

**CYNGOR SIR POWYS COUNTY COUNCIL.**

**CABINET EXECUTIVE  
26<sup>th</sup> September 2023**

**REPORT AUTHOR:** County Councillor Pete Roberts  
Cabinet Member for a Learning Powys

**REPORT TITLE:** Llanfyllin / North Welshpool Catchment Review

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**REPORT FOR:** Decision

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**1. Purpose**

1.1 The purpose of this report is to outline the findings of the review of education in the Llanfyllin / North Welshpool catchments which restarted in April 2023, and to seek Cabinet approval of a revised preferred way forward for the catchment.

1.2 The report is supported by the following Appendices:

Appendix A – Engagement Report

Appendix B – Llanfyllin / North Welshpool Catchment Review

Appendix C – Impact Assessment

**2. Background**

**Introduction**

2.1 The Council has been developing plans for the Llanfyllin / North Welshpool catchment since the Council's Strategy for Transforming Education in Powys<sup>1</sup> was initially approved in April 2020, however to date, no statutory proposals have been taken forward in respect of the schools in the catchment.

2.2 In July 2022, the newly appointed Cabinet published a Work Programme for Wave 2 of the Transforming Education Programme, which included a commitment to restart the review of the Llanfyllin catchment, and to explore the potential of establishing additional Welsh-medium provision in the catchment as part of the Catchment Area Review. The review of the Llanfyllin catchment restarted in April 2023.

2.3 The review has focussed on revisiting the previously identified preferred way forward for the catchment and subsequent amendments

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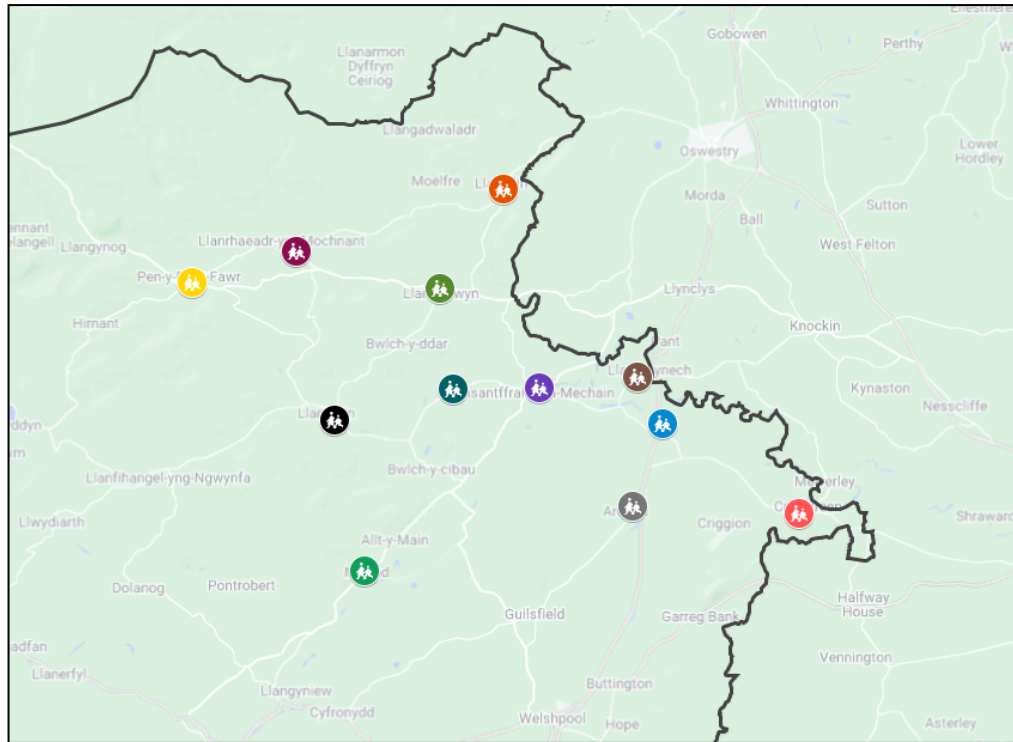
<sup>1</sup> Available at: <https://en.powys.gov.uk/article/9344/Transforming-Education-Strategy>

agreed between September 2020 and March 2022, to determine whether or not this is still the preferred way forward for the area.

