



CONSULTATION ON THE PROPOSAL TO CLOSE TALGARTH & BRONLLYS C.P. SCHOOLS

OBJECTION REPORT

1. Introduction

Powys County Council consulted on a proposal to close Talgarth and Bronllys C.P. Schools on the 31st August 2017, in accordance with the School Standards and Organisation (Wales) Act 2013, and to establish a new community primary school on the 1st September 2017 that will operate across the current two sites. Upon the opening of a new school building in Talgarth, the two current sites will close. The consultation opened on the 7th March 2016 and closed on the 18th April 2016. On May the 24th 2016, the Council's Cabinet agreed to proceed with the proposal to close the schools, and statutory notices were published from the 25th May 2016 to the 22nd June 2016.

2. Objections received

One objection was received during the statutory notice period.

The issues raised in the objection are listed in the below table, along with the authority's response to them.

REF	ISSUE	LOCAL AUTHORITY RESPONSE
1. EDUCATIONAL STANDARDS AND CLASS SIZES		
<p>The new school will have large class sizes (est.n=30), something that is educationally inappropriate for teaching two years It is the objectors' <u>professional view that this would lead to a lowering of educational standards in comparison with current provision at</u> lowering of educational standards in comparison to the current provision at Talgarth and Bronllys</p>		<p>It is the authority's aspiration for primary education, as stated in the School Reorganisation Policy 2015, to have schools with single year group classes, and schools that have headteachers with no classroom responsibilities. However, the Policy goes on to state that 'it must be recognised that in some situations, geographic or linguistic issues make the aspirational targets for size of schools difficult to achieve, and consideration will be given to the specific circumstances of each school under consideration'.</p> <p>The proposal is to build a new 150 pupil capacity school in Talgarth, which will include 5 classrooms + early year's provision. The calculation for size of the new school is based on pupil projections which are shown on page 18 of the consultation document, which indicate that there will be 133 pupils in both schools by 2020.</p> <p>The School Admissions (Infant Class Sizes) (Wales) Regulations 2013 states</p> <p>1) No infant class may contain more than 30 pupils while an ordinary teaching session is conducted by a single school teacher.</p> <p>(2) Where an ordinary teaching session is conducted by more than one school teacher, the infant class may not contain more than 30 pupils for every one of those teachers.</p> <p>(3) Where an infant class contains any excepted pupil (as defined by regulation 5), the limits in paragraphs (1) and (2) apply as if the excepted pupil were not included in the class.</p>

The current total combined number of pupils per year group at both schools is as follows (Teachers Centre 22/06/16):

Nursery/Reception	21
Year 1	18
Year 2	13
Year 3	22
Year 4	7
Year 5	13
Year 6	19

The organisation of classes and year groups will be the responsibility of the governing body and headteacher, taking account of pupil numbers. It is the authority's view that five classrooms provides enough flexibility for the school to manage future fluctuations in pupil numbers.

Depending on how the governing body and headteacher wish to organise classes, it may be possible that some classes will have to have mixed aged groups, but having five classrooms provides an opportunity for the school to have some single-age classes – this is an improvement on the current situation, where Talgarth CP School currently provides education in four mixed aged classes, and Bronllys in two mixed aged classes. Schools often choose to have vertical grouping of more than one year group in a class. There is no problem with this as teachers are used to differentiating the work according to both age and stage of development. There is no evidence that mixed-age classes with two year groups have lower standards than schools with single-aged classes.

The authority is of the view that the educational standards at the new school will be as good or better than the current provision at Talgarth and Bronllys. Page 20 of the Consultation Document outlines the National Categorisation of Schools information for Talgarth and Bronllys schools, which shows that they are both categorised as 'amber' support category. It is Estyn's opinion that the proposal will at least maintain the current standards of education in the area.

<p>Concerns were raised that that it is educationally inappropriate to teach two years in one classroom, particularly from ages 7 – 11.</p>	<p>There is no evidence that it is educationally inappropriate to teach KS2 pupils in one setting. The reduction in the number of year groups in the class, will reduce the required level of differentiation to be undertaken by the teachers compared to the current situation, particularly at Bronllys, where there are only two mixed-aged classes, which include pupils aged from 4 – 7 and 7 – 11. This will allow the teachers to improve educational attainment in the new school.</p>
<p>a)The savings outlined in the consultation document simply don't justify the lowering of educational standards</p>	<p>The main reasons for the proposal are to improve educational standards and the learning environment for pupils from Talgarth and Bronllys, and not to make savings.</p> <p>The authority's view is that the proposal provides better value for money, by ensuring a more equitable distribution of funding and a new school building, replacing two older schools.</p> <p>Although the estimated annual revenue savings are small, it is the authority's view that the improved buildings, appropriate sized class rooms and the reduced number of age ranges in the classes will all support the expected improvement in educational standards in the new school. In addition there will be focused leadership, in a single school location, to monitor teaching and learning which will facilitate the raising of standards.</p>
<p>b) ESTYN fail to discuss the impact of these larger classes in their assessment of the proposal, perhaps because in the consultation documents it is not mentioned (in this regard the consultation documents</p>	<p>Estyn is responsible for the content of its response to any school proposal.</p> <p>The Consultation Document refers to the implications on staffing at page 9. Establishing the specific staffing structure will be the responsibility of the shadow governing body and headteacher in accordance with the school's priorities, pupil numbers and budget.</p>

