Recommend inserting additional text into para. 6.9 as follows: Para. 6.9 This involves carrying out a Character Appraisal of the historic</p>

<p>significance. 3) Stage 3 could be broken down into two processes i) identifying proposed changes and ii) assessing the impact of proposals and getting the best solution. (Rep 5867)</p>	<p>context of the site. This is an important part of understanding significance and is the equivalent to the Statement of Significance referred to in Cadw's Heritage Impact Assessment guidance... 3) Agree that this section could be divided into two. However, it is recommended that the word 'designing' is used rather than 'identifying' to be consistent with the content of this section. Recommend inserting titles above para. 6.15 'Designing proposed changes' and above para. 6.18 'Assessing the impact of proposals'.</p>
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Question 4: CA4 – Is it clear from the guidance here and in Appendix 1 when HIS, DAS or Planning Statements are required? If not, please explain why.

Issue	Council Response
<p>Two representors agreed. (Reps 7094, 7095)</p>	<p>This support is noted.</p>
<p>Clarity needed on the extent of issues to be discussed in a planning statement. Otherwise requiring a HIS/DAS by default. (Rep 409)</p>	<p>It is agreed that the extent of the issues to be discussed in a Planning Statement could be made clearer. Recommend inserting additional text into para. 6.40: 6.40 ...in light of the duty to preserve and enhance the character and appearance of Conservation Areas. This informal assessment should involve a basic character appraisal identifying the characteristics and features of the building and the surrounding buildings within view of the site that would be impacted on by the proposal. Where proposals would lead to the removal of features or alteration of the character of the area, consideration should be given to how the development could be mitigated, re-sited or re-designed to avoid negative impacts. Where negative impacts are unavoidable, the justification for the proposal and the potential benefits should be clearly set out.... Also recommend inserting new paragraph with the following additional text: 6.41 The Planning Statement should summarise the impacts identified through the informal assessment process and how these impacts have been addressed. The level of detail included within the Planning Statement should be proportionate to the nature</p>

	and scale of the development. This means that a development involving alterations to a single feature or a feature that is not of particular importance is likely to require a shorter statement than a development involving large scale or multiple alterations to features of importance.
More detail needed on when an historical impact assessment would be required. (Rep 525)	Applicants must carry out a Heritage Impact Assessment (HIA) and submit a Heritage Impact Statement (HIS) in connection with applications for listed building consent and conservation area consent. This requirement is explained in paras. 4.4, 6.6 and 6.23, and the requirements in respect of different types of proposals is set out in Appendix 1. This is considered to be sufficiently clear.
Need to be clearer when a planning statement is expected and to explain this at the beginning of section 6. Also to explain at the outset that HIS, DAS and planning statements are all expected to include an element of character appraisal. (Rep 5867)	As explained in para. 6.7, in cases where HIS or DAS is not required, it is good practice for design and access issues to be discussed in a Planning Statement. This is considered to be clear, however it is recommended that paras 6.6 and 6.7 are moved from stage 1 to the opening part of section 6, after para. 6.2. Also, recommend additional text in the moved para 6.6 as follows: 6.4 ...HIS, DAS and Planning Statements are all expected to include an element of character appraisal (see stage 2). Consequential change to Figure 1 Key Stages to delete 'determine whether a DAS/HIS is required.'

Question 5: CA5 – Does the list above reflect the key considerations that apply in Conservation Areas? If not, please explain why.

Issue	Council Response
A representor agreed. (Rep 7095)	This support is noted.
Contradiction between paras. 6.11 and 6.13 in terms of the extent of analysis required. Proportionality should be the guide to what is required. (Rep 409)	The potential for confusion is noted. The following additional text is recommended to be inserted into para. 6.13: 6.13...how the planning proposal has responded to them. The Statement should comprise of a brief summary of

	the character and special interest of the Conservation Area (point 1 below) followed by the site specific elements taking into account the context of the immediate surroundings of the site (points 2-12 below).
Agreed with in terms of visual character, but the impact on climate change must always be a key consideration. (Rep 7094)	The primary purpose of conservation area designation is to protect and enhance the character and appearance of the area. The process is flexible enough to allow for necessary adaptations at the application stage. Appropriate solutions can normally be found providing that careful consideration is given to siting and design matters.

Question 6: CA6 – Do you agree that the above factors are important when designing an appropriate development in Conservation Areas? Do you agree with the key considerations for specific types of development set out in Appendix 2? If not, please explain why.

Issue	Council Response
A representor agreed. (Rep 7095)	This support is noted.
The considerations listed in 6.16 discourage innovative design and will tend to encourage pastiche. (Rep 409)	The penultimate bullet point of para. 6.16 refers to contemporary and innovative design and therefore is considered to encourage this. Para. 6.16 also warns against simply focusing on replicating architectural detailing, instead the focus should be on layout, form, scale, proportions, materials and visual appearance, which should help to avoid pastiche.
Comments on Appendix 2: 1) Single glazing must be replaced with double or triple glazing or enhanced with double secondary glazing in order to tackle climate change and comply with Well-being of Future Generations Act. 2) Consideration of vertical emphasis to windows and solid to void ratio would make it impossible to take advantage of passive solar heating. 3) Questions the requirement for the number of rooflights to be kept to a minimum, as reducing electric light use would not be possible if unable to adequately increase daylighting. 4) The requirement for chimneys on new development panders to some archaic idea of design. 5) Balancing between the need to	1) Standard double glazed units are unlikely to be appropriate in a Conservation Area. However, the SPG refers to alternative solutions, including slim double glazing or the use of secondary glazing, which will improve the energy efficiency of a building whilst retaining the character and appearance of window features. 2) Window proportions are important to the character and appearance of a building. This does not necessarily mean that larger windows will not be appropriate, however paying attention to the proportions, rather than the exact size of the windows, i.e. vertical height in relation to the width, will help to integrate new development.

<p>promote energy efficiency and protecting the character and appearance of the Conservation Area really means that conservation trumps the use of solar panels. Solar panels are not permanent and we are in a climate emergency</p> <p>6) Query regarding advertisements asking what a traditional typeface is.</p>	<p>3) The overuse of rooflights, particularly on the front elevation of a building, will harm the character and appearance of the building and, if repeated on other buildings, will also have a cumulative effect on the area. The SPG encourages sensitive siting and design of rooflights in order to reduce this harm.</p> <p>4) Chimneys are a feature of historic buildings and areas, and should be replicated, where appropriate to the street scene. Recommend that the text in Appendix 2 is amended as follows:</p> <p>...Where new development is proposed, chimneys should be incorporated within the design, where this is an important feature of the street scene,...</p> <p>5) The primary purpose of conservation area designation is to protect and enhance the character and appearance of the area. The process is flexible enough to allow for necessary adaptations at the application stage. Appropriate solutions can normally be found providing that careful consideration is given to siting and design matters.</p> <p>6) Typeface means font i.e. the style of text. Times New Roman is an example of traditional typeface. Recommend inserting the following text:</p> <p>The lettering should be hand painted directly onto the existing fascia and should be painted using a clear and simple traditional typeface or italic font appropriate to the building style and character of the area.</p>
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Question 7: CA7 - Do you agree with the above summary of information that should be included in a HIS? If not, please explain why.

Issue	Council Response
<p>Two representors agreed. (Reps 7094, 7095)</p>	<p>This support is noted.</p>
<p>Information requirements are disproportionate to smaller applications. The effect of this will discourage applications for smaller developments, which could contribute to the organic change, which is conducive to healthy</p>	<p>Figure 2 is intended to summarise the type of information that could be included in a Heritage Impact Statement and is intended to help with drafting the content of a HIS. It is therefore, intended to be applicable to applications</p>

<p>urban environments. (Rep 409)</p>	<p>for Conservation Area Consent i.e. involving demolition, and, therefore, is not intended to apply to smaller developments that do not involve demolition. Amendments are recommended to clarify the intention of Figure 2 – see response to rep 5867 2) below.</p>
<p>Comments on Figure 2: 1) Make clear that part of the statement relating to significance is intended to be based on the character appraisal process described in para. 6.13. 2) Length of the checklist of information compared to list of requirements included at section 7.2 in Cadw’s own guidance on HIA. Needs simplifying as otherwise could be seen as disproportionate and unreasonable. (Rep 5867)</p>	<p>1) Recommend additional text in point 3 in Figure 2 as follows: ...Referred to as a Statement of Significance and based on the character appraisal undertaken at stage 2.</p> <p>2) Figure 2 is intended to provide a list of the type of information that could be included in a HIS, and is based on a real life example. Not all considerations will be relevant in all cases. Recommend that this is clarified by amending para. 6.32 as follows:</p> <p>6.32 A summary of the type of information to be included that applicants may wish to consider including in the their HIS is provided in Figure 2...It should be noted that the considerations listed may not all be relevant to all cases.</p> <p>Also amend title of figure 2 as follows: Figure 2 – Summary of the type of information to include consider including in the Heritage Impact Statement</p>

Question 8: CA8 – Do you agree with the circumstances where additional information may be required? If not, please explain why.

Issue	Council Response
<p>Two representors agreed. (Reps 7094, 7095)</p>	<p>This support is noted.</p>
<p>Proportionality should be the guide. (Rep 409)</p>	<p>It is considered that the amendments proposed in response to the comments under CA4 address the issue of proportionality.</p>

Question 9: CA9 – Do you agree with the information requirements for planning submissions and the processes illustrated in the charts in Section 8? If not, please explain why.

Issue	Council Response
<p>Two representors agreed. (Reps 7094, 7095)</p>	<p>This support is noted.</p>

<p>Requirements are disproportionately onerous. The aim should be to use the lightest touch compatible with maintaining the overall character of the conservation area. (Rep 409)</p>	<p>It is considered to be reasonable to expect either a HIS or DAS in accordance with the regulations, or otherwise a Planning Statement, along with detailed plans, for all applications within or affecting a Conservation Area. The emphasis of the SPG is for matters of character and appearance to be considered by applicants at an early stage in order that this work can inform the siting and design of a proposal. This information will ensure that sufficient information is available to the local authority at the application stage and will enable the local authority to make informed planning decisions.</p>
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Question 10: CA10 – Is the guidance provided here and in figures 3, 4 and 5 on how to undertake site and context analysis useful? If not, please explain why.

Issue	Council Response
<p>A representor agreed. (Rep 7095)</p>	<p>This support is noted.</p>
<p>Needs checking that the information is current. LANDMAP information on Machynlleth is out of date. (Rep 7094)</p>	<p>This extract is an example for illustrative purposes only. It is understood from NRW's website that this LANDMAP layer is dated December 2018. However, it is noted that part of it is out-of-date, therefore to avoid confusion, it is recommended that the part of the extract relating to Celtica, which has closed is deleted from Figure 3, as follows: Tower dominating what is essentially a Victorian town within the Conservation Area... The attempt to celebrate Celtic culture at Plas Machynlleth, the visitor attraction Celtica, is under threat of closure due to limited resources and subsidies...</p>
<p>Comments on figures 3 and 4 in section 7: 1) Better to describe this as 'how to undertake a character appraisal' to avoid confusion. 2) Figure 3 is nicely set out but needs to relate more closely to the stages of appraisal identified in para. 6.13 and distinction between information relating to the conservation area as a whole and information relating to the specific site. 3) Clarity needed on the use of current and historic maps, HER, LANDMAP and modern and historical photographs in</p>	<p>1) The term site and context analysis has been used as this is a planning term and is used in the guidance relating to Design and Access Statements. This emphasises the need to consider both the site and it's context, which is particularly important in Conservation Areas. 2) It is considered that figure 3 is clear in terms of the information that is relevant to the conservation area as a whole and information relating to specific site. 3) Some of the re-wording requested is not considered to be necessary as the use of the information sources is considered to be clear. Recommend</p>

<p>practice.</p> <p>4) Need to simplify figure 4 to make clear the distinction between the requirements relating to the character of the conservation area as a whole and the detail on the site specific level. May be asking for an unrealistic level of detail. (Rep 5867)</p>	<p>amending text in Figure 3 as follows: Other mapped information, such as the Historic Environment Record (HER) (above) Lle and Coflein, can be referred to in order to obtain information on designated and recorded historic buildings and features either on or adjacent to the site.</p> <p>LANDMAP - It provides important general landscape information for a site and its context...</p> <p>Comments regarding LANDMAP being out of date has been noted and addressed in response to rep 7094 above.</p> <p>4) Recommend inserting additional text into para. 6.13 as follows: 6.13...The Statement should comprise of a brief summary of the character and special interest of the Conservation Area (point 1 below) followed by a more detailed analysis of the site specific elements taking into account the immediate context of the site (points 2-12 below).</p>
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Question 11: CA11 – Do you have any further comments on this consultation draft of the SPG?

Issue	Council Response
<p>SPG should include explicit recognition that there is not and should not be a presumption against any development in conservation areas, the objective being to manage additions and subtractions to the built environment in a way which recognises the value of what already exists and the contributions of the part to the whole. (Rep 409)</p>	<p>Agree to include additional text to clarify the meaning of Conservation Area designation through adding a paragraph under the heading 'The meaning of Conservation Area designation' in section 4, to read as follows:</p> <p>The meaning of Conservation Area designation</p> <p>4.16 The designation of an area as a Conservation Area does not prevent change, however designation ensures that change is managed in a positive way by enabling change without harm to the character and appearance of the area. This means that there are additional planning controls and considerations in place to safeguard the character and appearance of the area.</p>
<p>Heartened to see significant acknowledgement of Place Plans and reference to local work here in Newtown.</p>	<p>This support is noted. It is agreed that it would be useful to make reference to Place Plans where they are available. It</p>

<p>Reference to character appraisals being undertaken as part of the Newtown Place Plan. Suggest that more detailed information on locally distinctive key characteristics can be found in Place Plans where they are available.</p> <p>(Rep 439)</p>	<p>is recommended that additional text should be provided in para. 6.10 to make specific reference to character appraisals that may have been undertaken as part of the Place Plan process. Recommend amending para. 6.10 as follows:</p> <p>Where Conservation Area Character Appraisals or local characterisation studies have been carried out in respect of an area, these will provide an important resource for assessing local character. Character appraisals may also have been undertaken as part of preparing Place Plans, which will identify locally distinctive key characteristics, therefore any relevant Place Plan should also be referred to.</p>
<p>A need to balance conservation area restrictions with the need to allow changes for disability access and to make both new and existing properties more energy efficient (e.g. replacement windows). Policy needs to be more forward looking to take into account new technology, and request that allowance is made for this within the guidance.</p> <p>(Rep 525)</p>	<p>The primary purpose of conservation area designation is to protect and enhance the character and appearance of the area. The process is flexible enough to allow for necessary adaptations at the application stage. Appropriate solutions can normally be found providing that careful consideration is given to siting and design matters.</p>
<p>Dislike the taste for bad mock Victorian buildings. Rather see very good modern design that could enhance old buildings as a contrast. The need to take responsibilities seriously in the face of the state of the climate and Well-being of Future Generations Act.</p> <p>(Rep 7094)</p>	<p>The list in para. 6.20 of factors that may assist with designing appropriate development in Conservation Areas includes reference to contemporary design.</p> <p>See previous responses regarding climate change. As explained in para. 1.3, the Powys LDP considers Conservation Areas as important strategic assets that require protection from unacceptable development so as to protect the economic, environmental social well-being of Powys.</p>
<p>Fully supportive of the document.</p> <p>(Rep 7095)</p>	<p>This support is noted.</p>
<p>Although Montgomery Town Council do not have any comments on SPG, they would like to congratulate the team on their early engagement with the council and compliment the team on how thorough the document is.</p> <p>(Rep 517)</p>	<p>This support is noted.</p>
<p>Welcoming the SPG which has the potential to make a significant contribution to successfully managing change in conservation areas so as to</p>	<p>This support is noted.</p>

<p>protect their special character. (Rep 5867)</p>	
<p>Regarding the introduction, the purpose of the guidance is clear, however the language could be simplified and condensed to make it more accessible to non-specialist planners. (Rep 5867)</p>	<p>The SPG has been drafted with the involvement of a range of stakeholders and has been written with applicants, agents and developers in mind.</p>
<p>Comments regarding section 4: 1) Need to strengthen references to PPW. 2) Para. 4.7 should be straightforward quotation from the TAN. 3) Reference to Cadw’s Conservation Principles could be overlooked and should be in a separate paragraph. 4) Reword the beginning of para. 4.11. 5) Clarify meaning of para. 4.12. 6) Include other examples of where PD rights have been removed in Conservation Areas at para. 4.16 or include a link to further detail. 7) Brief explanation needed of what is covered by the Article 4 directions in place at para. 4.17. (Rep 5867)</p>	<p>1) Recommend amending quotation from PPW in paras. 4.5 and 4.6 as follows:</p> <p>4.5...It explains that the protection, conservation and enhancement of historic assets is most effective...when designing new proposals.</p> <p>‘It is the responsibility of all those with an interest in the planning system, including planning authorities, applicants, developers and communities, to appropriately care for the historic environment in their area. The protection, conservation and enhancement of historic assets is most effective when it is considered at the earliest stage of plan preparation or when designing new proposals’.</p> <p>4.6... It refers to the states:</p> <p>‘There should be a general presumption in favour of the preservation or enhancement of the character or appearance of conservation areas or their settings’ and sets a ‘ Positive management of conservation areas is necessary if their character or appearance are to be preserved or enhanced and their heritage value is to be fully realised.</p> <p>and:</p> <p>There is a strong presumption against the granting of planning permission for developments, including advertisements, which damage the character or appearance of a conservation area or its setting to an unacceptable level.... In exceptional cases, the presumption may be overridden in favour of development considered desirable on public interest grounds.</p> <p>This presumption applies unless, in</p>

	<p>exceptional circumstances, where a development is desirable on the grounds of public interest.</p> <p>2) Recommend amending final sentence of para. 4.7 to direct quotation from PPW:</p> <p>Defining the character of each conservation area and setting out policies for preservation and enhancement through Conservation Area Character Appraisals and Management Plans, respectively, are seen as ways of providing a sounder basis for local development plan policies and development management decisions. It explains that:</p> <p><i>'Local development plan policies and development management decisions which relate to conservation areas will have a sounder basis and make more positive contributions to long-term aims if the character of each conservation area is defined and policies for its preservation and enhancement set out in detail'.</i></p> <p>3) Recommend deletion of reference to Cadw's Conservation Principles in para. 4.9 and add new para. as follows:</p> <p>4.10 Cadw's published Conservation Principles highlights the need to base decisions on an understanding of the impact a proposal may have on the significance of an historic asset.</p> <p>Consequential re-numbering of subsequent paragraphs.</p> <p>4) Recommend deletion of first sentence of para. 4.11 and replace it with:</p> <p>'The special, distinctive character of many of Powys's towns and large villages is recognised in the high number of conservation areas in the county'.</p> <p>5) Recommend deletion of first sentence of para. 4.12 and replace it with:</p> <p>The LDP has identified the importance of protecting the character and appearance of the numerous conservation areas in the county, and the importance of</p>
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	<p>protecting and enhancing local distinctiveness through good quality and sensitively designed development.</p> <p>6) There are various additional restrictions on permitted development in Conservation Areas and it is not considered helpful to cite a few more examples here. The link provided goes to the WG website, which includes guidance for householders, which sets out the circumstances where permission will be required for development in Conservation Area.</p> <p>7) Para. 4.17 includes a link to further details on the Article 4 directions. It would not be helpful to include further details on what is covered by the Article 4 directions within the SPG as the directions in Powys cover various alterations.</p>
<p>Comment on section 5 that the relationship between the specific policies SP7 and DM13 and the LDP objective 13 needs to be explained. (Rep 5867)</p>	<p>Recommend that an additional para. is inserted after para. 5.6 referring to LDP para. 4.2.78 to explain how local assets on the Historic Environment Record are to be taken into account:</p> <p>5.7 Para. 4.2.78 of the LDP states that 'regard should also be given to the information held on the Historic Environment Record (HER) in order to identify local features or areas that may be affected by proposals'.</p>
<p>Comments on section 6 stage 1: 1) Siting and design should follow rather than precede the character appraisal. The focus should be on the principle of development and what it is intended rather than the detail. 2) Para. 6.8 would provide a better starting point to the section. (Rep 5867)</p>	<p>1) Recommend amending para. 6.5 to remove reference to siting and design at this stage:</p> <p>6.5 In order to ensure that the proposed development is responsive to the character and appearance of the Conservation Area, consideration must be given to the siting and design and how it fits with its surroundings from the outset.</p> <p>Also recommend amending section 7 Figure 6.</p> <p>2) Recommend moving para. 6.8 to follow para. 6.5.</p>
<p>Comments on section 6 stage 2: 1) Clear statement needed on when character appraisal is expected. 2) Key messages could be expressed</p>	<p>1) This guidance is intended to be used for those developments that require planning permission and therefore it is not necessary to state that character</p>

<p>more succinctly.</p> <p>3) Confusion between reference to character appraisal and a site and context analysis.</p> <p>4) Explanation needed of the objective of the background research in para. 6.10.</p> <p>5) Clarity needed on defining objectives and scope - a brief summary of the character and special interest of the area, and points 2 to 12 in para. 6.13 referring to the specific site.</p> <p>6) Paragraph ordering is confusing i.e. background research before explaining the process of character appraisal. (Rep 5867)</p>	<p>appraisal will be needed in connection with proposals that require consent.</p> <p>2) The detail included in this section is considered to be necessary to explain the character appraisal process.</p> <p>3) The guidance explains that a character appraisal involves carrying out a site and context analysis informed by a site visit and background research. This is considered to be clear.</p> <p>4) Recommend inserting additional text into para. 6.10 as follows:</p> <p>6.10 Background research is necessary to obtain an understanding of the development of the site which is the subject of the development proposal. It should be used to inform the site and context analysis...</p> <p>5) Recommend inserting additional text into para. 6.13 as follows:</p> <p>6.13... The Statement should comprise of a brief summary of the character and special interest of the Conservation Area (point 1 below) followed by a more detailed analysis of the site specific elements taking into account the immediate context of the site (points 2-12 below).</p> <p>6) Careful consideration has been given to the ordering of the paragraphs and it is considered to be logical.</p>
<p>Comment on section 6 stage 3 that this section is over-long, somewhat repetitious and rather confusing. (Rep 5867)</p>	<p>The length of this section is due to the need to set out the requirements associated with HIA, DAS and Planning Statements separately. This level of detail is considered to be necessary to fully explain the requirements.</p>
<p>Comment on section 6 'Assessment for development requiring HIA' that it needs to be made clear that even where a building makes little or no positive contribution to the character of a conservation area, consent will still be needed before demolition can proceed. (Rep 5867)</p>	<p>Recommend that wording of para. 6.24 is amended, as follows:</p> <p>Where a building makes little or no contribution, demolition can proceed is likely to be permitted providing...</p>
<p>Comment on section 6 Assessment for Development requiring DAS that it would be useful to clarify that reference to character in paragraph 6.34 means that a character appraisal as per paragraph 6.13 is expected.</p>	<p>Recommend that additional text is inserted into para. 6.34 as follows:</p> <p>A DAS is required to demonstrate the steps taken to appraise the context of the development and how the design of the</p>

<p>(Rep 5867)</p>	<p>development takes the context into account. This involves undertaking a character appraisal as expected in paragraph 6.13.</p>
<p>Comment on section 6 'Assessment for development not requiring HIS or DAS' that need to make it clear at the beginning of section 6 that an element of character appraisal is needed in all cases, but this may be discharged through a HIS, DAS or planning statement.</p> <p>(Rep 5867)</p>	<p>Additional text is proposed to be inserted into new para. 6.4 to address this point in response to Rep 5867 to question CA4 above.</p>
<p>Need to change a few references to CADW in upper case to Cadw.</p> <p>(Rep 5867)</p>	<p>Recommend correcting references to Cadw, as follows:</p> <p>6.12...Reference should also be made to CADW's Cadw's Conservation Principles...</p> <p>6.42...For further guidance on assessing these types of proposals, please refer to CADW's Cadw's best-practice guidance.</p> <p>7.5...Reference should also be made to the CADW Cadw best-practice guidance...</p> <p>9.2...through consultation responses received from CADW Cadw...</p> <p>Appendix 4</p> <p>Welsh Government Historic Environment Service (CADW Cadw)</p>

5.2 Residential Design SPG

5.2.1 Reference Group

5.2.2 In order to prepare the Residential Design SPG, the Council sought participation and involvement with various Topic Stakeholders, from which the Council formed a Reference Group.

5.2.3 The Reference Group comprised seven members, which included representatives from the following Council services:

- Development Management (Senior Officers)
- Built Heritage Officer
- Planning Policy
- Housing

5.2.4 Engagement with the Reference Group during the preparation of the Draft SPG is summarised in table B16:

Table B16 – Reference Group Involvement (Residential Design SPG)

Date	Who and How?
April 2019	Scoping document and cover email sent to four senior Development Management Officers and Housing Professional Lead. Copied to Built Heritage Officer and Planning Policy officer due to crossover with Conservation Areas topic. This small internal Reference Group were provided with the proposed structure of the SPG and asked for comments on possible content including the use/carry forward of existing guidance, reference to Model Guidance, and also asked for an opinion on whether urban designers were required (the UDP Residential Design SPG was produced in association with an outside design and consultancy company). A list of proposed Topic Stakeholders was provided and feedback was invited.
14 May 2019	First Working Draft SPG circulated for feedback to internal officers including original Reference Group. The involvement was extended to Environmental Health, Active Travel, Ecology, Land Drainage, Highways and all of Development Management.
23 May 2019	Revised Working Draft and appendices circulated to Topic Stakeholders. Feedback/discussions with Active Travel, Environmental Health, Building Control, Development Management, Planning Policy, Newtown and Llanllwchaiarn Town Council commented on the Place Plan section.
4 June 2019	Working Draft sent to Doug Hughes (Architect) on his request.
August 2019	Notice of public consultation period circulated to LDP Database. 6 week public consultation period from 9 th of August to 20 th September.
September 2019	Representations received to the public consultation shared with the

	Reference Group and specific issues discussed with the relevant members of the Reference Group. Any changes proposed to the SPG in response to the representations received also shared with the Reference Group and any outstanding issues discussed further.
October 2019	Consultation Draft SPG showing proposed changes presented to the LDP Working Group shared with the Reference Group. The Reference Group was informed of any issues raised by the LDP Working Group before the SPG was finalised for Cabinet approval.

5.2.5 Topic Stakeholders

5.2.6 The following Topic Stakeholders were involved:

- Building Control
- Highways
- Environmental Health
- Housing
- All Development Management Officers
- Registered Social Landlords (Housing Associations)
- Newtown Place Plan team
- BBNP Strategy Contact
- Home Builders Federation

5.2.7 These stakeholders were invited to provide informal feedback on a working draft of the SPG prior to the formal public consultation stage.

5.2.8 Comments received from the Topic Stakeholders were considered and responded to, with further discussion taking place on specific issues where necessary. The input from Topic Stakeholders was used to inform changes to the working draft of the SPG.

5.2.9 LDP Working Group

5.2.10 The Draft SPG was considered by the LDP Working Group on 21st of June 2019 and approved for Public Consultation.

5.2.11 SPG Consultation

5.2.12 The public consultation period ran from 9th August to 20th September 2019 and representations were received from the following:

Representor Name (Representor No.)

- Newtown and Llanllwchaiarn Town Council (439)
- Montgomery Town Council (517)
- Presteigne and Norton Town Council (525)
- Douglas Hughes Architects Ltd (1552)
- Natural England (4177)
- Severn Trent Water and Hafren Dyfrdwy (5880)
- Dwr Cymru Welsh Water (6348)

- Natural Resources Wales (7093)
- Canal and River Trust (7095)

5.2.13 The main issues arising from the consultation and the Council's responses to these are set out in Table B17 below.

Table B17 – Main Issues from the Public Consultation (Residential Design SPG)

Issue	Council Response
Pleased to see significant acknowledgment of Place Plans and local work (Rep 439) .	Comments noted.
No comments to make but thank you for early engagement with the council and for the thorough SPG document (Rep 517) .	Comments noted.
<p>Presteigne Area Centre Appraisal considered to be excessive for properties outside the Conservation Area.</p> <p>Action needed now on electric vehicle charging points.</p> <p>Compulsory requirements (eg chimney stacks) and guidance on two/three storey buildings – not flexible enough for bungalows which are needed. Appraisal precludes eco-homes. (Rep 525).</p>	<p>Concerns acknowledged. Carrying forward the area centre guidance will not be any more onerous as this is the guidance currently being applied. However, the Council will review the wording of compulsory requirements in case they are too prescriptive for the types of development now coming forward. Planning decisions incorporate judgement/flexibility.</p> <p>SPG cannot bring in new or more stringent requirements than that set out in current LDP policy (no policy specifically on electric charging points).</p>
<p>Well written document which is earnest and clear but it is too long and has too many references to what is particularly aged design guidance. Too many appendices. Missed opportunity for an aspirational guide. It should be more cogent and reflective of what is relevant when it comes to designing homes and housing in Powys. Clashes between legislation and guidance (e.g. walkable neighbourhoods vs car parking standards) – guide is trying to do much linkages to issues that are at odds with each other. More pictorial guide required. Includes design standards which are no longer appropriate. The reference to housing densities is not necessary in this guide – they hinder rather than assist in achieving locally distinctive design.</p>	<p>Will review the Draft to see if it can be cut down by making cross-references instead of including so many Appendices. Have approached DCFW for a second opinion on the inclusion/use of Model Guides – meanwhile we consider that they do still have fundamental and correct design principles.</p> <p>Photos/case-studies/ideas still welcome. May delay final production of SPG.</p> <p>Taking forward for discussion with Working Group:</p> <ul style="list-style-type: none"> • Possible to work together to produce further design guidance (Best Practice Guides/Place making in Practice?) – may not have SPG status. • Losing the area centre (town) appraisals if they are felt to be too dated. • Reviewing strict/compulsory adherence to design requirements/standards (such as in

<p>(Rep 1552).</p>	<p>draft Appendix 4) to ensure that they are not too prescriptive or outdated for the types of development now coming forward.</p> <p>In terms of general criticisms, SPG is not considered to be a document which can “streamline” the planning process given the complexities of the process itself and the balance that is struck in making planning decisions in light of Development Plan Policy, competing interests, and all relevant circumstances.</p> <p>The Council considers the reference to Housing Density policy to be appropriate in this Guide and will retain its inclusion. The Council refutes that the density Policy requires “slavish adherence”. It is important in making the best use of resources and ensuring the most efficient use of land, both essential planning priorities.</p>
<p>Consider the issues of: Green Infrastructure, Biodiversity Enhancement, Landscape Enhancement, other Design Considerations (eg lighting). (Rep 4177).</p> <p>Reference to enhancement could be included at 7.3.3.2. Reference to Green Infrastructure is welcomed and the production of Green Infrastructure SPG is recommended (Rep 7093).</p> <p>Preliminary Risk Assessment (contaminated land) could be included in Table 3. (Rep 7093).</p> <p>Support for references to non mains foul drainage and the Circular advice (Rep 7093).</p>	<p>Advise that the Powys LDP is governed by the Welsh Planning System and not by the same NPPF as England although an NDF is on the way.</p> <p>Separate SPGs on Biodiversity and Geodiversity and Landscape address matters in more detail.</p> <p>The LDP does not have a Green Infrastructure Policy but this matter will be addressed at Plan Review. In the meantime developers are still expected to address green infrastructure as it is a requirement of PPW and the national sustainable place making outcomes.</p> <p>Recommend additional text to para 7.3.3.2 to cover biodiversity enhancement as well as resilience.</p> <p>Table 3 suggestion is accepted.</p> <p>Support noted, thank you.</p>
<p>In relation to DM13 13. Encourage use of SuDs in new developments to manage surface water as well as separation of surface water from combined sewerage system in brownfield developments. (Rep 5880)</p> <p>Recommend water efficient fittings</p>	<p>Comments noted. Additional wording is proposed to follow para 15.126 to cover these points (involving PCC Building Regs in the new wording).</p>

to be installed. Encourage LPA to impose the expectation on developers that properties are built to the optional requirement in Building Regulations (110 litres of water consumption per person per day). (Rep 5880)	
In relation to DM13 12. Support for the use of DM1 to secure essential infrastructure. Developers can fund improvements to Wastewater Treatment Works in advance of AMP funding where there are capacity issues. (Rep 6348) .	Thank you for the clarification, comments noted.
No comments to make (Rep 7095) .	

5.3 Approval and Adoption of the third set of SPG by the Council

Having considered the issues and comments received and scrutinised the Consultation Draft SPGs, the Cabinet approved the two SPGs at its Cabinet meeting on 21 January 2020.

6. Public Consultation on the fourth set of SPG

6.0.1 In accordance with the SPG programme agreed for the LDP (in Table 1 on page 1), the fourth set of SPG to be prepared for public consultation:

- **Archaeology**
- **Historic Environment**
- **Land Drainage**
- **Open Space (this SPG has been delayed and does not appear in Set 4).**

6.0.2 In accordance with Stage 4 of the SPG Protocol, the Consultation Draft SPG were published for public consultation over 6 weeks with the consultation period running from 20th January to 28th February 2020.

6.0.3 County Councillors, Town and Community Councils and all representors on the Powys LDP database were informed of the consultation and the documents were available to view on the LDP pages of the Council's website.

6.0.4 Notice of the consultation period was publicised on the Council's News page, the LDP webpage, and via social media. A press release was issued to the local press.

6.0.5 Hard copies of the consultation documents were made available to view in the Council's main offices at:

- County Hall and The Gwalia, Llandrindod Wells.
- Neuadd Brycheiniog, Brecon.
- Neuadd Maldwyn, Welshpool.

6.0.6 Hard copies were made available to view in all Powys Public Libraries.

6.0.7 Representations were invited either by letter /email and the use of a standard representation form was encouraged.

6.0.8 Table B18 below shows how many representors made comments in relation to each SPG. A more detailed report of the responses received for each SPG can be found in the relevant appendices.

Table B18: Number of Representors making consultation comments on the fourth set of SPG

Consultation Draft SPG	No. of Representors who made Representations
Archaeology	3
Historic Environment	4
Land Drainage	6

Total	13
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6.0.9 The main issues arising from the consultation are set out for each SPG in the tables below, together with the Council's response.

6.1 Archaeology SPG

6.1.1 Reference Group

6.1.2 In order to prepare the Archaeology SPG, the Council sought participation and involvement with various Topic Stakeholders, from which the Council formed a Reference Group.

6.1.3 The Reference Group comprised seven members, which included representatives from the following:

- Planning Policy.
- Development Management.
- Built Heritage Conservation Officer.
- Cadw.
- Clwyd-Powys Archaeological Trust.

6.1.4 Engagement with the Reference Group during the preparation of the Draft SPG is summarised in table B14:

Table B19 – Reference Group Involvement (Archaeology SPG)

Date	Who and How?
September 2019	Meetings and correspondence with members of the Reference Group to discuss updated topic-related and planning information to inform the background and context of the SPG, to discuss the scope of the SPG and process involved, and to identify and agree a list of Topic Stakeholders to seek feedback from prior to public consultation.
October-December 2019	Initial working drafts of the SPG shared and discussed with the Reference Group to agree content of the working draft to be circulated to Topic Stakeholders. Initial feedback received from the Topic Stakeholders and suggested changes shared with the Reference Group. Specific issues raised by Topic Stakeholders discussed with the relevant members of the Reference Group. Comments from the Reference Group taken into account in preparing of the Consultation Draft.
January 2020	Notice of public consultation period circulated to LDP Database. 6 week public consultation period from 20th January to 28th February 2020.
March 2020	Representations received to the public consultation shared with the Reference Group and specific issues discussed with the relevant members of the Reference Group. Any changes proposed to the SPG in response to the representations received also shared with the Reference Group and any outstanding issues discussed further.

March 2020	Consultation Draft SPG showing proposed changes presented to the LDP Working Group shared with the Reference Group. The Reference Group was informed of any issues raised by the LDP Working Group before the SPG was finalised for Cabinet approval.
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6.1.5 Topic Stakeholders

6.1.6 The following Topic Stakeholders were involved:

- Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW).
- Council for British Archaeology.
- Ancient Monuments Society.
- Home Builders Federation.

6.1.7 These stakeholders were invited to provide informal feedback on a working draft of the SPG prior to the formal public consultation stage.

6.1.8 Comments received from the Topic Stakeholders were considered and responded to, with further discussion taking place on specific issues where necessary. The input from Topic Stakeholders was used to inform changes to the working draft of the SPG.

6.1.9 LDP Working Group

6.1.10 The Draft SPG was considered by the LDP Working Group on 18th of December 2019 and approved for Public Consultation.

6.1.11 SPG Consultation

6.1.12 The public consultation period ran from 20th January to 28th February 2020 and representations were received from the following:

Representor Name (Representor No.)

- Dr Gerry McDonnell (6812)
- CPRW Brecon & Radnor (5466)
- Canal & River Trust (6395)

6.1.13 The main issues arising from the consultation and the Council's responses to these are set out in Table B20 below.

6.1.14 The representations and Council draft responses were considered by the LDP Working Group at its meeting on the 20th of March 2020, and further changes to the SPG, as requested by Cadw, were circulated to members of the group in May 2020 for comment. Factual updates were made to the content of the SPG to reflect recent changes in national policy and presented to the LDP Working Group on the 19th of April 2021. and The representations

and responses were subsequently considered by the Council's Cabinet at its meeting on 13th July 2021.

Table B20 – Main Issues from the Public Consultation (Archaeology SPG)

Issue	Council response
<p>Understands focus of the guidelines is for the planning process, however request for a more holistic approach, particularly links between archaeology heritage and tourism and archaeology, heritage and health, such as walks linking archaeological sites.</p> <p>(Rep 6812)</p>	<p>Reference is made in the introduction to the SPG at para. 1.3 to the benefits of the historic environment to tourism and well-being. It would not be appropriate to provide further guidance on these matters in this planning document, which focuses on interpretation of local planning policies. No changes recommended.</p>
<p>Para. 4.17 refers to the potential for other unknown buried archaeological remains. "Potential" should be changed to "certainty of" given that there are bound to be more archaeological sites.</p> <p>(Rep 6812)</p>	<p>The use of the word "potential" is considered to be appropriate in this context and reflects national guidance, which refers to "known" and "potential" archaeological remains. No changes recommended.</p>
<p>Para. 4.52 refers to local societies in Newtown and Welshpool, Presteigne does not have active policies.</p> <p>(Rep 6812)</p>	<p>Noted. The SPG recognises the work undertaken by organisations at a local level in relation to the historic environment. No changes recommended.</p>
<p>Para. 6.9 is illogical as it is untenable to imply that previous records provide the answer, particularly as the HERs are often poor in recording early industrial sites, e.g. early iron working slag heaps.</p> <p>(Rep 6812)</p>	<p>Requests for further archaeological assessment as part of a planning application need to be supported by evidence that indicates the potential for archaeology, which may include records on the HER. Cadw and CPAT will provide advice to Officers on information requirements relating to archaeology, as per para. 7.6. Unexpected archaeology may still be found in the course of development and the SPG explains the arrangements in these circumstances at para. 7.30. No changes recommended.</p>
<p>Query relating to para. 7.15, which refers to excavation – question whether this includes post-excavation analysis</p>	<p>For larger pieces of work like excavation and evaluations, or indeed any intrusive works that recover artefacts and samples, an approved Written Scheme</p>

and publication. (Rep 6812)	of Investigation would include the requirements for post excavation analysis. As explained in para. 7.25, the final report will need to be submitted to the LPA and a copy, together with a digital copy of any archive produced, is also provided to CPAT for inclusion on the Historic Environment Record. This means that this information will be publicly available. No changes recommended.
Request for more specific reference in para. 7.25 to inclusion within the final report of detailed post excavation analysis as laid down in the programme or scheme of works etc. (Rep 6812)	The need for post excavation analysis will depend on the nature of the work and on what is agreed as part of the Written Scheme of Investigation. No changes recommended.
In relation to para. 7.30, following the process set out in the SPG will not avoid or reduce the risk of discovering unexpected archaeology, because it is predicated on their being previous archaeological finds, registered in the HER. Archwilio records only 61 occurrences of iron working in Powys since the Iron Age, which is hard to believe. (Rep 6812)	Recommend to amend para. 7.30 to clarify that unexpected archaeology may continue to be found during the development of a site.
In relation to para. 7.30, it is nigh on impossible to identify a site as of national importance at this stage. Also queries what happens to those sites that are found unexpectedly that are not of national importance and to the small developer who would not have the resources to fund an excavation/post excavation. (Rep 6812)	Para. 7.30 reflects the guidance in TAN 24 in relation to unexpected archaeological discoveries, which provides guidance on what would happen if the archaeological discoveries where of national importance. Where sites are not nationally important, the site would normally be completely excavated if it cannot be preserved in situ by a late change in design and layout of the development. Recommend additional para. after 7.30 to explain this.
First box in Figure 5 is guaranteed to fail archaeology as if no archaeological intervention can take place, unless	If there is no known or potential for archaeology or potential impacts on archaeology, it is not possible to require

<p>when the ground is disturbed and archaeology is encountered, then the archaeology is lost. Again for the second box. Also query as to what is meant by significant archaeology.</p> <p>(Rep 6812)</p>	<p>archaeological intervention through the planning process. Planning requests must be reasonably related to the proposal. The planning process is also informed by the expertise and knowledge of CPAT and Cadw who advise Officers on archaeological matters and on the significance of archaeology. No changes recommended.</p>
<p>Welcome the SPG as it is thorough, authoritative and clearly written, as a guide to important but little-known resources, and demonstrates the quality and quantity of archaeological heritage and importance of Offa's Dyke.</p> <p>(Rep 5466)</p>	<p>Support is noted.</p>
<p>Request for an introductory definition of archaeology and how this is separate from historic environment.</p> <p>(Rep 5466)</p>	<p>Recommended to include a definition of archaeology taken from TAN 24 within the introduction of the SPG. Also, to clarify that archaeology is part of the historic environment and not separate to it.</p>
<p>The length of the SPG will deter many readers and therefore encourage production of a short, accessible document that could be sent to anyone considering a smaller development.</p> <p>(Rep 5466)</p>	<p>The final SPG will be accompanied by a summary setting out the key messages of the SPG, which will also help to navigate the full SPG. CPAT already has a short guide entitled 'Archaeology and your planning application'. No changes recommended.</p>
<p>Refer to factors beyond the planning system that affect archaeology, in particular agriculture, and whether they have similarly good level of protection. There should be similar protection of archaeology from deep ploughing, flooding, draining, uprooting ancient hedgerows, felling of historically significant trees.</p> <p>(Rep 5466)</p>	<p>The SPG provides guidance in respect of development that requires planning permission, and therefore it is not appropriate for it to cover other works that do not require planning permission. Various agricultural activities do not fall within the planning remit. There are separate policies and processes in place for hedgerow removal and removal of protected trees or trees within a Conservation Area. No changes recommended.</p>

<p>Suggest that PCC and CPAT collaborate to produce a comprehensive quick guide to protecting archaeological sites.</p> <p>(Rep 5466)</p>	<p>Further guidance on looking after scheduled monuments and different types of archaeological sites can be found on the Cadw website. No changes recommended.</p>
<p>Wat's Dyke deserves a mention alongside Offa's Dyke.</p> <p>(Rep 5466)</p>	<p>Offa's Dyke has been referred to in the SPG given its significance within the Powys LDP area, and following on from reference to it in the reasoned justification to LDP policy SP7. CPAT has confirmed that Wat's Dyke does not enter Powys at all as it is last visible in Oswestry and terminates near Maesbury, Shropshire. No changes recommended.</p>
<p>Regarding the questions in Figure 2 relating to listed buildings and their curtilages and buildings of local historic interest, an explanation is required as to why they are relevant to archaeology before getting to Figure 3.</p> <p>(Rep 5466)</p>	<p>For clarity, it is recommended that additional text is included in para. 6.6, which explains the historic value of these buildings and potential for significant archaeology associated with them.</p>
<p>Information in para. 4.44 on searching house history is not directly relevant.</p> <p>(Rep 5466)</p>	<p>Para. 4.44 which refers to RCAHMW guidance is considered to be relevant as a source of information. No changes recommended.</p>
<p>Various comments regarding the length, repetition, structure and clarity of the SPG, along with a need for full indexing.</p> <p>(Rep 5466)</p>	<p>The Council has been through all the specific comments and made changes to the SPG to improve readability where in agreement. It is anticipated that users will not always read the document from cover to cover but will refer to specific pages or tables, hence the need for repetition within the document. The summary that is planned to go alongside the SPG will help to identify the key messages for readers.</p>
<p>The appendices are useful.</p> <p>(Rep 5466)</p>	<p>Support is noted.</p>

No comments to make in respect of the Archaeology SPG. (Rep 6395)	Noted no comments.
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6.2 **Historic Environment SPG**

6.2.1 Reference Group

6.2.2 In order to prepare the Historic Environment SPG, the Council sought participation and involvement with various Topic Stakeholders, from which the Council formed a Reference Group.