- 2.4 Alongside this, a period of engagement has been held with the schools that are within the scope of this work. This included an engagement meeting for staff and governors at those schools, and visits to each school. The findings of the engagement work carried out are summarised in the Engagement Report, which is attached to this report as Appendix A.
- 2.5 Due to the geographical location of schools in the area, some schools which are considered part of the Welshpool catchment area are considered as part of this review, so the review is now being known as the 'Llanfyllin / North Welshpool Catchment Review'.

### **Current provision in the Llanfyllin / North Welshpool area**

- 2.6 The following 12 schools in the Llanfyllin / North Welshpool catchments are within the scope of this review:
- Arddleen C.P. School
  - Brynhafren CP School
  - Carreghofa CP School
  - Llandysilio C. in W. School
  - Llanfechain C. in W. School
  - Llangedwyn C. in W. School
  - Llansantffraid C. in W. School
  - Ysgol Bro Cynllaith
  - Ysgol Llanfyllin
  - Ysgol Llanrhaeadr-ym-Mochnant
  - Ysgol Meifod
  - Ysgol Pennant
- 2.7 The 12 schools are shown on the following map:



*Black – Ysgol Llanfyllin, Yellow – Ysgol Pennant, Dark Red – Ysgol Llanrhaeadr-ym-Mochnant, Orange – Ysgol Bro Cynllaith, Green – Llangedwyn C. in W. School, Dark Blue – Llanfychain C. in W. School, Purple – Llansantffraid C. in W. School, Brown – Carregofa C.P. School, Blue – Llandysilio C. in W. School, Red – Brynhafron C.P. School, Dark Green – Ysgol Meifod, Grey – Arddleen C.P. School*

- 2.8 Ysgol Pennant is a Welsh-medium school and Ysgol Llanfyllin and Ysgol Llanrhaeadr-ym-Mochnant are dual stream schools. All other schools within the scope of the review are English-medium schools.
- 2.9 Llandysilio C. in W. School, Llanfychain C. in W. School, Llangedwyn C. in W. School and Llansantffraid C. in W. School are Church in Wales schools. The other 8 schools are community primary schools.
- 2.10 The following is a summary of pupil numbers at each school in June 2023:

	R	1	2	3	4	5	6	Total
<b>Arddleen C.P. School</b>	13	22	18	14	18	19	11	115
<b>Brynhafron C.P. School</b>	4	2	5	3	6	6	5	31
<b>Carreghofa C.P. School</b>	18	20	12	12	10	15	12	99
<b>Llandysilio C. in W. School</b>	8	6	6	14	9	9	5	57

<b>Llanfechain C. in W. School</b>	1	2	7	3	13	8	4	38
<b>Llangedwyn C. in W. School</b>	0	1	2	1	4	2	1	11
<b>Llansantffraid C. in W. School</b>	11	17	15	15	16	12	26	126
<b>Ysgol Bro Cynllaith</b>	5	2	5	1	4	4	4	25
<b>Ysgol Llanfyllin (Primary)</b>	18	20	17	19	18	19	29	140
<b>Ysgol Llanrhaeadr-ym-Mochnant</b>	15	10	12	9	15	12	6	79
<b>Ysgol Meifod</b>	8	8	9	10	14	8	6	63
<b>Ysgol Pennant</b>	10	8	17	12	8	14	12	81
<b>TOTAL</b>	<b>111</b>	<b>118</b>	<b>125</b>	<b>113</b>	<b>135</b>	<b>128</b>	<b>121</b>	<b>851</b>

	7	8	9	10	11	12	13	Total
<b>Ysgol Llanfyllin (Secondary)</b>	112	106	100	124	100	55	54	651

2.11 Further data relating to the 12 schools is provided on pages 11-16 and page 54 onwards in the 'Llanfyllin / North Welshpool Catchment Review' document which is attached as Appendix B.

### **The Case for Change**

2.12 The case for change in the area is as follows:

**i) Schools with low pupil numbers**

Pupil numbers at the primary schools in the catchment range from 11 to 140. There are less than 35 pupils in 3 of the 10 schools.

**ii) Decreasing pupil numbers**

Total pupil numbers across the 12 schools are projected to decrease over the next 5 years.

**iii) Variations in budget per pupil**

The budget per pupil for the primary schools ranges from £4,159.42 to £11,689.50. Four of the primary schools have a budget per pupil which is higher than £7,000. The average budget per pupil for Powys primary schools is £4,656.50.