<p>appear to have deliberately left out key information in terms of the staffing of the new school).</p>	<p>The new school will be funded in accordance with the authority's fair funding formula and the authority accepts that the average class size in the new school will be higher than currently in both schools. ESTYN will be fully aware through their own MIS systems and information provided by schools through the annual pupil level PLASC census return.</p>
<p>c) A key issue in the Talgarth / Bronllys area is that many parents already send their children to Llangorse school which has higher educational standards, in part due to average class sizes and one teacher per year group at ages 7-11</p>	<p>The authority funds all schools in accordance to its agreed fair funding formula, the responsibility for planning and managing the budget rests with the individual governing body. The authority notes the comments around the number of parents from the Talgarth / Bronllys area who choose to send their children to Llangorse CiW School and other primary schools.</p>
<p>d) Average class size in the UK is 19 children, which is significantly above the OECD average of 14.</p>	<p>The authority notes this comment. Schools in Powys are funded in accordance with the authority's fair funding formula, with the responsibility of planning and delivering the curriculum resting with the governing body. Maximum infant class sizes in Wales are laid down in legislation.</p>
<p>2. CAPACITY OF THE NEW SCHOOL</p>	
<p>Concerns were raised that the new school will not have sufficient places for the children who will need to attend the school. There are plans for extensive house building in Talgarth and Bronllys, much of which is already in progress. This forms a key part of the Brecon Beacons National Park housing strategy. These extra houses and the children associated with them have not been</p>	<p>In determining the new school capacity of a 150 places, and in providing projected pupil numbers within the consultation report: 133 by 2020 - full consideration has been made of the proposed housing developments in conjunction with the Brecon Beacons National Park Local Development Plan.</p> <p>In addition to considering the projected pupil numbers, the authority has instructed the contractor to ensure that the new school design is flexible and is easily adaptable to accommodate classroom extensions - in a cost effective manner, if required in the future.</p>

included in the projections outlined in the consultation report

a) Neighbouring schools are full or close to full, so there is little spare capacity to educate children from new build housing

In determining the new school capacity at all of the primary schools, full consideration has been made in evaluating current pupil numbers, projected pupil numbers and the BBNP Local Development Plan. The authority has also considered the number of pupils who currently travel out of catchment to receive their primary education.

The planned capacities of the five new schools in the Gwernyfed catchment area are:

School	Proposed capacity (Reception to Year 6)
Archdeacon Griffiths CiW School	150 places
Clyro CiW School	120 places
Llangorse CiW School	150 places
Hay-on-Wye CP School	210 places
New school at Talgarth	150 places

The authority is of the view that planned capacities at each proposed new school are sufficient.

b) The extent of the new housing is currently unclear (especially in relation to the Mid Wales Hospital site), as such it is an unfortunate time to be making capital expenditure decisions based on population projections.

The authority notes this comment. The authority, through its Schools Service Asset Management Plan (SSAMP) has identified the estimated impact of housing developments rising from both the Authority's and National Parks LDP's.

<p>c) Failure to plan a school of sufficient capacity could easily exacerbate the educational problems identified above (see Issue 1), with the potential for classes in excess of 35 pupils per teacher and/or insufficient classroom space.</p>	<p>Please see response 1.</p> <p>In determining the new school capacity, and in providing projected pupil numbers within the consultation report - full consideration has been made in of the proposed housing developments in conjunction with the Brecon Beacons National Park Local Development Plan.</p> <p>In addition to considering the projected pupil numbers, the authority has instructed the contractor to ensure that the new school design is flexible and is easily adaptable to accommodate classroom extensions - in a cost effective manner, if required in the future.</p> <p>Response 1 includes information related to the statutory requirements for infant class sizes, which should not be planned to exceed 30 pupils throughout the year.</p>
<p>d) A key motivation of the current proposal is that it will remove excess spaces from the two current schools. It seems likely this is a counter-productive aim in the medium term.</p>	<p>The authority is in constant discussions with Welsh Government with regards to the issue around surplus capacity and this is why careful considerations have been made in determining the new schools capacity at Hay on Wye, Clyro, Llangors, Archdeacon Griffiths and Talgarth and Bronllys – this has been done in discussions with the individual schools themselves.</p> <p>The authority has instructed the contractor to ensure that the new school designs are flexible and easily adaptable to accommodate classroom extensions - in a cost effective manner, if required in the future, therefore addressing the issues around surplus capacity across all schools.</p> <p>Although the proposal will not significantly reduce the level of current surplus places, it will reduce the average cost per pupil which is one of the measures that the authority and Welsh Government use as a cost of surplus places.</p>
<p>3. CONCERNS THAT THE COUNCIL IS NEGLIGENT IN ITS CONSIDERATION OF</p>	

ROAD SAFETY

Concerns were raised that Powys County Council and individuals responsible for this proposal at Powys County Council have been negligent in their consideration of road safety directly outside the school (the school is to be located on a dangerous A road).