6.2.3 The Reference Group comprised six members, which included representatives from the following:

- Planning Policy.
- Development Management.
- Cadw.
- Clwyd-Powys Archaeological Trust.

6.2.4 Engagement with the Reference Group during the preparation of the Draft SPG is summarised in table B21:

Table B21 – Reference Group Involvement (Historic Environment SPG)

Date	Who and How?
September 2019	Meetings and correspondence with members of the Reference Group to discuss updated topic-related and planning information to inform the background and context of the SPG, to discuss the scope of the SPG and process involved, and to identify and agree a list of Topic Stakeholders to seek feedback from prior to public consultation.
October-December 2019	Initial working drafts of the SPG shared and discussed with the Reference Group to agree content of the working draft to be circulated to Topic Stakeholders. Initial feedback received from the Topic Stakeholders and suggested changes shared with the Reference Group. Specific issues raised by Topic Stakeholders discussed with the relevant members of the Reference Group. Comments from the Reference Group taken into account in preparing of the Consultation Draft.
January 2020	Notice of public consultation period circulated to LDP Database. 6 week public consultation period from 20th January to 28th February 2020
March 2020	Representations received to the public consultation shared with the Reference Group and specific issues discussed with the relevant members of the Reference Group. Any changes proposed to the SPG in response to the representations received also shared with the

	Reference Group and any outstanding issues discussed further.
March 2020	Consultation Draft SPG showing proposed changes presented to the LDP Working Group shared with the Reference Group. The Reference Group was informed of any issues raised by the LDP Working Group before the SPG was finalised for Cabinet approval.

6.2.5 Topic Stakeholders

6.2.6 The following Topic Stakeholders were involved:

- Natural Resources Wales.
- Canal & River Trust.
- Montgomery Canal Partnership.
- Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW).
- Society for the Protection of Ancient Buildings.
- Ancient Monuments Society.
- The Georgian Group.
- The Victorian Society.
- Twentieth Century Society.
- Council for British Archaeology.
- Welsh Historic Gardens Trust.
- Home Builders Federation.

6.2.7 These stakeholders were invited to provide informal feedback on a working draft of the SPG prior to the formal public consultation stage.

6.2.8 Comments received from the Topic Stakeholders were considered and responded to, with further discussion taking place on specific issues where necessary. The input from Topic Stakeholders was used to inform changes to the working draft of the SPG.

6.2.9 LDP Working Group

6.2.10 The Draft SPG was considered by the LDP Working Group on 18th of December 2019 and approved for Public Consultation.

6.2.11 SPG Consultation

6.2.12 The public consultation period ran from 20th January to 28th February 2020 and representations were received from the following:

Representor Name (Representor No.)

- Newtown and Llanllwchaiarn Town Council (439)
- Natural Resources Wales (6315)
- Canal & River Trust (6395)
- CPRW Brecon & Radnor (5466)

6.2.13 The main issues arising from the consultation and the Council's responses to these are set out in Table B22 below.

6.2.14 The representations and Council draft responses were considered by the LDP Working Group at its meeting on the 20th of March 2020, and further changes to the SPG, as requested by Cadw, were circulated to members of the group in May 2020 for comment. Factual updates were made to the content of the SPG to reflect recent changes in national policy and to account for new, amended or de-listings, and presented to the LDP Working Group on the 19th of April 2021. and The representations and responses were subsequently considered by the Council's Cabinet at its meeting on 13th of July 2021.

Table B22 – Main Issues from the Public Consultation (Historic Environment SPG)

Issue	Council response
Support the SPG and in particular the priority placed on preserving local feature, character and distinctiveness. (Rep 439)	Support is noted.
Note that local sources will be taken into consideration on planning issues, in particular the Newtown Place Plan, however suggest wording in para. 4.73 is changed from 'taken into account' to 'prioritised'. (Rep 439)	It is not appropriate to make the change requested by the representor, as judgements made on the priority and weight to be given to individual material considerations are a matter for the decision-maker at the application stage. No changes recommended.
Request that the final sentence of para. 4.21, which refers to the division of communal courtyards and historical unity of the workers houses of Newtown being compromised, is removed, as seen as a criticism and singling out Newtown in this respect. (Rep 439)	This section of the SPG has been taken from information previously published in the Historic Environment Topic Paper prepared as part of the preparation of the LDP. It is not intended to be a criticism of Newtown, as such, rather it is a reflection on the impact that changes have had on the character of these buildings. This is an important message in the context of this SPG. No changes recommended.
Comments reflect past experience of working with Registered Historic Landscapes and a planning appeal for	Noted.

<p>Bryn Blaen Wind Farm near Llanidloes.</p> <p>(Rep 6315)</p>	
<p>Suggest a list of Registered Historic Landscapes that have undergone Historic Landscape Characterisation and a link to CPAT's website to encourage access to this information.</p> <p>(Rep 6315)</p>	<p>CPAT has confirmed that all Registered Historic Landscapes have been characterised. A link to CPAT's website on historic landscape characterisation is already included in the SPG at paras 4.42 and 6.12. No changes recommended.</p>
<p>Inconsistency in approach towards defining Historic Character Areas by the Archaeological trusts and LANDMAP. The SPG should acknowledge this anomaly and explain how the two sets of separate baseline evidence can be used.</p> <p>(Rep 6315)</p>	<p>The Good Practice Guidance explains that the characterisation work is compatible with the historic landscape layer of LANDMAP. Matters relating to consistency between these data sets should be resolved at a national level and cannot be addressed by this SPG. Recommended additional text in para. 6.15 explaining the use of the historic characterisation work and LANDMAP. No changes recommended.</p>
<p>Request explanation of what Outstanding and High RHLs and Outstanding, High, Moderate and Low LANDMAP Historic Landscapes tells us about the importance of the historic landscape resource for making planning decisions.</p> <p>(Rep 6315)</p>	<p>Recommend additional text in new paras. 6.20 and 6.21 to explain the national importance and high value of RHLs (which is the same whether on part 1 or part 2 of the register) and LANDMAP evaluations, and to refer to guidance within the Landscape SPG on the use of LANDMAP.</p>
<p>Request for better explanation on what might cause a significant effect on a Registered Historic Landscape to support SP7.</p> <p>(Rep 6315)</p>	<p>The significance of effects are considered on a case by case basis and therefore it would not be appropriate for the SPG to attempt to define this. The process set out in the SPG should help to identify effects that may be significant. No changes recommended.</p>
<p>Some LPAs take the approach of using the ASIDOHL2 process to assess the effects on the aesthetic appreciation of a historic landscape, however wind farms have been found to be acceptable as no physical disturbance of artefacts. ASIDOHL 2 and para. 4.33 of the SPG pre-dates wind farms and those we are</p>	<p>This appears to be a general comment on different approaches being used towards assessing the impact on historic landscape. The Bryn Blaen Inspector considered the impact on views of the RHL and on the key characteristics of the RHL. The guidance in the SPG requires</p>

<p>set to see as a result of the draft NDF.</p> <p>(Rep 6315)</p>	<p>consideration of the impact on views and on characteristics of the RHL. No changes recommended.</p>
<p>ASIDOHL 2 process provides very little on assessing the visual changes to historic landscapes and responsibility for revising this would fall to Cadw. In the interim request more definitive guidance in the SPG to decision makers and assessors.</p> <p>(Rep 6315)</p>	<p>This comment relates to concerns about the current ASIDOHL 2 guidance and recognises that Cadw would be responsible for revising this nationally. It would not be appropriate to address this at the local level in this SPG. No changes recommended.</p>
<p>Clarity needed on the form of assessment required to assist decisions on visual character and qualities of Registered Historic Landscapes, maybe in the form of a Historical Landscape and Visual Impact Assessment.</p> <p>(Rep 6315)</p>	<p>Appendix 4 of the SPG explains the different types of assessments involved. In respect of EIA development, Cadw will advise on the assessment requirements. In other cases, information requirements will be agreed at pre-application stage. Landscape and Visual Impact Assessment, as part of an EIA or in connection with major or wind turbine developments, or informal assessment, will include information on visual and landscape impacts relevant to RHLs. Further guidance on LVIA is found in the Landscape SPG. No changes recommended.</p>
<p>Request additional elements to be included in the list in para. 6.21 relating to traditional materials and use of colour. Also to amend the wording of the penultimate bullet point to refer to 'key views' rather than 'prominent views'.</p> <p>(Rep 6315)</p>	<p>Recommend inserting additional elements into the list in para. 6.21.</p>
<p>Support the SPG and welcome reference to the Montgomery Canal and future/continued restoration of the waterway.</p> <p>(Rep 6395)</p>	<p>Support is noted.</p>
<p>Suggest additions to para. 6.100 relating to improved access along the canal corridor, enhancements of</p>	<p>Recommend inserting additional considerations into para. 6.100.</p>

<p>important views outward from the canal corridor, enhancing recreational opportunities including pedestrian and cycling routes, and ensuring the structure integrity of the canal corridor is not harmed.</p> <p>(Rep 6395)</p>	
<p>Also in relation to para. 6.100, clarification requested of whether these considerations are intended to apply to parts of the former canal that have not yet been restored.</p> <p>(Rep 6395)</p>	<p>These considerations are intended to apply to unrestored sections of the canal to reflect the scope of policy TD3. Recommend additional text is inserted in para. 6.100 to clarify this.</p>
<p>Welcome reference at para. 6.101 to pre-application engagement with the Canal and River Trust.</p> <p>(Rep 6395)</p>	<p>Support is noted.</p>
<p>Request for consistency in the way that Canal & River Trust is referred to in the SPG.</p> <p>(Rep 6395)</p>	<p>Recommend to amend references to the Canal & River Trust throughout the document for consistency.</p>
<p>Welcome this thorough and informative SPG which will be an invaluable reference for a wide range of readers. Agree that Powys has an impressively rich Historic Environment which must be preserved and enhanced through the planning system for future generations.</p> <p>(Rep 5466)</p>	<p>Support is noted.</p>
<p>Various comments regarding the length, repetition, structure and clarity of the SPG, along with a need for full indexing, and in particular in relation to sections 6 and 7 of the SPG.</p> <p>(Rep 5466)</p>	<p>The Council has been through all the specific comments and made changes to the SPG to improve readability where in agreement. It is anticipated that users will not always read the document from cover to cover but will refer to specific pages or tables, hence the need for repetition within the document. The summary that is planned to go alongside the SPG will help to identify the key messages for readers.</p>

<p>Almost none of the landscape of Powys benefits from adequate planning protection – under representation of Registered Historic Landscapes, and designation of Special Landscape Areas not supported by PCC. LANDMAP is mentioned in section 4 but thereafter refers to the Landscape SPG.</p> <p>(Rep 5466)</p>	<p>It is not considered to be the role of the SPG to reflect on the representation of Registered Historic Landscapes in the Powys LDP area, which are designated nationally. Other matters raised in relation to designating Special Landscape Areas were addressed at the LDP examination. It is appropriate to cross-refer to the Landscape SPG, which provides detailed guidance on the use of LANDMAP. Further guidance on the historic landscape layer of LANDMAP is explained in Figure 5. No changes recommended.</p>
<p>Locally important non-designated features are mentioned in the SPG but are not headlined or emphasised.</p> <p>(Rep 5466)</p>	<p>The approach towards local non-designated features, particularly those recorded on the Historic Environment Record, are sufficiently covered in paras 4.50 to 4.52, and guidance on the use of the HER is provided in section 7 of the SPG. The SPG does not discuss historic assets of special local interest as there is no policy within the LDP relating to these assets. No changes recommended.</p>
<p>Further discussion required of direct and indirect impacts that are not visual or related to materials and design, such as biodiversity, noise, odour, pollution.</p> <p>(Rep 5466)</p>	<p>Cadw guidance covers these matters and is referred to as appropriate in the SPG. It is not considered to be necessary to repeat this guidance in the SPG. No changes recommended.</p>
<p>Request for explanation of the concepts of setting and curtilage.</p> <p>(Rep 5466)</p>	<p>Recommend to include further explanation of setting by inserting a new para. following 4.52 relating to setting of historic assets. Para. 4.44 already explains what is meant by curtilage in the context of Listed Buildings. Reference is also made in the SPG to further guidance by Cadw on these matters.</p>
<p>Section 1-4 of the SPG are authoritative and clearly written.</p> <p>(Rep 5466)</p>	<p>Support is noted.</p>
<p>Regarding section 5, suggest that LDP</p>	<p>This section of the SPG sets out the key</p>

<p>policies go into a table of policy, policy type or topic with a short summary of implications.</p> <p>(Rep 5466)</p>	<p>relevant LDP policies relating to the historic environment and also mentions other policies that refer to the historic environment. It is considered to be sufficiently clear and is consistent with the way that policies are set out in other SPG. No changes recommended.</p>
<p>Regarding section 6, most of the RHL section applies to RHPG and LBs too. Request for common step-by-step guidance in table format.</p> <p>(Rep 5466)</p>	<p>As explained in para. 6.5 of the SPG, there will be similarities in the general process for all 3 designations, however the details will differ. The suggested table format would appear overly complicated. Recommend to include, at the start of section 6, a figure setting out the common step-by-step process that applies to all 3 designations.</p>
<p>Request for a flow diagram summary of the application and decision process.</p> <p>(Rep 5466)</p>	<p>Recommend to include a flow diagram summarising the application and decision process at the end of Section 6.</p>
<p>Suggest series of questions for step 1 or combined into a table.</p> <p>(Rep 5466)</p>	<p>Recommend to include a figure which summarises key questions in relation to step 1 for RHL, RHPG and LB.</p>
<p>Para. 6.35 last sentence should state 'will be refused', instead of 'may be refused'. Otherwise it implies that projects with unacceptable impacts may be accepted. This comment applies for each designation.</p> <p>(Rep 5466)</p>	<p>It is not appropriate to confirm that applications will automatically be refused where there are unacceptable impacts to the historic environment. Planning decisions will weigh up material planning considerations relating to the proposal. As para. 6.35 suggests, there will be occasions where unacceptable adverse impacts may be outweighed by other planning matters. No changes recommended.</p>
<p>Regarding section 8, best to reproduce what the LDP says about monitoring and monitoring indicators for the historic environment.</p> <p>(Rep 5466)</p>	<p>This section summarises the LDP monitoring relevant to this SPG and is considered sufficient. No changes recommended.</p>
<p>Appendix 4, assessment of impact on setting, refers to photomontages and maps showing zones of theoretical</p>	<p>Reference to photomontages and ZTV reflects Cadw guidance in respect of setting. They are already referred to in</p>

<p>visibility, which implies they are specific to setting, whereas they should be applied more generally under other headings.</p> <p>(Rep 5466)</p>	<p>para. 6.28 in relation to RHL. This level of information is less likely to be required as part of typical applications affecting LBs and RHPG. However, the need for this information may arise when considering the impact of major or complex developments on the setting, in which case the SPG covers this situation. The need for this type of information as part of EIA or ASIDOHL process will be determined as part of that process. The use of ZTV for general landscape purposes is explained in the Landscape SPG. No changes recommended.</p>
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6.3 Land Drainage SPG

6.3.1 Reference Group

6.3.2 In order to prepare the Land Drainage SPG, the Council sought participation and involvement with various Topic Stakeholders, from which the Council formed a Reference Group.

6.3.3 The Reference Group (which also included Topic Stakeholders) comprised seven members, which included representatives from the following:

- PCC - Planning Policy.
- PCC - Development Management.
- PCC - Land Drainage (SuDS Approval Body (SAB), Local Flood Risk Management Authority)
- PCC - Highways
- Natural Resources Wales
- Dwr Cymru
- Hafren Dyfrdwy

6.3.4 Engagement with the Reference Group during the preparation of the Draft SPG is summarised in table B23:

Table B23 – Reference Group Involvement (Land Drainage SPG)

Date	Who and How?
October 2019	Meetings and correspondence with members of the Reference Group to discuss updated topic-related and planning information to inform the background and context of the SPG, to discuss the scope of the SPG and process involved, and to identify and agree a list of Topic Stakeholders to seek feedback from prior to public consultation.

November 2019	Initial working drafts of the SPG shared and discussed with the Reference Group to agree content of the working draft. Comments from the Reference Group taken into account in preparing of the Consultation Draft.
January 2020	Notice of public consultation period circulated to LDP Database. 6 week public consultation period from 9 th of 20 th January to 28 th February 2020.
March 2020	Consultation Draft SPG showing proposed changes presented to the LDP Working Group shared with the Reference Group. The Reference Group was informed of any issues raised by the LDP Working Group before the SPG was finalised for Cabinet approval.

6.3.9 LDP Working Group

6.3.10 The Draft SPG was considered by the LDP Working Group on 18th of December 2019 and approved for Public Consultation.

6.3.11 SPG Consultation

6.3.12 The public consultation period ran from 20th January to 28th February 2020 and representations were received from the following:

Representor Name (Representor No.)

- CPRW (5466)
- Hafren Dyfrdwy (5880)
- Natural Resources Wales (6315)
- Canal and River Trust (6395)
- Dale (Azra) (6758)
- Caersws Concerned Resident Group (7099)

6.3.13 The main issues arising from the consultation and the Council's responses to these are set out in Table B24 below.

6.3.14 The representations and Council draft responses were considered by the LDP Working Group at its meeting on the 20th of March 2020, and subsequently by the Council's Cabinet at its meeting on 21 January 2020.

Table B24 – Main Issues from the Public Consultation (Land Drainage SPG)

Issue	Council Response
Welcome SPG, contains important and useful sources of information. Rep. 5466.P52	The Council welcomes your comments and thanks you for the time you have taken to read the document.
Issues with the SPG being repetitive and	The Council has been through all the

readability, detailed specific comments have been included for each paragraph where required. Rep. 5466.P52	specific comments and made changes to the SPG to improve readability where in agreement. It is anticipated that users will not always read the document from cover to cover but will refer to specific pages or tables, hence the need for repetition within the document.
Needs introductory forceful outline of the impacts of climate change and flooding on human and natural populations, housing and infrastructure and soils (compared with leaving this to minimal statement at 4.3). Rep. 5466.P52	Agreed, have revised introduction (section 1).
Transport problems and their social and economic impacts receive insufficient emphasis. Rep. 5466.P52	Disagree, the paper needs to be more about the implementation of LDP Policy than context.
The SPG should describe the prospect for the future posed by climate change. It should also briefly discuss the problems posed by using the familiar “1 in 100 year events” or “100-year return events” in assessment of SuDS and other mitigation measures. Rep. 5466.P52	Whilst the SPG does touch on this. The Powys LDP and the Land Drainage SPG is guided by the approach take at the national level particularly with regards to Planning Policy Wales and TAN 15, this level of detail is beyond the scope of this SPG.
We would also like to see a clear description of how vegetation cover, including trees, especially in upland catchments, on slopes and along watercourses, assists water absorption and prevents flooding. A mention of the impacts of agricultural practices and risk of soil compaction and erosion, even although these are mainly outside LPA control, would help in providing the context for this SPG. Rep. 5466.P52	Added as part of natural flood risk management (paragraphs 4.0.5 to 4.0.8). However, the purpose of the SPG is to provide guidance on LDP policies on flood risk and land drainage. Whilst the Council does appreciate the importance of these factors it is difficult to see the value of including them within the SPG.
The SPG needs to sell the critical importance of SuDS in mitigating the devastation caused by climate change. Rep. 5466.P52	Agreed, have revised introduction (section 1).
There is not enough hard detail about the LDP area. Reproducing a river or flood map might help. Rep. 5466.P52	Maps have now been included (Figure 1 and 2).
We would like to see firm assurance that an evidence-based description of basic site specific hydrological and drainage measures will be required at the planning determination stage and no longer be relegated to Planning Conditions: also, that a list of promised generic measures and diagrams with no site-specific details will no longer be sufficient to discharge hydrology planning conditions. We trust that new	This issue is for Development Management to consider.

SAB procedures will ensure this. Rep. 5466.P52	
Has the SPG has been checked by a qualified hydrologist? We suggest this could be useful. This is a highly technical subject and the SPG needs to look tighter and more professional without compromising the necessary clear explanations for lay-readers. Rep. 5466.P52	
With regards to the title of the SPG, we are now tending to support natural flood risk management techniques rather than the draining of land. Rep.6315.P1	The title has been changed from Land Drainage and Flooding to 'Flood Prevention Measures and Land Drainage' this is the same title as the LDP Policy and puts more emphasis on Flood Prevention.
Paragraph 4.5 -We advise there is a requirement that developers seek drainage approval from a SUDs Approval Body (SAB)before starting any construction work that has drainage implications (as set out in schedule 3 of the Flood and Water Management Act 2010). It would be beneficial to include reference to this in the bullet points below paragraph 4.5. Rep.6315.P1	Agreed, inserted into paragraph 4.0.4.
Paragraph 5.2 – We advise the following change in paragraph 5.2. Some watercourses are defined as 'Main River' –where Natural Resources Wales (NRW) has responsibility (NRW) have powers and responsibilities to manage flood risk, whilst... Rep.6315.P1	Agreed changes made as suggested. Paragraph 5.1.2 amended to read "Natural Resources Wales (NRW) have powers and responsibilities to manage flood risk".
Paragraph 6.2–Please note there is an aim to publish new Flood Maps for Wales in the spring. Rep.6315.P1	Correspondence with Welsh Government suggests this is more likely to be the autumn.
Paragraph 6.10 - We note the only reference to site specifics issues is to the Stage 2 SFCA outputs. It should be highlighted that these outputs are already dated and would require updating in order to support further development allocations and detailed design. Rep.6315.P1	Agreed, added "However, these outputs are already outdated and will require updating to support further development sites and detailed design" to paragraph 6.4.3.
Paragraph 9.2 - Please note Powys County Council (acting as the Lead Local Flood Authority) would advise on the content of any FCA where the source of flooding is solely from surface water risk. Rep.6315.P1	Cross referenced to paragraph 13.2.3 which details this further.

<p>Paragraph 9.15 – It should be noted that consent for culverting is required under the Environmental Permitting (England and Wales) Regulations 2016 (LDA1991/EPR2016). Rep.6315.P1</p>	<p>Agreed, added “consent for culverting is required under the Environmental Permitting (England and Wales) Regulations 2016 (LDA1991/EPR2016).” To paragraph 9.0.15.</p>
<p>We advise that Natural Flood Management (NFM) should be referred to as a source of control. NFM has the potential to help ensure new development is sustainable and can also provide wider community benefits. However, it should also be noted that NFM is a useful technique to prevent and manage nuisance flooding. During unprecedented heavy rainfall events it is unlikely that NFM techniques will be effective on their own and a combination of approaches will need to be taken. Rep.6315.P1</p>	<p>Agreed, a section has been added (paragraphs 4.0.5 to 4.0.8)</p>
<p>Section 5 (pg7) sets out various types of sources of potential flooding to be considered. It would appear that the potential for flooding from canals has been omitted. We consider that the potential for flooding from canals should be included within document. Rep.6395.P4</p>	<p>Agreed, a section has been added (section 5.6)</p>
<p>It may be useful to add a section on the Drainage and Wastewater Management Plans (DWMP). All sewerage undertakers in the UK are required to publish DWMPs for their service areas in 2022 to enable flood risk management organisations to collaboratively improve drainage and environmental water quality. Rep.5880.P2</p>	<p>A section has been added (section 7.14) on DWMPs into the legislative and policy context, until the plans have been developed further its premature to add them as a resource.</p>
<p>In agreement with, and support the SPG, but the impact of Renewable Energy schemes (including infrastructure) on flooding and land drainage needs to be addressed and included. Rep.6758.P5</p>	<p>The SPG and LDP Policy DM6 states that “<i>All development proposals need to make satisfactory provision for land drainage</i>”, this includes Renewable Energy schemes. Policy RE1 also states that in relation to Renewable Energy Schemes “<i>satisfactory mitigation shall be in place to reduce the impact of the proposal and its associated infrastructure</i>”. Further detail is provided in section 9 of the Renewable Energy SPG.</p>
<p>Note that there is no mention of the importance of dredging watercourses. The lack of dredging has been noted in communities who have suffered from recent heavy flooding. Dredging in my opinion, is a critical issue with huge potential impact that needs to be</p>	<p>Dredging is outside the remit of the Land Drainage and Flooding SPG. The SPG been drafted to provide guidance on the implementation of LDP Policies relating to Flood Risk and Land Drainage.</p>

addressed and included in the SPG. Rep.6758.P5	
Comments regarding the inclusion of an allocation in Caersws in relation to the assessment processes at the candidate site stage. Rep.7099.P1	All planning applications need to comply with LDP Policies DM5 and DM6 regardless of whether the site is allocated or not. The site in Caersws was not part of the detailed stage 2 SFCA because an independent Flood Consequences Assessment (FCA) was submitted to the planning authority at the time. The FCA was able to demonstrate that the site was flood free.

6.4 Approval and Adoption of the fourth set of SPG by the Council

Having considered the issues and comments received and scrutinised the Consultation Draft SPGs, the Cabinet approved the three SPGs at its Cabinet meeting on 21 January 2020. *Note: This paragraph will be confirmed/edited subject to decision-making at the Cabinet Meeting on 21 January 2020.*

The Covid-19 pandemic in 2020 resulted in delays to the Council's normal service and a move to "Business Critical" mode. The SPG preparation was put on hold until more normal working arrangements resumed in 2021. The fourth set of SPG were delayed to Cabinet meeting in July 2021.

Having considered the issues and comments received and scrutinised the Consultation Draft SPGs, the Cabinet approved two of these SPGs, Archaeology and The Historic Environment, at its Cabinet meeting on 13th July 2021. *Note: This paragraph will be confirmed/edited subject to decision-making at the Cabinet Meeting on 13/07/21.*

The third SPG in this set, Land Drainage, has been deferred, awaiting the confirmation of the SUDS Approval Body (SAB) which has overall responsibility for drainage. Whilst the LDP included a commitment to produce Land Drainage SPG, it should be noted that the SAB process was introduced after the LDP was adopted. SAB input is now required before the SPG can be progressed to adoption.

7. **Public Consultation on an additional SPG**

7.0.1 This section refers to:

- **The Newtown & Llanllwchaiarn Place Plan SPG**

7.0.2 As noted in section 8. of the SPG Protocol, other SPG can be formulated. Since November 2018, Newtown and Llanllwchaiarn Town Council have been working on creating a Place Plan for their area. With the help of Planning Aid Wales, consultants at the Place Studio and supported by Powys County Council Officers as stakeholders, the Place Plan has been

drawn up to be compliant with the LDP but adds a level of local detail, expressing the views of the community, to help inform planning decisions in the local area.

7.0.3 The Newtown and Llanllwchaiarn Place Plan will supplement Policy DM13 – Design and Resources – alongside having relevance to a variety of other LDP policy (such as new housing, open space, biodiversity, community facilities, town centre and retail).

7.0.4 The Place Plan contains objectives, policies and action points grouped under three main themes: Newtown – a great place to live, learn and work; Green Newtown; and Destination Newtown. It also contains its own local planning guidance under the Plan's 11 topic headings and a chapter referencing items for the next Local Development Plan. The policies have all been developed to be in conformity with the over-arching Powys LDP. This guidance will inform the development management (planning application) process enabling the Town Council to prepare more detailed responses to planning applications and SPG that Planning Officers/Council Members will consider in their decision-making.

7.1 Newtown & Llanllwchaiarn Place Plan SPG

7.1.1 To prepare the SPG, the general six stage format of – Review; Reference Group, Topic Stakeholders and Working Draft SPG; Consultation Draft SPG; Public Consultation; Final SPG; and Adoption is being followed but the process has been largely orchestrated by the Newtown Town Council. The Place Plan will represent more than a planning document to the Town Council as through its vision, objectives and action points it is able to robustly demonstrate the local community's priorities for improving and shaping the future of their area and will help to target decision making and funding programmes.

7.1.2 To ensure the Place Plan is able to act as SPG, Powys County Council have managed the Public Consultation stage (this is in addition to the various stages of community involvement that the Town Council have already undertaken).

7.1.3 LDP Working Group

7.1.4 The Draft SPG was considered by the LDP Working Group on 10th of December 2020 and approved for Public Consultation.

7.1.5 SPG Consultation

7.1.6 In accordance with Stage 4 of the SPG Protocol, the Consultation Draft SPG was published for public consultation over 6 weeks with the consultation period running from 26th January 2021 to 9th March 2021.

7.1.7 All representors on the Powys LDP database, and all Powys County Council internal contacts, were informed of the consultation by email and the documents were available to view on the LDP pages of the Council’s website. Due to difficult situation concerning the Covid 19 pandemic, no hard copies were made available.

7.1.8 Notice of the consultation period was publicised on the Council’s News page, the LDP webpage, and via social media. A press release was issued to the local press. Newtown Town Council also publicised this stage.

7.1.9 Representations were invited by email and the use of a standard representation form was encouraged.

7.1.10 Table B25 below shows how many representors made comments. A more detailed report of the responses received can be found in Appendix 5.

Table B25: Number of Representors making consultation comments on the Place Plan SPG

Consultation Draft SPG	No. of Representors who made Representations
Newtown and Llanllwchaiarn Place Plan	17

7.1.11 The 17 representations comprised: 4 individuals (including a County Councillor) 10 organisations (including NRW and Natural England) 1 Local Authority (Caerphilly) 1 firm of local architects, 1 Town Council (Newtown & Llanllwchaiarn).

7.1.12 Three representors had “no further comment to make”. Of the remaining 14 representations, the main issues raised are set out in Table B26 below.

7.1.13 The representations were considered by the LDP Working Group at its meeting on 19th April 2021. Responses were subsequently drafted in conjunction with the Town Council. The representations and Council draft responses were considered by the Council’s Cabinet at its meeting on 13th July 2021.

Table B26 – Main Issues from the Public Consultation (Newtown & Llanllwchaiarn Place Plan SPG)

Issue	
Comments on the possible pedestrianisation of parts of the town.	Representor: 7105, 7106
Comments on the importance of preserving the	Representor: 7105,

town's heritage including targeting regeneration grants to green the town, promote a café culture and bring disused buildings back into re-use.	
Comments on making more reference to promoting Newtown as a tourist destination and acknowledging the importance of tourism businesses and cultural tourism .	Representor: 7105, 7107
Comments on reinforcing the importance of the canal and its linkages to green/blue space, ensure consistent wording re: sensitive repair/restoration, highlight the importance of waterways to health and well-being . Comments on Green Infrastructure, Green Spaces and Open Spaces, Tree Cover	Representor: 7108, 6315, 7105
Comments on including creative industries as part of economic well-being, ensuring enough focus is given to culture and the arts, including the protection of the existing cinema and theatres as important cultural venues.	Representor: 4369, 7107
Comments on planning post pandemic including emphasis on well-being/addressing poor mental health.	Representor: 1552, 6992
Comments on Active Travel and Public Rights of Way	Representor: 4640, 7024, 1552, 7131, 6315
The suitability of Land allocations plus suggestions for possible additional sites.	Representor: 1552
Place Making - the Design Commission for Wales (DCFW) recommends the inclusion of a link to the Placemaking Wales guide as a useful resource. http://dcfw.org/placemaking/resources/	Representor: 3076
Ecological - Natural England have raised the issue of the Severn Estuary SAC and Ramsar site to which the River Severn is hydrologically linked, highlighting the importance of migratory fish and the work of "Unlocking the Severn" partnership to restore the Severn to enable fish to move within the river and to increase people's engagement. They consider the Place Plan provides an opportunity to remove any barriers to fish migration and to enhance the river and riparian habitat. Natural England commented "As the Plan falls within the hydrological catchment of the Severn Estuary SAC/RAMSAR, we would advise you consider potential impacts on these sites from the proposed plan". Natural Resources Wales have brought attention to the wide range of issues, including the Plan's alignment to their goals regarding SMNR (sustainable management of natural resources) and	Representor: 6412, 6315

the need to include consideration of the Mid Wales Area Statement. Additional advice was provided on green spaces, pollinators, tree cover (Future Generations Commissioner's Manifesto) etc.	
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7.1.14 As the Place Plan SPG has been written by the Town Council and because the comments are mainly focussed at the local level, the decision on which changes to make have been dealt with primarily by the Town Council in liaison with PCC Officers. The Council responses set out in Appendix 5 therefore make general references to the changes being made to Plan but for completeness may be read in conjunction with the supporting evidence compiled by Newtown Town Council who approved the revisions to their Place Plan on 24th May 2021. [Supporting evidence can be found here.](#)

7.1.15 Powys County Council have identified any changes and composed the detailed responses for two particular issues, given their relevance to the main LDP - the Natural England comments (Repr: 6412) concerning HRA plus the queries being raised on LDP sites (Repr: 1552). The Council's ecologist was consulted on the representations made by Natural England and NRW in order to inform the response.

7.1.16 PROW and Active Travel comments are to be shared to PROW team.

7.2 Approval and Adoption of the Newtown & Llanllwchaiarn Place Plan SPG by the Council

Having considered the issues and comments received and scrutinised the Consultation Draft SPG, the Cabinet **approved** the Place Plan SPG at its Cabinet meeting on **13th July 2021**. *Note: This paragraph will be confirmed/edited subject to decision-making at the Cabinet Meeting on 13/07/21.*

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NEWTOWN & LLANLLWCHAIARN PLACE PLAN

REVISIONS BASED ON COMMENTS FROM PUBLIC CONSULTATION JAN-MAR 2021

	REPRESENTOR NAME / ORG	SECTION	SUMMARY OF COMMENTS	EXPLANATORY NOTES	PROPOSED REVISIONS
1a	Mr. O. D	Town Centre	Concern that current changes to parking on Broad Street will effect town centre economy.		See suggested change in 2a.
1b		Town Centre	Against pedestrianisation of Broad Street.	Project TC2 is to “explore the feasibility of full or part pedestrianisation of parts of town centre”. No mention of a specific street.	No change
2a	Ms. CRR	Character & Heritage	<p>Several suggestions about taking pro-active steps to make improvements to enhance the character and design of the town.</p> <p>Including:</p> <ul style="list-style-type: none"> • Creating an area for café culture in Severn Square • Reclaiming the historical country park in the back lane carpark area • Creating independent retail areas in the historical alleyways off Broad Street 	<p>The proposed rewording of Project TC-1 aims to pull together several individual projects in the plan into a focussed, cohesive design for the town.</p>	<p><u>Revision i:</u> In project CH-1, include reference to the respondents’ specialist heritage reports and include them in the supporting evidence library.</p> <p><u>Revision ii:</u> Revise the wording of TC1: Original wording: <i>Set up working group to develop & implement solutions to regenerate the high street (potentially via Town Partnership - see “Business” section)</i></p> <p>New wording: <i>Create a working group to develop & implement a cohesive strategic plan for town centre usage and design, fit for the mid-21st Century. To incorporate the needs of retail, leisure, hospitality, residential, health, social care, education & infrastructure (roads, parking).</i></p>

			<ul style="list-style-type: none"> • Preservation works to Penygloddfa and The Crescent 		<p><i>(This project pulls together and cross references with projects CH1, CH6, CH7, CH10, HF2, BL2, HW2, ST9, AT1, AT14, CC3, TC2, TC3, TC4, TC5 & TC6)</i></p> <p><i>Timescale S-L</i></p> <p><i>Collaborators: Town Council (D), Powys CC, Powys tHB, Voluntary Sector / PAVO, Business Sector via Chamber of Trade / Chamber of Commerce (ie future Town Partnership ref project BL2)</i></p> <p><u>Revision iii:</u> Revise the wording of Project CH1 to include aspects of reclaiming the former Country Park.</p>
2b	Character & Heritage	Urgent attention should be paid to finding alternative uses for the vacant listed buildings.			<p><u>Revision:</u> Project CH-10 (Longterm)</p> <p>Original wording: <i>“Identify partners & funding to implement solutions to key empty / run down buildings as identified in the Vacant Buildings Audit”</i></p> <p>Change to a 3-part project and revise the timescales:</p> <p><i>“Identify partners & funding to implement solutions to key empty / run down buildings:</i></p> <p><i>a) Short Term – Refer to the Place Plan Vacant Buildings Audit and create a priority list of those buildings in most urgent need of repair.</i></p> <p><i>b) Short Term - Refer to Historic England’s “Stopping The Rot” publication and develop an action plan for finding partners, funding and solutions to the priority rundown buildings.</i></p>

					<i>c) Medium term – Implement the Action Plan.”</i>
3a	Oriel Davies Gallery	Intro	Support for the plan. Request for cultural industries to be included in data	Graphics / data is from an external source – changes not possible.	No change.
		Intro / Impact of Covid	Request for tourism industries to be included in data	Graphics / data is from an external source – changes not possible.	No change.
		Intro	Include a Welsh language speaking historical figure		<u>Revision:</u> Include reference to triple harpist, John Roberts
			Include reference to vibrant cultural scene and cultural tourism destination.		<u>Revision:</u> Include reference to vibrant cultural scene and cultural tourism destination.
			Refer to arts and culture as key economic drivers and role improving place and mental health and well-being.	Arts businesses and wellbeing are both already referenced.	No change.
4	Cllr Rowlands	Health & Wellbeing	Support for the Plan. Suggests strengthening issues around children and young people’s mental health and how they will be addressed.	The Town Council’s input to supporting young people’s mental health is already covered in work with Newtown Network project HW6.	<u>Revision:</u> Strengthen wording in “Impact of Covid” section.
5	Coal Authority		No specific comments to make.		No change
6	Powys Ramblers		Support for the plan and many projects, Several request to		Additions and references will be incorporated where appropriate.

			include references to Public Rights of Way		
6a		Character and Heritage	Include reference to PROWs in one of the policies.	PROWs more relevant to the Active Travel & Open Spaces topics.	<p><u>Revision i:</u> Add to Active Travel Key Facts: <i>“Newtown has 105 public rights of way, stretching 61km. The majority are public footpaths (97) with 8 bridleways.”</i></p> <p><u>Revision ii:</u> Add local PROW map to Supporting Evidence</p>
6b		Housing and future development	Refer to PROW’s in Policy HFa		<p><u>Revision</u> Include reference to PROW’s in Policy HFa</p>
6c		Community facilities	Request to include PROW’s in Policy CF-a	PROWs are not included in the planning definition of Community Facilities.	No change
6d		A safe and tidy town	Include reference to PROW’s in Project ST1		<p><u>Revision</u> Include reference to PROW’s in Project ST1</p>
6e		Green Newtown	Include reference to PROW’s in Policy OSa		<p><u>Revision</u> Include reference to PROW’s in Policy Osa in the “locations” column.</p>
6f			Include reference to PROW’s in Project OS2		<p><u>Revision</u> Include reference to PROW’s in Project OS2.</p>
6g		Active travel and transport	Include reference to improving PROW’s in Policies ATa & b	PROW Improvements are covered in AT-b & AT9	No change
6h			Request for audit in project AT2 to include all PROWs	Project AT2 focusses on priority / designated Active Travel routes however, Powys Ramblers can be involved in future audits as part of the working group to be formed in project AT3.	<p><u>Revision</u> Add Powys Ramblers as Suggested Collaborator for Project AT3.</p>

6i			Positive support for projects AT4, AT7, AT8, AT9, AT10 and AT11 about improving and protecting footpaths and bridleways.		<u>Revision</u> Include as Suggested Collaborator for Projects AT4, AT7, AT8, AT9, AT10 and AT11.
6j		Tourism, culture and attractions	Request for PROW's to be included in policy T-a	Covered by the Outdoor Festival referenced in CA-b	No change
7a	Design Commission for Wales (DCFW)		Request that design quality and successful integration of placemaking are emphasised in any new proposals.	High quality design is covered in policy HF-a	No change.
7b			Recommends the Placemaking Wales guide as a useful resource. http://dcfw.org/placemaking/resources/		<u>Revision</u> Include Placemaking Wales guide in Housing & Future Development section "Other relevant documents".
8a	ND (Individual)	Active Travel	Support for plan except Active Travel section. Does not agree with policies AT-a and AT-b. Walking should be prioritised over cycling. Emphasis should be on maintaining footpaths. Cycles are a menace to pedestrians.	The Active Travel Act places equal emphasis on walking and cycling. Policies ATa&b refer to both pedestrian cycle routes equally Comments will be passed to PCC Active Travel Officer.	No change
9	Theatres Trust		Supports the Place Plan and Community Facilities policies. Recommends the Community		<u>Revision i:</u> Add Cinema & Powys Theatre to Comm Facs map.