**iv) Building condition**

4 of the primary schools in the catchment are assessed as being condition C. There is estimated backlog maintenance of £6,200,801 across the schools in the catchment. However it is recognised that some of these schools have had improvement or remedial works carried out during the last few years.

**v) Surplus capacity**

There are currently 543 surplus places across the 12 schools which are within the scope of this review.

**Review of the Preferred Way Forward**

2.13 An initial preferred way forward for the Llanfyllin Catchment was considered and approved by Cabinet in September 2020. This was as follows:

- A new community campus for approximately 900 pupils aged 4-18 in Llanfyllin, replacing the Ysgol Llanfyllin buildings.
- To establish and build a new 360 place area school, to replace Carreghofa School and Llandysilio C. in W. School and potentially other schools in the Welshpool catchment. Site to be confirmed.
- To establish a new Welsh-medium school on the current Llanrhaeadr-ym-Mochnant site, replacing Ysgol Pennant and Llanrhaeadr-ym-Mochnant Primary School. This may require capital funding to extend the school.
- To provide an extension to Llansantffraid CiW Primary School.
- Possible closure of Llangedwyn CiW School, Llanfechain CiW School and Ysgol Bro Cynllaith.

2.14 Since September 2020, work has been undertaken to move towards implementation of the Preferred Way Forward, and a number of subsequent Cabinet decisions have been taken. These are outlined in Section 3 on pages 6-8 of the 'Llanfyllin / North Welshpool Catchment Review' document, which is attached as Appendix B. Some of the work undertaken / decisions made mean that some elements of the original Preferred Way Forward are no longer applicable.

2.15 As part of the Llanfyllin / North Welshpool Catchment Review, the original preferred way forward from September 2020 has been reviewed, to identify an updated preferred way forward for the

catchment. The process of reviewing the preferred way forward is outlined in detail in Appendix B.

2.16 As part of reviewing the preferred way forward, options for groups of schools have been considered. This is outlined in detail in Appendix B, however a summary is provided below:

i) Llangedwyn, Llanfechain and Llansantffraid

Llangedwyn C. in W. School

2.17 As pupil numbers at Llangedwyn C. in W. School have decreased significantly in recent years to just 11 pupils, future options for Llangedwyn were considered separately to the other two schools.

2.18 The options appraisal that was carried out is included in pages 21-28 of Appendix A. This exercise identified the following preferred option for Llangedwyn C. in W. School:

- Close Llangedwyn C. in W. School, pupils to transfer to Llanfechain C. in W. School.

2.19 Implementation of this option would be subject to the Statutory Process as outlined in the School Organisation Code.

Llanfechain C. in W. School and Llansantffraid C. in W. School

2.20 Options for Llanfechain and Llansantffraid cannot be considered until the future of Llangedwyn C. in W. School is clearer.

2.21 Once the way forward for Llangedwyn is clearer, the Council will work with Llansantffraid C. in W. School, Llanfechain C. in W. School and the Diocese of St Asaph to explore the possibility of merging the two schools to establish a dual sited school, with the intention of moving them to a new building within the next ten years.

2.22 This project will be included in the Council's new Strategic Outline Programme (SOP) for the Welsh Government's Sustainable Communities for Learning Programme's 'rolling nine-year programme' (previously known as the 21<sup>st</sup> C Schools and Colleges Programme), in order to draw down capital funding from the Welsh Government to match-fund the Council's contribution. The new SOP will be submitted to Welsh Government in early 2024.

ii) Pennant, Llanrhaeadr-ym-Mochnant and Ysgol Bro Cynllaith

Ysgol Pennant and Ysgol Llanrhaeadr

2.23 The paper concludes that the preferred option previously identified for these two schools, which is for them to continue as standalone

schools, but to support Ysgol Llanrhaeadr to move along the language continuum, still stands.

- 2.24 Alongside this, there is a longer term aspiration to merge the two schools in the future, to establish a dual sited school.