The authority disagrees with the accusation that it has been negligent in its consideration of road safety. The issue of road safety directly outside the planned location of the new school has been discussed with officers responsible for health and safety and highways.

The Regional Transport Consortium and the Police and Crime Commissioner are also statutory consultees in respect of this consultation.

The Transport and Highways Dept. is a statutory consultee in respect of the planning process - they will provide further details about the actions that will be required to ensure that pupils access the school safely.

a) No mention was made of this issue in the response to the consultation summary even though this was raised by us as a grounds for objection in the consultation process.

Road safety was identified as an issue at point 2 and point 14 within the Consultation Report, and a response was provided.

The authority's Schools Service department, Property Service and Transport and Highways Department will work together in relation to safe routes to school and consider what if any pedestrian crossing should be provided. The authority will also evaluate whether there is a need to reduce the speed limit and to erect extra signage on the trunk road during the start and end of the school day – at the proposed new school site at the Bronllys/ Talgarth roundabout.

The Transport and Highways Dept. is a statutory consultee in respect of the planning process - they will provide further details about the actions that will be required to ensure that pupils access the school safely.

b) We highlighted 3a prior to the council considering issuing the statutory notice but no steps were taken to inform the council of the deficient consultation reply.

The authority is of the view that it responded appropriately to the consultees' issue regarding road safety in the Consultation Report. Following publication of the Consultation Report on the 19th of May 2016, the consultee subsequently contacted the authority by email to express concern that the response to the issue contained within the Consultation Report was not adequate. The authority provided a reply to the consultee on 25th May 2016, stating that it was of the view that the responses provided within the

	<p>Consultation Report sufficiently addressed the issues raised around road safety and the anaerobic digester.. Therefore, no further steps were taken to inform the Cabinet about the views of the consultee about this issue.</p>
<p>c) The council and individuals at the council have a clear duty of care to the children of Talgarth and Bronllys</p>	<p>The authority agrees with this statement and fully understands its legal obligations in relation to safeguarding and health and safety at schools. The school will be designed with pupils' safety and well-being as a fundamental principle. –please also see response 3 and 3a.</p>
<p>d) The council and individuals at the council may be leaving themselves open to criminal prosecution as a result of their failure in respects to 3c</p>	<p>The authority notes this comment.</p>
<p>4. CONCERNS ABOUT A NEARBY ANAEROBIC DIGESTER PLANT</p>	
<p>Concerns were raised that the proposed school is located within 500 metres of an anaerobic digester (AD) which is located on a hill above the proposed school site</p>	<p>The anaerobic digester plant is on a farm which is approximately 500 metres from the proposed new school site in Talgarth.. The proposed site is designated for community and school use within the Brecon Beacons National Park Authority's Local Development Plan in the knowledge of the presence of the plant. Whilst the authority understands that the plant had some initial concerns, these concerns have reduced as the plant has been in operation. The authority would expect that as the plant is operating to standards set by the NRW and Local Authority Environmental Health, that good environmental controls are maintained. These controls will be tested during the planning application stage of the proposed development.</p> <p>The authority has taken advice about the impact this facility will have on the proposed new school, and no issues have been identified.</p>
<p>a)The effects of pollution from the AD have not been considered sufficiently given that outside play is a key element of primary school provision</p>	<p>The authority would expect that, as the plant is operating to standards set by the NRW and Local Authority Environmental Health, good environmental controls are maintained. These controls will be tested during the planning application stage of the proposed development.</p>

<p>b) The Brecon Beacons National Park objected to the location of the AD previously because it was slightly less close to housing (approx. 600 metres). We would fully expect them to object to the location of a school so close to the AD based on the same principles.</p>	<p>The Brecon Beacons National Park is one of the planning authorities for this area, and it will receive and consider the application.</p>
<p>c) The potential effects of an accident at the AD plant have not been considered. This could make the proposed school site unusable for an extended period of time</p>	<p>The authority notes this comment and is fully aware of its obligation in providing acceptable primary education in the area.</p> <p>The authority has taken advice on the impact this facility will have on the proposed location of the new school without any identified issues.</p>