			Facilities map shows the Powys Theatre and Regent Cinema as valued assets.		<u>Revision ii:</u> Add cinema to list of key attractions in Tourism section (to accompany photo).
10	Canal & River Trust		Overall support of the plan and its recognition of the Canal as valued asset.		
10a		Character & Heritage	Policy CH-f - Include the word “sensitive” repair and restoration of the Montgomery to align with Policy T-a.		<u>Revision</u> Add word “sensitive” to CH-f:
10b		Health & Well-being	Request for more lengthy description of the distinct wellbeing benefits the Canal provides.	Lack of space prevents more detailed descriptions of individual wellbeing providers such as the canal, river, gardens, allotments, arts & culture & sport. Wellbeing benefits can be further highlighted by the suggested revisions.	<u>Revision i:</u> Add the word “wellbeing” to Policy T-a <u>Revision ii:</u> Include the canal in the description of Open Spaces promoting wellbeing:
10c		Policy T-a	Previous suggested revisions welcomed. Request the Canal’s link to wellbeing also highlighted in this section.		See above
10d		Open Spaces	Requests mention of “blue” spaces as well as “green” spaces.	In planning terms green infrastructure also covers waterways. This can be clarified in the definition in the	<u>Revision:</u> Add in “waterways” in the Open Spaces definition

				Introduction to Open Spaces.	
11	Hughes Architects		Commend the Town Council for their work - a comprehensive document and an important part of securing the kind of development we all want in Newtown.		
11a		Character & Heritage	We are in agreement with the aspirations in this section.		No change
11b		Housing & Future Development	Concern about quoting Welsh Government's (Draft NDF) figure for affordable homes - '44% as it conflicts with figures provided by PCC.	Agreed. A more locally appropriate figure can be included from PCC LDP SPG on Affordable Housing (2018), Page 8 https://powys.moderngov.co.uk/mgConvert2PDF.aspx?ID=30990 Figure for Severn Valley area is 20%.	<u>Revision:</u> Replacement wording in the Introduction: <i>"At time of writing, in the sub-market area of the Severn Valley, the number of units required to be affordable is 20%"</i>
11d			Reservations about some of the community suggestions for potential housing sites.	It is important that the Place Plan reflects community suggestions. The sites mentioned have been filtered for appropriateness ("long-listed") for inclusion. They will also be subject to further scrutiny ("short-listing") as part of the official candidate	Noted. No change

				sites process in the future.	
11e			Request for significant housing sites with planning permission (but not in the LDP) to be included. For example the remainder of the site at the top of Bryn Lane and the site alongside Glandulas Caravan Park.		<u>Revision:</u> Reference to those sites with planning permission but not in LDP, can be included in the “what’s been happening recently” section.
11f			Request for additional sites to be considered: <ul style="list-style-type: none"> • the opposite side of the road to Rock Wood in Llanllwchaiarn, • land around the Gro • Wern Ddu Lane. 	New suggested sites can be included in the Place Plan Supporting Evidence but would need to be submitted to Powys CC as part of the normal process for candidate sites (expected in 2022/3).	<u>Revision</u> Suggested housing sites to be added to the list in the supporting evidence under the heading of “suggested at public consultation & may warrant further investigation”.
11g			A design brief for Treowen was referred to but wasn't included.		<u>Revision</u> Re-word to clarify: “it is noted that development of a Design Brief is included as a future project in the Place Plan”
11h			A request for flexibility regarding developments that may cause a loss of community facilities.	This is covered by the phrase “unless sufficient justification”	No change
11i		Business	Querying where the employment land is proposed.	No locations were suggested by the community. The “Employment Land & Premises Review” is awaited from Powys CC	No Change

11j		Community Facilities	Query regarding definition of a community facility and how demand is calculated.	A definition is already included. Not aware of a planning mechanism for calculating demand. PCC will respond.	No change
11k		Business	Comments & suggestions about sites for employment land.	Will be reviewed as part of LDP2. PCC will address & respond.	No change
11l		Health	Comments about the involvement of community and schools in the development of the proposed health hubs.		No change
11m		Safe Tidy	Support for a cohesive design for the whole town and suggestion to employ a professional landscape designer.		<u>Revision</u> See proposed revision to project TC1 in comment 2a above.
11n		Open Spaces	Suggests drawing up a town-wide list of priorities for S106 agreement funds.		<u>Revision</u> : - also see 15j Re-wording of project OS3 to include other priorities in addition to playparks: <i>“Use the Place Plan evidence (Supporting Evidence Open Spaces & Play Areas Audits & Map) to review the provision of small playparks (for example within the housing estates & Penygloddfa) and draw up a list of priorities for play areas and other open spaces to be funded by Section 106 money.”</i> Revise the timescale from Medium to short term
11o		Active Travel	Carpark spaces may become more multi-functional. Consider small alterations to make easier to adapt e.g for events spaces.		<u>Revision</u> : Revise addition to wording of project T2 to address events infrastructure.
11p			Comment about the need for local authority support for car		Noted. No change

			share / car free zones to be successful.		
11q		Climate change	Request for policy CCa, to be reworded, to be proportional to the size of the development.	Powys CC recommends rewording CCa as it doesn't currently align with the LDP policy (DM 13.13)	<p><u>Revision:</u> <u>Current wording:</u> <i>Any new development in Newtown and Llanllwchaiarn will only be supported where it can be reasonably argued that it will contribute towards the mitigation of the effects of climate change.</i></p> <p><u>Suggested wording</u> <i>Any new development in Newtown and Llanllwchaiarn will only be supported where it demonstrates sustainable and efficient use of resources or can be reasonably argued that it contributes to the mitigation of the effects of climate change</i></p>
11r		Tourism, Culture Attractions	Request for project CA1 to be brought forward as the need is clear now.	See separate paper	<p><u>Revision i</u> Add wording to CA1 & CA2 to clarify the projects are linked</p> <p><u>Revision ii:</u> See separate paper</p>
		<u>Next LDP</u>	Suggesting flexible permitted development rights for change of use in the town centre, for post-Covid recovery.	Powys CC will respond to this point directly. This issue is already referenced in item 2.	Noted. No change
12	Caerphilly County Borough Council		No comments to make		No change
13	Avison Young for National Grid		No Comments to make		No change

14	Natural England	Climate Change & Biodiversity	<p>Drawing attention to the Severn Estuary Special Areas of Conservation (SAC) and Ramsar site (Wetland of International Importance) to which the River Severn is linked. Expressing concern about the impact of any upstream developments on migratory fish species.</p> <p>Suggests referencing the SAC's conservation objectives and encourages a link with the "Unlocking the Severn" project which enhances the ability of migratory fish to move within the river. https://www.unlockingthesevern.co.uk/about-this-project/</p>	Powys CC's Ecologist has reviewed the Place Plan, with regard to these comments. The suggested revisions are deemed an appropriate response by Planning Policy.	<p><u>Revision i:</u> Add to project CC3: <i>Improve the town's green infrastructure and biodiversity: (more trees /shrubs /wild areas/patches of wildflowers/wildlife corridors/bird boxes/rewilding of areas / tree planting on approaches into town / integration with the "Unlocking The Severn" project).</i></p> <p><u>Revision ii)</u> Revise Policy CCF <i>i) Any developments that would adversely affect the Montgomery Canal's status as a Special Area of Conservation would not be supported.</i> <i>ii) Any upstream development proposals concerning the River Severn that would adversely affect the Severn Estuary's status as a Special Area of Conservation would not be supported</i> <i>iii) Schemes that assist in removing barriers to fish migration within the River Severn and which enhance the river and riparian habitat will be supported".</i></p> <p><u>Revision iii</u> Add text to the Introduction re SAC & <i>Habitat Regulation Assessment.</i></p>
15	Natural Resources Wales			The resources & references supplied by NRW, are welcomed and will be incorporated where possible. Some of the publications have	

				been published since the Place Plan was written.	
15a		Introduction	Welcoming the reference to environment in the “A world changed by Covid-19” section.		Noted. No change
15b		Links with other plans	Identifying that references to Planning Policy Wales Edition 10, should be updated to the newly published Edition 11.		Revisions: References will be updated to Planning Policy Wales Edition 11, throughout the document.
15c		Links with other plans	Requesting reference to the “Sustainable Management of Natural Resources (SMNR)” And NRW’s “Introduction to Sustainable Management of Natural Resources document.		<u>Revisions:</u> Reference to NRW’s “Introducing Sustainable Management of Natural Resources” will be added in appropriate sections.
15d			Requesting reference to the “State of Natural Resources Report (SoNaRR, 2020)”		<u>Revisions:</u> References to SoNRR will be added in appropriate sections.
15e			<u>Area Statements</u> Suggestion to make reference to NRW’s “Mid Wales Area Statement”. Links would potentially benefit any funding applications to NRW / WG for projects in the Newtown area.		<u>Revisions:</u> References to “NRW / Mid Wales Area Statement (2020)” will be added in appropriate sections.
15f		Character & Heritage	Support for Project CH6 <i>“Green” the town – through planting – street scene and entrance / gateway routes</i>		<u>Revision i:</u> Include references in appropriate sections. <u>Revision ii</u> (ref additional comment 15q) Revise wording of CH6: <i>“Green” the town – through planting – street scene and entrance / gateway routes to contribute to the Future</i>

			Suggestion to reference Welsh Govts & Future Generations Commissioner's commitment to increase urban tree canopy cover.		<i>Generations Commissioner's target of 20% tree canopy cover in every town and city in Wales by 2030.</i>
15g		Housing & Future Development	Querying the use of the symbol for the "Sustainable and Productive Environment" but no mention of green spaces.	the symbol indicates the housing / development policies consider environmental issues	Noted. No change
15h			Suggest reference to the Welsh Government's Statutory national standards for sustainable drainage systems.	Policy CC-d already references "National guidance"	No change.
15i			Development must consider the flood risk (ref Technical Advice Note 15)	Flood Risk is already referenced in policy CC-d and TAN 15 is already given as a reference	No change
15j		Open Spaces	Project OS3 (see 11n for new wording) Suggestion to consult Accessible Natural Green Space Standards (ANGs) plus Fields in Trust standards (FITs)		<u>Revision i:</u> "Use the: <ul style="list-style-type: none"> • Place Plan evidence (Supporting Evidence Open Spaces & Play Areas Audits & Map) • <i>Accessible Natural Green Space Standards (ANGs) plus</i> • <i>Fields in Trust standards (FITs)</i> to review the provision of small playparks (for example within the housing estates & Penygloddfa) <i>and draw up a list of priorities for play areas and other open spaces to be funded by Section 106 money.</i> "
15k			Suggests green space provision and enhancement could be assessed against the Green Flag Award standards		<u>Revision i:</u> Add a project OS9 <i>Identify partners and funding to obtaining Green Flag Awards status for well managed parks and green spaces.</i> Timescale – Medium Suggested Collaborators:

			The Green Flag and Green Flag Community Awards are supported by the Welsh Government and provide the only internationally recognised standards for the quality management of publicly accessible open space.		Town Council (E), Open Newtown, Keep Wales Tidy, Powys CC?
15l			NRW hold a data set of all urban green space in Wales which is available for use.		Noted. no change
15m		Active Travel and Transport	Suggestion to add reference to PCC Rights of Way Improvement Plan (RoWIP) 2018-2028.		<u>Revision i:</u> Add references to RoWIP in appropriate sections.
15n		Climate Change and Biodiversity	We welcome the clear reference to and definition of green infrastructure on page 78.		No change.
15o			Suggestion to include reference to NRW publication about managing the grounds of public buildings for pollinators.		<u>Revision i:</u> Include reference in project CC3.
15p			Suggestions for town to achieve Welsh Government “Bee Friendly” status.		<u>Revision i:</u> Rewording project CC5: <i>Support Climate Change & Biodiversity education projects including achieving Welsh Government “Bee Friendly” status.</i> Collaborators: Town Council (E), Montgomeryshire WildlifeTrust, River Severn Custodians, schools & college, Newtown Climate Action Group.

15q			Recommendation to adopt an ambition to achieve 20% urban tree canopy cover.		See 15f
15r		Town Centre Experience	Noting opportunity in Project TC4 to incorporate sustainable drainage systems into designs.	SUDs and rainwater gardens are already incorporated into the "Green Infrastructure" project.	<u>Revision i:</u> Add wording into TC4: <i>Create more safe town centre social spaces, street trees, Sustainable Drainage Systems, rain gardens, seats, information boards, better links to green spaces</i>
15s		The Next Local Development Plan	Recommending usage of NRW's Greenspace toolkit, Green Infrastructure Data Set and the Green Flag Award standard to prioritise the green spaces which are to be proposed.		<u>Revision i:</u> Add reference to Project OS1 <i>With reference to NRW's Greenspace toolkit, Green Infrastructure Data Set and the Green Flag Award standards, review the Place Plan evidence for green spaces suggested for protection (see Next LDP section) and submit these for consideration into the next review of Powys CC's "Open Space Assessment"</i>
16	NLTC		Support is implicit.	N/a	
17	Local Access Forum		The majority of the comments submitted are an exact copy of those submitted by Powys Ramblers (and addressed in 6 above), except those detailed below.		
17a		Active travel and transport	Request to consider the provision of safe routes for horse-riders.	Local Access Forum can be involved in future audits as part of the working group to be formed in project AT3.	<u>Revision</u> Add Local Access Forum as Suggested Collaborator for Project AT3.

TOWN COUNCIL SUGGESTED REVISIONS

(Additions from Lead Cllr & Officer after internal consultation)

	CLLR / OFFICER	SECTION	SUMMARY OF COMMENTS	PROPOSED REVISIONS
18a	RE/SW	Title	Enhance the document title to make clear that the plan's contents are based solely on the views of the community.	Revision: Suggested Title Change: "Created With the Community" – Newtown & Llanllwchaiarn Place Plan.
18b	SW	Thanks		<u>Revision:</u> Add consultants and translator's names to the list of thanks.
18c	SW	Various		<u>Revision:</u> Update references to the Welsh Government's draft National Development Framework, which has since been published. (<i>Future Wales – The National Plan 2040</i>)
18d	SW	Housing & Future Development	Action required to ensure that a) community's suggested housing sites are submitted formally as candidate sites for LDP2 in 2022-3 b) that the items identified in the "Next LDP" section are submitted to Powys CC.	<u>Revision i:</u> Edit Project HF3 (long term) Support the community to develop design briefs for other existing housing allocations and pursue other potential small housing sites as identified in the Appendix – Housing Sites To Take Forward & Map. <u>Revision ii)</u> Add short term project: HF5 <i>Ensure the following items are submitted to Powys CC Planning Policy for consideration for LDP2:</i> <ul style="list-style-type: none"> • <i>community suggestions for housing (candidate) sites as identified in the Appendix - Housing Sites To Take Forward & Map.</i> • <i>The items identified in the "Next LDP" section of the Place Plan</i>
18e	SW	Town Centre		<u>Revision:</u> In "Key Facts" add reference to the town centre Primary & Secondary frontages & add the map to the supporting evidence library.
18f	KM	Housing	Ex Travis Perkins Site suggested for housing	<u>Revision</u>

				Suggested site to be added to the list in the supporting evidence under the heading of “suggested at public consultation & may warrant further investigation”.
18g	KM	Active Travel	Suggestion for request train stop at college	Revision Add suggestion to “Community Comments” supporting evidence
18h	KM	Town Centre	QR codes included in signage throughout the town	Add suggestion to “Community Comments” supporting evidence
18i	KM	Tourism	Suggestion for Youth Hostel	Add suggestion to “Community Comments” supporting evidence

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Powys Local Development Plan

Supplementary Planning Guidance

Archaeology

SUMMARY

The Archaeology SPG should be used by those who are involved in development proposals that may affect Scheduled Monuments or other archaeological remains

This SPG is aimed at applicants, agents, members of the public, elected Members, and Council Officers who are involved in development proposals that may affect Scheduled Monuments or other archaeological remains. It provides guidance on how archaeology should be considered when designing developments and when making planning decisions.

Scheduled Monuments and other archaeological remains are important historic assets that contribute to the economic, environment and social well-being of Powys

Archaeology includes evidence of our pre-historic past buried below the ground or in the surviving fabric of historic buildings and other structures. The Powys Local Development Plan, through policy SP7, identifies Scheduled Monuments and other archaeological remains, along with their settings, as strategic assets that should be safeguarded from unacceptable development. **Section 5** of the SPG provides an explanation of local planning policy relating to archaeology.

Archaeological remains are protected through national legislation, policies and guidance aimed at ensuring that historic assets are protected, conserved and enhanced

Scheduled Monuments are nationally important sites that are contained on a list compiled and maintained by Cadw. There are 716 Scheduled Monuments within the Powys Local Development Plan area. Scheduled Monuments are statutorily protected, meaning that certain works to these monuments require consent from the Welsh Government. Archaeological remains, whether they are scheduled or not, are also protected through the planning system as they are a material planning consideration when decisions are made on planning applications. **Section 4** of the SPG summarises the relevant legislation, policy and guidance relating to planning and archaeology.

The Historic Environment Record contains details of all known archaeological sites and features

Information on archaeological sites and features of national and local importance can be found on the Historic Environment Record, compiled and maintained by the Clwyd-Powys Archaeological Trust, on behalf of Welsh Ministers, and accessed via

the Archwilio website. The Local Planning Authority is required by statutory guidance to use the information contained on the Historic Environment Record to inform planning policy and planning decisions.

Development sites may also have the potential for unknown archaeological remains

In addition to recorded archaeological sites and features, there may still be potential for unrecorded archaeology within a development site. The Clwyd-Powys Archaeological Trust will advise on whether a particular site has the potential for unknown buried archaeology and on how this should be investigated. Archaeology may also be discovered during the course of undertaking a development, and where the archaeology is found to be of national significance, Cadw may decide to protect the archaeology by scheduling it as a Scheduled Monument, meaning that consent is required before work can continue.

Further information about archaeology is available from a range of different sources

This SPG provides an overview of the type of information available on archaeology, from national web-based information and maps to more local level information. For details of these resources, see **Section 4** of the SPG.

This SPG sets out the key stages to follow for all developments proposed on and near Scheduled Monuments or other archaeological remains and for sites with archaeological potential

Applicants should follow the key stages set out in **Section 6** before a planning application is submitted in order to ensure that the archaeological interest or potential of a site is considered at an early stage and is taken into account in the planning and design of the development.

Applicants should obtain pre-planning application advice from the Council and the Clwyd-Powys Archaeological Trust, including Cadw where Scheduled Monuments are involved

It is important to obtain pre-planning application advice from the Council, and also to seek advice from either Cadw (for development that may affect Scheduled Monuments) and, in other cases, the Clwyd-Powys Archaeological Trust, at an early stage in order to avoid potential delays and costs at a later stage. See **Appendix 5** for contact details.

Planning applications that may affect archaeological remains will need to be accompanied by detailed supporting information

The Local Planning Authority needs sufficient information in order to assess the potential impact of a development proposal on recorded and unrecorded archaeological remains. In cases where a development is likely to impact on archaeological remains, applicants may need to submit evidence with their planning application of how the archaeological interest or potential of the site has been assessed and evaluated, along with the details of a mitigation scheme. See **Section 6** of the SPG for further guidance on the type of evidence that may be needed.

Archaeological assessments and evaluations must be carried out by experienced professional archaeologists and to the relevant standards and guidance of the Chartered Institute for Archaeologists

Any detailed archaeological work will need to be carried out by an experienced professional archaeologist following the standards and guidance of the Chartered Institute of Archaeologists relating to the type of work involved. Cadw or the Clwyd-Powys Archaeological Trust will advise on the need for this work and will agree the brief, scope and specification for the works. See **section 6** of the SPG for advice on engaging archaeological contractors and consultants and for links to the relevant standards and guidance.

Archaeological work may be needed before a decision can be issued on a planning application, or in some cases, may be needed after planning permission has been granted in order to meet a planning condition

Section 7 of the SPG explains how planning applications involving archaeological remains or potential, and applications to discharge planning conditions relating to archaeology, are processed and considered. See **Appendix 3** of the SPG for an explanation of the roles of the Local Planning Authority, Cadw and the Clwyd-Powys Archaeological Trust in the planning process. See **Appendix 4** of the SPG for a set of standard planning conditions relating to archaeology that are commonly applied to planning permissions.

This SPG does not contain detailed guidance on the Scheduled Monuments and archaeological remains associated with Offa's Dyke

The SPG refers to previous and ongoing work relating to Offa's Dyke, including the recent Conservation Management Plan published in 2019. Cadw/Historic England are planning joint guidance specifically on Offa's Dyke, which will also involve the relevant local planning authorities. Given that separate joint guidance is planned, specific guidance on Offa's Dyke is not needed in this SPG.

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Powys Local Development Plan

Supplementary Planning Guidance

Historic Environment

SUMMARY

The Historic Environment SPG should be used by those who are involved in development proposals that may affect Registered Historic Landscapes, Registered Historic Parks and Gardens or Listed Buildings, or sites or features contained on the Historic Environment Record

This SPG is aimed at applicants, agents, members of the public, elected Members, and Council Officers who are involved in development proposals that may affect the above-mentioned historic assets. These assets are not covered by their own separate SPGs. For guidance on Conservation Areas and Archaeology, please see the relevant separate SPGs. This SPG provides guidance on how these historic assets should be considered when designing developments and when making planning decisions.

Historic assets, including those covered by this SPG, contribute to the economic, environment and social well-being of Powys

The Powys Local Development Plan, through policy SP7, identifies Registered Historic Landscapes, Registered Historic Parks and Gardens, and Listed Buildings, along with their settings, as strategic assets that should be safeguarded from unacceptable development. **Section 5** of the SPG provides an explanation of local planning policy relating to these historic environment designations.

Historic assets are protected through national legislation, policies and guidance aimed at ensuring they are protected, conserved and enhanced

Listed Buildings are nationally important buildings or structures included on a statutory list compiled and maintained by the Welsh Ministers and have statutory protection through the listed building consent process. The Register of Historic Parks and Gardens is due to become a statutory register later in 2021. The Register of Historic Landscapes is a non-statutory designation that identifies the most important and best surviving historic landscapes in Wales. Registered Historic Parks and Gardens and Registered Historic Landscapes do not have statutory protection meaning that they are not subject to a separate consenting process. However, all three types of historic assets, and their settings, are protected through the planning system and are material planning considerations in making planning decisions. **Section 4** of the SPG summarises the relevant legislation, policy and guidance relating to planning and archaeology.

The Historic Environment Record contains information on historic assets of national and local importance

Information on historic sites and features of national and local importance can be found on the Historic Environment Record, compiled and maintained by the Clwyd-Powys Archaeological Trust, on behalf of Welsh Ministers, and accessed via the Archwilio website. The Local Planning Authority is required by statutory guidance to use the information contained on the Historic Environment Record to inform planning policy and planning decisions. **Section 7** of the SPG provides guidance on how to use the Historic Environment Record to research the historic interest of a development site.

Further information about historic assets and the historic environment is available from a range of different sources

This SPG provides an overview of the type of information available on historic assets and the historic environment from national web-based information and maps to more local level information. For details of these resources, see **Section 4** of the SPG.

This SPG sets out the key stages and steps to follow for all developments that may impact on Registered Historic Landscapes, Registered Historic Parks and Gardens, Listed Buildings, and their settings

Applicants should follow the key stages and steps set out in **Section 6** relevant to the type of historic asset(s) likely to be affected by the development before a planning application is submitted. This will help to ensure that the potential impact of the development on the significance of these historic assets is considered at an early stage in the planning and design of the development.

Applicants should obtain pre-planning application advice from the Council where developments are likely to impact on historic assets or their settings before submitting a planning application

It is important to obtain pre-planning application advice from the Council at an early stage to avoid delays and costs at a later stage. This will enable guidance to be provided on the level of information that may be required to be submitted with the planning application and also on the appropriateness of the siting and design details of the scheme. Applicants should also contact the Clwyd-Powys Archaeological Trust for advice on developments that may impact on sites or features on the Historic Environment Record. See **Appendix 5** of the SPG for contacts details.

Planning applications that may affect historic assets will need to be accompanied by detailed supporting information

The Local Planning Authority needs sufficient information in order to assess the potential impact of a development proposal on historic assets. In cases where a development is likely to impact on Listed Buildings, Registered Historic Parks and Gardens and Registered Historic Landscapes, applicants may need to submit additional information and/or assessments. See **Section 6** and **Appendix 4** of the SPG for further guidance on the type of information that may be needed.

The SPG also contains guidance on developments that may impact on the Montgomery Canal and its historic assets

There is a high number of historic assets associated with the Montgomery Canal, which is also designated as a Special Area of Conservation and Site of Special Scientific Interest. Local planning policy is supportive of the sensitive restoration of the Canal and also protects its historic and nature conservation designations. See **section 6** of the SPG for more detailed guidance on historic environment issues relating to the Canal, including guidance on key design considerations for development on or adjacent to the Montgomery Canal.

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Powys Local Development Plan

Supplementary Planning Guidance

The Newtown and Llanllwchaiarn Place Plan

SUMMARY

Introduction

The Newtown and Llanllwchaiarn Town Council, together with the local community, have been busy working on a Place Plan which sets out a vision for the place that Newtown aims to be by 2036. The Place Plan covers three main themes:

- Newtown – a great place to live, learn and work
- Green Newtown
- Destination Newtown

Each theme has accompanying objectives, action points and projects for the town and local area over the next 15 years. The Plan includes 11 topics which each have a set of local planning guidance – these policies sit below the over-arching Policies of the adopted Local Development Plan.

Who wrote the Place Plan?

The Place Plan has been developed through local community engagement. It represents an approach to local sustainable place-making that the Welsh Government are strongly in favour of. Whilst the County Council have supported the Town Council in preparing the Place Plan, the Place Plan has been written at the Town Council level and remains a community led document.

The Place Plan “**Our Town, Our Plan**” makes it clear that “Every policy and project in the plan is based on suggestions from the community”. The Place Plan can be viewed on the website hosted by the Newtown Town Council ([Newtown & Llanllwchaiarn Place Plan : Newtown](#)).

Why is a Place Plan important?

This is the first official Place Plan in the Powys Local Planning Authority area and it brings a local level of detail to the County Council’s over-arching Local Development Plan (**LDP**) (2011-26). The Place Plan (and any subsequent evidence work) can also, importantly, be taken into account when the Powys LDP is reviewed from 2022, helping to inform and shape how the replacement LDP applies to the Newtown area.

Once a Place Plan is approved (or “adopted”) by Powys County Council as Supplementary Planning Guidance (**SPG**) it becomes a material consideration in the determination of planning applications in that geographical area.

What does the Place Plan do?

Place Plans are about “delivering local outcomes, helping build consensus and buy-in within the wider development plan process”. In the Newtown and Llanllwchaiarn Place Plan you will find an explanation of its stated purpose and benefits including discussion on the changes in society that may result from the impacts of Covid-19. You can also read how the Place Plan responds to the Well-being and Future Generations Act to meet the Acts seven well-being goals of a more Prosperous Wales, a Resilient Wales, a more Equal Wales, a Healthier Wales, a Wales of Cohesive Communities, a Wales of Vibrant Culture and Thriving Welsh Language, and a Globally Responsible Wales.

Demonstrating the wide range of issues that are important to the community in terms of land-use planning, the planning policies developed for the Place Plan have been grouped into the main topics of:

Character and Heritage; Housing and Future Development; Community Facilities; Business, Learning and Employment; Health and Wellbeing; A Safe and Tidy Town; Open Spaces; Travel and Transport; Climate Change and Biodiversity; Town Centre Experience; Tourism, Culture and Attractions.

This local planning guidance will inform the development management (planning application) process enabling the Town Council to use them when responding to planning applications and Planning Officers/Council Members to consider them in their decision-making. The policies have all been developed to be in conformity with the Powys LDP.

As well as using it to influence future planning decisions in the town, Newtown Town Council expect to use the Place Plan to i) to identify priorities for investment, ii) create a body of evidence that can be drawn on to attract investment into the town and iii) direct the future work of organisations in the town, including the Town Council.

The Policy Hook in the Local Development Plan

Supplementary Planning Guidance is not stand-alone. It must properly relate to the Policies found in the over-arching Local Development Plan and not, for example, introduce new stipulations that go beyond the Development Plan content. The LDP has a main policy - Policy DM13 (Design and Resources) - which promotes good quality design, having regard to *the qualities and amenity of the surrounding area, local infrastructure and resources* and DM13 stipulates that new development must *contribute towards the preservation of local distinctiveness and sense of place*. Place-making is now a central theme of spatial planning in Wales. Further mention of Place Plans can be found in the Council’s adopted Residential Design SPG. The Place Plan chapters detail how each topic has linkages to relevant LDP Policies.

What approval processes have been followed?

The Town Council approved the Working Draft Place Plan in November 2020, following which the Council’s LDP Working Group agreed to a public consultation on the Draft Plan.

The County Council consulted on the Draft Place Plan SPG for six weeks between January and March 2021. The consultation feedback led to some amendments and updating to the Working Draft. Following the Town Council’s approval of the (amended) Place Plan in

May 2021, it was approved as SPG by the Powys County Council Cabinet in July 2021 (this wording to be confirmed after the meeting). Upon adoption and publication, the final Place Plan became operational as Supplementary Planning Guidance. [It can be viewed here.](#)

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by: Representation No

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LDP Document: 62 Archaeology SPG

RefPoint: 62.

5466 Brecknock and Radnorshire Committee of the Camp

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
5466.P50		01/03/2020	<input type="checkbox"/>	E	C	W	M		Summary: Comments on Archaeology SPG

Document:Archaeology SPG

Question Representation Texts

Question: Details

Representation Text: BRB-CPRW thanks PCC for the opportunity to comment. We warmly welcome this SPG which is thorough, authoritative and clearly written. It will also act as a public guide to many important but little-known online resources. It demonstrates the rich quality and sheer quantity of our Powys archaeological heritage and underlines the importance of Offa's Dyke.

It should be required reading for all planning officers, architects/agents, relevant landowners and everyone applying for planning permission for a major development or one close to a Scheduled Monument.

An introductory definition of "archaeology" and how this is separated out from "historic environment" for the purposes of this SPG would be useful.

Sadly, the length of the SPG will deter many readers. We would encourage the production of a short, accessible document - no longer than 2 pages - that could be routinely sent to anyone considering a smaller development not involving a scheduled monument or listed building, especially those in the historic core of a settlement.

There are, of course, factors beyond the planning system that affect archaeology and we wonder if they have a similarly good level of protection? In particular, agriculture. There should be similar protection of archaeology from, for example, deep ploughing, flooding or draining, uprooting of ancient hedgerows, felling of historically significant trees etc.

Perhaps PCC could collaborate with CPAT etc. to produce a ground-breaking, 2-page comprehensive "Quick Guide to protecting Archaeological sites".

We wonder whether Wat's Dyke deserved a mention alongside Offa's Dyke.

How could the SPG be improved?

Definition

A definition of "archaeology" and how this is separated out from "historic environment" for the purposes of these 2 SPGs would be useful and might be used to inform some minor culling.

The questions in Fig 2:

"Is the site a listed building or within the curtilage of a listed building?
Does the site include a building that may be of local historic interest?"

and the text of 6.20 sentence 1,
require a clear explanation of why they are relevant to archaeology before the reader gets to Fig 3.

Because there is so much information, any that is not directly relevant should be removed: for instance, 4.4 on searching house history.

by: Representation No

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
5466.P50		01/03/2020	<input type="checkbox"/>	E	C	W	M		Summary: Comments on Archaeology SPG

Length

Any opportunity to reduce this should be seized, including by avoiding repetition and pruning and restructuring sentences to remove redundant words. Examples are given below.

Structure and clarity

Since the SPG is densely packed, a clear structure for easy reference is all important.

At present there is a problem with the structure of headings. The index showing purple chapter headings and black italic subheadings but purple sub-subheadings (looking like chapter headings) reappear in Ch 4 from 4.27 onwards. Both black sub-headings (listed in the index) and purple sub-subheadings are unrelated to the paragraph numbering. This is specially confusing because the index gives purple precedence over black.

We appreciate that structure is often revised in a final SPG draft but recommend that a full index is included and the paragraph numbering and headings are designed to reflect the hierarchical structure of the contents and inclusion of lists.

Acronyms such as WFS and WMS at 4.46 should be spelt out.

Sections 5 & 6 on Local Planning Policy and implementation

This nub of the SPG, is less clear, concise and coherent than the preceding 4 sections.

Suggested format for policy:

Brief description of LDP: objectives, strategic policies, DM policies, further information in appendices then each policy in turn reproduced before the discussion.

any comments about scope and relevance of policy (for each policy).

6.1 & 6.2 Sentence 1 simply repeat policy in Section 5 but 6.2 Sentence 2 is important - especially the "early stage".

If 6.1 and 6.2 s1 are to be retained:

6.1 Sentence 1: "need to be": replace by either "must be" or "should be".

Sentence 2 does not make sense.

6.3 Sentence 2: suggest: "Development proposals should have regard to the advice about key stages and demonstrate the step approach taken to comply with planning policy"

6.4 to 6.32. There is much essential and useful information here but it should be made more concise.

7 Planning Process

Important information but could be more concise.

Examples:

Suggest delete 7.1 sentence 1 and, Sentence 2 say "Advice in Section 6 ensures archaeology has been....."

by: Representation No

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5466.P50		01/03/2020	<input type="checkbox"/>	E	C	W	M		Summary: Comments on Archaeology SPG

Delete 7.4 Already said in 7.1.

7.5 suggest "If further information is required to allow proper consideration of the application, the LPA will make an information request proportionate to the likely impact on archaeology. The LPA may require additional desk or field assessment or mitigation proposals, as set out in Section 6, and will insist on these prior to determination" (half the word number).

Fig 6. Bottom left box should read "application to discharge condition refused". We believe the applicant has the right to try again.

The appendices are useful.

Typos:

Two small typos noticed:

4.10 end of line 3 'monument' should be 'monuments'

4.39 line 2 '(or provides access to)' should be '(or provide access to)'

Council Response: Support is noted.

Recommended to include a definition of archaeology taken from TAN 24 within the introduction of the SPG. Also, to clarify that archaeology is part of the historic environment and not separate to it.

The final SPG will be accompanied by a summary setting out the key messages of the SPG, which will also help to navigate the full SPG. CPAT already has a short guide entitled 'Archaeology and your planning application'. No changes recommended.

The SPG provides guidance in respect of development that requires planning permission, and therefore it is not appropriate for it to cover other works that do not require planning permission. Various agricultural activities do not fall within the planning remit. There are separate policies and processes in place for hedgerow removal and removal of protected trees or trees within a Conservation Area. No changes recommended.

Further guidance on looking after scheduled monuments and different types of archaeological sites can be found on the Cadw website. No changes recommended.

Offa's Dyke has been referred to in the SPG given its significance within the Powys LDP area, and following on from reference to it in the reasoned justification to LDP policy SP7. CPAT has confirmed that Wat's Dyke does not enter Powys at all as it is last visible in Oswestry and terminates near Maesbury, Shropshire. No changes recommended.

For clarity, it is recommended that additional text is included in para. 6.6, which explains the historic value of these buildings and potential for significant archaeology associated with them.

Para. 4.44 which refers to RCAHMW guidance is considered to be relevant as a source of information. No changes recommended.

The Council has been through all the specific comments and made changes to the SPG to improve readability where in agreement. It is anticipated that users will not always read the document from cover to cover but will refer to specific pages or tables, hence the need for repetition within the document. The summary that is planned to go alongside the SPG will help to identify the key messages for readers.

Archaeology SPG representations and Council responses

by: Representation No

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6395 Canal and River Trust

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
6395.P5		28/02/2020	<input type="checkbox"/>	E	C	W	M		Summary: No comment

Document:Archaeology SPG

Question *Representation Texts*

Question: **Details**

Representation Text: . We have no comments to make on the Archaeology SPG.

Council Response: Noted no comments.

by: Representation No

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6812 McDonnell, Gerry

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
6812.P1		23/02/2020	<input type="checkbox"/>		C	W	M		Summary: Comments on Archaeology SPG

Document:Archaeology SPG

Question Representation Texts

Question: Details

Representation Text: . 2.1 Purpose of the Guidance Although clearly the focus of the guidelines is for the planning process, surely a more holistic approach should be included, in particular the link between archaeology heritage and tourism and archaeology, heritage and health (e.g walks linking archaeological sites). This suggest that the planning policy is in silos.

4.17 "There is also the potential for other unknown buried archaeological remains that have yet to be formally identified that could be discovered in the course of undertaking development." There are bound to be more archaeological sites replace "potential for" with certainty of. Repeat in 4.37

4.52 – 4.57 local societies, Newtown Welshpool Town have active policies Presteigne does not

6.9 "If the response is 'no' to all of these questions, it is unlikely that further archaeological assessment work will be required." This illogical, many 'developments will encounter some past human activity, to imply that the previous record provides the answer is untenable. This will result in circular arguments, i.e. is there is nothing in the HER then there is no archaeology. The UK HER's are often poor in recording early industrial sites, e.g. early iron working slag heaps. This repeats in 7.5

7.15 States that sites will be excavated, but does that include post-excavation analysis and publication. There is no point in excavation unless it is taken through to full publication.

7.25 "a final report will need to be produced and submitted to the LPA" This requires more specificity, regarding post-excavation analysis, final report including detailed postexcavation analysis as laid down in the programme or scheme of works etc.

7.30 "By following the approach set out above, this should avoid or, at least, reduce the risk of discovering unexpected archaeology during development of a site." No it won't!, because the whole process it is predicated on there being previous archaeological finds, registered in the HER. For example, a search of the Archwilio database for 'slag' in Powys returned 61 hits. The logic of this proposal would argue that there were only 61 occurrence of iron working in Powys since the Iron Age. As an internationally respected researcher of archaeometallurgy, specialising in iron, I find that very hard to believe!!

7.30 "If the archaeological remains are considered to be of national importance" Come on, who are you fooling. It's very hard, nigh on impossible to identify a site as of national importance at this stage. Also, what happens to those sites (99%) that are found unexpectedly and not of National Importance. What happens to the small developer, e.g. a house extension that encounters unexpected archaeological deposits, who won't have the resources to fund an excavation/post excavation etc.

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8 Process Charts Figure 5 If the first box that's states "Does the site have archaeological potential or are there potential impacts on other archaeological sites?" If the answer is no, then no archaeological intervention can take place, unless when the ground is disturbed archaeological deposits are encountered, AND ADMITTED TO, then the archaeology is lost. This first box with the answer no is guaranteed to fail archaeology. Again, if the answer to Box 2 (Have significant archaeological remains been identified?) is no the archaeology is lots. Also, what is meant by significant? To many archaeologists iron smithing slag is not significant, but to me and most cases it can be very significant, e.g. it relates to the economic basis of a site. In conclusion it appears that the whole process is reliant upon entries in the HER, which as the example of ironworking slag record is incomplete.

Council Response: Reference is made in the introduction to the SPG at para. 1.3 to the benefits of the historic environment to tourism and well-being. It would not be appropriate to provide further guidance on these matters in this planning document, which focuses on interpretation of local planning policies. No changes recommended.

The use of the word "potential" is considered to be appropriate in this context and reflects national guidance, which refers to "known" and "potential" archaeological remains. No changes

by: Representation No

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
6812.P1		23/02/2020	<input type="checkbox"/>		C	W	M		Summary: Comments on Archaeology SPG

recommended.

The SPG recognises the work undertaken by organisations at a local level in relation to the historic environment. No changes recommended.

Requests for further archaeological assessment as part of a planning application need to be supported by evidence that indicates the potential for archaeology, which may include records on the HER. Cadw and CPAT will provide advice to Officers on information requirements relating to archaeology, as per para. 7.6. Unexpected archaeology may still be found in the course of development and the SPG explains the arrangements in these circumstances at para. 7.30. No changes recommended.

For larger pieces of work like excavation and evaluations, or indeed any intrusive works that recover artefacts and samples, an approved Written Scheme of Investigation would include the requirements for post excavation analysis. As explained in para. 7.25, the final report will need to be submitted to the LPA and a copy, together with a digital copy of any archive produced, is also provided to CPAT for inclusion on the Historic Environment Record. This means that this information will be publicly available. No changes recommended.

The need for post excavation analysis will depend on the nature of the work and on what is agreed as part of the Written Scheme of Investigation. No changes recommended.

Recommend to amend para. 7.30 to clarify that unexpected archaeology may continue to be found during the development of a site.

Para. 7.30 reflects the guidance in TAN 24 in relation to unexpected archaeological discoveries, which provides guidance on what would happen if the archaeological discoveries were of national importance. Where sites are not nationally important, the site would normally be completely excavated if it cannot be preserved in situ by a late change in design and layout of the development. Recommend additional para. after 7.30 to explain this.