#### Ysgol Bro Cynllaith

- 2.25 As Ysgol Bro Cynllaith is a small school, with less than 30 pupils, future options for Ysgol Bro Cynllaith were considered separately to the other two schools.
- 2.26 The options appraisal that was carried out is included in pages 29-38 of Appendix B. This exercise identified the following preferred option for Ysgol Bro Cynllaith:
- Close Ysgol Bro Cynllaith, pupils to attend Llanrhaeadr-ym-Mochnant School
- 2.27 Implementation of this option would be subject to the Statutory Process as outlined in the School Organisation Code.
- 2.28 Should Ysgol Bro Cynllaith close, consideration would need to be given to ensuring that pupils can transfer to Welsh-medium provision by ensuring that late immersion ('Trochi') provision is available to them at Llanrhaeadr-ym-Mochnant School. This would support the Council's aspiration to increase Welsh-medium pupil numbers at Ysgol Llanrhaeadr-ym-Mochnant, with the aim of supporting the school to move along the Welsh language continuum
- 2.29 However, given that Ysgol Bro Cynllaith is located in the same geographical area as Llangedwyn C. in W. School, there is a need to understand the future for Llangedwyn school before proceeding with a statutory process in respect of Ysgol Bro Cynllaith.

#### iii) Brynhafren, Ardleen, Carreghofa and Llandysilio

##### Brynhafren C.P. School

- 2.30 As pupil numbers at Brynhafren C.P. School have decreased significantly in the last few years, from 59 in January 2016 to 31 in January 2023, future options for Brynhafren C.P. School were considered separately to the other two schools.
- 2.31 The options appraisal that was carried out is included in pages 39 – 48 of Appendix B. This exercise identified the following preferred option for Brynhafren C.P. School:
- Close Brynhafren C.P. School, pupils to attend their nearest alternative schools in Powys

- 2.32 Implementation of this option would be subject to the Statutory Process as outlined in the School Organisation Code.

Ardleen C.P. School, Carreghofa C.P. School and Llandysilio C. in W. School

- 2.33 The original preferred way forward for the catchment included a possible new build area school to replace these schools. However, concerns about the practicalities of this were identified during the engagement exercise which will need to be explored further.
- 2.34 However, the aspiration remains to provide a new build area school within the next ten years.
- 2.35 This project will be included in the Council's new Strategic Outline Programme (SOP) for the Welsh Government's Sustainable Communities for Learning 'rolling nine-year programme' (previously known as the 21<sup>st</sup> C Schools and Colleges Programme), in order to bid for capital funding from the Welsh Government to match-fund the Council's contribution. The new SOP will be submitted to the Welsh Government in early 2024.
- 2.36 In the short to medium term, consideration will be given to the possibility of establishing one multi-sited school in the area, building upon the strong collaboration that currently takes place between these three schools which are very closely located in villages along the A483.

iv) Ysgol Llanfyllin and Ysgol Meifod

- 2.37 The original preferred way forward for the catchment included a commitment to a new build community campus in Llanfyllin. The aspiration to provide a new build community campus in Llanfyllin remains.
- 2.38 This project will be included in the Council's new Strategic Outline Programme (SOP) for the Welsh Government's Sustainable Communities for Learning Programme's 'rolling nine-year programme' (previously known as the 21<sup>st</sup> C Schools and Colleges Programme), in order to bid for capital funding from the Welsh Government to match-fund the Council's contribution. The new SOP will be submitted to the Welsh Government in early 2024.
- 2.39 Ysgol Meifod will continue as a standalone school for the time being, however options for the school will be considered as part of the development of a new campus in Llanfyllin in the future.

v) Overall conclusion



2.40 As outlined in Appendix B, the revised preferred way forward for the Llanfyllin / North Welshpool catchment is as follows:

**Llangedwyn C. in W. School, Llanfechain C. in W. School, Llansantffraid C. in W. School**

- To close Llangedwyn C. in W. School, pupils to transfer to Llanfechain C. in W. School.
- To explore with Llansantffraid C. in W. School and Llanfechain C. in W. School the possibility of establishing a dual sited school in the area
- To provide a new building in the future to replace Llansantffraid C. in W. School and Llanfechain C. in W. School

**Ysgol Bro Cynllaith, Ysgol Pennant, Ysgol Llanrhaeadr**

- Ysgol Pennant and Ysgol Llanrhaeadr to continue to operate as standalone schools. Support Ysgol Llanrhaeadr to move along the language continuum
- To consider, when appropriate, the possibility of establishing a dual sited school in the future
- To close Ysgol Bro Cynllaith, Powys-based pupils to transfer to Llanrhaeadr-ym-Mochnant School. Trochi support to be provided to enable pupils to transfer to the Welsh-medium stream if they wish to do so.