If there is no known or potential for archaeology or potential impacts on archaeology, it is not possible to require archaeological intervention through the planning process. Planning requests must be reasonably related to the proposal. The planning process is also informed by the expertise and knowledge of CPAT and Cadw who advise Officers on archaeological matters and on the significance of archaeology. No changes recommended.

by: Representation No

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by: Representation No

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LDP Document: 63 Historic Environment SPG

RefPoint: 63.

439 Newtown & Llanllwchaiarn Town Council

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
439.P3		08/02/2020	<input type="checkbox"/>	E	C	W	M		Summary: Comments on Historic Environment SPG

Document:Historic Environment SPG

Question *Representation Texts*

Question: Details

Representation Text: Newtown Town Council, on the whole, support the SPG, and particularly note the priority that has been placed throughout on preserving local feature, character, and distinctiveness. The Town Council are pleased to note that local sources will be taken into consideration on planning issues, in particular the Newtown Town Council Place plan. However, we are suggesting that maybe the wording on Page 16, Section 4.73, line 4 'Taken into account' might be better changed to 'Prioritised'? Finally, given that no other town in Powys has been singled out in the SPG for any criticism of the current character of an area, we would like to request that Page 7, Section 4.21, lines 8 & 9 "Sadly most of the communal courtyards are now divided and historical unity of the area has been compromised" be removed.

Council Response: Support is noted.

It is not appropriate to make the change requested by the representor, as judgements made on the priority and weight to be given to individual material considerations are a matter for the decision-maker at the application stage. No changes recommended.

This section of the SPG has been taken from information previously published in the Historic Environment Topic Paper prepared as part of the preparation of the LDP. It is not intended to be a criticism of Newtown, as such, rather it is a reflection on the impact that changes have had on the character of these buildings. This is an important message in the context of this SPG. No changes recommended.

by: Representation No

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5466 Brecknock and Radnorshire Committee of the Cam

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5466.P51		01/03/2020	<input type="checkbox"/>	E	C	W	M		Summary: Comments on Historic Environment SPG

Document:Historic Environment SPG

Question Representation Texts

Question: Details

Representation Text: . BRB-CPRW thanks Powys Planning for the opportunity to comment. We warmly welcome this SPG which we consider to be thorough and informative. It contains a lot of useful information and source materials which will make this an invaluable reference for a wide range of readers. It was a particular pleasure to read a concise, expert and appreciative account of the historic background to the current Historic Environment and the range of historic assets. We fully agree that Powys has an impressively rich Historic Environment which must be preserved and enhanced through the planning system for future generations.

We note that the purple and black headings system is reversed in the index compared with Archaeology and Drainage & Flooding SPGs, also out for consultation. Purple subheadings appear in the text but are independent of paragraph numbering. We trust that the SPG format will be standardised and the index extended before publication.

We find it unfortunate that large swathes of Powys are empty of Registered Historic Landscapes. We note that 36 areas were published in 1998 and a further 22 in 2001, making 58 in all. Apparently, none have been added since (TAN 24 Annex C).

Powys, excluding the BBNP, makes up 18.5% of the area of Wales and yet (taking the proportions outside the Powys borders into account) contains four (three and two halves) of smallish RHLs. This is only 6% of the total number for Wales. Just as with Special Landscape Areas, this lack of designations serves Powys poorly. Powys Council has repeatedly refused to support designation of SLAs on the grounds that all Powys landscape is of high quality. The result has been that almost none of landscape in the Powys LDP area benefits from adequate planning protection. The historic aspect layer of LANDMAP is mentioned in Section 4, but thereafter principally in advice to refer to the Landscape SPG. This failure to designate makes the commitment to protect local non-designated features of the historic environment all the more important. Locally important features are mentioned in the SPG but not headlined or emphasised. We would like to see this point about under-representation incorporated into the SPG.

We have found no overall discussion of direct and indirect impacts (briefly mentioned 6.23) or of impacts in the historic environment which are not visual or not related to the materials and design of buildings. These might be impacts on biodiversity from emissions, prevention of public enjoyment and appreciation of an asset through noise or odour, harm from pollution etc.

All parties find the concepts of "setting" and "curtilage" difficult. Since these are enshrined in policy, they are liberally scattered through the text. It would be helpful to include a frank, dedicated attempt to explain these (although we know there is a lot of grey-area).

Sections 1 - 4 of the SPG are authoritative and clearly written.

Our comments below are principally about Sections 6 & 7 which would benefit from clearer structuring, simpler sentences, reduction in length and tables. We appreciate that SPG drafting is a challenging task. However, if these sections were more reader-friendly, applicants, the public and decision makers would be better able to find their way about and digest the large volume of requirements and advice. Appropriate revision would make an important contribution to the stated aim (1.4) of "improving the approach towards protecting and enhancing local distinctiveness through preservation and enhancement of the historic environment".

It would make for too long a response to comment on every paragraph but we have picked out a few problem paragraphs. We include some particular examples of language use which are common in Sections 5-7 and which inhibit easy reading and obscure key information. Suggested changes are in italics. We have added some suggestions about restructuring Section 6. In general, the drafting of SPG text should consider which general information the reader needs to know at the outset of a section or subsection, before embarking on pages of discursive paragraphs.

A well-designed flow diagram summary of the application and decision process would also be useful.

5. Local Planning Policy

Could LDP policies go in a simple initial table of Policy, policy type or topic, short summary of implications? Any further comments on Objective 13, SP7 and DM13 could be spelt out in

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more detail? This would be easier to consult and would deal neatly with the bits and bobs 5.6 -5.12

5.4 Penultimate sentence difficult to understand. Suggest "to development.....or significant views" insert "with": "or with significant views"

5.5 last sentence: "give regard": suggest "have regard" or, better, "consider"

Two examples of improving text which could usefully be applied more widely in Sections 5 to 8.

5.6 "Reference is also made to": "such as in relation to", "where the", "relating to", "specifically", "and as part of" are all redundant and interfere with clarity . suggest: "The historic env. and assets are mentioned in other parts of the LDP. Tourism Policy TD1 reasoned justification explains ".....". Tourism Policy TD3, Montgomery canal and Associated Development, refers to..... and the reasoned justification recognises...."

5.9 similarly, "relating to", "relates to", "it is explained in..." "it goes on to explain.....that" "will need to take account of" This para. could be reorganised starting "Policy E5, development of Bronlyss Hospital Site into a Health Park,....", suggest substitute: "Para x.x.x. explains", "should consider" or "must consider"

6. Implementation of Historic Environment Policies

This is the most important section for applicants but is also the most difficult to follow and takes an astonishing 14 pages.

The text needs reducing and ordering so applicants and others can see clearly how planning for the historic environment works and exactly what is required of an application for development.

We suggest that a means must be found in the structure of the SPG to highlight essential general planning information so that it does not have to be repeated in every section and subsection.

Suggest delete most of 6.1 to 6.5 and list briefly what the section does:

- Provides overview of policy implementation for the 3 classes of designated assets: RHL, RHP&Gs, LBs (in that order) and the settings of each,
- Gives specific guidance for the Montgomery Canal
- Assists applicants to incorporate impacts on historic assets into submissions
- Discusses Heritage Impact Assessments
- For each class, describes four stages
 - identifying likely significance impacts
 - designing the proposed development,
 - assessing the impact of the development
 - submitting an application
- Describes how planning decisions take the designated historic assets into account

Say Section 7 addresses non-designated sites.

Then make a clear strong statement that it is essential to consider HE impacts from the very outset, consulting appropriate authorities and qualified experts, thus avoiding peppering the text with irritating repetition about the (very important, we agree) need for early integration of the HE.

Describe the pre-application stage here and say that the various specialist reports which may be required are described in Appx 4.

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Using RHLs as an example, most of this this applies to RHPG and LBs too. The common ground is demonstrated by the many copy-and-paste identical paragraphs. Can't some common step-by-step advice be given? This could be in box tables with 3 "designation" columns and 4 "step" rows. Common advice could go in a row with a single merged column but the columns could divide into three at some points, for example setting out separate registers, advice docs., competent authorities etc. in parallel boxes for each class of designation. General text for Step 2 could be in a single box and then the particular features to take into account for each type of designation in Step 2 could be placed in three parallel boxes .
 Step 3 also has much common advice
 Step 4 is virtually all common advice.
 This may be worthwhile even as a summary guide with reference to fuller information paragraphs.

EXAMPLE

Implementation stageRHLRHP&GLB
 Implementation general(e.g.) All development proposals:
 •must consider the impact that the development would have on the historic character of these designations and their settings or curtilages (Policy SP7)
 •must be designed to complement and enhance the character of the surrounding area and to contribute towards the preservation of local distinctiveness and sense of place (Policy DM 13 .1 & 2) etc.
 Step 1 general
 Identify significance(e.g.) Is the Development within or close to a Historic Environment designation?
 What impact will the development have on views etc.....
 Step 1 particular
 Authorities
 Ref. documents etc.
 Particular things to considerAuthorities
 Ref. documents etc.
 Particular things to considerAuthorities
 Ref. documents etc.
 Particular things to consider
 Step 2 general
 Design
 (e.g.) Can the development be sited and designed so that it is appropriate and sensitive to the character of the RHL and its setting?
 Does the design reflect the locally distinctive character of the RHL, through siting, built form, detailed design, and materials?
 Step 2 particularList of features to consider for RHLList of features to consider for RHP&GList of features to consider for LBs
 Etc.Etc.

Returning to the current text:

6.1 sentence 2. "given that these assets have been designated as valued building or areas in respect of these matters" replace with "because these are the characteristics which have determined the designation of these assets"

6.1 & 2 & 3
 PPW takes precedence over LDP so should come first.

6.5 Muddled statement which needs clarifying:
 "The process incorporates the requirement for Heritage Impact Statements in connection with applications for listed building consent." Is this saying that LBC applications differ from RHP&G applications because they require an HER while HER is desirable but not obligatory for RHP&G applications? And how do settings of different historic assets fit in? "Three designations covered by this SPG" are mentioned in 6.2 and again here. It is not made clear whether there is an HER process for Registered Landscape Areas.

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RHLs

The RHL section should begin with 6.8. Sentence 1 and add that developers are encouraged to submit a design and access statement or a planning statement explaining how they have addressed issues concerning the Historic Environment.

The next para. should be:

"X.X For Development requiring Env. Imp. Ass.(see Appx 4.) or ASIDOHL2.(see 4.10), these basic steps are not sufficient. Cadw and Cpat should be consulted about the need for detailed assessment."

Reference to 4.10 where ASIDOHL2 explained and Appx 4 where EIA is explained helps here but it would also be useful to put internal references to explanations about official sources, regs, etc., perhaps in brackets, throughout this section .

6.6 & 6.7 should be in Step 1.

6.7 Suggest "It is essential to check the detailed information on the Register for large or complex development but applicants should also ensure that smaller developments will not have harmful impacts."

Step 1.

Too confused and repetitive about "historic character areas"

Best in a series of questions? Or perhaps combined into EXAMPLE Table above?

Very rough example for reducing Step 1 without losing information.

1.Consult Register/map

- Is the proposal within a RHL? Consult.....

-Is it close to a RHL boundary: how close?

-Are there views from within from the RHL?

-Are their views where the development and the RHL are seen together?

2.Is there is any potential impact on the RHL or its setting, consult details of Historic character areas (ref.) which explains(refs in Ch 4).

3.Site visit:

-check for characteristics listed by CPAT for the Historic character area

-consult Cadw conservation principles

-identify potential impact on historic characteristics

-identify potential impact on views.

Etc.

6.25.& 6.26 & 6.28 & 6.30 & 6.31: all these are confusing when read together with 6.8. Should draft one definitive statement. Also 6.28 is the first mention of HIR so it comes up as a complete surprise!

6.27 Note following 6.27 should have come somewhere in the very beginning - with 6.1.

6.35 last sentence: "will be refused". Otherwise it is implied that projects with unacceptable impacts may be accepted! This applies for each designation.

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6.61 "curtilage" and "setting" are difficult concepts. Should "setting" have been addressed in Section 5 with SP7?

6.98 does the long list add anything - since any applicant would have to consult the MCP Strategy anyway?

7 Using the HER

Pre-application consultation with CPAT should be headlined at the outset to avoid repetition.

7.2 Sentence 3. "The HER is composed of" or "the HER is...."

8. Monitoring and Review

Best to reproduce exactly what the LDP says about monitoring and monitoring indicators for the Historic environment.

Appendix 4

EIA para 2 does not make sense and has a singular/plural mistake: "in deciding whether EIA is required for Schedule 2 development, the selection criteria set out in Schedule 3 of the EIA regulations refers to...."

ASIDOHL2 para1 "Technical Annex"

Para 2 "As explained above, all applications requiring EIA will be required to carry out the ASIDOHL2 process." For accuracy, suggest: "The ASIDOHL2 process is mandatory for EIA applications with likely impacts on Registered Historic Landscapes

DAS "Where development affecting the historic environment is involved, the DAS must cover the standard aspects expected of a DAS, but it must also address how the proposal relates to its particular special context. Therefore, the DAS must consider the historic environments assets affected by the proposal. A DAS is required to demonstrate the steps taken to appraise the context of the development and how the design of the development takes the context into account."

Suggest: "For any development affecting the Historic Environment, the DAS must demonstrate the steps taken to assess the impact on historic assets and character and show how the project design takes the Historic Environment into account."

Assessment of impact on setting:

"historic or modern viewpoints. Photomontages and maps showing zones of theoretical visibility may assist with this assessment....."

This implies these assessment techniques are specific to "settings" whereas they are applied more generally and should also be mentioned under other headings.

Council Response: Support is noted.

The Council has been through all the specific comments and made changes to the SPG to improve readability where in agreement. It is anticipated that users will not always read the document from cover to cover but will refer to specific pages or tables, hence the need for repetition within the document. The summary that is planned to go alongside the SPG will help to identify the key messages for readers.

It is not considered to be the role of the SPG to reflect on the representation of Registered Historic Landscapes in the Powys LDP area, which are designated nationally. Other matters raised in relation to designating Special Landscape Areas were addressed at the LDP examination. It is appropriate to cross-refer to the Landscape SPG, which provides detailed guidance on the use of LANDMAP. Further guidance on the historic landscape layer of LANDMAP is explained in Figure 5. No changes recommended.

The approach towards local non-designated features, particularly those recorded on the Historic Environment Record, are sufficiently covered in paras 4.50 to 4.52, and guidance on the use of the HER is provided in section 7 of the SPG. The SPG does not discuss historic assets of special local interest as there is no policy within the LDP relating to these assets. No changes recommended.

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<p>Cadw guidance covers these matters and is referred to as appropriate in the SPG. It is not considered to be necessary to repeat this guidance in the SPG. No changes recommended.</p> <p>Recommend to include further explanation of setting by inserting a new para. following 4.52 relating to setting of historic assets. Para. 4.44 already explains what is meant by curtilage in the context of Listed Buildings. Reference is also made in the SPG to further guidance by Cadw on these matters.</p> <p>This section of the SPG sets out the key relevant LDP policies relating to the historic environment and also mentions other policies that refer to the historic environment. It is considered to be sufficiently clear and is consistent with the way that policies are set out in other SPG. No changes recommended.</p> <p>As explained in para. 6.5 of the SPG, there will be similarities in the general process for all 3 designations, however the details will differ. The suggested table format would appear overly complicated. Recommend to include, at the start of section 6, a figure setting out the common step-by-step process that applies to all 3 designations.</p> <p>Recommend to include a flow diagram summarising the application and decision process at the end of Section 6.</p> <p>Recommend to include a figure which summarises key questions in relation to step 1 for RHL, RHPG and LB.</p> <p>It is not appropriate to confirm that applications will automatically be refused where there are unacceptable impacts to the historic environment. Planning decisions will weigh up material planning considerations relating to the proposal. As para. 6.35 suggests, there will be occasions where unacceptable adverse impacts may be outweighed by other planning matters. No changes recommended.</p> <p>This section summarises the LDP monitoring relevant to this SPG and is considered sufficient. No changes recommended.</p> <p>Reference to photomontages and ZTV reflects Cadw guidance in respect of setting. They are already referred to in para. 6.28 in relation to RHL. This level of information is less likely to be required as part of typical applications affecting LBs and RHPG. However, the need for this information may arise when considering the impact of major or complex developments on the setting, in which case the SPG covers this situation. The need for this type of information as part of EIA or ASIDOHL process will be determined as part of that process. The use of ZTV for general landscape purposes is explained in the Landscape SPG. No changes recommended.</p>									

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6315 Natural Resources Wales

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6315.P2		25/02/2020	<input type="checkbox"/>	E	C	W	M		Summary: Comments on Historic Environment SPG

Document:Historic Environment SPG

Question *Representation Texts*

Question: Details

Representation Text: . Our comments on the Historic Environment SPG reflect past experience of working with Registered Historic Landscapes and a planning appeal for Bryn Blaen Wind Farm near Llanidloes. We would be pleased to provide additional input and clarification on the points raised.

Registered Historic Landscapes (RHL) It would be beneficial to list which of the Registered Historic Landscapes (RHL) within the Powys LDP area have undergone Historic Landscape Characterisation. A web link to this information or direction to CPAT’s website would encourage access to the appropriate information. LANDMAP historic and cultural landscape data sets These two assessments provide information in a format that can help inform Assessment of the Significance of the Impacts of Development on Historic Landscape (ASIDHOL 2).

The approach taken to defining Historic Character Areas by the Archaeological Trusts and LANDMAP has not been consistently applied across Wales. It would be beneficial if the SPG were to acknowledge this anomaly and explain how the two sets of separate baseline evidence can be used.

Similarly, an explanation of what Outstanding and High RHLs and Outstanding, High, Moderate and Low LANDMAP Historic Landscapes tell us about the importance of the historic landscape resource would be useful for making planning decisions. The SPG could better explain what might cause a significant effect on a Registered Historic Landscape to support Strategic Policy SP7. ASIDOHL 2 can be used to assess development effects on the aesthetic appreciation of a historical landscape i.e. to conserve a place perceived to have little or no modern-day intrusions. We are aware that some LPAs have taken this approach to RHLs. We are also aware that wind farms have been argued to be an acceptable addition to a RHL because of no physical disturbance of artefacts. Both ASIDOHL 2 and the statement in paragraph 4.33 predate wind farms on the scale we are seeing today and are set to see as a result of the draft NDF.

We acknowledge that ASIDOHL 2 currently provides very little on assessing the visual change to historic landscapes. The responsibility of revisiting ASIDOHL 2 would fall to CADW. However, in the interim we strongly recommend the SPG provide more definitive guidance to decisions maker and assessors. Paragraph 6.6 All development proposals within Registered Historic Landscapes, or near to these landscapes, will need to consider the impact that the development would have on the historic character of these areas and their settings.

RHLs are being considered in the same way as National Parks, AONBs and Schedule Ancient Monuments by bringing in visual character, qualities, views and status in the landscape. ASIDHOL2 does not assess this. The SPG is unclear as to what form of assessment needs to be undertaken to assist decisions here. It may take the form of an Historic Landscape and Visual Impact Assessment which responds to the historic landscape baseline. Clarification on this matter would be beneficial. Paragraph 6.21 Proposals should reflect the locally distinctive character of the RHL

We advise that the following elements are added to those listed in paragraph 6.21:

- Traditional materials used for doorways, paths, drives, thresholds of drives and courtyards (i.e. tiles, brick, flag stones, stone setts, stone kerbs, cobbles, gravel)
- Use of colour that integrates well with the prevailing town/open countryside character or reflects historical use

We would also advise the following change:

- Key (delete Prominent) views to, from and across the area.

Council Response: Noted.

CPAT has confirmed that all Registered Historic Landscapes have been characterised. A link to CPAT’s website on historic landscape characterisation is already included in the SPG at

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paras 4.42 and 6.12. No changes recommended.

The Good Practice Guidance explains that the characterisation work is compatible with the historic landscape layer of LANDMAP. Matters relating to consistency between these data sets should be resolved at a national level and cannot be addressed by this SPG. Recommended additional text in para. 6.15 explaining the use of the historic characterisation work and LANDMAP. No changes recommended.

Recommend additional text in new paras. 6.20 and 6.21 to explain the national importance and high value of RHLs (which is the same whether on part 1 or part 2 of the register) and LANDMAP evaluations, and to refer to guidance within the Landscape SPG on the use of LANDMAP.

The significance of effects are considered on a case by case basis and therefore it would not be appropriate for the SPG to attempt to define this. The process set out in the SPG should help to identify effects that may be significant. No changes recommended.

This appears to be a general comment on different approaches being used towards assessing the impact on historic landscape. The Bryn Blaen Inspector considered the impact on views of the RHL and on the key characteristics of the RHL. The guidance in the SPG requires consideration of the impact on views and on characteristics of the RHL. No changes recommended.

This comment relates to concerns about the current ASIDOHL 2 guidance and recognises that Cadw would be responsible for revising this nationally. It would not be appropriate to address this at the local level in this SPG. No changes recommended.

Appendix 4 of the SPG explains the different types of assessments involved. In respect of EIA development, Cadw will advise on the assessment requirements. In other cases, information requirements will be agreed at pre-application stage. Landscape and Visual Impact Assessment, as part of an EIA or in connection with major or wind turbine developments, or informal assessment, will include information on visual and landscape impacts relevant to RHLs. Further guidance on LVIA is found in the Landscape SPG. No changes recommended.

Recommend inserting additional elements into the list in para. 6.21.

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6395 Canal and River Trust

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
6395.P3		28/02/2020	<input type="checkbox"/>		C	W	M		Summary: Comments on Historic Environment SPG

Document:Historic Environment SPG

Question *Representation Texts*

Question: Details

Representation Text: Glandwr Cymru (the Canal & River Trust in Wales) supports the production of this Historic Environment SPG and we welcome the references to the Montgomery Canal and future/continued restoration of the waterway (for example at para 4.26-4.27 pg9).

Paragraph 6.100 sets out key design considerations for development adjacent to the Montgomery Canal we support the thrust of the these but have the following suggested additions:
 -"improve access along and across the canal corridor where appropriate"
 -"enhance important views outward from the canal corridor;
 -"enhance recreational opportunities of the waterway by providing a waterside pedestrian and cycling route that is accessible to all and connects to other key pedestrian and cycling routes in the local area, where appropriate"
 -"ensure the structural integrity of the canal corridor is not harmed"
 It is unclear if these considerations are also intended to apply to the parts of the former canal which have not yet been restored. We would welcome this being clarified in the text.

We welcome the reference at 6.101 in terms of pre-application engagement with the Canal & River Trust.

A general comment, there are numerous references to the Canal & River Trust within the document. We welcome this but there are also numerous versions of our name given with 's' add to River and with the use of 'and' instead of the ampersand (&). Please can all references to Trust be made consistent and read 'Canal & River Trust'

Council Response: Support is noted.

Recommend inserting additional considerations into para. 6.100. These considerations are intended to apply to unrestored sections of the canal to reflect the scope of policy TD3. Recommend additional text is inserted in para. 6.100 to clarify this.

Recommend to amend references to the Canal & River Trust throughout the document for consistency.

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Place Plan SGP Reps and Draft Responses

by: Representation No

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439 Newtown & Llanllwchaearn Town Council

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439.P4		10/03/2021	<input type="checkbox"/>	E	S	W	M		Summary: Support as the SPG is the NLTC's own document
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Document:Newtown Place Plan SPG

Question *Representation Texts*

Question: **Details**

Representation Text: . A resolution made at the March meeting of the Economy and Environment Committee is as follows:

“The committee resolves that as this Powys LDP Draft SPG public consultation on the draft Newtown and Llanllwchaearn Place Plan is NLTC's own consultation, support is implicit.”

Place Plan SGP Reps and Draft Responses

by: Representation No

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1481 The Coal Authority

<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>	<i>Summary</i>
1481.P2		25/02/2021	<input type="checkbox"/>	E	C	W	M		Summary: No specific comment to make

Document:Newtown Place Plan SPG

Question *Representation Texts*

Question: Details

Representation Text: . Having reviewed your document, I confirm that we have no specific comments to make on it.

by: Representation No

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1552 Douglas Hughes Architects Ltd

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
1552.P29		05/03/2021	<input type="checkbox"/>	E	C	W	M		Summary: Support for the Place Plan with suggestions for some changes/amendments including concerns on the suitability of some of the Plan's suggested development sites

Document:Newtown Place Plan SPG

Question *Representation Texts***Question: Details***Representation Text:* . Response Following review of plan by Richard Lewis and Doug Hughes

Firstly we wanted to commend the Town Council for their work on this, it is a comprehensive document and an important part of securing the kind of development we all want in Newtown.

Policy 1.1

We are in agreement with the aspirations in this section.

Policy 1.2

We have some concerns with the quoting of the Draft NDF which states that '44% of the additional homes needed should be affordable homes'. We suggest that this figure is not included because it conflicts with the figures provided by Powys County Council and once this SPG is adopted could be used by planning officers as a material consideration. Of course provision of sufficient affordable homes is crucial, but the county already has very low levels of delivery of open market housing which could be harmed further.

Looking at the proposed housing sites, we agree that the Treowen site is of great importance and every effort should be made to achieve an exemplar development here in terms of design and sustainability. However we don't think the other sites referred to for future development are suitable for a number of reasons.

Hendidley – The site is very steep and suffers from poor access onto Milford Road

Dolfor Road – This site is incredibly steep and would be very difficult to develop fully, it may provide some extension to the existing allocated site, but not whole of the hatched area on the map.

Llanllwchaiarn – Very steep site, poor access, poor highways infrastructure.

We think that current sites with permission should be included such as the remainder of the site at the top of Bryn Lane and the site alongside Glandulas Caravan Park. There may be others.

In terms of other sites to bring in, we'd suggest the opposite side of the road to Rock Wood in Llanllwchaiarn, land around the Gro and possibly Wern Ddu Lane.

A design brief for Treowen was referred to but wasn't included.

- In terms of loss of community facilities some flexibility within this would be important to change to other uses or provided uses which could make these sustainable in the long term.
- Section 1.4 is not clear on where the employment land is proposed.

Policy 1.3

Some extra detail on what constitutes a community facility and how it's demand is calculated would be useful, but the safeguarding is supported. Flexibility to change to other uses which support the community would be good.

Policy 1.4

The need for additional employment land is agreed. We think proposals of where to place this should be made, with contingencies in place if the current sites cannot expand. For example could the Golf Club be relocated to free up vital land? What is the future of Fronlas Farm? That site could allow expansion at Mochdre. A long term plan with public sector involvement and

by: Representation No

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
1552.P29		05/03/2021	<input type="checkbox"/>	E	C	W	M		Summary: Support for the Place Plan with suggestions for some changes/amendments including concerns on the suitability of some of the Plan's suggested development sites

support is required.

Policy 1.5

The new health hub is strongly supported. The involvement of the local community and in particular the 2 schools should be considered carefully though.

Policy 1.6

The Street Scene design is a great idea, the creation of a more harmonious and cohesive design for the whole town is very important. Previous piecemeal improvements lead to a lack of overall identity. We'd strongly suggest that a professional landscape designer is employed to undertake this. The work that Lingard Styles have done around Newtown over the last 30 years is exemplary.

Policy 2.1

We support the aspirations on S106 agreements. We suggest that an overall plan of requirements for the town could be drawn up so that all developments can contribute towards them rather than a piecemeal approach development by development.

Policy 2.2

Could improvements to active travel mean more flexible uses within under utilised car parks? Events space in Dolerw Car Park, can still be used as car park for majority of the time, but some small alterations to make easier to adapt?

Adoption of car share and in particular car free zones is supported, but requires buy in from the Local Authority Highways department to be successful.

Policy 2.3

In particular policy CCa, we think this needs to be reworded to be proportional to the size of the development and shouldn't hinder development unduly.

Policy 3.2

We feel policy CA1 should be a short term goal, the need is clear now.

Next LDP:

Suggest flexible permitted development rights for the town centre to change uses should be pursued. We have raised this with Powys CC, who have pointed to the new Future Wales document. Brecon Beacons NPA have already announced a policy on this. We feel it is vital in assisting with the post Covid recovery.

As previously mentioned we think that the proposed housing sites (apart from Treowen) will be very difficult to develop.

We would like to conclude by saying this is a very well written document and a great positive for the town.

Council Response: Noted thank you. The document will be amended to reflect the publication of Future Wales in February 2021 and updated PPW11. It is agreed that the mention of the national figure of Affordable Housing need may be confusing and reference will be made instead to the LDP target for the Powys Severn Valley Sub-market Housing Area.

In terms of site selection/proposals, the Place Plan contains commentary on a range of sites from those which already have planning permission to those already "zoned" for housing to those that are only suggestions for the next Local Development Plan.

Whilst it would not be appropriate for the Place Plan to include wholly unrealistic sites, it is important that the Plan reflects local community views (as obtained from engagement exercises). The Council have worked with the Town Council to ensure that wholly unsuitable sites have been sifted from consideration. Those that are mentioned in the Plan have either already been determined as suitable or potentially suitable subject to detailed design (ie they have planning permission or they are allocated) or, where this is not the case, sites included should be only be viewed as "long-listed". Any such sites will be subject to further scrutiny as part of the next LDP.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
1552.P29		05/03/2021	<input type="checkbox"/>	E	C	W	M		Summary: Support for the Place Plan with suggestions for some changes/amendments including concerns on the suitability of some of the Plan's suggested development sites

The Place Plan, being supplementary guidance, cannot introduce new sites unless they accord with LDP policy. At this stage your suggestions for possible new sites would fall into the "long-list" category but will now be recorded in the supporting evidence for future attention. Note that potential sites mentioned in the Place Plan will not automatically be considered for allocation by PCC - the SPG is subsidiary to the LDP - the County Council will expect to receive a detailed site submission at the appropriate stage of the development plan review process for further consideration. At this early stage we can point out that at least 50% of the Pool Road site (mentioned in your rep as land at The Gro) could well be constrained by flooding issues and hence be contrary to national policy in TAN15.

For completeness, the Town Council agree to add the sites near to "Glandulas Caravan Site" to the "what's been happening recently section" in chapter 1.2.. Generally other large sites are already captured in the LDP - the Place Plan references LDP Policy H2 - and, where the Place Plan is unable to influence their future, it had been considered better to direct people to the LDP rather than making the SPG repetitive. The Bryn Lane site you mention being one example of a site already shown in the LDP as a Housing Commitment where planning has already been determined.

Your comments on the need for employment land are noted. This will be reviewed as an over-arching Development Plan matter and will be considered at the LDP Review stage. We would welcome your further engagement on this topic at the appropriate time. However, we can advise that current studies (2020) have highlighted the importance of Employment Land allocation P48 EA1 (Llanidloes Road, Newtown) where strategic intervention is recommended.

We welcome your overall support for the Place Plan and the involvement already undertaken and can advise that your comments have resulted in wording changes in Policy HF-b and Policy CC-a and Projects OS3 and T2 . Also note the revised project TC1 and the commitment to bring forward Project CA1. Thank you.

Please note that change of use/increased flexibility on permitted development etc (especially in relation to Covid-19 recovery) are issues not readily addressed at the Place Plan/SPG level. Higher tier legislation/policy will impact on lower tier plans The DCFW consultation response included a relevant link to placemaking resources where an up to date paper "Places for Life II" is available. Welsh Government <https://gov.wales/planning-policy-covid-19-recovery> - "Building Better Places" is also relevant to planning post-pandemic.

Place Plan SGP Reps and Draft Responses

by: Representation No

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3076 Design Commission for Wales

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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3076.P1		03/03/2021	<input type="checkbox"/>	E	C	W	M		Summary: Emphasise the importance of Design Quality and Place Making
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Document:Newtown Place Plan SPG

Question *Representation Texts*

Question: **Details**

Representation Text: . It is important that design quality, and successful integration of placemaking are emphasised in any new proposals.

The Placemaking Wales guide could be a useful resource. It can be found here: <http://dcfw.org/placemaking/resources/>

Council Response: Thank you for your comments which are noted. The document will be amended to include the placemaking link.

We advise that high quality design is included within Place Plan policy HF-a and design quality is clearly identified in the over-arching Powys LDP at Policy DM13 which is further supported by an adopted Residential Design SPG which references Placemaking .

by: Representation No

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4369 The Theatres Trust

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
4369.P1		04/03/2021	<input type="checkbox"/>	E	C	W	M		Summary: Supportive of the CF policies, suggests mapping of theatre and cinema to help protect these assets

Document:Newtown Place Plan SPG

Question *Representation Texts*

Question: Details

Representation Text: . Theatres Trust is supportive of this Place Plan and in particular the strong emphasis afforded to the protection and promotion of community facilities through the CF policies. We welcome that this includes theatres, as these provide access to cultural activities for local people and enable participation and engagement. This helps reduce loneliness and isolation and improves social and cultural wellbeing. Cultural facilities, of which there are a number in the area, also help bring people into the town which is increasingly important as retail and town centres come under increasing change.

We would note the accompanying map fails to identify the Powys Theatre or the Regent Cinema. We would suggest that the map is amended before the plan is progressed to ensure these valued facilities are recognised and protected

Council Response: Thank you for your comments. We agree with the proposed mapping changes to show the theatre and the cinema as cultural venues. The cinema will also be added (to accompany photo) to the list of key attractions in the introductory text at 3.2.

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4640 Powys Ramblers

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
4640.P1		02/03/2021	<input type="checkbox"/>	E	C	W	M		Summary: Support for the Place Plan, comments on Rights of Way Content and increasing the References to PROW

Document:Newtown Place Plan SPG

Question *Representation Texts***Question: Details**

Representation Text: . We very much welcome the development of this plan and our comments are set out below under the various Headings within the document.

Character and Heritage

Rights of way are part of the heritage of Newtown. They have been used for generations and tell a story about the history of the area. It would be helpful if this could be made clearer in this chapter and mentioned specifically in one of the policies.

We are very much in support of project CH3 to seek funding for the repair and renewal Dolerw bridge.

Housing and future development

On policy HFa it would help to demonstrate the importance of walking routes when considering housing developments, if this policy could explicitly refer to footpaths and taking opportunities to link pedestrian routes on estates to the existing rights of way network.

It would also help to be clear in the policy that any changes of rights of way required by housing developments will require, at least, the same length of path to be re-provided.

Community facilities

On Policy CFa can it be made clear please that rights of way are considered to be community facilities and, as such, any proposals that will result in their loss will be strongly resisted?

Business, learning and employment

We are very much in support of project HW5 - seeking funding for a project to construct an accessible path up and around Trehafren Hill in conjunction with the already built cycle track.

A safe and tidy town

On project ST1 can specific reference be made to rights of way please as they are often in a much worse condition than normal pedestrian routes? That is also the case with some of the furniture on rights of way, e.g. stiles, bridges etc.

Green Newtown

On Policy OSa which refers to the loss of public open space arising from development being resisted, can this be expanded to specifically mention rights of way as well please?

We are very much in support of project OS2 to enhance the use of the river and open spaces. Could this be expanded to refer to rights of way please?

Active travel and transport

On Policies AT a & b about securing pedestrian and cycle ways in new developments, can specific reference to improving existing rights of way be included here as well please? Can consideration also be given please to pursuing new routes to be made rights of way?

On project AT2 can it be made clear please that this audit should include all rights of way? It would also be useful to build in further audits in future years to identify and then resolve any future maintenance issues.

We are very much in support of projects AT4, AT7, AT8, AT9, AT10 and AT11 about improving and protecting footpaths and bridleways.

Place Plan SGP Reps and Draft Responses

Powys County Council Local Development Plan

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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4640.P1		02/03/2021	<input type="checkbox"/>	E	C	W	M		Summary: Support for the Place Plan, comments on Rights of Way Content and increasing the References to PROW
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Tourism, culture and attractions

On policy Ta in the list of welcome tourist initiatives, can reference be made please to projects which aim to encourage tourists to take advantage of the rights of way in the area?

General

It will be apparent from the comments above that we think there should be more reference to rights of way in the Plan. We would be happy to offer further advice as the Plan developed so please keep in touch with us on this matter.

Council Response: Thank you for your comments. We understand the importance of protecting and improving rights of way. The Local Development Plan (to which the Place Plan is subsidiary) contains Policies SP7(3), DM13(9) and Transport policy T1 to this effect. We will however pass a copy of your comments to the Council's PROW team and the Council's Active Travel Officer to alert them to your views.

The Ramblers support to various policies/projects in the Place Plan is appreciated. In response to your proposed alterations surrounding more mention of public rights of way, additions have been made to the Active Travel Key Facts section, the supporting evidence section (Character and Heritage), to Policy HF-a, Project ST1, Policy OS-a and Project OS2. We also include the Powys Ramblers as a Suggested Collaborator for Project AT3 as well as on Projects AT4, AT7, AT8, AT9, AT10 and AT11. With these additions and given the statutory protection offered to PROW we do not consider other changes to be necessary.

by: Representation No

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6315 Natural Resources Wales

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
6315.P3		19/03/2021	<input type="checkbox"/>		C	W	M		Summary: Raising Awareness and providing info on a number of topics for inclusion including SoNaRR 2020, SMNR and Area Statement work, Open Spaces, Green Infrastructure, Pollinators and SUDS

Document:Newtown Place Plan SPG

*Question Representation Texts***Question: Details***Representation Text:* . Newtown & Llanllwchaiarn Draft Place Plan V 4.1 January 2021

General observations

The draft document considers the environmental implications of plans and often references the importance of the environment, biodiversity and their importance for the wellbeing people and their townscapes.

We welcome the commitments made in the section "A world changed by Covid-19" on page 11 of the document, where the Welsh Government are quoted for the 'protection and enhancement of natural resources and investment in active travel'. We are pleased that the opportunity is being taken to consider the importance of the environment.

Page 15 of the document has a table of 'Links to other plans' relevant to National Planning & Wellbeing Plans. Reference is made to Planning Policy Wales (Edition 10). On the 4th of February 2021, Edition 11 of Planning Policy Wales has been made available.

Sustainable Management of Natural Resources (SMNR)

The Place Plan goes a long way to support the aims and objectives of SMNR which align with NRW's own SMNR aims including:

- Safeguarded natural resources
- Resilient ecosystems
- A healthy environment for people
- A regenerative economy

Whilst the plan is indirectly seeking to achieve some of the same objectives and aims of SMNR, no direct reference or mention of SMNR has been given. We suggest it may be relevant to include or make reference to NRW's introduction to Sustainable Management of Natural Resources document in this Place Plan. As quoted in this document, 'the Environment (Wales) Act and the Well-being of Future Generations (Wales) Act together create modern legislation for managing Wales' natural resources and to improve the social, economic, environmental and cultural well-being of Wales.'

State of Natural Resources Report (SoNaRR, 2020)

NRW has recently published the second edition initial report of the State of Natural Resources Report and has just published the further evidence chapters. We have also released some related evidence on the Wales Environmental Information Portal. The report looks towards taking a greener pathway out of the global Covid-19 pandemic, and to seize the opportunity to re-imagine how we use our natural assets to address the dual threats from the climate and nature emergencies. We would support your Authority referencing any relevant headline messages found in SoNaRR 2020.

Area Statements

We notice the Plan does not appear to make any connections or reference to the Mid Wales Area Statement.

This plan provides an opportunity to create important links with themes from the Mid Wales Area Statement and WG's Nature Recovery Action Plan 2020. Recognition of such links would potentially benefit any funding applications to NRW / WG for projects in the Newtown area. The Wales Environmental Information Portal which has been developed alongside the Area Statements includes multiple spatial datasets that can be used in Place Plans and development management alike as evidence to inform decision making. Among others, ecosystem resilience and Welsh Information for Nature Based Solutions (WINS) and nitrogen sensitive air quality indicators are all available for use.

We are supportive of the place plans content aligning with the guiding principles of SMNR which align with NRW's Mid Wales Area Statement. The Area Statements key guiding principles are:

- Improving biodiversity – responding to the nature emergency

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
6315.P3		19/03/2021	<input type="checkbox"/>		C	W	M		Summary: Raising Awareness and providing info on a number of topics for inclusion including SoNaRR 2020, SMNR and Area Statement work, Open Spaces, Green Infrastructure, Pollinators and SUDS

- Sustainable land, water and air
 - Reconnecting people and places – improving health, well-being and the economy
 - Forest resources – managing timber resources effectively
 - Climate emergency – adaptation and mitigation across four themes
- Not all these themes will be relevant to the Place Plan, but links are provided above for ease of reference.
We have provided more detailed advice on relevant sections of the Place Plan below.

Green Infrastructure

Proposal CH-6 page 39: This is particularly welcome and the final Place Plan could usefully reference both The Welsh Government's Priority Action number 5 from their Woodlands for Wales Action Plan to "Deliver increased and safeguard existing tree cover in towns and cities and support sustainable urban tree management", and the Future Generations Commissioner's Manifesto for the Future recommendation 11 for a commitment to achieving 20% tree canopy cover in every town and city in Wales by 2030. NRW maintains a data set of urban tree canopy cover which will be helpful in this context (and will shortly be publicly available via the Lle data portal).

Section 1.2 Housing & Future Development (Pg. 40)

We welcome suggestions on housing sustainability. However, this section does not mention green space, despite the symbol for the "Sustainable and Productive Environment" objective appearing at the top of the page. The Plan could usefully reference the Welsh Government's Statutory national standards for sustainable drainage systems, with which all new development and redevelopment must comply. These require all SUDS to deliver biodiversity and amenity benefits, which should contribute to the Place Plan's ambitions to ensure residents enjoy a sustainable and productive environment.

We recognise the important role that the requirements of the implementation of Sustainable drainage systems (SUDS) as part of new developments is as a key opportunity to create multifunctional greenspace. It is possible to retro-fit SUDS to existing development within the existing streetscape such as which has been done in the 'Greener Grangetown' project in Cardiff. We would welcome proposals of this nature.

Development must consider the risk of flooding to proposed sites in accordance with the Welsh Government's Technical Advice Note 15: Development and Flood Risk (July 2004) which provides guidance on managing development and the risk of flooding, so to achieve sustainable development.

Section 2.1 Open Spaces

NRW welcome the prominence of open space issues in the Place Plan. We also note that Technical Advice Note (TAN) 16: Sport, Recreation and Open Space (2009) recommends the Accessible Natural Green Space standards (ANGs, Para. 2.18) alongside Fields in Trust standards (Paras. 2.9-2.11 and Annex C) for access to sports fields and play provision. We suggest that prioritisation of works to improve green space (Proposal OS3) could be based on those areas of the town where green space provision does not meet those standards. The toolkit can be viewed here.

Proposals OS1, OS2 and OS3 relate to the review and provision of green space and NRW could note that the requirements for green space provision and enhancement could be assessed against the Green Flag Award standards. The Green Flag and Green Flag Community Awards are supported by the Welsh Government and provide the only internationally recognised standards for the quality management of publicly accessible open space. Research has shown that if green space is poorly managed then it deters public use and is rendered functionally inaccessible. It may still appear on a map, but its delivery of the full range of ecosystem services is considerably reduced.

NRW maintains a data set of all urban green space in Wales which is available for use by all members of the Ordnance Survey's Public Sector Geospatial Agreement (PSGA). When combined with socio-economic data sets, for example, it can be used to suggest where investments in green space may bring the greatest benefit to the most deprived areas.

Section 2.2 Active Travel and Transport

We welcome the active travel and transport policies and suggested projects/actions identified from your public consultation exercises and the idea to develop the public footpath/ cycle network across the town. We recommend that the plan references the Powys County Council Rights of Way Improvement Plan (RoWIP) 2018-2028. There may be opportunities to connect the community's aspirations with the strategy set out in the RoWIP.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
6315.P3		19/03/2021	<input type="checkbox"/>		C	W	M		Summary: Raising Awareness and providing info on a number of topics for inclusion including SoNaRR 2020, SMNR and Area Statement work, Open Spaces, Green Infrastructure, Pollinators and SUDS

Section 2.3 Climate Change and Biodiversity

We welcome the clear reference to and definition of green infrastructure on page 78.

NRW support Proposal CC3 and reference our guide to managing the grounds of public buildings for pollinators as a source of advice which is helpful when managing the grounds of most buildings. The guide and a sample management plan can be downloaded from the following link [Natural Resources Wales / Love pollinators](#). We also suggest a commitment for the plan to achieve Welsh Government "Bee Friendly" status for the area as an indicator of progress. NRW also recommend that the Place Plan adopts an ambition to achieve 20% urban tree canopy cover as referenced in the comments on CH-6 above.

Section 3.1 Town Centre Experience

We welcome Proposal TC4, referring to the need for increased urban tree canopy cover (see comments on CH-6 above) and noting the increasing evidence from across the world that greener shopping districts encourage people to spend more time in the districts. In this context we note the opportunity to design flower beds and tree pits as SUDS to reduce the impact of surface water flooding thereby making the area more attractive to shoppers.

The Next Local Development Plan

We welcome the intention to submit further green spaces to Powys County Council for consideration as part of the next open space assessment, and we recommend the use of NRW's greenspace toolkit, Green Infrastructure Data Set (which may have to be done in conjunction with a PSGA member) and the Green Flag Award standard to prioritise the green spaces which are to be proposed.

Other Matters

We have provided comments that relate to the functions of NRW that we can within our expertise provide advice on. We have not provided comments on other matters such as that may be of environmental concern because they are informed by the Local Authority or other public bodies.

We advise that a collaborative approach is maintained and implemented to support your Place Plan and that the group should make themselves aware of any permits/ consents/ licences relevant to future development proposals. Please refer to our website for further details.

Council Response: Thank you for your detailed response. The Place Plan has been reviewed to take account of your representation and additional/updated text and relevant website links have now been inserted at the:

"links to other plans" section;

the Climate change and Biodiversity section - including adding SNMR and updating the What's Been Happening Recently section to include SoNaRR 2020 and the Mid Wales Area Statement;

PPW10 updated to PPW11;

Further mention of tree cover in the intro section to Character and Heritage plus including the target of 20% in Project CH6.

Your information on bees has now been included in Projects CC3 and CC5.

Open Spaces wording has been added to Project OS3 and new Project OS9 considers the Green Flag Award.

The NRW Greenspace toolkit, Green Infrastructure Data Set and the Green Flag Award standards are now referenced in Project OS1.

The RoWIP will be referenced in the Active Travel Section. Please be advised that we received associated comments from both the Powys Ramblers and the Local Access Forum. We will be sending on their comments, together with your suggestion about more integrated working to our (PCC) PROW department.

Place Plan SGP Reps and Draft Responses

Powys County Council Local Development Plan

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<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>	<i>Summary</i>
6315.P3		19/03/2021	<input type="checkbox"/>		C	W	M		Summary: Raising Awareness and providing info on a number of topics for inclusion including SoNaRR 2020, SMNR and Area Statement work, Open Spaces, Green Infrastructure, Pollinators and SUDS

As SuDS are considered within the over-arching Local Development Plan framework (see Policy DM6 LDP) and are subject to their own legislation and process as part of any development proposal, it is not considered appropriate to detail these to any extent in the Place Plan. Note however that sustainable land drainage is included in Policy CC-d as is TAN15. It is agreed that Project TC4 can be updated to include creating SuDS.

Your comprehensive and up to date response to our SPG consultation is appreciated. We will share your comments within the Council's wider planning policy team to raise awareness as obviously many of these policy objectives are cross-cutting and will need to be taken into account in other policy work alongside their connection to the Newtown Place Plan SPG.

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6421 Natural England

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
6421.P1		09/03/2021	<input type="checkbox"/>		C	W	M		Summary: Drawing attention to the River Severn and catchment links to the Severn Estuary SAC

Document:Newtown Place Plan SPG

Question *Representation Texts***Question: Details**

Representation Text: . The River Severn runs through Newtown and Llanllwchaiarn and is hydrologically linked to the Severn Estuary Special Area of Conservation (SAC)- weblink provided - and Ramsar site. Together these sites are designated in respect of the following migratory fish species: Atlantic salmon, Sea trout, Allis shad, Twaite shad, Sea lamprey, River lamprey and European eel. Natural England has become concerned about the impact of upstream development proposals on migratory fish species designated as part of the Severn Estuary Special Area of Conservation (SAC) and Ramsar Site, which spend part of their life cycle in the wider Severn hydrological catchment.

The recent judgement (Case C-461/17 Holohan v An Bord Pleanála 7/11/18) highlighted the importance of consideration, as part of EIA and HRA, of potential implications for habitat types and species outside the boundaries of European designated sites, those implications being liable to affect the conservation objectives of the site. As the Plan falls within the hydrological catchment of the Severn Estuary SAC/RAMSAR, we would advise you consider potential impacts on these sites from the proposed plan.

As part of ongoing dialogue with neighbouring planning authorities it has been established that, subject to physical obstacles to passage, these species may be found throughout the Severn hydrological catchment. The Severn Estuary SAC's conservation objectives (weblink) include a requirement to both maintain and restore natural habitats and species of European Union interest at favourable conservation status. This Place Plan provides an opportunity to remove any barriers to fish migration and to enhance the river and riparian habitat through creation and restoration, ensuring good water quality and enabling people to enjoy and connect with nature. The Unlocking the Severn (weblink) project is working to restore the Severn to enable fish to move within the river and to increase people's engagement, and the Plan maybe an opportunity to work with this project. Further information on some of their work can be found here (weblink).

Council Response: Thank you for your comments. Project CC3 will be amended to reflect your representation and encourage integration with the Unlocking the Severn project.

Policy CC-f will be amended to add reference to the importance of protecting the Severn Estuary SAC including seeking schemes that remove barriers to fish migration within the River Severn and which enhance the river and riparian habitat.

Given the concerns you raise the Council's Ecologist has been asked the review the Draft Place Plan. It is considered that HRA screening is most appropriate at the more detailed project (planning application or pre-application) level. However, attention will be drawn to the over-arching LDP policy (Policy DM2 The Natural Environment is already referenced) by including additional wording in the introduction section to highlight the relevance of both SACs and further raise awareness of need to conduct HRA to ensure that development does not have adverse effect.

by: Representation No

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6992 Powys County Council (Cllr Rowlands)

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
6992.P1		19/02/2021	<input type="checkbox"/>		C	W	M		Summary: Welcomes the Plan, comments on recovery post Covid-19 including support for mental health especially for children and young people

Document:Newtown Place Plan SPG

Question *Representation Texts***Question: Details**

Representation Text: . Due to the pandemic and the huge impact this will have on everyone particularly children and young peoples especially impacting mental health in particular anxiety etc. Is it worth having something in the plan on how this will help in this particular area? In the report it states that the Impact of Covid-19 Due to Covid-19 restrictions, the majority of community facilities, were forced to close their doors. The government has recently announced a £26 million support package for the whole of Wales, intended to provide grants of £10,000 to eligible small charities within retail, leisure and hospitality.

I know this would involve a wide range of services but I think it would be reassuring for everyone in the community that the town council are potentially making an effort to help with this. Or at least working alongside other services. Just a thought.

Council Response: Thank you for your comments. Wording changes have been made (Impact of Covid section) to further recognise the impact of the pandemic on health and well being including on mental health. Please also note the relevance of Project HW6.

Place Plan SGP Reprs and Draft Responses

Powys County Council Local Development Plan

by: Representation No

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7024 Davies, Norman

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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7024.P1		28/02/2021	<input type="checkbox"/>	E	C	W	M		Summary: General support but disagrees with Active Travel section as currently worded
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Document:Newtown Place Plan SPG

Question *Representation Texts*

Question: Details

Representation Text: . Overall fine except for the Active Travel section.

My particular comments relate to the section on Active Travel – the overall policies Ata and ATb I do not agree with.

Basically, the Council should be seeing active travel as walking (most important) and walking to/from public transport. Too much of the policy (and subsequent expenditure) relates to cycling which is a very minority interest in a rural area which is very hilly. The current footpaths are not well maintained (no doubt understandably given financial restraints). Thus, the emphasis should be taken away from cycling – also note restrictions on private vehicle use which will result from the pro-cycling lanes/cycling policy and potentially block all active travel ideas.

The emphasis should be on a system of well-lit well-maintained footpaths between key housing areas and the town centre, and to/from rail and bus station. Cycles are currently a real menace on the pavements of Newtown and cycles/pedestrians simply do not mix

Council Response: Thank you for your comments. Whilst we understand your views, it is important to realise that the Active Travel Act places equal emphasis on walking and cycling as modes of sustainable travel. We will pass a copy of your comments to the Council's Active Travel Officer. Active Travel is designed to encourage people to move away from the car for purposeful journeys. It does not displace the need for footpaths and other public routes to be upkept and made suitable for safe and easy use. We will ensure that our Highways department are notified of your concerns regards cyclists using the pavements and causing nuisance and of the general problem you experience in terms of footpaths being poorly maintained. Note also that the Town Council are working on an audit - Project ST1, AT1 and AT2 are relevant.

by: Representation No

Filtered to show: (all of) Document=Newtown Place Plan SPG

7105 Ryan-Ridout, Ms Carole

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
7105.P1		17/02/2021	<input type="checkbox"/>	E	C	W	M		Summary: Views and Suggestions on the Historic Environment, Regeneration and Tourism Issues

Document:Newtown Place Plan SPG

Question Representation Texts

Question: Details

Representation Text: . Historic Character – Comments Made Previously- more comments in bold (PCC OFFICER NOTE: comments made to the NLTC at earlier stages not at SPG stage). I have been giving more thought to 'character areas and design' especially after the conversation I had with one of the consultants after the last event who echoed my thoughts on the lack of articulation in the town (its rather disjointed nature). This is due of course to two major events in the 1960s that disrupted the medieval grid iron plan conceived by its founder.(I am a former Principle Planning Officer and Head of Historic Environment in an adjacent Authority and worked with a number of similar historic towns).

1)The first of these was the demolition of Pryce's mansion, a magnificent timber framed manor house and the utilisation of its country park as a bus station and gigantic carpark etc. 2)The second was the demolition of almost all the industrial terraced housing leading down to the river. I dealt with both in my presentation to the Civic Society and you have this document. BOLD 1)Although there is some mention of the former country park and the need for more greening* in the plan it need more careful thought. Recently a monstrously large block of flats has been built fronting onto Back Lane which is exactly what would militate against trying to reclaim this former magnificent country park. END BOLD

*Dealing with the first, more greening and tree planting is needed to soften the large areas of tarmac in and around the bus station and car park, so that something of the character of the country park could be returned. (What a tourist destination this could have been!). BOLD But this should only be the beginning of reclaiming this country park for locals and visitors (tourism). END BOLD

2)With regard to the second, the tree planting done in the medieval shut/alley leading down to St Mary's has been successful and softens the effect of the loss of character of this 'shut/alley/ginnet' but more green spaces are needed around the very large complex of flats that replaced the housing in the area and which now over dominates it and where a rather dead island structure is placed.

I may have missed it but there does not appear to be any mention of dealing with this area. This would soften the impact of this 1990s development. In addition this could be a carried into Severn Street, to link this street with what remains of Severn Square (again badly affected by previous demolitions). BOLD Severn Street and Severn Square would make an ideal zone for street cafe culture, but again a grant scheme for which funding would need to be sought, would need to be in operation to encourage would be cafe vendors. It would ensure that the derelict shop would prove viable. One building already has a glass awning and possibly more could adopt this approach to cope with the uncertain climate. END BOLD This street may eventually become almost totally residential, as there are already empty shops and shops with limited opening although an emphasis on cafe culture could be an alternative option . Attention to the shuts leading into Broad Street is also needed. Floorscape and walling material are crucial to their appearance and both have suffered in the post war period, but small craft enterprises which already exist should continue to be encouraged and more could also benefit these areas. BOLD There is no mention of doing this. These shuts are an important feature of the town as they lead down to the river. The corresponding features/lanes on the other side of Broad Street are even more bleak with blank walls of rebuilds forming the sides of the street. Something to break up these blank walls is urgently needed. END BOLD

*Trees are of course a problem, particularly at certain times of year (Autumn)and their root systems can be disruptive. The type of greening needs careful thought. BOLD It is suggested that trees be put in large planters, but the wooden planters for flowerbeds that have been put in Broad Street currently are not particularly welcome. They give the street a disjointed appearance, take up valuable car parking spaces, and will be major maintenance issue in the future. Broad Street already has a green setting by virtue of the hills that can be viewed at either end of the street and which are a major asset. END BOLD.

REMAINDER OF TEXT IN BOLD (I.E. NEW COMMENTS):

The need to stimulate the repair of Penygloddfa area is beyond question but no means of suggesting how this is to be achieved is put forward. What is needed is a grant aided scheme for basic repair, similar to the town schemes of old, analogous to the Heritage Actions Zones in England. Without this existing landlords, largely of the social housing variety will continue to tenant buildings into they fall into total disrepair and then hope to gain a cleared site for redevelopment. Sources of funding should now be sought from the Welsh Assembly.

The Crescent Buildings need to be considered as a separate area zoned for special repair treatment. This is a unique feature of the town, modelled on similar buildings in Regency

by: Representation No

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
7105.P1		17/02/2021	<input type="checkbox"/>	E	C	W	M		Summary: Views and Suggestions on the Historic Environment, Regeneration and Tourism Issues

Cheltenham, and again social housing. Whilst not decrying the use, landlords may similarly treat them as stated. It cannot be over emphasised how important they are architecturally, despite the rash of illegal plastic windows in these listed buildings, or how important they are as a picturesque enclosure to one end of Broad Street.

Key to reinstating the much needed character and economy of Newtown is the need to find a new use for the listed empty buildings, St Davids Church being the most in need, followed by Bethel Chapel, United Reform Church (is this the derelict chapel with holes in the roof in which case another church on the corner of Park Street needs to be included), The Grapes in Commercial Street, and the Flannel Factory in Bryn Street. No 2 Commercial Street was on this list but the ugly green board has been replaced by illegal plastic windows, with an unfortunate configuration. It is pious to hope that writing to owners of empty buildings will achieve anything other than silence. They are going to be all too aware that they are sitting on plots which if cleared would be ripe for redevelopment. The former English Heritage published 'Stopping the Rot' a manual to guide local authorities on which legislation to use to encourage sale or repair. (CADW have not produced a similar document presumably because it would be repetition). Any competent person in an Authority can use this document to devise a carrot and stick approach i.e. funding for a feasibility study or grant for repair versus threat of legislation or simply the latter. This has been proven to stimulate action. That there is some urgency here is without question. Any empty building is in danger of dry rot to truss and rafter ends and ultimate collapse of the roof. Inertia of air in a closed building can promote moisture transfer into roofing construction, particularly those abutting solid masonry, leading to the growth of dry rot mycelium. St David's Church is particularly at risk having been empty for some 15 years.

Pedestrianisation of Broad Street and High Street.

Exponents of this appear to have lost sight of the medieval plan which still exists and how it functioned and why it is still viable today. Set out in the early Middle Ages, Broad Street would have been designed to cope with a morass of carts being pulled by oxen, with the carts acting as stall. High Street was a specialised horse market with wide grass verges (such a contrast to the present sea of tarmac which surely needs to be replaced with a more attractive tegula hard standing). Market Street was part of Back Lane to enable exit of market traffic into the remainder of Back Lane, and was only developed in the 19thC as a shopping area. The 18thC saw the carts in Broad Street replaced by some horses and carriages but the street was still a hive of activity, particularly on market day. Today's cars are simply the next phase in this area which needs to be busy and active to create much needed vitality in the conservation area. To pedestrianise would create a deadly dull area. There are numerous examples all over Britain, one of the most notable being Market Street, Poole in Dorset. As for a cafe culture, whilst it has been suggested for Severn Street it must be remembered that the Welsh climate is primarily a rainy affair, so unless the street was to be covered with a gigantic roof, it would be difficult to see how such an outdoor eating culture would survive. By far the most important reason to preserve the status quo is the need for the quick turn-around for visiting cars whose occupants want to purchase one or two items and then leave. This is the only way existing shops, already starting from a negative stance, due to the pandemic, will survive. In particular the elderly and mums with prams rely on this aspect. Back Lane car-park is largely a white elephant, as it is simply too expensive and too far for the elderly, disabled and others desiring a quick visit, to patronise particular shops. Ditto Ladywell car-park. The nature of the existing shops caters for this passing vehicle enabled footfall and any attempt to interfere with it will exacerbate the already depleted economy.

Finally Newtown needs to be made into a tourist destination. Thousands flock to Llangollen to congregate on the bridge, and see the self same river formation as exists in Newtown, where the bridge is of even more importance being purpose designed by Thomas Penson, as was the Wool Mart (Regency Centre) and St David's Church. Three such important structures by one historically famous architect surely renders Newtown of key importance in the tourism stakes, coupled with the world famous flannel industry and catalogue initiative of Pryce Jones. The only way to achieve this is for a financial stimulus package to upgrade derelict and under-used buildings in conjunction with the Senedd.

Council Response: Thank you for comments which are noted. The retention of character, respecting the historic environment, the greening of spaces, the vitality of streets and the positive re-use of redundant buildings are all important planning principles. As Place Planning rolls out (see also the Design Commission for Wales consultation comments) we expect to see an even greater emphasis on the holistic consideration of these issues. Regarding tourism, you will note the Place Plan contains a chapter on Destination Newtown which is all about improving the tourist offering of the town.

Your views, including the presentation "Newtown and it's Hinterland through the eyes of a Conservator" will be captured in the supporting evidence sections to ensure they are properly considered at subsequent stages. Resulting from your representation, please see the changes the Town Council have made to project CH1. In terms of the usage and regeneration of the town centre, please see the revised project TC1 and the revised timescales in project CH10.

Place Plan SGP Reps and Draft Responses

Powys County Council Local Development Plan

by: Representation No

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7106 Davies, Owen

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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7106.P1		09/02/2021	<input type="checkbox"/>	E	C		M		Summary: Comments on plans to pedestrianise streets
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Document:Newtown Place Plan SPG

Question *Representation Texts*

Question: **Details**

Representation Text: . My thoughts are:

- Re instate the parking on Broad Street to pre. COVID. (Not being able to park sends consumers to the out of town centre and town stores.)

- Don't pedestrianise Broad Street - this would kill the town centre totally, if you must do one street I would do High Street, the impact would be a lot less damaging.

Council Response: Thank you for your comments which are noted. If any streets are proposed to be pedestrianised (see Project TC2) there will be a further opportunity for involvement. Across Powys, towns will be adapting to post Covid-19 recovery. The Town Council will be able to co-ordinate local views on the issues such as the Broad Street changes to ensure that longer term solutions are truly "fit-for-purpose". Some of the emergency/short term changes may not be suitable to retain longer term and the issues can be properly assessed going forward working in conjunction with PCC.

In terms of the usage and regeneration of the town centre, please see the revised Project TC1.

by: Representation No

Filtered to show: (all of) Document=Newtown Place Plan SPG

7107 Oriel Davies Gallery

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
7107.P1		17/02/2021	<input type="checkbox"/>	E	C	W	M		Summary: Support for the Plan, observations on culture, arts and tourism content

Document:Newtown Place Plan SPG

Question *Representation Texts*

Question: Details

Representation Text: I support the plan but make the following observations:

Page 9 In the industry section there is no reference to cultural or creative industries.

Page 12 economy: accommodation and food services are mentioned, why not tourism businesses?

With reference to important people there are no Welsh language speaking examples such as John Davies, the triple harpist (who also connects with Romany and Gypsy culture).

Although the plan shows how it aligns with well-being goals, by the time we reach the vision, there is no mention of a vibrant cultural scene, nothing about cultural tourism destination. There is potential for future WG national developments involving Oriel Davies and contemporary art venues. We are the only Arts Council revenue funded visual arts organisation in North Powys.

The arts and culture are key drivers for economic development as well as improving place and mental health and well-being. There is increasing awareness of the importance of support for the growth sector of creative industries. The plan places too much emphasis on employment and manufacturing in the mid 21 century when the majority of creative businesses are increasingly small start ups.

Council Response:

Thank you for comments. Whilst acknowledging the importance of the cultural and creative industries, the Town Council advise that the section (page 9) was taken from external source material so it would not be appropriate to change.

Again,on page 12, the section reproduces data from an original graphic so it is not appropriate to change.

In response to your representation, the document has been amended to incorporate wording changes (Intro section) regarding the triple harpist John Roberts and, in the Vision section, to further highlight the benefits of a vibrant cultural scene.

Thank you for your views concerning the (over) emphasis on employment and manufacturing. However, we consider that the Place Plan does emphasise the arts, culture and small businesses appropriately including their connection to well-being. Therefore, no changes are considered necessary.

Page 958

by: Representation No

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7108 Canal and River Trust/Glandŵr Cymru

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
7108.P1		05/03/2021	<input type="checkbox"/>	E	C	W	M		Summary: Comments and proposed changes to sections concerning the benefit of the canal

Document:Newtown Place Plan SPG

Question *Representation Texts*

Question: Details

Representation Text: Glandŵr Cymru, the Canal & River Trust in Wales, (the Trust) cares for Wales' historic canals, made up of the Swansea, Llangollen, Montgomery and Monmouthshire & Brecon Canals, holding them in trust for the nation in perpetuity. A small section of the Montgomery Canal to the east of the Place Plan Area, from Freestone Lock, is held within the Trust's ownership. The Trust notes the long-term ambition highlighted within the Place Plan to work towards the restoration and re-watering of the canal into Newtown as set out on page 89 of the draft, and the resolution to work with the Trust to this end.

The Trust previously provided comments to an earlier draft version of the plan on 9th March, 2020.

Policy CH-f

The Trust notes the addition of cross-referencing to other canal-related policies and projects. We would recommend that in addition to the current text, the wording of this policy makes reference to proposals for the 'sensitive' repair and restoration of the Montgomery Canal to ensure consistency with other policies in this plan (notably Policy T-a).

Policy CC-f

The Trust welcomes the recognition given to the canal's status as a designated Special Area of Conservation.

1.5 Health & Well-being (page 55)

This section refers to the key role that Open Spaces (including waterways) play in supporting the health and well-being of the community, noting the links between this topic and others in the plan. It is considered that this section could go further to reflect the distinct benefits associated with waterways in terms of health & wellbeing. Canals are special amenity spaces and routes, which help improve connectivity between places, enhancing liveability and supporting healthy and active living. This has been witnessed during the Covid-19 pandemic when many of our towpaths have seen significant uplift in usage, as people looked to local greenspace for recreation and wellbeing opportunities demonstrating the value of this type of accessible asset for local communities. Crucially, the Montgomery Canal offers the community access to health and wellbeing, while also providing vital links to other green and blue spaces. While the majority of the canal corridor within the Place Plan area has yet to be restored, any future restoration project may wish to note the potential to provide a range of social, economic and environmental wellbeing benefits for local communities. We would therefore welcome specific recognition of the canal's health and well-being benefits within the plan.

Policy T-a

The Trust welcomes additions to this policy following our previous comments and acknowledge reference to sensitive restoration and improved signage as ongoing projects. We note the additional reference of the canal as a multi-functional resource and while this is true with regard to tourism, these benefits extend beyond this topic area. As noted above, the multi-functional nature of the canal has the potential to bring multiple health and well-being benefits. These wider links could be acknowledged within the policy.

2.1 Open Spaces (page 66)

This section refers to a number of important functions of green spaces in the Place Plan area. While reference is made to the canal path and canal dry bed within Appendix 13: Open Spaces of Importance to the Community, this could be reinforced within this section. We recommend consideration of the following amendment: "Green and blue spaces provide several important functions to society..."

Council Response: Thank you for your comments. The over-arching Local Development Plan contains a strong emphasis on the protection of the canal/canal route for its own sake and for its multi-functional benefits (Policy TD3 LDP). The Place Plan has added further detail to these aims in the local area. Further to your representation wording changes have been made to Policy CH-f and Policy T-a and to the Open Spaces section at 2.1.

Place Plan SGP Reps and Draft Responses

by: Representation No

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<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>	<i>Summary</i>
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7108.P1		05/03/2021	<input type="checkbox"/>	E	C	W	M		Summary: Comments and proposed changes to sections concerning the benefit of the canal
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Please be advised that for planning purposes, open space is defined as having "public value" including land and water (Technical Advice Note 16). As we consider green infrastructure to include blue spaces, we would discourage the deliberate separation of the two terms to avoid confusion. However, "Waterways" have now been added to the definition/ types of open space listed under the title at 2.1 in the Place Plan as we realise this was an omission.

by: Representation No

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7131 Local Access Forum

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
7131.P1		18/03/2021	<input type="checkbox"/>		C	W	M		Summary: Comments on Newtown Place Plan - more reference should be made to PROW

Document:Newtown Place Plan SPG

Question *Representation Texts***Question: Details***Representation Text:* . We very much welcome the development of this plan and our comments are set out below under the various Headings within the document.

Character and Heritage

Rights of way are part of the heritage of Newtown. They have been used for generations and tell a story about the history of the area. It would be helpful if this could be made clearer in this chapter and mentioned specifically in one of the policies.

We are very much in support of project CH3 to seek funding for the repair and renewal Dolerw bridge.

Housing and future development

On policy HFa it would help to demonstrate the importance of non-vehicular routes when considering housing developments, if this policy could explicitly refer to taking opportunities to link pedestrian routes on estates to the existing rights of way network.

It would also help to be clear in the policy that any changes of rights of way required by housing developments will require, at least, the same length of path to be re-provided.

Community facilities

On Policy CFa can it be made clear please that rights of way are considered to be community facilities and, as such, any proposals that will result in their loss will be strongly resisted?

Business, learning and employment

We are very much in support of project HW5 - seeking funding for a project to construct an accessible path up and around Trehafren Hill in conjunction with the already built cycle track.

A safe and tidy town

On project ST1 can specific reference be made to rights of way please as they are often in a much worse condition than normal pedestrian routes? That is also the case with some of the furniture on rights of way, e.g. stiles, bridges etc.

Green Newtown

On Policy OSa which refers to the loss of public open space arising from development being resisted, can this be expanded to specifically mention rights of way as well please?

We are very much in support of project OS2 to enhance the use of the river and open spaces. Could this be expanded to refer to rights of way please?

Active travel and transport

On Policies AT a & b about securing pedestrian and cycle ways in new developments, can specific reference to improving existing rights of way be included here as well please? Can consideration also be given please to pursuing new routes to be made rights of way?

On project AT2 can it be made clear please that this audit should include all rights of way? It would also be useful to build in further audits in future years to identify and then resolve any future maintenance issues.

We are very much in support of projects AT4, AT7, AT8, AT9, AT10 and AT11 about improving and protecting footpaths and bridleways.

by: Representation No

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
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7131.P1		18/03/2021	<input type="checkbox"/>		C	W	M		Summary: Comments on Newtown Place Plan - more reference should be made to PROW
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What the needs of walkers and cyclists are mentioned in the plan, there is little reference to horse riders. It is important that account is taken of the needs of those wishing to travel by horse. By way of example one of our members has referred to a recent trip into Newtown on his horse to take him to the veterinary surgery. He rode into town from the west along the Llanidloes Road, passing under the Nantoer railway bridge, where there is no alternative to the main carriageway, and sight-lines are particularly restricted. Improvements to the traffic management arrangements need to take account of horse riders.

Tourism, culture and attractions

On policy Ta in the list of welcome tourist initiatives, can reference be made please to projects which aim to encourage tourists to take advantage of the rights of way in the area?

Horse Riders

Newtown has the only river crossings for several miles in either direction, and so is an essential link between bridleways on either side of the river. It would therefore be helpful please to look at the provision of a safe route to and across the river for horse riders.

General

It will be apparent from the comments above that we think there should be more reference to rights of way in the Plan. We would be happy to offer further advice as the Plan developed so please keep in touch with us on this matter.

Council Response: Thank you for your comments. We understand the importance of protecting and improving rights of way for all users. The Local Development Plan (to which the Place Plan is subsidiary) contains Policies SP7(3), DM13(9) and Transport policy T1 to this effect.

We read your comments regarding horse-riding with interest. It is obviously important to know how paths are valued and used locally and where improvements could be made (such as the River Crossing issue to enable access to bridleways).

We will pass a copy of your comments to the Council's PROW team and the Council's Active Travel Officer to alert them to your views.

The Local Access Forum's support to various policies/projects in the Place Plan is appreciated. In response to your proposed alterations surrounding more mention of public rights of way, additions have been made to the Active Travel Key Facts section, the supporting evidence section (Character and Heritage), to Policy HF-a, Project ST1, Policy OS-a and Project OS2. We also include the Local Access Forum as a Suggested Collaborator for Project AT3 where safe routes for horse-riders can be given consideration.

With these additions and given the statutory protection offered to PROW we do not consider other changes to be necessary.

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

REPORT AUTHOR: County Councillor Beverley Baynham, Portfolio Holder for Corporate Governance and Regulatory Services

REPORT TITLE: Annual Information Governance Report 2020-2021

REPORT FOR: Information

1. Purpose

1.1 To brief Cabinet on the on the Information Governance (IG) activities undertaken, practices implemented, and the standards of IG compliance achieved for the financial year 2020/2021

2. Background

2.1 Powys County Council has in place an Information Management Assurance Governance (IMAG) plan to initiate, develop, and monitor policies and practices in relation to information security, information management, and information risk, to ensure compliance with relevant information legislation and standards.

2.2 This report is supported by the following appendices,

- Appendix 1 – ICO Enforcement training graphs
- Appendix 2 - Information security incident breakdown

3. Information Management Assurance and Governance (IMAG) Plan

3.1 The 2019-2021 IMAG plan was agreed by the Corporate Information Governance Group (CIGG) in March 2019. The plan details the execution of activity and objectives to improve IG practices within the Council. It also identifies and manages the ongoing IG work that takes place to maintain levels of compliance with information legislation, and standards of good practice.

3.2 In December 2021, CIGG agreed a revision of timescales due to the impact of COVID 19, and IG work undertaken in support of the Council's response to COVID 19 and Test Trace and Protect (TTP) work both for Powys County Council and on a wider national basis.

3.3 As at the 31st March 2021 there were 50 elements to the plan,

- 16 had been completed (32%),
- 27 were in progress and still within the revised timescales (54%),
- 7 were out of timescales (14%), which included the elements of Information Asset Registers, controls when working with others, review of the Corporate Retention Schedule, computer system audit

functionality, Council constitution changes, review of the Terms of Reference of the Information Governance groups, and relevant training for Information Asset Owners (IAO) /Senior Information Asset Owner (SIRO)

3.4 Four CIGG meetings have taken place in the year where implementation of planned practices is considered, and challenged where timescales have not been met, and areas of concern discussed, and actions required identified. These meetings are chaired by the SIRO

3.5 CIGG meets quarterly; and within the year returned to routine meetings as described with its Terms of Reference.

3.6 Additionally, regular Corporate Information Governance Operational Group (CIOG) meetings have taken place, involving representatives of the Information Asset Owners (IAOs), to discuss and monitor IG matters and measurements and to carry out work activities as directed by the CIGG.

3.6 CIOG meets every 6 weeks, and again meetings have returned to routine scheduling.

4. **ICO Enforcement Training**

4.1 In December 2012 the Information Commissioner (ICO) issued an enforcement order against Powys County Council requiring that all staff with access to personal data undertake training in the basics of the data protection and also the organisation's information policies, every 3 years.

4.2 In April 2019 the Council amended its training requirements, to be undertaken on an annual basis, and to include cyber security, reflecting those messages within the Council's information policies and revised data protection information.

4.3 In April 2021 the reporting for training was transferred from the Information Compliance team to the Business Intelligence team, to enable the provision of compliance data to managers within dashboards, alongside other mandatory training reports.

4.4 Compliance details (Departmental breakdowns at Appendix 1)

	2 nd March 2020*	2 nd April 2020	1 st April 2021**
Number of staff requiring training	2,453	2,391	3015
Number of staff trained	2,356	1,812	2314
Compliance rate	96.05%	75.78%	76.7%
Target Compliance rate	95%		

* Mixture of new and old courses

** Change to a different reporting process

Overall training compliance figures continue to form part of the IG measurements provided to CIGG.

4.5 The decrease in organisational compliance rates and the increase of noncompliance within HTR can be attributed to the decision to include HTR staff within the training requirement due to the rollout of in cab technology, but due to the jobs undertaken normal E learning was not feasible and so face to face training was implemented, but due to COVID 19 this has been greatly reduced. However due to the limits of the devices and the information contained within them, then it was considered appropriate to tolerate this risk.

5. Information Security Incidents

5.1 The council has had robust personal data breach reporting and management processes in place, for a number of years, which continues to ensure swift containment action, informed identification of information risks and mitigation, and supports relevant reporting obligations, to both the regulator and data subjects.

5.2 The table below provides details of incidents and personal data breaches, and comparison data from last year.

	2019/2020	2020/2021
Numbers of reported incidents	230	220
Number of personal data breaches	104*	115*
Number of incidents reported to the ICO	9 (1 by another organisation in respect of PCC data)	7
Number of notifications to data subjects	18	5
Number of separate complaints made to the ICO over personal data breaches	4	3**
Number of DPA breaches occurring externally	68	70
Number of DPA breaches occurring internally	21	44
Number of DPA breaches involving sensitive personal data	32	20
Number of DPA breaches contained	80	89

* using the definition of a personal data breach within GDPR. A personal data breach is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed in connection with the provision of a public electronic communications service.

** challenged regulator over data subject(s) ability to raise complaint, still awaiting a response.

5.3 A breakdown of service area & information security incident types is provided at Appendix 2.

5.4 Whilst there has been a slight decrease in the number of information security incidents reported there has been an increase of personal data breaches occurring (11%), it is likely that this increase can be attributed to changes in working locations/conditions, duties, and delivery of new and changed services due to COVID. Those that reach the threshold of needing to be reported to the ICO remain reasonably static.

5.5 Reports of information security incidents are regularly made to CIGG, and CIOG and staff are made aware of the need to report incidents and breaches through notices and reminders in relation to the incidents that have occurred. Additionally, the Information Security Incident and Personal Data Breach reporting policy and procedures were revised and re-presented to staff.

5.6 Those personal data breaches reported to the ICO include a cyber-attack on one of the Council's providers, disclosure of information through various means, such as including information within shared reports, misdirected emails, local caching of information, and failing to redact information.

5.7 In all but one case the ICO has found that the Council breached data protection legislation, though has recognised that in most cases this has been due to human error in failing to follow organisational measures put in place to prevent breaches of personal data, rather than the Council not having the necessary measures in place.

5.8 Whilst no regulatory action, such as fines or enforcement orders, have been made against the Council, where the ICO has recommended further improvements, such as service/role specific training, checking processes employed, then these are implemented by the relevant service area or organisation as appropriate.

5.9 The ICO has provided 27 recommendations, within their decision notices. At this time, 17 have been implemented, and 10 not yet implemented. The implementation of recommendations maybe part of wider pieces of work, which have been delayed due to COVID work.

5.10 Some recommendations are repeated within ICO decisions.

5.11 The three complaints to ICO relate to disclosure of information. In two of the three cases, a breach of personal data had occurred. Where the Council was found to have breached personal data then no further recommendations for improvements were made.

5.12 In the third case the decision as to whether a personal data breach occurred was made without affording the Council the opportunity to respond to the complaint made. The Council continues to challenge this decision and the ability of the data subject to raise the complaint made to the ICO.

5.13 The reporting and management of information security incidents and personal data breaches continues to allow the Council to identify areas of vulnerability and information risk, enables the development and introduction of relevant policies, processes, and or training in order to reduce the likelihood of the vulnerability being further exploited and causing a serious breach of the data protection legislation, or affecting the integrity and availability of important information assets.

5.14 Processes in place ensure that the cyber security and information compliance areas complement each other when responding to cyber incidents which also affect personal data.

6. Information Requests

6.1 There were 1000 valid information requests covering the Freedom of Information Act (FOI) 2000, Environmental Information Regulations (EIR) 2004, or the UK General Data Regulations Subject Access Request (SAR) information regimes, this is against 1295 last year, a decrease of 23%

6.2 The decrease can be attributed to COVID 19, and requestors understanding the additional burdens placed on public authorities. Whilst the ICO initially indicated they would be a pragmatic regulator during these times, the timescales in responding to these information requests could not be changed without changes to the legislation itself.

6.3 The Information Compliance team continued to deliver services throughout this time and attempted to release some pressure on the service areas by attempting to gather relevant information where it was possible to do so.

6.4 The Information Commissioner has indicated that she expects a 90% compliance rate.

Information Regime	Numbers received	Compliance rate	Compliance up or down
FOI	789	86%	+17%
EIR	143	94%	+36%
SAR	68	87%	+28%
Overall	1000	85%	+20%

6.5 Where records indicate reasons for non-compliance with FOI/EIR timescales, then,

- 80% of non-compliance was due to delays by the service areas.
- 15% of non-compliance was due to delays by the Information Compliance Team themselves. Primarily due to large complex requests requiring inspection, redaction and /or decisions over the application of exemptions.
- 5% of non-compliance was due to other factors, such as the impact on COVID 19.

6.6 Based on the above then had the only delays experienced been by the Information Compliance Team then the organisational compliance rate for FOI/EIRs could have been around 97%.

6.7 Reports detailing reasons for lateness, were supplied to CIGG.

6.8 These figures do not apply to UK GDPR SARs since the delays experienced are predominantly due to the Information Compliance team. Most

SARs involve large volumes of files, records, emails, documents etc, which have to be examined and considered for disclosure, redacting information where not appropriate for disclosure or not the personal data of the requester.

6.9 Due to the imposed new ways of working then it has been necessary to develop and implement electronic processes for responding to UK GDPR SARs. To modify the transfer of information from the Services, to create electronic versions, of documents, since many SARs still involve manual records, and to make the disclosure to the individual electronically as well.

- 6.10 The improved compliance rates can be attributed to
- Reduced number of information requests
 - Recruitment during the year to the vacancies that had been created in the previous year, by the loss of staff.
 - Filling the vacant Information Compliance Manager post, however this had a knock-on effect on the DPO for Schools post.

6.11 Details of complaints over information requests

Complaint to Powys County Council – internal review	24 (↓12)	Complaint made directly to the ICO	2 (↓5)
Over lateness			2
General disagreement with response	15		
Application of exemption	9		
Outcome – complaint not upheld	5		
Outcome – complaint upheld	1		2
Outcome – complaint partially upheld	2		
Withdrawn	6		
Still under consideration at 31-03-21	10		

- 6.11 During the year, the Information Compliance Team,
- Was not able to continue with the project to develop automated information request processes and reporting, and service management dashboard reporting. This work has re-commenced at the start of the 21-22 year.
 - Recruited two new members of staff, who commend home working from the start of their employment with Powys County Council, and which also includes the training on handling information requests and other IG activities.

7. Resources Available

7.1 The Information Compliance Team delivers the majority of the Council's information governance functions, including that of a designated Data Protection Officer, for the Council, and a DPO for Schools Service. All formal information requests are handled, managed, and responded to by the Team.

7.2 The Team would normally be comprised of 5 Information Compliance Officers, 1 Information Compliance Manager, 1 Data Protection Officer Schools, and 1 Professional Lead Data Protection.

7.3 However, with 3 of the 5 Information Compliance Officers leaving in 19-20, and the subsequent impact of the COVID pandemic and lockdown then the recruitment of 2 new Information Compliance Officers was not finalised until the summer of 2020. The previously vacant post of Information Compliance Manager was filled in March 2020, but this left the DPO Schools post vacant.

7.4 From April 2020 to August 2020 one member of staff was redeployed on COVID work.

7.5 The Professional Lead Data Protection undertakes both DPO and IG activities, in addition to the roles of Regulation of Investigatory Powers Act 2000 (RIPA) Co-ordinator, and Senior Responsible Officer for Camera Surveillance.

7.6 A review of the Information Compliance team has been undertaken in light of changes required to the team and also for the budget savings required. These changes are currently under consultation.

8. Data Protection Officer

8.1 All public authorities are required to have in place a designated Data Protection Officer whose position and tasks are detailed within data protection legislation.