**Brynhafren C.P. School, Ardleen C.P. School, Carreghofa C.P. School, Llandysilio C. in W. School**

- To close Brynhafren C.P. School, pupils to transfer to their nearest alternative schools in Powys
- To explore with Ardleen C.P. School, Carreghofa C.P. School and Llandysilio C. in W. School the possibility of establishing a new multi-sited school in the area, with the potential of a new build at a later stage
- To explore the possibility of establishing Welsh-medium early years/primary provision in the area

**Ysgol Llanfyllin and Ysgol Meifod**

- Provide a new building for pupils aged 4-18 in Llanfyllin, replacing the current Ysgol Llanfyllin buildings.
- To support Ysgol Llanfyllin to move along the language continuum.
- Options for Ysgol Meifod to be considered alongside the building development in Llanfyllin.

2.41 The preferred way forward identified in Appendix B and above will require implementation over a number of years. A 10 year programme has been developed to outline how the preferred way forward will be implemented on a phased basis. This is as follows:

Schools	Short Term (2023-2025)	Medium Term (2025-2028)	Long Term (2028-2033)
<b>i) Llangedwyn, Llanfechain and Llansantffraid</b>			
Llangedwyn C. in W. School	Undertake Statutory Process on a proposal to close the school		
Llanfechain C. in W. School and Llansantffraid C. in W. School		Explore the possibility of merging the two schools at their existing locations	Provide a new building
<b>ii) Pennant, Llanrhaeadr-ym-Mochnant and Bro Cynllaith</b>			
Ysgol Bro Cynllaith	Undertake Statutory Process on a proposal to close the school (once there is clarity on the way forward for Llangedwyn C. in W. School)		
Ysgol Pennant and Ysgol Llanrhaeadr-ym-Mochnant	Support Ysgol Llanrhaeadr to move along the continuum	Support Ysgol Llanrhaeadr to move along the continuum	Ysgol Llanrhaeadr to become a Welsh-medium school; Further consideration given to merging the two schools on their existing sites

<b>iii) Brynhafren, Ardleen, Carreghofa, Llandysilio</b>			
Brynhafren C.P. School	Undertake Statutory Process on a proposal to close the school		
Ardleen, Carreghofa, Llandysilio	Discussions with Mudiad Meithrin about establishing Cylch Ti a Fi / Cylch Meithrin provision in the area	Explore the possibility of merging the schools on their existing sites	Provide a new building in the area
<b>iv) Ysgol Llanfyllin and Ysgol Meifod</b>			
Ysgol Llanfyllin	Continue to work with the school to support it to move along the language continuum		Provide a new community campus for pupils aged 4-18
Ysgol Meifod			Options for Ysgol Meifod to be considered as part of the capital development in Llanfyllin

### **3. Advice**

- 3.1 The advice of officers is that Cabinet approves the indicative preferred way forward for the Llanfyllin / North Welshpool catchment which is outlined in 2.40 above, with implementation to be taken forward over 10 years as outlined in 2.41.
- 3.2 Implementation of the preferred way forward will be subject to the statutory process outlined in the School Organisation Code in respect of any school reorganisation processes required.
- 3.3 In addition, implementation of the indicative preferred way forward will be subject to obtaining funding for the capital developments which are

outlined. These developments will be reflected in the Council's revised Strategic Outlined Programme (SOP) for the Sustainable Communities for Learning Programme.

- 3.4 In accordance with the timeline outlined in 2.41, it is advised that officers will bring back proposal papers related to the proposals to close Llangedwyn C. in W. School and Brynhafren C.P. School in October 2023, and a proposal paper related to the proposal to close Ysgol Bro Cynllaith early in 2024.

#### **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.

##### 4.1.1 Llangedwyn C. in W. School, Llanfechain C. in W. School, Llansantffraid C. in W. School

Based on the current formula, it is estimated that implementation of the proposal to close Llangedwyn C. in W. would result in annual revenue savings to the Council of around **£56.4k**. This overall figure comprises a potential saving on Schools' delegated formula-led funding of over £91.0k reduced by estimated additional transport costs of £34.6k.

Detailed costings on the further work on the preferred way forward will take place as more details are known.