8.2 In addition to the provision of advice and support, the DPO undertakes its monitoring responsibilities through reporting processes, working closely with service areas providing advice & support, managing the mandatory assessment of data protection risks for new ways of working or projects (Data Protection Impact Assessment). etc.

8.3 The DPO over sees the reporting, investigating and management, of personal data breaches and where the breach is of such seriousness ensures notification to the ICO, and if required undertakes the necessary investigations.

9. Cyber Security

9.1 The ICT Cyber Security Manager delivers a joint service under the Section 33 agreement with Powys Teaching Health Board. A Cyber Security Officer has also been recruited to assist with this growing area of work.

9.2 In November 2020 the Council achieved Cyber Essentials Plus and IASME Gold accreditations.

9.3 Cyber Essentials is a Government-backed, industry-supported scheme to help organisations protect themselves against common online threats. The certification enables organisations to reassure customers, partners, and other business that cyber security is taken seriously.

9.4 The Information Assurance for Small to Medium-sized Enterprises (IASME) was designed as a security benchmark enabling organisations to assess the level of their information security maturity, against a set of nationally recognised standards. IASME Gold accreditation involves on site audit on the level of information security provided by the organisation. The Council continues to achieve its PSN compliance status, allowing the sharing of Data with Central Government departments such as the DWP.

9.5 During the Covid Pandemic, the Cyber Resilience programme has proven effective in preventing any major Cyber Security incident from impacting on the work of the Council. The Council was prepared for and continues to provide a safe and secure ICT provision for staff to work from home. Cyber Aware bulletins have been issued during this time to staff in order to inform and raise their awareness of the current Cyber Security threat.

9.6 The Welsh Government have been proactive in providing 3 rounds of funding for Cyber Resilience during the financial year. Powys County Council has used their funding to provide tailored training courses for the recently recruited Cyber Security Officer as well as obtaining a professional Qualification (CISSP) for the Cyber Security Manager. Further funding has been used to invest in additional Cyber Resilience tools to protect against ransomware attacks and a programme of work to increase training and awareness for all staff on the threat of Phishing emails.

9.7 The Cyber Response plan continues to be developed and will be a key part of the Cyber Resilience Strategy.

10. DPO for Schools Service

10.1 The Information Compliance Team also deliver a DPO service and IG support for each of the Schools in Powys, rather than each having to employ their own DPOs.

10.2 The Head of Schools Services is provided with an annual DPO for Schools report, in line with the school year. The 2019-2020 report having been issued in October 2020.

10.3 From September 2019 to March 2020 this work has consisted of over 370 separate pieces of data protection, and information governance advice, for example on information sharing, security of pupil work through the use of Apps, on-line teaching queries, information requests, and also in support of personal data breaches, and Data Protection Impact Assessments.

10.4 Only one personal data breach involving a School met the threshold for reporting to the ICO.

10.5 Work of the DPO schools is included within reports to CIGG quarterly, even though for the purposes of data protection they are separate controllers.

10.6 The DPO Schools post has been vacant since March 2020, with the duties being shared between the Information Compliance Manager and the Professional Lead Data Protection.

11. Information Management Service

11.1 Throughout the pandemic and as the Council invoked its Business Continuity Plan, staff have been on site 5 days a week, as it was felt important to continue file retrievals for those council services who continued to operate. Information Management also store and operate a records management service for PTHB, and again it was considered essential that file requests were processed as quickly as possible. On one day alone in January 2021 they requested over 100 patient files from store.

11.2 Staffing issues have plagued Archives and Information Management for over 18 months and has prevented the provision of management information to CIGG. Attempts have been made to recruit a second archivist (in addition to the Professional Lead Arts and Culture) since January 2020. This has created significant pressures on staff time, with tasks such as cataloguing and accessioning of new archive collections being put on hold as the remaining staff focus capacity on day-to-day responsibilities.

11.3 During the year the service has commenced a specific piece of work with some service areas in relation to the retention and deletion of both hard copy and corresponding electronic records.

12. COVID/TTP

- 12.1 The impact of the pandemic has resulted in
- All members of the Information Compliance Team working from home, including the newly recruited staff.
 - The planned movement from manual SAR work to electronic had to be escalated and implemented quickly. This implementation work remains ongoing to ensure solutions developed are robust and secure.
 - A slight reduction in information requests received, and whilst the ICO indicated initially that they would be a pragmatic regulator, the legislation around response timescales did not change, and so this service had to be maintained. Additional support was provided to the service area in the identification of relevant information to enable the Council to respond to these requests.
 - An assessment of the Council's ability to recover from the result of the pandemic on information requests, having been undertaken. Which due to the continued activity during the year has not resulted in any great recovery work being required, but which has enabled a review of current practices and identification of further improvements required, such as improved training on information requests for staff and members.

- The continued need to ensure the management and investigation of information security incidents and personal data breaches, and responses to those wishing to exercise their data protection rights.
- Involvement in local and national groups considering and managing the data protection issues around the use of personal data to support the NHS Test Trace and Protect service, and the Council's wider response to COVID issues, such as information sharing agreements, analysis and development of dataflows, and Data Protection Impact Assessments.

13. Conclusion

13.1 Powys County Council continues to take steps to progress and improve its information management, assurance and governance policies, procedures, and practices. The work being undertaken towards compliance with data protection legislation and other information legislative regimes must continue, in order to reduce information risk, likelihood of regulatory action, and to support the Council's vision of being an open and enterprising Council.

13.2 The impact of the Information Compliance team reorganisation and budget savings will need to be monitored.

13.3 Personal data is intrinsic to much of the Council's activities, and public trust and confidence in the organisation's ability to manage and use their information appropriately is essential.

13.4 Staff awareness of information governance and compliance matters continues to improve, with a resultant rise in enquiries, requests for complex advice, and the nature and types of information security incidents being reported.

13.5 Senior Information Risk Owner's statement of assurance.
Partial Assurance - We are able to offer partial assurance that the council's arrangements adequately reflect the principles of good information governance. Some key risks are not well managed, and processes require the introduction or improvement of internal controls to ensure effective governance but plans for future improvement are in place and are monitored by CIGG.

14. Planned Activity 2021-2022

- Implement the changes to the Information Compliance Team, including changes to roles, grades, and numbers, in line with new budgetary requirements, and to also assist staff in the delivery of these revised roles, thorough training and support.
- Continue with full implementation of the electronic SAR project.
- Continue with the development of automated information requests processes and reporting, including chasing and recording of non-compliance rates and reasons, and provision of information directly to management dashboards.
- Continue to monitor training compliance rates.

- Progress, with Business Intelligence and also the relevant services, the publication of self-service data sets, based on regularly asked FOIs, including information request statistical information.
- Continued implementation of IMAG plan, in particular the review of work previously undertaken on Information Asset Registers
- Continue close working relationships with cyber security staff, to ensure both technical security standards and information governance issues are addressed in tandem.

15. Legal implications

- 15.1 Legal; the recommendations can be supported from a legal point of view.
- 15.2 The Head of Legal and Democratic Services (Monitoring Officer) notes the report and has nothing further to add.

16. Data Protection

- 16.1 The Data Protection Officer is the author of this report and has nothing further to add.

17. Comment from local member(s)

- 17.1 NA

18. Integrated Impact Assessment

- 18.1 NA

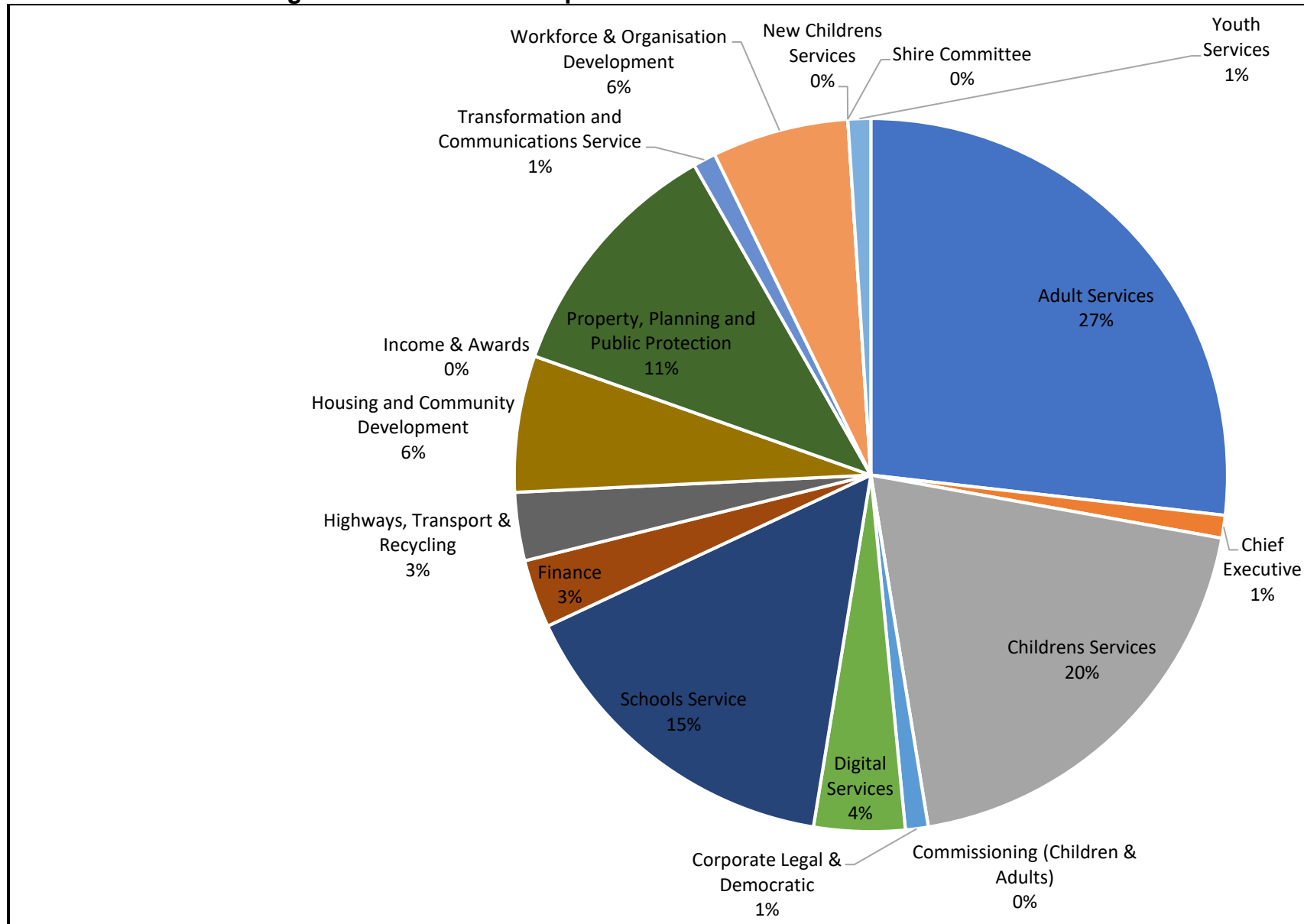
19. Recommendation

- 19.1 Cabinet notes the assurance set out in 13.5 and the planned activity for 2021-2022 as set out in paragraph 14.

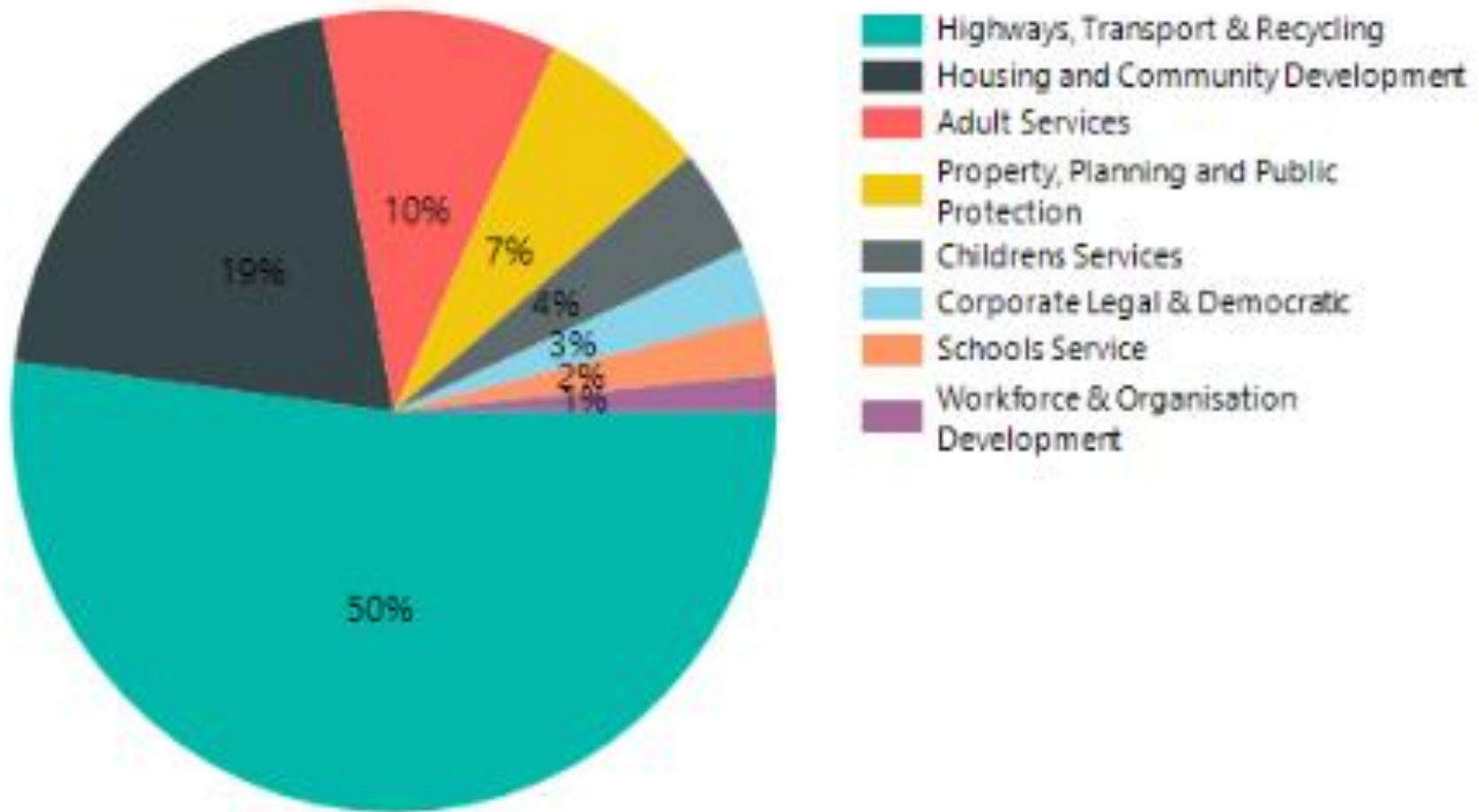
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Corporate Director:	Nigel Brinn
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ICO enforcement training March 2020 – noncompliance



Contribution to Organisational Non-Compliance by Service Area (Top 8)



Information security incident breakdown

Service Area	Numbers of incidents
Adult Services	37
Childrens Services	76
Commissioning	7
Digital Services	14
Finance	16
Housing & Community Development	9
HTR	6
Legal and Democratic services	8
Members	1
Other	3
Property, Planning and Public Protection	17
Schools Services	16
Workforce & organisational Development	10

Type of Incident	Numbers
Complaint	18
Cyber factor	6
Inappropriate access	7
Inappropriate processing of data	11
Information rights	5
Integrity of information	5
Loss of information	2
Loss/theft of equipment	1
Other	10
Physical Security	2
Unauthorised disclosure (External)	100
Unauthorised disclosure (Internal)	53

CYNGOR SIR POWYS COUNTY COUNCIL.**CABINET EXECUTIVE****Date: 13th July 2021****REPORT AUTHOR: Head of Legal & Democratic Services****REPORT TITLE: Amendments to Growing Mid Wales Inter Authority Agreement**

REPORT FOR: Decision

1. Purpose

- 1.1 This document sets out what changes are required to the Inter Authority Agreement (IAA) to ensure good governance for the development of a Portfolio Business Case and agreeing a Final Deal Agreement with WG and the UK Government.

2. Background

- 2.1 The original IAA was approved by Cabinet on 9th May 2019 and now needs amending to ensure good governance for the development of a Portfolio Business Case and agreeing a Final Deal Agreement with WG and the UK Government., strengthen Audit and Scrutiny provision sand to reflect changes to the Regional Learning and Skills Partnership.

3. Advice

- 3.1 The following are the main changes made to the draft amended IAA as set out in Appendix 1:
- Redefine scope of the “project” in the agreement to accommodate stipulated expectations and requirements for achieving Full Deal Agreement, as were outlined in the Heads of Terms document. –Development of a “Portfolio Business Case” (see small page number 6);
 - Strengthening the audit provisions (See para 4.2.6 small page number 10);
 - Including the joint scrutiny provisions into the IAA (see Sch 5 on small page number 37-39);
 - Multiple amendments to reflect that fact the former Regional Learning & Skills Partnership (RLSP) is now known as Regional Skills Partnership ((see Sch 4 on small page number 30- 36);

- 3.2 The proposed amendments to the IAA were discussed by the Growing Mid Wales Board on 21st June 2021 and the amendments were approved and recommended to the Cabinets of both Authorities to ensure good governance for the development of a Portfolio Business Case and agreeing a Final Deal Agreement with WG and the UK Government A. The amendments will be considered by the Ceredigion cabinet on 13th July 2021.
- 3.3 In the circumstances it recommended that the IAA is amended as set out in Appendix 1 to this report on the understanding that a further amendment to the IAA may be required to reflect changes required by the introduction of Corporate Joint Committees for the Mid Wales area.

4. Resource Implications

- 4.1.1 The Deputy Head of Finance acknowledges the updated IAA and the strengthening of the document in terms of clarity around Finance and audit arrangements.

5. Legal implications

- 5.1 Legal: the recommendations can be accepted from a legal point of view.
- 5.2 The Head of Legal and Democratic Services (Monitoring Officer) has commented as follows: “ I note the legal comment and have nothing to add to the report”.

6. Data Protection

- 6.1 The proposal does not involves the processing of personal data

8. Impact Assessment

- 8.1 Not required

9. Recommendation

- 9.1 That the IAA is amended in accordance with the draft set out in Appendix 1 to this report.
- 9.2 The Head of Legal & Democratic Services is authorised to sign the amended IAA.

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APPENDIX 1

THIS AGREEMENT is made the day of July 2021

BETWEEN:

CEREDIGION COUNTY COUNCIL (1)

And

POWYS COUNTY COUNCIL (2)

**AMENDED INTER AUTHORITY
AGREEMENT**

for

**AGREEING A PORTFOLIO
BUSINESS CASE AND THE FINAL
DEAL AGREEMENT**

FOR THE

MID WALES GROWTH DEAL

DATED **July 2021**

BETWEEN:

PARTIES:

- (1) **CEREDIGION COUNTY COUNCIL** of Neuadd Cyngor Ceredigion, Penmorfa, Aberaeron, Ceredigion, SA46 0PA ("Ceredigion") : and
- (2) **POWYS COUNTY COUNCIL** of County Hall, Llandrindod Wells, Powys LD1 5LG ("Powys")

together described as the "Authorities" or "the Parties"

WHEREAS

- (1) Currently the Authorities have in place an Inter Authority Agreement dated 11th December 2019 (" the IAA") in respect of the development of an Outline Business Case ("OBC") for the Mid Wales Growth Deal ("the Growth Deal") and for approval of Heads of Terms with the Welsh Government ("WG") and the United Kingdom Government ("UK Government").
- (2) The Authorities have resolved to amend the IAA to take them to the next stage of developing a Portfolio Business Case and agreeing a Final Deal Agreement with WG and the UK Government.
- (3) The Authorities have established a Joint Committee for the purpose of establishing good and clear governance around the development of an OBC for the Growth Deal and for approval of Heads of Terms with the WG and the UK Government and confirm that the Joint Committee will continue for the next stage of developing a Portfolio Business Case and agreeing with WG and the UK Government a Final Deal Agreement in accordance with the Heads of Terms
- (4) The Authorities recognise that a further and more detailed Inter Authority Agreement will be required once a Final Deal Agreement has been agreed by the Authorities, the WG and the UK Government, and the impact of Corporate Joint Committees for the Mid Wales area is better understood.
- (5) The Authorities agree that there will be no host authority and that the Joint Committee will operate on a joint partnership basis.
- (6) The Authorities agree to strengthen the joint scrutiny of the Project as set out in clause 23 and Schedule 5.

NOW IT IS HEREBY AGREED as follows:-

1. Definitions and Interpretation

1.1. For the purpose of this Agreement the following definitions apply to this Agreement and Schedules:

“the Accounts” shall mean the financial statements, records and relevant documents of The Project;

“Authorities” shall mean either Ceredigion or Powys or both as the context requires;

“Board” shall mean the joint committee as is established in accordance with this Agreement in relation to the Growth Deal;

“Budget” shall mean an itemised summary of intended revenue and capital expenditure for the Financial Year as approved in accordance with Clause 5;

“Chair” shall mean a Member acting as chair of meetings of the Board or the chair of the JOSSC as the case may be in accordance with this Agreement;

“Change in Law” shall mean any primary or secondary legislation that constitutes a change in Law that impact on this Agreement, which comes into force after the date of this Agreement;

“Constitution” shall mean a document produced, approved and maintained by an Authority setting out that Authority’s arrangements including any procedural rules relating to contracts, finance and land and such other information as required by Section 37 of the Local Government Act 2000;

“ESG” shall mean the Economic Strategy Group formed for the purpose of undertaking an advisory and consultative role to the Board and whose terms of reference are set out in Schedule 3;

“Funding” means funding provided to the Board otherwise than from the Authorities;

“Financial Year” shall mean a year beginning on 1st April;

“ Heads of Terms” shall mean the agreement signed by the Parties and WG and the UK Government on 22nd December 2020;

Joint Overview & Scrutiny Sub-Committee (“JOSSC”) shall mean the joint scrutiny whose terms of reference are set out in Schedule 5.

“Law” means any applicable law, statute, bye-law, regulation, order, regulatory policy guidance or industry code, rule of court, directives or requirements of any Regulatory Body, delegated or subordinate legislation, or notice of any Regulatory Body;

“Management Group” shall comprise an appropriate Senior Officer from each Authority and invited officers from each of the Authorities;

“Mid Wales” shall mean the counties of Ceredigion and Powys;

“Member” shall mean a person elected to hold the office of member of an Authority in accordance with Section 79 of the Local Government Act 1972;

“ Monitoring Officer” shall mean the officer specified in Clause 4.3 hereof who shall have responsibility for maintaining good legal governance of the Project and of the work of the Board in relation to this Agreement;

“The Project” shall mean the development of a Portfolio Business Case and concluding a /Final Deal Agreement with the WG and the UK Government;

“Regulatory Body” means those government departments and regulatory, statutory and other entities, committees and bodies that, whether under statute, rules, regulations, codes of practice or otherwise, are entitled to regulate, investigate or influence the matters dealt with in this Agreement, or any other affairs of the Authority;

“RSP” shall mean the Regional Skills Partnership for Mid Wales established to support the delivery of a post-16 learning environment which is fit for purpose for the economic area involved in the Growing Mid Wales Partnership and whose terms of reference are set out in Schedule 4;

“Senior Officer” for Ceredigion shall mean the Corporate Lead Officer for Economy and Regeneration and for Powys shall mean the Corporate Director for the Economy and the Environment.

“Treasurer” shall mean the officer specified in Clause 4.3 hereof who shall have responsibility for maintaining the financial accounts of the Board in relation to this Agreement and shall act as the Section 151 Officer in respect of the Board and the Project;

“Vice Chair” shall mean such Member serving in the place of the Chair in accordance with this Agreement.

1.2. In this Agreement and Schedules:-

1.2.1. any references to a specific statute include any statutory extension or modification amendment or re-enactment of such statute and any regulations or orders made under such statute;

1.2.2. references to any Clause, sub- Clause, schedule or paragraph without further designation shall be construed as a reference to the Clause, sub- Clause schedule or paragraph to this Agreement so numbered;

1.2.3. the Clause, paragraph and schedule headings do not form part of this Agreement and shall not be taken into account in its construction or interpretation;

1.2.4. person shall mean corporation, partnership, firm, unincorporated association and natural person;

1.2.5. the singular includes the plural and vice versa;

1.2.6. the four Schedules form part of the Agreement and have the same force and effect as if expressly set out in the body of the Agreement and any reference to this Agreement shall include the Schedules.

2. Power to make this Agreement

2.1 The Authorities wish to enter into this Agreement and deliver the Growth Deal pursuant to the powers conferred on them by Sections 101, 102, 111 and 113 of the Local Government Act 1972, Section 1 of the Local Authority (Goods & Services) Act 1970, Section 25 of the Local Government (Wales) Act 1994, Section 2, 19 and 20 of the Local Government Act 2000, Section 9 of the Local Government Wales Measure 2009 and all other enabling powers now vested in the Authorities.

2.1 In making this Agreement each of the Authorities confirm that they have in place an appropriate scheme of delegation under which the powers and duties set out in Schedule 2 hereof are delegated wholly to the Board and do not require to be ratified in any way by the individual Councils.

3. The Board

3.1. The Authorities agree to establish the Board in accordance with the provisions of Schedule 1 for the purpose of undertaking the Project and to undertake the duties and responsibilities set out in Schedule 2 of this Agreement or such other duties and/or responsibilities as may be further agreed from time to time by the Authorities.

3.2. The Board may recommend such matters which are not considered to be in the ambit of Schedule 2 for consideration and decision in accordance with each Authority's Constitution.

4. Authorities

4.1. The Authorities shall carry out the administrative functions of the Board which shall include the following:

4.1.1. Subject to Schedule 2 employ or otherwise deploy sufficient people to enable the Board to operate in an effective manner within the approved Budget. For the avoidance of doubt, the employing Authority will use its own

recruitment processes and be responsible for the line management of their employees under their own employment policies; and

4.1.2. enter into and use reasonable endeavours to perform all contracts approved by the Board to achieve the Project; and

4.1.3. apply for Funding as directed by the Board; and

4.1.4. receive and make payments out of all monies dedicated to the Board (and the Parties expressly agree that Funding shall be paid to the Authority employing the Treasurer which Authority shall hold the same in accordance with its financial regulations); and

4.1.5. act as clerk and host the Board support and other requisite support services, including legal services; and

4.1.6. comply with the provisions of this Agreement and use reasonable endeavours to do all such things as authorised from time to time by the Board.

4.2. The Authorities shall nominate an Authority who shall also:

4.2.1. subject to the statutory role of each Authority's monitoring officer in accordance with Section 5(A)(1) of the Local Government and Housing Act 1989 and the Local Authorities (Executive and Alternative Arrangements) (Modification of Enactments and Other Provisions) (Wales) Order 2002 SI 2002 2002/808 in relation to their Authority, provide for the purposes of the Board the services of its monitoring officer; and

4.2.2. act as the Treasurer for the purposes of the Project and all financial aspects of the Board and the Project will be controlled and managed through the financial systems of the Treasurer's authority and will ensure that the accounting practices comply with relevant legislation and other controls.

4.2.3. The Authorities shall be entitled to recover from the Budget dedicated to the Board an amount equal to the costs and outgoings which have been properly incurred in undertaking the responsibilities allocated under this Agreement including the payment of wages, expenses, pension contributions and termination/redundancy payments for employees. A detailed analysis of such costs and outgoings will be presented to the Treasurer for payment and to the Board for information and approval.

4.2.4. The Treasurer will make available to the chief finance officer and internal or external auditors of the other Authority access to the Accounts of the Board at all reasonable times free of charge or any officer of the other Authority duly authorised for the purpose and such accounts shall be subject to audit as accounts to which Section 2 of the Audit Commission Act 1998 applies.

4.2.5. After the conclusion of every Financial Year the Treasurer will by the 30th June each year send to the other Authority a copy of the final accounts of the Board for such Financial Year this provision being in addition to and not in substitution for any obligation to furnish to the other Authority copies of the auditor's report on such accounts and of the financial statement thereof.

4.2.6 Each Council shall permit all records referred to in this Agreement to be examined and copied from time to time by the Treasurer, or any representatives of the Treasurer who reasonably require access to the same in order to undertake any audit of the funds received and spent pursuant to this Agreement.

4.3. For the purposes of discharging the administrative functions detailed in paragraphs 4.1 and 4.2 above, it is hereby agreed that the functions listed in Column 1 below shall be initially undertaken by the Authority listed in Column 2 below;

<u>Column1</u>	<u>Column 2</u>
Human Resources	Ceredigion
Clerk to the Board	Shall be designated to the Authority in which the meeting of the Board is held
Legal Services/Monitoring Officer	Powys
Treasurer and Section 151 Officer	Ceredigion
Communications	Jointly by Ceredigion and Powys
Procurement	Powys
Translation	The Authority where a meeting is held
IT	Ceredigion
Internal Audit	Powys

PROVIDED ALWAYS that the Authorities may by agreement from time to time vary the arrangements detailed in Columns 1 and 2 above.

4.4 Each Authority shall appoint a Senior Officer to act as the Joint Senior Responsible Officer (“SRO”) for the Project and the SROs shall agree which further officers will be required to be utilised to deliver the Project and to form part of the Management Group.

5. Finance

5.1.

5.1. An initial budget forecast will be submitted for consultation by 31st December each year for the next Financial Year and approval sought by 31st January. The budget shall include the costs associated with the implementation of the Project in accordance with this Agreement for the approval of the Board. Any substantial increase to the baseline should be agreed by the Board with clear funding options identified.

5.2. In respect of grants and other external sources of funding, the Treasurer shall notify the Authorities in writing of the sums which have been granted to the Board as and when the Treasurer becomes aware of such.

5.3. The Board shall only operate within its Budget, as agreed with each of the Authorities subject to maximum thresholds and any additional external funding. Quarterly financial monitoring reports and forecasts should be provided by the Treasurer to SRO’s and to the Board.

5.4. Each of the Authorities shall contribute towards the net costs of operating the Board in equal proportions.

5.5 The contributions specified in Clause 5.4 shall be made by the Authorities quarterly in advance based on an invoice for the agreed amounts submitted by the Treasurer.

5.6. If either of the Authorities fail to pay their share of the net costs within 31 working days of the delivery of an invoice in respect of the same then interest as hereinafter provided shall be payable on the outstanding amount until payment is made. Interest shall be calculated at the rate of one per centum per annum in excess of the base lending rate of the Bank of England applicable for the relevant period.

5.7 Any underspend will be rolled forward to the next financial year (by use of a specific reserve or other instrument approved by the Treasurer).

5.8 Overspends will be notified to the Management Group and the Board promptly with clear explanation of the deficit. The specific reserve will be utilised in the first instance to fund the overspend. But the Parties need to agree a recovery proposal for the existing and future years budget and where funding will be sourced. In immediate circumstances the Authorities will share the burden in equal parts. If substantial overspends continue the Board must consider its future viability and adopting termination Clauses.

5.9 External Audit arrangements will apply based on the Treasurer's local arrangements and Internal Audit arrangements will apply based on Powys local arrangements.

5.10 The Treasurer shall ensure that any purchases or supply of services made to the Project which are taxable under VAT legislation, whether or not the purchase price includes an element of VAT, shall be paid for only on the receipt by the responsible financial officer of an invoice complying with VAT regulations or a written guarantee that an authenticated VAT receipt will be issued on payments.

5.11 VAT will be chargeable on payments between the Authorities only where a taxable supply of goods or services is deemed to have been made as defined by statute in the VAT Act 1994 as amended.

6. Ownership of Assets

6.1. The Authorities shall hold all the assets belonging to the Board on trust for the Authorities in equal shares.

6.2. Upon termination of this Agreement the Authorities shall distribute any assets belonging to the Board as directed by the Authorities but in accordance with the proportions set out in Clause 6.1 hereof and in the event of dispute shall comply with the provisions of clause 20 of this Agreement relating to dispute resolution.

7. Indemnities

7.1. Each Authority shall indemnify and keep indemnified the other Authority for an appropriate proportion of all liabilities, losses, actions, claims, demands, proceedings, damages, costs, charges, and expenses whatsoever and howsoever arising in respect of or in any way arising whether in contract, tort or otherwise, except where the liability arises from any fraud, dishonesty, negligence, unlawful expenditure, libel or slander on the part of an Authority performing a function as set out in Clause 4 hereof and/or where an Authority has acted outside the scope of its authority.

7.2. In the event of an Authority in the performance of a function as set out in Clause 4 hereof committing fraud, dishonesty, negligence, unlawful expenditure, libel or slander or otherwise acting outside the scope of their authority, that Authority shall indemnify and keep indemnified the other Authority against all liabilities, losses, actions, claims, demands, proceedings, damages, costs, charges, and expenses whatsoever and howsoever arising in respect of or in any way arising whether in contract, tort or otherwise, directly or indirectly, out of such conduct.

8. Duration of the Agreement and Termination

- 8.1. This agreement shall continue until replaced by another Agreement governing the relationship between the Parties or otherwise terminated in accordance with clause 8.2.
- 8.2 Any Authority may terminate its involvement in this Agreement by giving to the other Authority 12 months' notice in writing.
- 8.3. In the event that this Agreement is terminated in accordance with Clauses 8.1 and 8.2 the Authorities shall remain liable for the following costs in equal proportions:-
- 8.3.1. the operational costs calculated to the date of termination; and
- 8.3.2. costs arising as a consequence of the indemnities referred to in Clause 7; and
- 8.3.3. the cost of any redundancies consequent upon the termination; and
- 8.3.4. any other costs properly incurred in connection with this Agreement or its termination.
- 8.4 Either Party (for the purposes of this clause 8.4, the First Party) may terminate this Agreement with immediate effect by the service of written notice on the other Party (for the purposes of this clause 8.4, the Second Party) in the following circumstances:
- (a) if the Second Party is in breach of any material obligation under this Agreement, provided that, if the breach is capable of remedy, the First Party may only terminate this Agreement under Clause 8.4, if the Second Party has failed to remedy the breach within 28 days of receipt of notice from the First Party (Remediation Notice) to do so;
- (b) there is a Change in Law that prevents either Party from complying with its obligations under this Agreement; or
- (c) following a failure to resolve a dispute under clause 20.

9. Confidentiality/Transparency

- 9.1. The provisions of Sections 100 100A - 100I and 100K of the Local Government Act 1972 shall apply to proceedings of the Board.
- 9.2. Without limiting the generality of the above paragraph 9.1. the Authorities shall comply with the Data Protection Act 2018 and Freedom of Information Act 2000 as applicable and appropriate.

9.3. With the exception of the matters referred to in paragraph 9.2. above the Authorities shall jointly agree a protocol for the disclosure of information relating to this Agreement.

9.4. None of the Authorities shall make any communication otherwise than in accordance with a jointly agreed protocol for disclosure of information relating to this Agreement.

10. Force Majeure

10.1. Notwithstanding anything else contained in this Agreement, no Authority shall be liable for any breach of its obligations hereunder resulting from causes beyond its reasonable control including but not by way of limitation national emergency, war, flood, earthquake, strike or lockout, other than a strike or lockout induced by the Authority so incapacitated, imposition of governmental regulations or Law which renders performance of the Agreement impossible.

10.2. Each of the Authorities hereto agrees to give written notice forthwith to the other upon becoming aware of the reasons likely to result in a delay and of the likely duration of the delay. Subject to the giving of such notice, the performance of such notifying Authority's obligations shall be suspended during the period such circumstances persist and such notifying Authority's obligations shall be granted an extension of time for performance equal to the period of the delay. Any costs arising from such delay shall be borne by the Authority incurring the same.

10.3. The other Authority may if the delay continues for more than 10 (ten) working days terminate the Agreement forthwith on giving written notice to the notifying Authority.

10.4. The notifying Authority may if the delay continues for more than twenty (20) working days terminate its participation in the Agreement on giving written notice to the other Authority.

11. Variation

11.1 At any time the Board or one or more of the Authorities may recommend changes to this Agreement by giving notice in writing to the other Authority as the case may be. The Authority in receipt of the notice shall use all reasonable endeavours to consider within six weeks of such receipt whether to accept the recommendation.

11.2 If both Authorities agree to the recommended changes a memorandum of variation shall be prepared for execution on behalf of the Authorities and appended to this Agreement.

12. No Partnership

12.1 Nothing in this Agreement shall be construed as establishing or implying any partnership between the Authorities and except as stated in this Agreement nothing in this Agreement shall be deemed to constitute any of the Authorities hereto as the agent of the other Authority or authorise any Authority (i) to incur any expenses on behalf of any other Authority (ii) to enter into any engagement to make any representation or warranty on behalf of any other Authority (iii) to pledge the credit of or otherwise bind or oblige any other Authority or (iv) to commit any other Authority in any way whatsoever without in each case obtaining that other Authority's prior written consent.

13. Successors

13.1 This Agreement shall be binding upon and endure to the benefit of the Authorities and their respective successors in title.

14. Notices

14.1. Any demand notice or other communication given or made under or in connection with this Agreement will be in writing.

14.2. Any such demand notice or other communication will if given or made in accordance with this Clause be deemed to have been duly given or made as follows:-

14.2.1. if sent by prepaid first class post on the second working day after the date of posting; or

14.2.2. if delivered by hand upon delivery at the address provided for in this Agreement; or

14.2.3. if sent by email to the Chief Executive of an Authority on the day of transmission;

provided however that if it is delivered by hand or sent by email on a day which is not a working day or after 4.00 p.m. on a working day it will instead be deemed to have been given or made on the next working day.

14.3. Any such demand notice or other communication will in the case of the service by post or delivery by hand be addressed to the recipient's address stated in this Agreement or at such other address as may from time to time be notified in writing by the Authorities as being the address for service.

15. Severability

15.1 If any of the provisions of this Agreement is found by a Court or other competent authority to be void or unenforceable such provisions shall be deemed to be deleted from this Agreement and the remaining provisions of this Agreement shall continue in full force and effect. Notwithstanding the foregoing the Authorities shall thereupon negotiate in good faith in order to agree the terms of a mutually satisfactory provision to be substituted for the provision so found to be void or unenforceable.

16. Entire Agreement

16.1. This Agreement and any Schedules thereto constitutes the entire agreement and understanding of the Authorities and supersedes any previous agreement between the Authorities relating to the subject matter of this Agreement.

16.2. Each of the Authorities acknowledges and agrees that in entering into this Agreement it does not rely on and shall have no remedy in respect of any statement representation warranty or understanding whether negligently or innocently made of any person whether party to this Agreement or not other than as expressly set out in this Agreement.

17. The Contracts (Rights of Third Parties) Act 1999

17.1 The Parties to this Agreement agree that the provisions of the said Act are hereby excluded.

18. Co-operation

18.1 The Authorities agree at their own cost to co-operate fully with each other and provide such information and assistance as the other may reasonably require in connection with any actual or potential legal proceedings arbitration hearings inquiries ombudsman enquiries inspections internal investigations and disciplinary hearing arising out of or in connection with the provision of this Agreement provided that such obligation shall not extend to any such proceedings between the Authorities.

19. Litigation

19.1 The Authorities agree to promptly notify the other by written notice upon becoming aware of or in receipt of any process or other notice of the commencement of proceedings in which any Authority is named in connection

with this Agreement. No litigation will be commenced in connection with anything arising out of this Agreement without the other Authority's prior written consent, such consent not to be unreasonably withheld or delayed.

20. Dispute Resolution

20.1. Prior to any dispute difference or disagreement being referred to mediation pursuant to the remaining provisions of this Clause 20 the Authorities shall seek to resolve the matter as follows:-

20.1.1 in the first instance the issue shall be considered by the Chief Executive officers of each of the Authorities;

20.1.3 if the Chief Executive officers are not able to resolve the matter within thirty (30) working days the provisions of Clauses 20.2, 20.3 and 20.4 shall take effect.

20.2 For the purpose of this paragraph 20.2 a dispute shall be deemed to arise when one Authority serves on the others a notice in writing stating the nature of the dispute.

20.3 Every dispute notified under paragraph 20.2. shall first be referred to mediation in accordance with the mediation procedures of the Alternative Dispute Resolution Group London;

20.3.1 The mediator shall be agreed upon by the Authorities and failing such agreement within fifteen (15) working days of one Authority requesting the appointment of a mediator and providing their suggestion thereof then the mediator shall be appointed by the President or the Vice -President for the time being of the Law Society;

20.3.2 Unless agreed otherwise the Authorities shall share equally the costs of mediation;

20.3.3 The use of mediation will not be construed under the doctrines of laches waiver or estoppel to affect adversely the rights of any Authority and in particular any Authority may seek a preliminary injunction or other judicial relief at any time if in its judgment such action is necessary to avoid irreparable damage.

20.4 In the event of the Authorities failing to reach agreement on their dispute or difference following mediation pursuant to Clause 20.3 one

Authority may serve on the other a notice in writing stating the nature of the matters still in dispute;

20.4.1 The dispute or difference shall then be referred to the arbitration of a sole arbitrator to be appointed in accordance with Section 16(3) of the Arbitration Act 1996 ("the Arbitration Act") the seat of such arbitration being hereby designated as Wales;

20.4.2 In the event of failure of the Authorities to make the appointment pursuant to Section 16(3) of the Arbitration Act the appointment shall be made by the President or if the President be unwilling, unable or unavailable the Vice President for the time being of the Law Society;

20.4.3 The arbitration will be regarded as commenced for the purposes set out in Section 14(1) of the Arbitration Act when one Authority sends to the others written notice in accordance with the Arbitration Act;

20.4.4 The arbitration shall be conducted in accordance with the Rules of the Chartered Institute of Arbitrators(s)/The Rules of the London Court of International Arbitration for the Chartered Institute of Arbitrators or any amendment or modification thereof being in force at the date of commencement of the arbitration.

21. Governing Law

21.1 This Agreement shall be governed by and construed in accordance with the laws of England and Wales.

22. Welsh Language

22.1 In accordance to the Welsh Language (Wales) Measure 2011 the Welsh Language will not be treated less favourably than the English Language in relation to this Agreement.

22.2 The Parties will comply to the Welsh Language standards of Ceredigion in relation to this Agreement

23. Scrutiny

23.1 The Parties shall ensure the proper scrutiny of the Project by means of a Joint Overview & Scrutiny Sub-Committee whose terms of reference are set out in Schedule 5.

IN WITNESS whereof the Common Seals of the respective Authorities were hereunto affixed the day and year first before written.

The COMMON SEAL of CYNGOR SIR)
CEREDIGION COUNTY COUNCIL)
was hereunto affixed in the presence of:

Corporate Lead Officer
Legal & Governance Services

Executed as a Deed by affixing)
the COMMON SEAL of)
POWYS COUNTY COUNCIL)
In the presence of

Head of Legal and Democratic Services
A duly authorised officer

SCHEDULE 1

TERMS OF REFERENCE OF THE BOARD

1. Establishment

- (a) There shall be constituted a Board:-
- (i) consisting of five voting Members to be appointed by each of the Authorities plus the chair of the Economic Strategy Group (“ESG”);
 - (ii) having the functions, powers and duties described in the Agreement; and
 - (iii) upon and subject to the terms and conditions described in the Agreement.
- (b) The Board may adopt or authorise the use of a brand name, logo or similar method to describe itself or its activities.

2. Nomination of Deputy to attend Meetings

Each Authority shall from time to time nominate in writing a deputy for any Member appointed by them to attend and to vote at any meeting of the Board in place of the Member who for any reason is unable to attend that meeting.

3. Appointment of Representative Members and Period of Office

- (a) Each of the Authorities shall appoint Members as mentioned in paragraph 1 and a Member so appointed shall hold office until the Member:
- (i) dies; or
 - (ii) resigns; or
 - (iii) becomes disqualified in accordance with Section 80 of the Local Government Act 1972; or
 - (iv) ceases to be a Member of the Authority they represent; or
 - (v) is suspended;
 - (vi) the Authority which the Member represents has decided that another Member should act in their place.
- (b) The chair of the ESG shall remain a Board member for as long as he or she remains the chair of the ESG.

4. Failure to Attend Meetings/ Filling of Casual Vacancies

- (a) The Clerks to the Board shall notify an Authority if one of their Members fails to attend three consecutive meetings of the Board and that

Authority will then consider whether or not that Member shall continue to represent the Authority on the Board.

(b) If for any reason there shall be a vacancy in the representation of any of the Authorities on the Board allowed under the terms of this Agreement for the time being the Authority where the vacancy occurs may fill such vacancy by appointment evidenced in writing by their Chief Executive officer or other authorised officer to the Chief Executive officer of the other Authority as the case may be.

5. Election of Chairperson

- (a) The Leaders of both Authorities shall act as Joint Chair and shall preside over alternate meetings such that the Chair for the meeting will be the Leader from the Authority at which the meeting takes place.
- (b) The Chair at any meeting shall not have a casting vote.

6. Co-opted Persons

- (a) The Board may invite such number of co-opted persons as it shall determine to attend meetings of the Board for a fixed period of time;
- (b) Such persons may be individuals or representatives of such organisations/ private sector companies as the Board shall determine;
- (c) Such co-opted persons may fully participate in meetings but may not vote at meetings of the Board and may be required by the Chair not to attend some or any part of a meeting. For the avoidance of doubt the Chair of the ESG is not a co-opted member but a full member of the Board and as such has full voting rights.

7. Meetings of the Board

The Board shall meet at least 4 times a year, or at such frequency as the Board shall determine.

8. Convening of Meetings

The meetings of the Board shall be convened by notice in writing issued by the Authority clerking the Board meeting in accordance with Clause 4.1.5 of the Agreement or by the Chairs and delivered to each Member of the Board and such co-opted person as required or sent by email or post to or delivered to the Member's or co-opted person's address as notified to the Authorities at least three clear working days before the day of the meeting.

9. Quorum of Meetings

To constitute a meeting of the Board not less than two voting Members from each Authority shall be present.

10. Voting

(a) Whilst the Board shall endeavour to work by consensus, each Authority shall be entitled to one vote for each voting Member attending at the meeting of the Board.

(b) Copies of the draft minutes of the proceedings of every meeting of the Board shall after each meeting be sent by the Clerk to the Board to the Chief Executive officers of each Authority, Board Members, officers appointed to the Management Group by the Authorities and as appropriate co-opted persons.

(c) The Chair at any meeting shall not have a casting vote.

(d) In the event of tied vote, the matter will be adjourned and reconsidered at the next Board meeting and if the vote remains tied, the matter will fall to be dealt with at a meeting of the Leaders and Chief Executives of both Authorities and in the event of a failure to agree, the issue cannot be re-introduced at the Board for at least 6 months.

11. Standing Orders etc

For the avoidance of doubt the Board shall, where relevant and subject to the provisions of this Agreement, operate in accordance with the Monitoring Officer's Authority's Constitution and contract procedure rules and with the Treasurer's Authority's financial procedure rules.

SCHEDULE 2

ROLE OF THE BOARD AND MANAGEMENT GROUP

1. The Duties and Responsibilities of the Board

The Board shall:

- 1.1. oversee and monitor the work required to enable an OBC to be submitted with regard to the Growth Bid and to agree Heads of Terms with the WG and UK Government in accordance with the Project;
- 1.2. approve bids for Funding in pursuit of the Project and refer such to the Authorities to apply for funding in accordance with Clause 4.1.3;
- 1.3. obtain appropriate advice, assistance and services;
- 1.4. take advice and consult with the ESG where appropriate to do so;
- 1.5. receive bi-annual reports from the RSP;
- 1.6. do such other things in accordance within the terms of this Agreement as may be agreed from time to time by the Authorities in furtherance of the Project.

2. The Role of the Management Group

The Management Group shall provide managerial direction to officers and advise the Board in the fulfilment of their responsibilities under this Schedule. The Management Group will:

- 2.1. Provide leadership to and management of officers by setting objectives and priorities for work to be progressed in line with work programme for submission of business cases.
- 2.2. Monitor progress of the work programme, identify and manage risks and issues, and provide regular reports to the Board.
- 2.3. To support the Board with well-planned papers that set out clear recommendations where decisions are required.
- 2.4. To manage resources in line with budgets allocated to the work.
- 2.5. Approve a staffing structure (if appropriate);
- 2.6. Approve the procurement of consultants and advisers in furtherance of the Project;

2.7. Approve such contractual arrangements as may be required for the Project;

SCHEDULE 3

THE ROLE AND TERMS OF REFERENCE FOR THE ECONOMIC STRATEGY GROUP (ESG)

1. Introduction

- 1.1. The Economic Strategy Group (ESG) has a vital role in supporting the Growth Deal and economic growth across Mid Wales by ensuring that collective responsibility exists between partners on the ESG and that the ESG is a key advisory, support and advocacy mechanism for the Growth Deal.
- 1.2. The ESG will:
 - Provide a business voice on the Growth Deal to the Board and champion the projects to be included within the Growth Deal.
 - Aid collaboration and communication within the private sector and to the Authorities and other public funding bodies.
 - Represent local business views to shape future strategy and influence policy relevant to economic growth and business benefit at Mid Wales level.
 - Make recommendations to the Board

2. Responsibilities of the ESG

- 2.1. The key role of the ESG is to represent the collective business interests in Mid Wales by bringing together business issues affecting the Growth Deal in a single forum.
- 2.2. The priorities of the ESG reflect existing local policy frameworks, specifically those relating to the Growth Deal and emerging economic plan, and the ESG plays a significant role in contributing to, advising on, and advocating the Growth Deal.

3. Membership of the ESG

- 3.1. The ESG members will be from the private sector, nominated by both Authorities, and will include representatives from the Powys and Ceredigion areas.
- 3.2. The Chief Executive officer of each Authority or their nominated representative shall be entitled to attend meetings of the ESG as an adviser or an observer but shall not have a vote.

4. Chair

The Chair of the ESG will be a business person (private company) with business interests in Mid Wales who has a cross county and sub-

regional interest and influence. It is expected that the business interests of the Chair of the ESG will be a significant local employer which has an impact and use of local, regional and national supply chain. The Chair of the ESG will have voting status at meetings of the Board and, in this capacity, will be expected to act as the private sector advisor. The Chair of the ESG will be appointed for a 2 year term at the end of he/she may end their term or seek reaffirmation by standing for re-nomination.

- 4.1. The Chair of the ESG will be a joint appointment by the Authorities following nominations by the unanimous agreement of the Welsh Government and the UK Government.

5. Vice Chair

- 5.1. The Vice-Chair of the ESG will be a Mid Wales based business person (private company), appointed for a 2-year term, nominated and voted in by the ESG.

6. Membership

- 6.1. The ESG will consist of at least 10 members and a maximum of 15 members, including the Chair.
- 6.2. All ESG members will usually serve a 2-year term at the end of which they may end their term or seek reaffirmation by standing for re-nomination. Membership will be opened out to the representative projects, organisations or business sectors as appropriate whenever a place on the ESG becomes available.
- 6.3. The ESG will consist of ten members plus the Chair of the ESG. The membership will be drawn from Mid Wales with five appointees from each Authority.

7. ESG Meetings

- 7.1. The ESG will meet 4 times per year or more frequently with agreement of the Chair of the ESG. Attendance will be monitored and it is expected that ESG members make every effort to attend all ESG meetings, repeated non-attendance may result in a request to step down from the ESG.
- 7.2. Each member will have 1 vote each with the Chair of the ESG having the deciding vote. Observers / speakers will be invited by the Chair of the ESG to attend the ESG Meeting or be part of sub-groups as and when required.
- 7.3. Members of the ESG are required to declare any personal or financial interests in any business of the ESG at the commencement of the

meeting. The Chair of the ESG will decide if this will lead to member's exclusion from the item in question, the whole meeting or withdrawal from the ESG (temporarily or permanently).

- 7.4. As the Chair of the ESG's role includes an advisory role to the Board, the ESG members will be expected to conduct themselves in accordance with the "seven principles of public life" as set out by the Committee Standards in Public Life (Nolan Committee). Within the ESG projects and sub-groups will be able to raise concerns, opportunities or ideas which may have an impact on the wider local economy.
- 7.5. Subgroups may be used to consider matters in depth or particular pieces of work. These sub groups may contain membership from both the ESG and other groups.
- 7.6. Minutes will be distributed by e-mail as soon after the meeting as possible for comment and will include a record of decisions, actions and discussions.
- 7.7. Secretariat will be provided by Powys.
- 7.8. For ESG meetings, six members (including the Chair or Vice Chair of the ESG in the Chair of the ESG's absence) will represent a quorate meeting.

8. Remuneration

- 8.1. There will be no remuneration paid to any ESG members for the opinion and guidance they provide. If, in the course of the ESG's business, members are required to travel then expenses and/or subsistence will be entitled to be claimed by those ESG members; the rates and requirements will follow Ceredigion's policy on Travel Expenses and Subsistence and overnight accommodation.
- 8.2. Expenses will be met by the Budget of the Board.

9. Communication

- 9.1. The principles of the ESG will be to communicate with the wider business community and then represent these views to the Board.
- 9.2. As the Chair of the ESG will become the business representative on the Board the remit of representing the view of business will be required whilst having wider consideration for the economic growth of the Mid Wales area.
- 9.3. It will be the responsibility of the Chair of the ESG to communicate recommendations of the ESG to the Board.

9.4. The Chair of the ESG will be supported in their role by the Authorities to review the ESG's progress, communications, membership and succession planning. It is expected that the ESG will meet every three months.

ESG Code of Conduct

Members of the ESG are required to declare any personal or financial interests in any of the business of the ESG meeting at the commencement of meetings.

The ESG members will be expected to conduct themselves in accordance with the "seven principles of public life" set out by the Committee Standards in Public Life (the Nolan Committee) these are:

Selflessness

Holders of public office should take decisions solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their families or their friends.

Integrity

Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might influence them in the performance of their official duties.

Objectivity

In carrying out public business, including making public appointments, awarding contracts or recommending individuals for awards and benefits, holders of public office should make choices on merit.

Accountability

Holders of public office are accountable to the public for their decisions and actions and must submit themselves to whatever scrutiny is appropriate to their office.

Openness

Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

Honesty

Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

Leadership

Holders of public office should promote and support these principles by leadership and example.

Schedule 4

Regional Skills Partnership

Terms of Reference

1. Name

- 1.1 The name and current working title of the RSP shall be the Regional Skills Partnership (“the RSP”) for Mid Wales, Partneriaeth Sgiliau Rhanbarthol, Canolbarth Cymru.

2. Vision

- 2.1 To align the public and private sectors in order to address the supply and demand issues for an effective agile workforce, with the appropriate skill level to attract inward investment to Mid Wales and improve communication networks between sectors to understand and identify learning and career pathways into appropriate long term employment for the citizens of Mid Wales.

3. Mission

- 3.1 The RSP will act as a stakeholder group engaging and consulting with specific sectors, industries and regions:
- To identify and respond to the needs of employers and learners across Mid Wales.
 - To engage with employers, sectors and stakeholders to identify current and future skills needs across the region and plan accordingly
 - To align activity to future demand and stimulate innovation through learning and employment
 - To enable an inclusive regional response to Welsh Government policy and initiatives
 - To align activity with the skills requirements of the Growing Mid Wales Partnership

4. Our Objectives – as set out in the IAA

- 4.1 To work with the Economic Strategy Group (ESG) to identify skill requirements from the private sector in Mid Wales
- 4.2 Establish methodologies to identify future employment opportunities across all sectors

- 4.3 Establish a curriculum strategy group to align learning pathways and progression routes for all learners from KS4/5 into work-based learning training programmes / Further Education / Higher Education or a regional apprenticeship scheme or occupational schemes.
- 4.4 Introduce Higher Education degree and masters courses aligned to the future skills agenda for employment opportunities in Mid Wales
- 4.5 Establish a regional apprenticeship scheme (including shared apprenticeships) that bridges and aligns public and private sectors and which recognizes the transferability of skills.
- 4.6 Produce innovative career guidance for all learners in Mid Wales to link learning and career pathways.
- 4.7 Develop the concept of 'Centres of Excellence' in Mid Wales.
- 4.8 Work with a range of partners to ensure opportunities for career-long support for upskilling the current workforce, including those in short term employment.
- 4.9 All of the actions would be underpinned by a strong bilingual focus contributing, via the unique bilingual education system and workforce across Mid Wales, to the vision of a million Welsh speakers by 2050

5. Membership

5.1 The membership will consist of those in the table below:

Membership of the RSP	
2 x Higher Education Representatives	One representative from each of the Universities (Aberystwyth and UWTSD)
2 x Further Education Representatives	One representative from each of the colleges (NPTC and Coleg Sir Gâr)
2 x Education & Skills Representatives	One officer from each Local Authority
2 x Strategic Workforce Planning leads	One officer from each Local Authority
2 x Regeneration Representatives	One officer from each Local Authority
2 x Health Representatives	One representative from each of the Health Boards (Powys Teaching Health Board and Hywel Dda Health Board)
Training providers	National Training Federation for Wales + WBL providers from each LA

<p>Industry / Employers</p> <p>The Strategic Growth Priorities for Growing Mid Wales are Agriculture, Food & Drink Transport Supporting Enterprise Skills & Employment Energy Strengthened Tourism Offer Applied Research & Innovation Digital</p> <p>These areas should all be covered by the representation that is proposed for the RSP.</p>	<p>A representative each from the sectors derived from those identified in AECOM Report:</p> <ol style="list-style-type: none"> 1. Tourism – to include hospitality and catering 2. Manufacturing 3. Agriculture and the land-based economy 4. Public Services – which might include local and national government, emergency services & defence 5. Foundation sectors * 6. Digital Services (this group is in addition to the AECOM-defined groups) <p>*This “sector” is particularly significant in its relative scale in Mid Wales and includes infrastructure, utilities, food processing, retailing and distribution, and health, education and welfare. This would merit further breakdown, with particular merit in prioritizing considering representation from health and social care (education is represented in other segments)</p>
<p>Economic Strategy Group Mid Wales</p>	<p>Representative to be nominated</p>
<p>Growing Mid Wales Partnership</p>	<p>Representative to be nominated</p>
<p>Careers Wales</p>	
<p>Job Centre Plus</p>	
<p>RLP Manager</p>	
<p>Other</p>	<p>Other industry, employer groups, higher education institutions or third sector partners to be invited as required. These could include local voluntary associations and education or training partners from outside the two authorities who might wish to work within the two authorities, or who can offer routes into education or training for the people of the Mid Wales region.</p>

5.1 Observer members and co-opted experts may be invited as needs arise

- 5.2 The RSP shall exist for 1 year and then be re-nominated. Members shall be eligible for re-nomination
- 5.3 The RSP shall appoint a Chair and Vice-Chair at its first meeting bi-annually. If it is necessary for the RSP to appoint an Interim Chair, the appointment will be reviewed every 3 months.
- 5.4 Failure to attend three consecutive RSP meetings will result in a new nomination being sought to represent the sector / stakeholder group
- 5.5 The secretariat function will be fulfilled by the officers employed to undertake the work of the Regional Skills Partnership
- 5.6 Members may appoint substitutes to represent their sector when necessary, all names of nominated substitutes to be sent to the Secretariat in advance of the meetings

6. Core Principles and Responsibilities

- 6.1 Members of the RSP shall be expected to work on the basis of mutual support, shared values and a culture of joint working and collaboration
- 6.2 Members of the RSP commit to the Nolan Principles
 - 6.2.1 Integrity – members should avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work
 - 6.2.2 Objectivity – Members should act and take decisions impartially, fairly and on merit and for the widest benefit of others
 - 6.2.3 Accountability – Every Member will act on behalf of the stakeholders or groups they represent, and it is expected that every member will ensure that reasonable arrangements are in place to report back on their work
 - 6.2.4 Openness – Members should act and take decisions in an open and transparent manner
 - 6.2.5 Confidentiality – Every Member should respect confidentiality, and where relevant ensure that confidential material is protected and that it is not use without permission from the RSP (as a collective) or for private purposes
 - 6.2.6 Accountability – every member is accountable to the public for their decisions and must submit themselves to scrutiny if necessary
 - 6.2.7 Honesty – every member should be truthful

- 6.2.8 Declarations – Every member should declare any interest that could influence discussions or decisions taken by the RSP, and they will be recorded by the secretariat
- 6.2.9 Promoting equality and respect for others – Every member should undertake their responsibilities with due regard to the need to promote equal opportunity for all and demonstrate respect and consideration towards others

6.3 Members of the RSP are expected:

- 6.3.1 To co-operate strategically on behalf of stakeholders across Mid Wales
- 6.3.2 To attend regular meetings of the RSP
- 6.3.3 To prepare thoroughly for all meetings by reading the minutes and accompanying papers as well as to contact and discuss any matter that is relevant to the work of the RSP with others they represent as required
- 6.3.4 To be prepared to contribute to meaningful discussions at RSP meetings and to listen, give due consideration to and respect the opinions and views of others
- 6.3.5 To communicate information about any work or development relevant to their sector
- 6.3.6 To convey and promote the decisions of the RSP within their sector and repost, on a regular basis, the work of the RSP
- 6.3.7 To recognise and respect the worth and contribution of each member
- 6.3.8 To represent the RSP effectively on other groups, forums and partnerships as required and to ensure that the views of the RSP are conveyed clearly and firmly on all occasions
- 6.3.9 To participate in meetings, events and other activities organised by the RSP from time to time.

7. Operational Procedures of the Board

- 7.1 The Regional Skills Partnership host organisation (...) will fulfil the administrative and financial functions of the RSP and shall be responsible for providing secretariat functions to the RSP
- 7.2 Meetings of the RSP are to be scheduled on a bi-monthly basis will be reviewed as necessary; however, it shall be a requirement for the RSP to meet at least once every quarter

- 7.3 The Chair of the RSP shall be responsible for calling meetings of the RSP with the support of the secretariat
- 7.4 The secretariat shall provide written notice of the time, date and location of the RSP meeting to all members at least 10 working days before the date fixed for the meeting
- 7.5 If a member of the RSP wishes to include an item on the agenda of the RSP meeting, they should notify the secretariat at least 5 working days prior to the date of the meeting. The Chair of the RSP and secretariat shall agree the final content of the agenda for the RSP meeting
- 7.6 If a member of the RSP wishes to present a written report to the RSP, they should ensure that the secretariat receives an electronic version of the report at least 7 working days before the date of the meeting. The Chair of the RSP has the discretion to take any items that are of an urgent or informative nature that would benefit the discussion at the meeting
- 7.7 The secretariat shall distribute the final agenda and reports for the RSP meeting electronically at least 5 working days before the date of the meeting
- 7.8 For RSP meetings, 6 members (including the Chair or the Vice-Chair in their absence) shall comprise a quorum
- 7.9 The RSP shall conduct its business in an open and transparent way and in a spirit of consensus and mutual respect. Therefore, the RSP shall endeavour to arrive at a decision on matters by consensus. If consensus cannot be reached, the Chair of the RSP shall ask for a vote and a simple majority shall carry the vote. If necessary, the Chair of the RSP shall ask for a second vote or shall use their casting vote
- 7.10 It shall be expected that decisions of the RSP will be implemented. However, where executive authority is required, decisions shall be referred to the decision-making bodies of individual authorities / stakeholders for consideration and the outcomes of these considerations shall be reported back to the RSP.
- 7.11 The secretariat shall be responsible for keeping minutes of the RSP and distributing them to members of the RSP
- 7.12 Copies of these minutes shall be made available by the secretariat on request
- 7.13 The Welsh and English languages have equal status and the RSP will work to Ceredigion's Welsh Language Standards

8. Accountability and Resources

- 8.1 as host will monitor and be accountable for the financial management of the RSP to ensure that the funder's and financial guidelines of the Authority are followed
- 8.2 Scrutiny of the RSP will be undertaken through the democratic process of Ceredigion and Powys and through regular updates to the Local Authority representative groups (Chief Executives; Regeneration and Education Directors)
- 8.3 **Finance:** Welsh Government currently supports the existing Regional Skills Partnerships, each at a cost of circa £150k per year. Discussions with Welsh Government confirm that the Mid Wales Regional Skills Partnership would be funded in the same way, and to the same level as the other partnerships. Additionally, a commitment to a half-year funding from October 2020 has been made to facilitate the establishing of the new partnership, and previously a sum of £30k was committed to support the work leading to the setting up of the partnership.

9. Amending the Constitution

- 9.1 The RSP shall undertake an annual self-assessment to assess the effectiveness of the RSP, including its future consideration
- 9.2 The RSP shall review the terms of reference on an annual basis and amend it as necessary

10. Commitment

- 10.1 Each member shall sign a copy of the RSP's terms of reference on behalf of the organisation they represent, as a sign of their support and commitment to the vision, mission and objectives of the Regional Skills Partnership for Mid Wales, Partneriaeth Sgiliau Rhanbarthol Canolbarth Cymru.

SCHEDULE 5

TERMS OF REFERENCE OF THE GROWING MID WALES JOINT OVERVIEW & SCRUTINY SUB-COMMITTEE (“JOSSC”)

1. Membership

- 1.1. The Joint Overview & Scrutiny Sub-Committee shall comprise of 10 members in total, 5 each from the Authorities, ensuring political balance.
- 1.2. Executive members of the Authorities shall not be members of the JOSSC.
- 1.3. Two nominated substitutes will be allowed for the representatives listed above provided that the substitutes are not involved in and have not attended meetings of the Board or ESG.
- 1.4. An Authority may send a substitute from their own Authority if they are unable to attend, but this may not be a member of the Authority's executive and should be a member of each Authority's relevant scrutiny committees and same political group. A substitute will be able to vote.

2. Purpose

- 2.1. The purpose of the Joint Overview & Scrutiny Sub-Committee shall be:
 - 2.1.1. Performing the overview and scrutiny function for the Growth Deal on behalf of the Authorities, to:
 - a) review and or scrutinise decisions made, or other action taken, in connection with the discharge of any of the Board's functions;
 - b) make reports or recommendations to the Board or its executive officers with respect to the discharge of any of those functions;
 - c) make reports or recommendations to the Board or its executive officers on matters which affect the area or the inhabitants of that area;
 - d) exercise such other functions as the Board may determine.
 - 2.1.2. To develop a Forward Work Programme annually, reflecting the functions under clause 2.1.1 above.
- 2.1.3. For the period up to Final Deal Agreement (Development):
To seek reassurance and consider if the Growth Deal is developing according to guidance from WG and UK Government in the period up to Final Deal Agreement, according to the Inter-Authority Agreement applicable, and against the expected timetable and/or is being managed effectively.

For the period post Final Deal Agreement (Delivery):

2.1.4. To seek reassurance and consider if the Growth Deal is delivering according to the Inter-Authority (IAA), the agreed Portfolio Business Case, Implementation Plan and timetable, and / or is being managed effectively;

2.1.5. To monitor the delivery of the Growth Deal Regional projects against agreed Portfolio/Programme/Project plans.

2.1.6. To make any reports and recommendations to the Authorities, whether to their executive boards or Full Council as appropriate, in respect of any function which has been delegated to the Board pursuant to this Agreement.

2.2. For the avoidance of doubt, scrutiny of individual Authorities projects' shall be a matter for the relevant Authorities' Scrutiny Committee.

3. Chair

3.1. The Chair and Vice-Chair of the JOSSC shall be elected by the JOSSC.

3.2. The Chair and Vice-Chair of the JOSSC shall be elected by the JOSSC at its first meeting and then at each calendar year.

3.3. The position of Chair and Vice-Chair will rotate between the Authorities on an annual basis.

3.4. Election of Chair – The JOSSC will elect a Chair from the statutory membership of the committee. Substitute Members will not be eligible for election as the Chair.

3.5. Election of Vice-Chair – The JOSSC will elect a Vice Chair from the statutory membership of the committee. Substitute Members will not be eligible for election as Vice-Chair.

4. Voting

4.1. Each member of the JOSSC shall have one vote. Decisions of the JOSSC shall be made by simple majority vote.

4.2. In the event of equality of votes the Chair of the JOSSC shall have a casting vote.

5. Conflicts of Interest

5.1. Members of the JOSSC must declare any interest either before or during the meetings of the JOSSC (and withdraw from that meeting if necessary) in accordance with their Authority's Code of Conduct or as required by law.

6. Proceedings of Meetings

6.1. The rules of procedure of the Monitoring Officer in respect scrutiny shall apply to meetings of the JOSSC.

6.2. Members of the JOSSC shall be subject to the Codes of Conduct for Members of their Authority.

6.3. Meetings may be rearranged, cancelled or additional meetings scheduled with the agreement of the Chair.

6.4. Each meeting will be recorded through the production of notes which will be made available to the public online after the meeting with the exception of any exempt or confidential information. Notes of meetings will usually be brief, containing a summary of discussions, action points and recommendations.

6.5. The JOSSC is not a decision making body, and the Chair should aim to facilitate consensual agreement on matters under consideration. Where a consensus cannot be reached, the Chair shall present the split views of the committee to the Board.

7. Quorum

7.1. The quorum for meetings shall be no less than 4 Members, which must include at least 2 Members from each of the 2 Authorities

8. Frequency

8.1. The JOSSC shall meet quarterly, having regard of the Board's meetings. Additional meetings may be convened by the Chair on at least 7 clear days' notice.

9. Allowances

9.1. No allowances shall be paid.

10. Sub-Groups

10.1. The JOSSC by agreement may create Task and Finish Groups.

11. Review

11.1. The Terms of reference of the JOSSC shall be reviewed annually.

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CYNGOR SIR POWYS COUNTY COUNCIL.

Cabinet
July 13th, 2021

REPORT AUTHOR: County Councillor Iain McIntosh

**Portfolio Holder for Economic Development, Planning
and Housing**

REPORT TITLE: Powys Affordable Housing Programme Delivery Plan
Guide.

REPORT FOR: Decision

1. Purpose

To approve the Council's Affordable Housing Programme Delivery Plan (PDP) Guide.

2. Background

2.1. Programme Delivery Plan Overview

- 2.1.1 As the strategic housing authority for Powys, the Council must submit a proposal to Welsh Government (WG) setting out how it wishes to allocate grant support for the development of affordable housing in Powys. This proposal is called the 'Programme Delivery Plan' (PDP). All schemes proposed for financial support must be in line with the Council's strategic housing priorities and contribute towards maximising the provision of affordable housing. Once submitted, WG considers the PDP proposals and unless there are major concerns, provides its approval for the recommendations made by the Council. Once approved by WG, housing providers can claim the approved grants from WG for approved schemes.
- 2.1.2 There are three grant types currently included in the PDP:
- Social Housing Grant (SHG): provides a capital grant of 58% of the total cost to develop a social rented home.
 - 'Rent to Own' (RtO): provides a capital grant of 25% of the total cost to develop a 'Rent to Own' home¹.

¹ Rent to Own: the occupier pays a rent up to but not exceeding a market rent for the property. A proportion of the rent payments are accrued to help support the tenant being able to secure funding from a mortgage provider to buy the property after two years of occupancy. A tenant unable to purchase remains a tenant. When a 'Rent to Own' home is sold, any grant must be recycled within Powys by the housing provider to increase the provision of affordable housing.

- Recycled Capital Grant (RCG): this covers grant awarded to affordable homes which have since been sold – the selling landlord is required to recycle to support development of affordable homes in the Local Authority area in which the grant was invested.

2.2. Future Financial Support Scheme for Affordable Housing

2.2.1 Until 2021-2022, both the SHG and RtO grant schemes were available only to housing associations. Different grant schemes were in place for the development of new homes by local authorities. However, as a result of the Independent Review of Affordable Housing Supply undertaken by WG in 2017-2018, which explored ways to simplify and streamline the grant schemes for affordable housing development in Wales, a new grant system has been introduced with effect from April 2021.

2.2.2 All social housing, regardless of provider, will be supported with SHG from a single grant programme. New affordable housing developments by both the Council and housing associations will therefore from April 2021 be supported from a single grant scheme. RtO grant will no longer be available.

2.2.3 Included in the new approach is a different way of determining how much grant will be made available for each scheme. This will be determined on a scheme-by-scheme basis by the WG using the Standard Viability Model (SVM) which is a gap funding model. The SVM considers the amount of grant needed to make sure that the rent to be charged is within the affordability guidelines set by the WG for affordable homes. The SVM considers for each model income and costs over a thirty-year period. This means that each scheme will receive a bespoke award of grant, replacing the previous approach in which all schemes received grant of 58%, subject to the Total Scheme Cost (TSC) being within the WG's Acceptable Cost Guidance².

2.2.4 The new approach is designed to tailor the use of grant more efficiently, encouraging providers to focus on controlling TSC to secure value for money while still developing new homes at costs affordable to people with low and middle incomes. At the same time, due recognition will need to be given to making sure that homes are still provided in high-cost areas, where the demand for affordable housing is often higher than areas with lower property values.

2.2.5 There will remain opportunities to complement SHG with other funding sources. These include the WG Innovative Housing Programme (IHP)³,

² Acceptable Cost Guidance figures (ACGs) are provided by the Welsh Government as guidance on the likely acceptability of social housing scheme costs for grant purposes.

³ The Innovate Housing Programme offers support to help with additional and extraordinary costs incurred in trialling new ways of designing and building homes.

the 'Land for Housing' loan scheme⁴, the Integrated Care Fund (ICF)⁵ and the Town Centre Loan Fund⁶ which may help with the cost of converting redundant commercial properties for residential use.

2.2.6 The Council's Housing Revenue Account Business Plan is under review to allow it to generate surpluses which could be used to support increased development of new Council homes.

3.0 Advice

3.1 The Council, as the strategic housing authority for Powys, will retain the lead role in determining which proposals by providers should be recommended to the WG for financial support. The end to separate grant regimes for different categories of landlord will mean that the Council and housing associations will be considered as equally competent providers. It will therefore be important for the Council to have a robust, equitable and transparent approach for deciding the relative priorities of proposed affordable housing schemes. This will allow providers to make informed investment decisions and make sure that the Council is able to secure investment by the most appropriate providers in the homes that are most needed by the people of Powys.

3.2 The 'Powys Affordable Housing Programme Delivery Plan Guide' is attached as Appendix One. The purpose of the guide is to give clarity to all competent providers – including the Council's own Development Team – on how grant recommendations will be considered and prioritised. Housing associations and the Council's own Housing Services Development Team have been consulted in drawing up the guide. All have given their support.

3.3 Proposals for social and affordable housing will be assessed by the Council's Housing Strategy team, which is independent of the Development Team, against the following criteria:

- Housing market trends.
- Unmet housing need.
- The Council's strategic priorities, including those set out in 'Vision 2025'.
- Other recent or planned affordable housing schemes in the area.
- The availability of grants and other financial support for development in Powys.
- Cross subsidy between tenures.

⁴ The Land for Housing scheme allows housing associations to borrow money to buy land to build on. The money is recycled as loans are repaid.

⁵ The Integrated Care Fund, which includes primarily capital investment but also some revenue expenditure, is designed to help health and social care services to work together to support people with care needs. An example is Extra Care housing for older people.

⁶ The Town Centre Loan Fund is an interest free loan available to reduce the number of empty sites and properties in urban areas.

- Other specific considerations unique or relevant to the proposal, for example regeneration or pooled funding from different sources.

3.4 Options Appraisal

3.4.1 Option 1: do not adopt the Powys Affordable Housing Programme Delivery Plan Guide.

- The lack of clear guidance for determining the allocation of resources may lead to decisions being challenged on the basis of a lack of transparency and discourage investment by developers.

3.4.2 Option 2: adopt the Powys Affordable Housing Programme Delivery Plan Guide.

- Clarity for all providers of affordable homes about how the Council manages its PDP and how it ranks affordable housing schemes for the allocation of grant will encourage investment in the County.
- A robust process will provide reassurance to the WG that the PDP is evidence based, makes best use of the resources available to all affordable housing providers and demonstrates transparency and equity in the way proposals have been considered.

3.4.3 Cabinet is therefore recommended to adopt Option Two and approve the use of the Powys Affordable Housing Programme Delivery Plan Guide for managing the Council's PDP, with effect from April 2021.

4.0 Resource Implications

4.1 To help providers plan ahead as housing developments invariably span a number of financial years, WG provides indicative SHG levels for each local authority area. It is possible that the actual grant award to Powys may be more or less than this indicative figure. However, as the provision of affordable housing is a WG priority it is possible that the total grant available may be higher than the current indicative figures.

4.2 For 2021-2022 only the Welsh Government has allocated SHG between councils and housing associations. From 2022-2023, a single allowance will be awarded to each local authority area, with the strategic housing authority responsible for the allocation of the SHG across all providers, including councils and housing associations. The amount to be allocated from 2022 onwards, to each local authority in Wales, is to be decided during 2021-2022.

Table 4.1: SHG for Powys 2021-2022

	Year	Housing Associations	Powys County Council	Total for Powys	Notes
Indicative SHG	2021/22	£8,388,125	£2,097,031	£10,485,156	

- 4.2 The ICF allocation for Powys for 2021-2022 is £1,800,000.
- 4.3 Powys County Council has a comprehensive PDP covering proposals until 2024. It includes thirteen local authority schemes which, if all are considered viable and feasible, together need an estimated £17,000,000 grant funding. More schemes are being considered for 2024 onwards. There are also twenty proposed housing association schemes for the period running until 2024 that, if all are deemed feasible, would need an estimated £30,000,000 grant funding. There are also two Extra Care housing schemes, to which the Council has committed its support, requiring in the region of £5,000,000 SHG. The total estimated additional grant requirement for all schemes currently being proposed for development in Powys between now and 2024 is around £52,000,000. However, it should be noted that some schemes are in the early stages of development and may not be feasible.
- 4.4 It is unlikely that sufficient grant will be awarded to support all the proposed schemes. Alternative sources of funding are being explored by all housing providers. However, the disparity between the SHG likely to be available and the extensive range of proposals highlights the importance of having in place a robust, equitable and evidenced based approach to prioritising the schemes within the PDP.
- 4.5 The introduction and management of the Powys Affordable Housing Programme Delivery Plan Guide does not require the use of any additional resources as managing the PDP is provided for within current Housing Services budgets.
- 4.6 The Council's Section 151 Officer has noted the contents of this report and acknowledges that the number of schemes and grant requirement far exceeds that available through to 2024. Alternative funding sources need to be identified to ensure the schemes are affordable before they commence.

5.0 Legal implications

- 5.1 The requirement for a PDP is set out in this report. The approval of the annual PDP is an executive function which does not have to be referred to full Council or the Cabinet. Approval of the PDP is currently vested in the Housing Services Senior Management Team. However, to achieve a higher level of accountability and recognising the importance of the PDP to Vision 2025, it is proposed that in future the PDP be approved by the Council's Executive Management Team (EMT).
- 5.2 This report therefore requests approval for the 'Powys Affordable Housing Programme Delivery Plan Guide', which will be used by the Housing Services Senior Management Team to assess and recommend to EMT for approval each year's PDP.

5.3 The Head of Legal and Democratic Services (Monitoring Officer) has commented as follows: "I have nothing to add to the report".

6.0 Data Protection

6.1 There are no data protection implications arising from this report as the PDP and associated work does not require the processing of personal data.

7.0 Comment from local member(s)

7.1 Housing developments take place across Powys which means that the PDP and Affordable Housing Programme Delivery Plan Guide apply to all constituencies. All affordable housing schemes are subject to approval by the relevant planning authority, the planning process providing opportunities for members to comment on proposed developments in their constituencies.

8.0 Integrated Impact Assessment

8.1 An Impact Assessment is attached to this report as Appendix Two.

9.0 Recommendation

9.1 Cabinet is recommended to:

9.1.1 Approve the 'Powys Affordable Housing Plan Delivery Programme Guide' as set out in appendix 1 to the report.

9.1.2 Approve the delegation of authority to EMT to approve each year's PDP.

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Head of Service: Nina Davies

Corporate Director: Nigel Brinn

CABINET REPORT NEW TEMPLATE VERSION 2

Appendix One: Affordable Housing Programme Delivery Plan Guide

Powys County Council

Affordable Housing Programme Delivery Plan Guide

Effective: April 2021



Overview

The Council, as the Strategic Housing Authority for Powys, supports and guides the programme for the development of affordable housing across the county. This is called Programme Delivery Plan (PDP) and is used to inform the Welsh Government which schemes the Council would like to see prioritised for financial support. The **Affordable Housing Programme Delivery Plan Guide** sets out how the Council will assess proposals for inclusion in the Programme Delivery Plan.

The PDP covers additional affordable housing to be delivered by the Council and any housing associations awarded developer status by the Welsh Government. In this document they are referred to as providers.

Housing proposals in the PDP are considered by the Welsh Government for the award of Social Housing Grant (SHG), which is a Welsh Government grant to increase the provision of social rented housing. There may be other grants or loans provided by Welsh Government or the Council that will on occasion, depending on the grant being considered, require inclusion in the PDP.

The Council is required to submit an updated PDP to the Welsh Government every quarter, with recommendations for the award of grant support and an update on the progress of affordable housing projects under development in Powys. Welsh Government assesses the updated PDP, including the Council's recommendations, to determine which schemes will benefit from grant support.

The Council's Housing Strategy Team will make provision to meet with all providers and Welsh Government representative, before submitting an updated PDP. Approval of the PDP for submission to the Welsh Government is vested with the Council's Executive Management Team.

Priority Status and Ranking

Addressing housing need and deliverability of a proposal are essential criteria for successful housing schemes. There are different options to increase affordable housing supply. Examples are new build by providers, purchasing new build from a developer, purchasing existing properties and remodelling

existing buildings. Therefore, the criteria to be used to assess housing proposals are not intended to be rigid and provide for the necessary degree of flexibility to encourage providers to explore all options for increasing the availability of affordable homes in Powys. This is reflected in the four Status categories – set out below - which will be used to deter purely speculative proposals with little chance of delivery while encouraging viable proposals.



Priority Status - Opportunity

The Council’s strategic housing service will consider the opportunity offered by each proposal to meet housing needs not otherwise provided for by the housing market. Evidence of need should include references to housing demand recorded by ‘Homes in Powys’⁷ and any other relevant evidence, for example the relationship between local incomes and the ability of people to secure funding to buy a home or pay private sector rents and the incidence of homelessness in the community. Where there is clear evidence of housing need the Council will support the proposal in principle. This is called “Strategic Support”.

Priority Status ‘Opportunity’ proposals are not included in the PDP. This Priority Status category is designed to help providers make an initial assessment about whether or not an opportunity to provide homes will contribute towards the expansion of affordable housing opportunities to meet housing needs and contributes towards achieving a balanced housing market.

Priority Status - Potential Programme

‘Potential Programme’ schemes are proposals which have been assessed by the provider as potentially representing a viable opportunity to provide new homes that will meet evidenced housing need and which the Council has determined are sufficiently robust to be included in the PDP. To secure ‘Potential Programme’ status, the provider will need to have carried out a basic assessment of the viability of the proposal. ‘Potential Programme’ status recognises that time is needed to complete detailed viability and feasibility studies and take account of land acquisition, determination of housing mix,

⁷ ‘Homes in Powys’ is the common allocation scheme used by all social housing providers to allocate affordable homes across Powys. Information on the current levels of demand will be provided to housing providers proposing affordable housing developments in the county by Powys County Council.

planning permission and any other relevant approvals or contributions from other agencies, etcetera. 'Potential Programme' schemes will need to undergo concept scrutiny by the Welsh Government.

A 'Potential Programme' scheme needs to meet the following criteria:

- Grant is sought for the scheme. If no grant is required the scheme does not have to be included in the PDP. The Council should however be made aware of such schemes, to be able to coordinate development of social housing across the county to make sure investment goes where it is most needed to contribute towards securing a balanced housing market.
- Indication of tenures, property types and numbers of bedrooms.
- Indication of type of grant and amount sought.
- An estimate of timelines and delivery milestones (see appendix A).

Priority Status - Reserve Programme

'Reserve Programme' schemes are those that are close to being ready to progress towards the main programme when grant becomes available.

A 'Reserve Programme' scheme needs to meet the following criteria:

- Undergone successful concept scrutiny from the Welsh Government. There may be exceptions for package deals, off-the-shelf developments and acquisition of existing properties.
- Detailed or outline planning permission and Sustainable-drainage Approval Body approval in place or being actively sought.
- Land in the provider's ownership or an agreement in principle with the landowner to sell, transfer or release the land for the scheme.
- An expected lead-in-time that allows the provider to draw down grant within the next financial year following registration as a 'Reserve Programme' scheme. For more complex schemes a longer draw down lead in will be considered.
- Indication of tenures, property types and numbers of bedrooms.
- Indication of type of grant and amount sought.
- An estimate of timelines and delivery milestones (see appendix A).

'Reserve Programme' schemes may or may not progress to 'Main Programme' scheme status. Progress will be considered against the availability of grant and the relative merits of all schemes being considered for 'Main Programme' status.

Priority Status - Main Programme








The Council's Housing Services Senior Management Team is the decision-making body with responsibility to include schemes in the 'Main Programme'. It will receive recommendations from the Council's Housing Strategy Team to

inform its decisions, informed by the quarterly PDP updates submitted to the Welsh Government.

To be considered for 'Main Programme' status, a scheme will need to meet the criteria for 'Reserve Programme' schemes. In addition, 'Main Programme' schemes must have the full support from the Council to apply for Welsh Government grant. It is the Welsh Government which decides which scheme meet grant requirements. Grant awards are made by the Welsh Government.

Ranking schemes within the 'Potential Programme' and 'Reserve Programme' categories

The Council will consider the following factors when ranking schemes:

-  Housing need.
-  Housing market trends.
-  Powys Strategic Housing Priorities.
-  Other recent or planned affordable housing schemes in the area.
-  The availability and suitability of grants for development in Powys.
-  Cross subsidy between tenures.
-  Other specific considerations unique or relevant to the proposal, for example regeneration or pooled funding from different sources.

Because every scheme is different, a degree of informed flexibility may be used when ranking schemes. Rankings may however on occasion need to change, in response to changing housing needs, housing market trends and the availability of investment resources.

Housing Needs and Housing Markets

There are different ways of measuring housing need, for example the total number of households looking for social rented housing, the average waiting time before people looking for social housing are offered a home, the number of households relative to the availability of social housing in any given community, average income compared to average house prices, turnover of properties for sale and private sector rents.

One of the principal indicators of housing need is the Local Housing Market Assessment (LHMA)⁸. For social rented housing, the common housing register 'Homes in Powys' is also an important indicator of housing need⁹. 'Homes in Powys' groups different households into different priority bands which reflect their level of housing need. Bands One to Three demonstrate the most urgent

⁸ The LHMA 2019 covering Powys is not yet published but will be available on www.powys.gov.uk. The LHMA 2014 Update can be found at: https://en.powys.gov.uk/media/6635/EBo8-Local-Housing-Market-Assessment-2014-Update/pdf/EBo8_Local_Housing_Market_Assessment_2014_Update.pdf?m=1539592428357.

⁹ 'Homes in Powys' website: homesinpowys.org.uk

and acute need – it is only these bands that are considered when assessing social housing proposals. Bands Four and Five include households who are not yet ready to move or who are already living in suitable accommodation.

Additional evidence may be considered, for example the findings of local housing market surveys, research with local estate agents, people coming forward at consultation meetings or anecdotal evidence from local people and communities, including Councillors, town and parish councils, community groups and housing officers.

The Council recognises that for some communities, for example villages and particular areas within towns, demand and need for housing may not be immediately apparent. This will not disadvantage proposals for such communities so long as robust evidence is provided in support of the proposed schemes.

The Council's Market Position Statement 'Accommodation for an Ageing Population' sets out the housing and care related services for older people in Powys.¹⁰ This includes the need for Extra Care housing. The Council's Social Services team records need for supported housing.

Locations with higher recorded numbers of households in housing need are ranked higher for new development.

The 'Homes in Powys' figures are included as Appendix B to this Guide, providing details of acknowledged and evidenced housing need (as of February 2020) across the county. Updates will be published annually.

Powys Strategic Housing Priorities

'Powys Strategic Housing Priorities' were agreed in September 2020, drawing upon both housing and social care needs across the county. The top priority for new housing investment is for Extra Care schemes, followed by increasing the provision of general needs social rented homes and accommodation for those who are homeless.

Powys Strategic Housing Priorities

1. *Extra Care new build.*
2. *Development of new, and the acquisition on the open market of, properties suitable for general needs social rent. This includes wheelchair accessible homes.*
3. *Accommodation suitable for helping the Council provide accommodation for those who are homeless.*

¹⁰ The 'Accommodation for an Ageing Population' statement 2018 can be found at: https://en.powys.gov.uk/media/3634/Accommodation-for-an-ageing-population---Market-Position-Statement-June-2018/pdf/Market_Position_Statement_June_2018.pdf?m=1530538406760

4. *Supported housing for people who need help and support to maintain a home in the wider community. This includes both new build and reprofiling of existing properties. Of particular importance to the Council is having sufficient accommodation to allow people who have had to be housed in places outside of Powys to return to the county.*
5. *'Low-cost Home Ownership' opportunities.*
6. *'Short Breaks' - new build homes or acquisitions for respite care.*
7. *Remodelling of existing homes for any of the above priorities, without creating additional dwellings.*

Other local housing developments

Other affordable housing developments recently completed, in development or planned in the area where new schemes are being proposed will be taken into account, with consideration being given to whether or not there remains in those communities unmet housing needs. The Council supports development in all locations with an evidenced housing need. Locations with no recent or past social housing provision and with no other planned developments, where there is clear evidence of need, will be given a higher ranking.

Making best use of grant funding opportunities

The Council is always keen to secure for investment in homes across the county the maximum possible available grant funding - subject to any grant conditions supporting the 'Powys Strategic Housing Priorities' and the provision of homes needed by the people of Powys. This means that schemes that fit the amount and type of grants available may be ranked higher if the proposals also contribute towards securing a more balanced housing market in Powys.

Cross subsidy opportunities

In pursuit of value for money, the Council will consider schemes that are able to generate cross subsidy opportunities and which incorporate tenures that do not require grant and so can reduce the amount of grant needed for social or low-cost housing. Proposals for the same location that deliver more homes with less grant are ranked higher. Pooled resources which also reduce grant will also be taken into account.

Schemes that do not require any grant, do not have to be included in the PDP, but the Council needs to be aware of them, to make sure that schemes supported by grant are prioritised where most needed. The Council will consider offering its support for schemes not requiring grant support in the same way that it does for schemes which will benefit from financial assistance.

Other specific considerations unique or relevant to the proposal

Schemes may support strategically important priorities, for example regeneration of any area, support for local employers to recruit or retain employees or encourage and support inward investment. Such factors with evidence of how the housing proposal will contribute towards such priorities will be taken into account when determining the support to be given to individual proposals.

Regulatory matters



Suitable location of a scheme and sustainability of housing development is addressed through the planning system and development plans. Both Powys and the Brecon Beacons National Park use a 'settlement hierarchy'¹¹.

The Welsh Government scrutiny process for providing financial assistance for new homes ensures good design and value for money. One of the grant conditions is that homes meet the Welsh Housing Quality Standard (WHQS)¹² and Development Quality Requirements (DQR)¹³.

Schemes need to have been given formal approval by the developing organisation's board or other appropriate and empowered governance body. This is to help make sure that all schemes have been subject to the sufficient internal scrutiny to make sure that all proposals are viable and deliverable.

Nominating developing organisations for Section 106 opportunities

Section 106 agreements are agreements made under Section 106 of the Town and Country Planning Act 1990. These are also called planning obligations. One of the obligations may be the provision of affordable housing. Some Section 106 agreements require the Council to nominate a social housing provider, for example the Council's own landlord service or a housing association, to take ownership of the affordable housing element in a scheme. The Council will use the following criteria in informing any such nominations...

-  If a developer indicates they have already reached an agreement with a provider, the Council will contact the provider. If the provider confirms the agreement, the Council will nominate this provider.
-  If the developer indicates there is no agreement with a provider, the Council will first approach the provider with the most homes in the


¹¹ Please visit https://en.powys.gov.uk/media/4256/Adopted-Powys-LDP-Written-Statement-April-2018/pdf/Adopted_Powys_LDP_Written_Statement_April_2018.pdf?m=1536134184070 for details of the Powys Local Development Plan and <https://www.beacons-npa.gov.uk/wp-content/uploads/Brecon-Written-Statement.pdf> for details of the Brecon Beacons Local Development Plan.

¹² Please visit <https://gov.wales/welsh-housing-quality-standard-guidance> for the Welsh Government's guidance for WHQS

¹³ Please visit <https://gov.wales/development-quality-requirements-housing-associations> for the Welsh Government guidance on the DQR

village or neighbourhood. If that provider does not wish to be nominated to the developer, the Council will consider the provider with second most homes and so on until it identifies a provider able and willing to take on board the properties.

 In the event of development taking place in a community where there is no provider operating, and the Council is required to nominate a provider, the Council will approach the provider with the most homes in the surrounding area.

 If the Section 106 agreement does not include the requirement to nominate a provider, it is up to the developer and providers to determine how to progress. If asked, the Council will provide details of all providers active in the area.

Appendix A: Priority Status Checklist

Information Requested	Details	Date Completed
Scheme name		
Scheme location details including site map and eastings / northings		
Provider name		
Short description (own development, package deal, S106, land acquisition etc.)		
Evidence of housing need		
Scheme mix (numbers, tenure, type, size)		
Required grant (amount and type)		
Site ownership		
Date of board approval		
Date Welsh Government concept scrutiny completed		
Date Welsh Government pre-planning scrutiny completed		
Date Welsh Government construction scrutiny completed		
Date Pre-application Consultation completed		
Date outline planning permission submitted and obtained		
Date detailed planning permission submitted and obtained		
Date reserved matters resolved		
Date Sustainable-drainage Approval Body approval		
Date site / property acquisition completed		
Date contractor on site		
Date draw down grant		
Date scheme completion		

Because every scheme, location and provider are different, it is often not possible to complete the checklist at the start of a project. Updated information should be provided as an when it becomes available. Providers are able to provide information using the form above or in any other format that provides the same information.

Appendix B: 'Homes in Powys' figures

Settlements in Powys with an acknowledged and evidenced housing need (as of February 2021).

Number of households per settlement registered with 'Homes in Powys', Bands One to Three first and subsequent preferred location, as at February 2021.

The total number of households on the "Homes in Powys" register at the time this table was compiled was 3,486. The total number of households in Bands One to Three is 2,021. They are assessed as in housing need and ready to move. Households are asked to indicate in which settlement they would like to live most. This is called the 'first choice'. They can add settlements to increase the chance they will be offered a home to move to. This is called 'other choice'.

	Settlement	First choice	Other choice	Total choice
1.	Welshpool Y Trallwng	261	133	394
2.	Newtown Y Drenewydd	263	111	374
3.	Ystradgynlais incl. Penrhos Ystradgynlais gan gynnwys Penrhos	170	83	253
4.	Brecon incl. Llanfaes Aberhonddu gan gynnwys Llanfaes	173	53	226
5.	Llandrindod Wells Llandrindod	135	58	193
6.	Lower Cwmtwrch incl. Gurnos Cwmtwrch Isaf gan gynnwys Gurnos	45	138	183
7.	Llanidloes Llanidloes	101	67	168
8.	Glanrhyd Glanrhyd	27	120	147
9.	Machynlleth Machynlleth	110	34	144
10.	Guilsfield Cegidfa	23	120	143
11.	Montgomery Trefaldwyn	26	97	123
12.	Caersws Caersws	34	84	118
13.	Berriew Aberriw	18	97	115
14.	Llanymynech Llanymynech	13	95	108
15.	Four Crosses Llandysilio	14	93	107
16.	Builth Wells incl. Llanelwedd Llanfair-ym-Muallt gan gynnwys Llanelwedd	54	50	104
17.	Llanfyllin Llanfyllin	34	70	104
18.	Abercrave Abercraf	17	77	94
19.	Hay-on-Wye Y Gelli Gandryll	39	50	89
20.	Forden Ffordun	6	82	88
21.	Arddleen Arddlîn	3	84	87
22.	Llansantffraid Llansantffraid	14	73	87
23.	Kerry Ceri	9	75	84
24.	Trewern Trewern	4	75	79
25.	Crickhowell Crughywel	42	36	78
26.	Cwmgiedd Cwmgiedd	5	72	77
27.	Meifod Meifod	4	73	77
28.	Llandrinio Llandrinio	7	69	76

	Settlement	First choice	Other choice	Total choice
29.	Yniswen Ynyswen	8	68	76
30.	Upper Cwmtwrch Cwmtwrch Uchaf	5	70	75
31.	Talgarth Talgarth	20	53	73
32.	Abermule Aber-miwl	8	64	72
33.	Llanfair Caereinion Llanfair Caereinion	14	56	70
34.	Rhayader incl. Cwmdauddwr Rhaeadr Gwy gan gynnwys Cwmdauddwr	23	45	68
35.	Churchstoke Yr Ystog	19	47	66
36.	Castle Caereinion Castell Caereinion	3	60	63
37.	Llanrhaedr Llanrhaeadr	18	45	63
38.	Middletown Treberfedd	3	58	61
39.	Leighton Tre'r-llai	1	59	60
40.	Bronllys Bronllys	7	51	58
41.	Llanfechain Llanfechain	4	54	58
42.	Presteigne Llanandras	38	19	57
43.	Carno Carno	6	50	56
44.	Llansilin Llansilin	5	49	54
45.	Pool Quay Cei'r Trallwng	1	52	53
46.	Coelbren Coelbren	8	44	52
47.	Penegoes Penegoes	3	49	52
48.	Llandinam Llandinam	1	50	51
49.	Clyro Cleirwy	12	38	50
50.	Crossgates Y Groes	4	45	49
51.	Llangattock Llangatwg	13	36	49
52.	Sarn Sarn	2	46	48
53.	Talybont on Usk Tal-y-bont ar Wysg	4	42	46
54.	Trefeglwys Trefeglwys	0	46	46
55.	Crewgreen Crew Green	1	44	45
56.	Derwenlas Derwenlas	4	41	45
57.	Tregynon Tregynon	4	41	45
58.	Glasbury Y Clas-ar-Wy	1	43	44
59.	Howey Hawy	3	41	44
60.	Bettws Betws	3	40	43
61.	Llanbrynmair Llanbrynmair	7	36	43
62.	Llangynidr Llangynidr	5	38	43
63.	Three Cocks Aberllynfi	2	40	42
64.	Caehopkin Caehopcyn	0	41	41
65.	Llangedwyn Llangedwyn	1	40	41
66.	Llangynog Llangynog	4	37	41
67.	Knighton Tref-y-clawdd	21	19	40
68.	Newbridge-on-Wye Pontnewydd ar Wy	4	36	40
69.	Sennybridge incl. Defynnog Pontsenni gan gynnwys Defynnog	4	36	40
70.	Pontrobert Pontrobert	1	38	39
71.	Bwlch Bwlch	0	38	38
72.	Llanhamlach and Groesffordd Llanhamlach a Groesffordd	2	36	38

	Settlement	First choice	Other choice	Total choice
73.	Cradoc Cradoc	0	37	37
74.	Llanwrin Llanwrin	2	35	37
75.	Llanwrtyd Wells Llanwrtyd	14	23	37
76.	Libanus Libanus	1	35	36
77.	Llanerfyl Llanerfyl	1	35	36
78.	Llanigon Llanigon	0	36	36
79.	Bausley Basle	1	34	35
80.	Cemmaes Cemais	2	33	35
81.	Foel Y Foel	0	35	35
82.	Llanwyddyn Llanwddyn	1	34	35
83.	Aberhafesp Aberhafesb	0	34	34
84.	Bwylch y Cibau Bwlch y Cibau	2	32	34
85.	Llanspyddid Llansbyddid	0	34	34
86.	Llanyre Llan-llyr	1	33	34
87.	Mochdre Mochdre	1	33	34
88.	Refail Refail	0	34	34
89.	Dolanog Dolanog	1	32	33
90.	Llangadfan Llangadfan	2	31	33
91.	Penybontfawr Pen-y-bont-fawr	0	33	33
92.	Cemmaes Road Glantwymyn	1	31	32
93.	Dolfor Dolfor	0	32	32
94.	Llanfihangel Llanfihangel	2	30	32
95.	Llyswen incl. Boughrood Llyswen gan gynnwys Bochrwyd	2	30	32
96.	Clatter Cletwr	2	29	31
97.	Llanddew Llanddew	0	31	31
98.	Llandyssil Llandysul	0	31	31
99.	Ceinws Ceinws	1	29	30
100.	Glantwymyn Glantwymyn	0	30	30
101.	Llangurig Llangurig	0	30	30
102.	Penybontllan'emrys Pen-y-bont Llannerch Emrys	0	30	30
103.	Velindre Felindre	1	29	30
104.	Groes-lwyd Groes-lwyd	1	28	29
105.	Llandefalle Llandefalle	0	29	29
106.	Penybont Pen-y-bont	4	25	29
107.	Cwmlinau Cwmlinau	0	28	28
108.	Llanfrynach Llanfrynach	1	27	28
109.	Llangyniew Llangynyw	0	28	28
110.	Pencelli Pencelli	0	28	28
111.	PontNeathVaughan Pontneddfechan	1	27	28
112.	Y-Fan Y Fan	0	28	28
113.	Aberhosan Aberhosan	2	25	27
114.	Dolfach Dolfach	0	27	27
115.	Felinfach Felinfach	0	27	27
116.	Pennorth Pennorth	0	27	27

	Settlement	First choice	Other choice	Total choice
117.	Tretower Tretwr	1	26	27
118.	Llanfilo Llanfilo	0	26	26
119.	Llangorse Llangors	4	22	26
120.	Manafon Manafon	1	25	26
121.	Trecastle Trecastell	0	26	26
122.	Trefecca Trefecca	0	26	26
123.	Cwmdu Cwmdu	0	25	25
124.	Erwood Erwyd	0	25	25
125.	Llandefaelog Llandefaelog	0	25	25
126.	Trallong Trallong	0	25	25
127.	Adfa Yr Adfa	0	24	24
128.	Glangrwyney Glangrwyne	1	23	24
129.	Llangammarch Wells Llangamarch	2	22	24
130.	Pwllgloyw Pwllgloyw	0	24	24
131.	Scethrog Scethrog	0	24	24
132.	Abertridwr Abertridwr	1	22	23
133.	Bwlchyffridd Bwlchyffridd	0	23	23
134.	Llanstephan Llansteffan	0	23	23
135.	Cray Crai	0	22	22
136.	Llangenny Llangenni	0	22	22
137.	Pontfaen Pontfaen	0	22	22
138.	Cefn Coch Cefn Coch	0	21	21
139.	Llanbedr Llanbedr	0	21	21
140.	Lower Chapel Capel Isaf	0	21	21
141.	Pant-y-Dwr Pant-y-dwr	1	20	21
142.	Abbecwmhir Abaty Cwm-hir	2	17	19
143.	Builth Road Builth Road	0	19	19
144.	Glyntawe Glyntawe	1	17	18
145.	Nantmel Nantmel	0	18	18
146.	Old Radnor Pencraig	1	17	18
147.	St Harmon Saint Harmon	0	18	18
148.	Llandegley Llandeglau	0	17	17
149.	New Radnor Maesyfed	0	17	17
150.	Beulah Beulah	2	14	16
151.	Garth Garth	0	16	16
152.	Knucklas Cnwclas	2	14	16
153.	Norton Nortyn	0	16	16
154.	Evenjobb Einsiob	0	15	15
155.	Llangunllo Llangynllo	0	15	15
156.	Lloiney Llwyni	1	14	15
157.	Felindre Felindre	2	12	14
158.	Gladestry Llanfair Llythynwg	1	13	14
159.	Kinnerton Kinnerton	0	14	14
160.	Llanbadarn Fynydd Llanbadarn Fynydd	0	14	14

	Settlement	First choice	Other choice	Total choice
161.	Llanbister Llanbister	0	14	14
162.	Llanwrthwl Llanwrthwl	0	14	14
163.	Aberedw Aberedw	1	12	13
164.	Beguildy Bugeildy	0	13	13
165.	Cilmery Cilmeri	0	13	13
166.	Llanddewi Llanddewi	0	12	12
167.	Llanfihangel Talylyn	0	12	12
168.	Hundred House Hundred House	0	11	11
169.	Rhosgoch Rhosgoch	0	11	11
170.	Dolau Dolau	0	10	10
171.	Llanbister Road Llanbister Road	0	10	10
	Total	2021	6613	8634

Cyngor Sir Powys County Council

Impact Assessment (IA)

The integrated approach to support effective decision making



Please read the accompanying guidance before completing the form.

This **Impact Assessment (IA)** toolkit, incorporates a range of legislative requirements that support effective decision making and ensure compliance with all relevant legislation. **Draft versions of the assessment should be watermarked as “Draft” and retained for completeness. However, only the final version will be made publicly available. Draft versions may be provided to regulators if appropriate. In line with Council policy IAs should be retained for 7 years.**

Service Area	Housing	Head of Service	Nina Davies	Portfolio Holder	Clr Iain McIntosh
Proposal	Affordable Housing Programme Delivery Plan Guide				
Outline Summary / Description of Proposal					
Introduce the “Powys Affordable Housing Programme Delivery Plan Guide” to provide a transparent process how the strategic housing authority will prioritise affordable housing schemes that will be eligible for Social Housing Grant and other grants. This aims to enable eligible housing providers to plan future schemes of affordable housing, in line with the Council’s priorities.					

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

Version	Author	Job Title	Date
1	Henk Jan Kuipers	Housing Service Improvement Officer	9 February 2021

2. Profile of savings delivery (if applicable)

2019-20	2020-21	2021-22	2022-23	2023-24	TOTAL
£N.A.	£ N.A.	£ N.A.	£ N.A.	£ N.A.	£ N.A.

3. Consultation requirements

Consultation Requirement	Consultation deadline/or justification for no consultation
Choose an item.	The Council’s own Housing Development Team and representatives from developing housing associations in Powys have been consulted.

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Impact Assessment (IA)

The integrated approach to support effective decision making



4. Impact on Other Service Areas

**Does the proposal have potential to impact on another service area? (Have you considered the implications on Health & Safety and Corporate Parenting?)
PLEASE ENSURE YOU INFORM / ENGAGE ANY AFFECTED SERVICE AREAS AT THE EARLIEST OPPORTUNITY**

Adult Services	<input type="checkbox"/>	Education	<input type="checkbox"/>	Legal and Democratic Services	<input type="checkbox"/>
Children's Services	<input type="checkbox"/>	Finance	<input type="checkbox"/>	Property, Planning and Public Protection	<input type="checkbox"/>
Commissioning	<input type="checkbox"/>	Highways, Transportation and Recycling	<input type="checkbox"/>	Transformation and Communications	<input type="checkbox"/>
Digital Services	<input type="checkbox"/>	Housing and Community Development	<input checked="" type="checkbox"/>	Workforce and OD	<input type="checkbox"/>

Data Protection Impact Assessment

Will the proposal involve processing the personal details of individuals? Yes No
 Is Powys County Council the data controller? Yes No
 If you have answered yes to either of the above you will be required to complete, as a minimum, the screening questions on the data protection impact assessment.
 For further advice please contact the Data Compliance Team.

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4a Geographical Locations

What geographical area(s) will be impacted by the proposal? (Chose all those applicable)

Powys	<input checked="" type="checkbox"/>	Brecon	<input type="checkbox"/>	Llandrindod and Rhayader	<input type="checkbox"/>	Machynlleth	<input type="checkbox"/>
		Builth and Llanwrtyd	<input type="checkbox"/>	Llanfair Caereinion	<input type="checkbox"/>	Newtown	<input type="checkbox"/>
North	<input type="checkbox"/>	Crickhowell	<input type="checkbox"/>	Llanfyllin	<input type="checkbox"/>	Welshpool and Montgomery	<input type="checkbox"/>
Mid	<input type="checkbox"/>	Hay and Talgarth	<input type="checkbox"/>	Llanidloes	<input type="checkbox"/>	Ystradgynlais	<input type="checkbox"/>
South	<input type="checkbox"/>	Knighton and Presteigne	<input type="checkbox"/>				

5. How does your proposal impact on Vision 2025?

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Council's Well-being Objective	How does the proposal impact on this Well-being Objective?	IMPACT Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
The Economy We will develop a vibrant economy	The Guide aims to maximise the use of grants made available. The building of new homes provides employment and apprentice opportunities, both for the housing providers, as well as the construction sector; local builders, suppliers and professionals may be contracted; it provides increase of number lifetime homes and a proportion will provide a home to economically active people.	Very Good		Choose an item.
Health and Care We will lead the way in providing effective, integrated health and care in a rural environment	The Guide confirms the Council's priority to develop extra care schemes, which will enable people to live independent.	Very Good		Choose an item.
Learning and skills We will strengthen learning and skills	No direct impact expected.	Neutral		Choose an item.
Residents and Communities We will support our residents and communities	The Guide aims to provide affordable housing in communities with the largest need. A proportion of people that will move into new homes will leave a private sector home vacant for a different household to move into.	Very Good		Choose an item.

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Source of Outline Evidence to support judgements

The indicative amount of Social Housing Grant and Recycled Capital Grant available between 2020 and 2024 is £13,570,000 and Rent to Own Grant is £1,060,000. Together with £3,410,000 and an investment of £13,060,000, the total investment is £31,100,000. It is planned that development of 188 new homes will start between 2020 and 2024. Of this 188, 138 are destined for extra care. More housing schemes are in the planning.

There is much evidence of the benefits of extra care in keeping older people healthy and independent, and reducing levels of health and care support needed. Evidence can be accessed here: <https://www.housinglin.org.uk/Topics/browse/HousingExtraCare/Evaluation/>

Community Housing Cymru states that for every £1 received from Welsh Government, housing associations invest £5.73 back into the economy. https://chcymru.org.uk/uploads/general/2439_CHC_Global_Accounts_2019_v4.pdf

There is much evidence of the positive impact of social housing besides an economic impact. It also tackles inequalities by reducing child poverty and homelessness and by providing inclusive, sustainable housing options health and wellbeing. It contributes to successful placemaking and community resilience (including rural community resilience). Social housing can be preventative if they offer savings in non-housing budgets (for example health, care, justice, social security), but this is difficult to evidence.

<https://www.sfha.co.uk/mediaLibrary/other/english/66628.pdf>

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

Well-being Goal	How does proposal contribute to this goal?	<u>IMPACT</u> Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from drop down box below
<p>A prosperous Wales: An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.</p>	<p>The Guide provides a transparent way of prioritising housing schemes, to enable investment in Powys. However, the grant conditions and quality of building are set by Welsh Government. In general terms additional affordable housing will have a positive impact on the economy, employment and apprenticeships. There is an increasing emphasis from Welsh Government on building using “modern methods of construction” provided by Welsh companies.</p>	<p>Very Good</p>		<p>Choose an item.</p>
<p>A resilient Wales: A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).</p>	<p>No direct impact expected, although new build homes need to meet Welsh Government quality requirements. The planning process will take account of environmental impact and sustainability.</p>	<p>Neutral</p>		<p>Choose an item.</p>

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Impact Assessment (IA)

The integrated approach to support effective decision making



Well-being Goal	How does proposal contribute to this goal?	<u>IMPACT</u> Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from drop down box below
<p>A healthier Wales: A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.</p> <p>Public Health (Wales) Act, 2017: Part 6 of the Act requires for public bodies to undertake a health impact assessment to assess the likely effect of a proposed action or decision on the physical or mental health of the people of Wales.</p>	<p>The strategic priorities in the Guide have been drawn up between the Housing and Social Services, and approved by the Council's Executive Management Team. By making extra care a priority, this is expected to have a positive impact on the independence, health and well-being of those that need housing with care and their carers.</p>	<p>Very Good</p>		<p>Choose an item.</p>
<p>A Wales of cohesive communities: Attractive, viable, safe and well-connected Communities.</p>	<p>The Guide itself does not contain any requirements, but this is ensured by grant conditions and the planning process.</p>	<p>Good</p>		<p>Choose an item.</p>
<p>A globally responsible Wales: A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.</p> <p>Human Rights - is about being proactive (see guidance)</p> <p>UN Convention on the Rights of the Child: The Convention gives rights to everyone under the age of 18, which include the right to be treated fairly and to be protected from discrimination; that organisations act for the best interest of the child; the right to life, survival and development; and the right to be heard.</p>	<p>No direct impact expected.</p>	<p>Neutral</p>		<p>Choose an item.</p>
<p>A Wales of vibrant culture and thriving Welsh language: A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation. <i>Incorporating requirements under the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards</i></p>				
<p>Opportunities for persons to use the Welsh language, and treating the Welsh language no less favourable than the English language</p>	<p>No direct impact expected.</p>	<p>Neutral</p>		<p>Choose an item.</p>

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Well-being Goal	How does proposal contribute to this goal?	IMPACT Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
<i>Opportunities to promote the Welsh language</i>	No direct impact expected.	Neutral		Choose an item.
<i>People are encouraged to do sport, art and recreation.</i>	No direct impact expected.	Neutral		Choose an item.
A more equal Wales: A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio economic background and circumstances). <i>Incorporating requirements under the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011 and the Social Economic duty (2020).</i>				
<i>Age</i>	Especially extra care schemes will have a positive impact on well-being health and independence of people over the age of 60 and their carers. All new homes need to meet the Welsh Government development quality standards and Welsh Housing Quality Standard.	Very Good		Choose an item.
<i>Disability</i>	All new homes need to meet the Welsh Government development quality standards and Welsh Housing Quality Standard and building regulations. Extra care schemes will be level access and dementia friendly with care on site to enable independent living. A proportion of other new build homes will be suitable for wheelchairs. In general, people with disabilities are more likely to be out of paid work and to be in poverty. A larger proportion of people with a disability than people without a disability is reliant on an affordable home.	Very Good		Choose an item.
<i>Gender reassignment</i>	No direct impact expected.	Neutral		Choose an item.
<i>Marriage or civil partnership</i>	No direct impact expected.	Neutral		Choose an item.
<i>Race</i>	No direct impact expected, due to the relatively small numbers. In general Black people in Wales are far more likely to live in social housing than White, Asian, Mixed or Other race.	Neutral		Choose an item.
<i>Religion or belief</i>	No direct impact expected.	Neutral		Choose an item.

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Well-being Goal	How does proposal contribute to this goal?	IMPACT Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
<i>Sex</i>	No direct impact expected. Although, 62 % of current Council tenants and 62% of people registered on the common housing register "Homes in Powys" is female.	Neutral		Choose an item.
<i>Sexual Orientation</i>	No direct impact expected.	Neutral		Choose an item.
<i>Pregnancy and Maternity</i>	No direct impact expected.	Neutral		Choose an item.
<i>Socio-economic duty</i>	The Guide itself does not have an impact, but building new affordable homes does reduce inequalities that result from socio-economic disadvantage	Very Good		Choose an item.

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Source of Outline Evidence to support judgements

Development quality requirements for housing providers: <https://gov.wales/development-quality-requirements-housing-associations>

Welsh Housing Quality Standard: <https://gov.wales/welsh-housing-quality-standard-guidance>

7. How does your proposal impact on the council's other key guiding principles?

Principle	How does the proposal impact on this principle?	IMPACT Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
Sustainable Development Principle (5 ways of working)				
Long Term: Looking to the long term so that we do not compromise the ability of future generations to meet their own needs.	The Guide aims to ensure homes are build where there is an evidenced need for them.	Very Good		Choose an item.
Collaboration: Working with others in a collaborative way to find shared sustainable solutions.	The Housing and Social Services work collaborative with developing housing providers to develop as many homes as possible to address need and maximise grant opportunities to achieve this.	Very Good		Choose an item.
Involvement (including Communication and Engagement): Involving a diversity of the population in the decisions that affect them including: Unpaid Carers: Ensuring that unpaid carers views are sought and taken into account	The views of communities and unpaid carers are nor directly sought when deciding to prioritise schemes. However, housing providers consult formally with communities through the pre-planning-application process and often informally through community events.	Poor		Choose an item.
Prevention: Understanding the root causes of issues to prevent them from occurring including: Safeguarding: Preventing and responding to abuse and neglect of children, young people and adults with health and social care needs who can't protect themselves.	Social housing can be preventative if they offer savings in non-housing budgets (for example health, care, justice, social security), but this is difficult to evidence.	Good		Choose an item.

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Principle	How does the proposal impact on this principle?	IMPACT Please select from drop down box below	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
Integration: Taking an integrated approach so that public bodies look at all the well-being goals in deciding on their well-being objectives.	Council and housing providers work collaborative to met housing need.	Good		Choose an item.
Powys County Council Workforce: What Impact will this change have on the Workforce?	No direct impact expected. No new tasks are proposed. Demands can be met within existing workforce.	Neutral		Choose an item.
Payroll: How will this impact salary, any overtime/enhanced payments etc? Does this affect any particular group of employees? E.g. Male/Female dominated workforce. Does this proposal comply with the Councils Single Status Terms and Conditions?	No direct impact expected. No new tasks are proposed. Demands can be met within existing workforce.	Neutral		Choose an item.
Welsh Language impact on staff	No direct impact expected.	Neutral		Choose an item.
Apprenticeships: Has consideration been given to whether this change impacts negatively, or positively on Apprenticeships within the service?	No direct impact expected.	Neutral		Choose an item.
Source of Outline Evidence to support judgements				

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

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Communities	How does the proposal impact on residents and community?	<u>IMPACT</u> See impact definitions in guidance document	What will be done to better contribute to a more positive impact or to mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> See impact definitions in guidance document	Source of Outline Evidence to support judgement
Towns and larger settlements	<p>The Guide gives greater priority to communities with higher numbers of evidenced need. While smaller rural settlements are not ruled out, all, or most new affordable housing is expected to be in towns and large villages and not in small villages. The positive impact is that areas with highest need are prioritised; the negative impact is that in smaller settlements with a lower number of housing needs are not prioritised. Those rural areas may have already little provision of social housing. There may be other options like homebuy or self-build available. It needs to be noted that housing providers will only build where they are confident there is demand for the next few decades. In addition, small schemes consisting of a few homes are often not financially viable on its own. It is not expected that the housing need in towns and larger villages will be addressed soon, so it is unlikely affordable housing will be build in smaller rural settlements soon.</p> <p>The Guide contains an appendix which shows the settlements with the number of households that are in housing need for a social rented home.</p> <p>The impact categories do not match the impact, which is “A more severe but manageable impact (positive or negative) on a significant number of vulnerable groups/individuals which is not likely to last more than twelve months.”</p>	Major		Choose an item.	

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Smaller rural settlements	See above. "Noticeable (positive or negative) impact on the community or a more manageable impact on a smaller number of vulnerable groups/individuals which is not likely to last more than six months.	Moderate			
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9. What are the risks to service delivery or the council following implementation of this proposal?

Description of risks			
Risk Identified	Inherent Risk Rating Impact X Likelihood (See Risk Matrix in guidance document)	Mitigation	Residual Risk Rating Impact X Likelihood (See Risk Matrix in guidance document)
<p>No new social housing by housing providers in smaller rural settlements with a need for them.</p> <p>It is likely to occur on many occasions, a persistent issue and the impact is more severe but manageable on a significant number of vulnerable groups/individuals which is likely to last more than twelve months.</p> <p>It needs to be noted that if grant would be prioritised differently, the risk would be transferred to other communities.</p>	20	<p>It is difficult to mitigate against insufficient grant, economy of scale and uncertainty about future housing demand. Homebuy is available in rural areas, although update has been one or two purchases per year. Households that want or need to live in more rural areas will mainly rely on existing social housing provision. Local connection in the allocation process gives the priority above households with no local connection. Planning conditions may secure affordability, but unlikely as social rent. Housing providers may still choose to build and finance from other sources. The Council's Housing Revenue Account, for example, has self-financed a scheme in Sarn and other rural developments may be delivered.</p>	20

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10. Overall Summary and Judgement of this Impact Assessment?

Outline Assessment (to be inserted in cabinet report)	Cabinet Report Reference:
<p>The introduction of the "Powys Affordable Housing Programme Delivery Plan Guide" provides a transparent process how the strategic housing authority will prioritise affordable housing schemes that will be eligible for Social Housing Grant and other grants. This aims to enable eligible housing providers to plan future schemes of affordable housing, in line with the Council's priorities. The Guide aims to prioritise extra care schemes. It also aims to prioritise new building in areas with highest evidenced need for it.</p>	

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

What additional evidence and data has informed the development of your proposal?

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None.

12. On-going monitoring arrangements?

What arrangements will be put in place to monitor the impact over time?

Annual statistical return to Welsh Government.

Please state when this Impact Assessment will be reviewed.

The Guide and its impact will be reviewed a year after implementation.

13. Sign Off

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Position	Name	Signature	Date
Impact Assessment Lead:	Henk Jan Kuipers		15-02-2021
Head of Service:	Nina Davies		
Portfolio Holder:	CLlr Iain McIntosh		

14. Governance

Decision to be made by	Date required
Cabinet	13 April 2021

FORM ENDS

Cabinet / Delegated				
Decision Date	Title	Portfolio Holder	Lead	Decision Maker
13/07/21	Castle Caereinion Consultation Report	Councillor Phyl Davies	Emma Palmer	Cabinet
13/07/21	Schools Budget Outturn Reports	Councillor Phyl Davies	Mari Thomas	Cabinet
13/07/21	Llanfyllin Phase 2 Proposal paper	Councillor Phyl Davies	Emma Palmer	Cabinet
13/07/21	Moving on Up	Councillor Iain McIntosh	Nina Davies	Cabinet
13/07/21	Historic Environment SPG	Councillor Iain McIntosh	Peter Morris	Cabinet
13/07/21	Archaeology SPG	Councillor Iain McIntosh	Peter Morris	Cabinet
13/07/21	Newtown Place Plan to adopt as SPG	Councillor Iain McIntosh	Peter Morris	Cabinet
13/07/21	Annual Information Governance Statement	Councillor Beverley Baynham		Cabinet
13/07/21	Amended Inter Authority Agreement for the Mid Wales Growth Deal	Councillor Rosemarie Harris	Clive Pinney	Cabinet
13/07/21	Powys Affordable Housing Programme Delivery Plan Guide	Councillor Iain McIntosh	Nina Davies	Cabinet
14/07/21	Demolition of Garages	Councillor Iain McIntosh	Nina Davies	Portfolio Holder
14/07/21	Gypsy and Traveller Agreement	Councillor Iain McIntosh	Nina Davies	Portfolio Holder
14/07/21	Resettlement and Assistance Report	Councillor Iain McIntosh	Nina Davies	Portfolio Holder
27/07/21	Quarter 1 Performance Report	Councillor Beverley Baynham	Emma Palmer	Cabinet
27/07/21	Quarter 1 Strategic Risk Register	Councillor Aled Davies	Jane Thomas	Cabinet
27/07/21	Revenue and Capital Update Quarter 1	Councillor Aled Davies	Jane Thomas	Cabinet
27/07/21	Transforming Support at Home	Councillor Myfanwy Catherine Alexander	Dylan Owen	Cabinet
27/07/21	Affordable Housing Package Deals	Councillor Iain McIntosh	Nina Davies	Cabinet
21/09/21	Draft WESP	Councillor Phyl Davies	Emma Palmer	Cabinet
21/09/21	Mount Street & Cradoc consultation report	Councillor Phyl Davies	Emma Palmer	Cabinet
21/09/21	Llanbedr Consultation Report	Councillor Phyl Davies	Emma Palmer	Cabinet
21/09/21	Churchstoke Consultation Report	Councillor Phyl Davies	Emma Palmer	Cabinet
21/09/21	Llanfihangel Rhydithon Consultation Report	Councillor Phyl Davies	Emma Palmer	Cabinet
21/09/21	Treasury Management Quarter 1 Update	Councillor Aled Davies	Jane Thomas	Cabinet
21/09/21	ACRF		Alison Bulman	Cabinet

21/09/21 LDP Monitoring Report	Councillor Iain McIntosh	Peter Morris	Cabinet
21/09/21 New Ways of Working Management of Change		Nigel Brinn	Cabinet
12/10/21 Ysgol Bro Hydden Objection report	Councillor Phyl Davies	Emma Palmer	Cabinet
12/10/21 Ysgol Dyffryn Trannon Objection Report	Councillor Phyl Davies	Emma Palmer	Cabinet
02/11/21 Quarter 2 Performance Report	Councillor Beverley Baynham	Emma Palmer	Cabinet
02/11/21 Quarter 2 Strategic Risk Register	Councillor Aled Davies	Jane Thomas	Cabinet
02/11/21 Quarter 2 Revenue and Capital Update	Councillor Aled Davies	Jane Thomas	Cabinet
19/11/21 Homes in Powys Policy Update	Councillor Iain McIntosh	Nina Davies	Portfolio Holder
23/11/21 Castle Caereinion Objection report	Councillor Phyl Davies	Emma Palmer	Cabinet
23/11/21 Llanfihangel Rhydithon Objection report	Councillor Phyl Davies	Emma Palmer	Cabinet
23/11/21 Council Tax Base	Councillor Aled Davies	Jane Thomas	Cabinet
23/11/21 Treasury Management Quarter 2 Update	Councillor Aled Davies	Jane Thomas	Cabinet
14/12/21 Llangedwyn / Llanfechain consultation report	Councillor Phyl Davies	Emma Palmer	Cabinet
14/12/21 Llanfyllin Phase 2 consultation report	Councillor Phyl Davies	Emma Palmer	Cabinet
14/12/21 Ysgol Calon Cymru Consultation report	Councillor Phyl Davies	Emma Palmer	Cabinet
18/01/22 Draft WESP	Councillor Phyl Davies	Emma Palmer	Cabinet
08/02/22 Quarter 3 Performance Report	Councillor Beverley Baynham	Emma Palmer	Cabinet
08/02/22 Quarter 3 Strategic Risk Register	Councillor Aled Davies	Jane Thomas	Cabinet

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