##### 4.1.2 Ysgol Bro Cynllaith, Ysgol Pennant, Ysgol Llanrhaeadr

Based on the current formula, it is estimated that implementation of the proposal to close Ysgol Bro Cynllaith would result in annual revenue savings to the Council of around **£83.7k**. This overall figure comprises a potential saving on Schools' delegated formula-led funding of over £120.9k reduced by estimated additional transport costs of £37.2k.

Detailed costings on the further work on the preferred way forward will take place as more details are known.

##### 4.1.3 Brynhafren C.P. School, Ardleen C.P. School, Carreghofa C.P. School, Llandysilio C. in W. School

Based on the current formula, it is estimated that implementation of the proposal to close Brynhafren C.P. School would result in annual revenue savings to the Council of around **£29.3k**. This overall figure comprises a potential saving on Schools' delegated formula-led funding of over £102.7k reduced by estimated additional transport costs of £73.4k.

Detailed costings on the further work on the preferred way forward will take place as more details are known.

#### 4.1.4 Ysgol Llanfyllin

No detailed costings have been carried out to date regarding this option and will be developed as more details are known of the proposal.

4.2 In summary it is estimated that implementation of the initial proposals would result in total estimated annual savings to the council of around **£169.4k**. This overall figure comprises a potential saving on Schools' delegated formula-led funding of over £314.6k reduced by estimated additional transport costs of £145.2k.

4.3 In line with the Council's Scheme for Financing Schools, should any of the schools be in a deficit budget position on closure of the school, the deficit is written off. Surplus balances are also returned to the Council. The current estimated cumulative surplus projected for 31 March 2024 for the schools proposed for closure are shown in the table below.

	Estimated Cumulative Surplus / (Deficit) as at 31 March 2024 (£)
Llangedwyn C. in W. School	(£30k)
Ysgol Bro Cynllaith	£34k
Brynhafren C.P. School	(£123k)

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 various 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.

4.5 The Head of Finance (Section 151 Officer) notes the content of the report and can support the recommendations.

## **5. Legal implications**

- 5.1 Legal: The recommendations can be supported from a legal point of view provided the statutory process for school organisation proposals in the School Organisation Code (2018) are followed.
- 5.2 The Head of Legal and Democratic Services (Monitoring Officer) has commented as follows: “ I note the legal comment and support the recommendations”

## **6. Data Protection**

- 6.1 The current recommendation does not involve processing personal data.

## **7. Comment from local member(s)**

To follow.

## **8. Impact Assessment**

- 8.1 An initial impact assessment in respect of the preferred way forward is attached as Appendix C. 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.

- 8.2 The summary of the impact assessment is as follows:

‘The impact assessment suggests that the impact is generally positive with some negative aspects, such as the requirement for some pupils to travel further than they currently do to school, and the impact on the communities in which schools that may close are located. The development of new facilities for schools in the area would address many issues related to the poor condition of the buildings, ensuring future pupils are taught in facilities that are fit-for-purpose, improving their learner entitlement and experience. The proposed changes in the Llanfyllin / North Welshpool area would raise the profile of Welsh-medium provision in the area, which should lead to an increase in pupils numbers, therefore contributing to the Welsh Government target to achieve a million Welsh speakers by 2050. In the longer term, this should have an impact on the Welsh-medium opportunities available in the secondary sector in the area.’

- 8.3 Should Cabinet approve the indicative preferred way forward, individual impact assessment will be carried out for each proposal taken forward.
- 8.4 These would be updated throughout each process, and updated versions will be taken into consideration by Cabinet when determining whether or not to proceed with each proposal.

## 9. Recommendation

It is recommended that Cabinet approves the following:

- i) That, subject to the statutory processes as outlined in the School Organisation's Code, the Council's indicative preferred way forward for schools in the Llanfyllin / North Welshpool catchment is as follows:

### Llangedwyn C. in W. School, Llanfechain C. in W. School, Llansantffraid C. in W. School

- To close Llangedwyn C. in W. School, pupils to transfer to Llanfechain C. in W. School.
- To explore with Llansantffraid C. in W. School and Llanfechain C. in W. School the possibility of establishing a dual sited school in the area
- To provide a new building in the future to replace Llansantffraid C. in W. School and Llanfechain C. in W. School

### Ysgol Bro Cynllaith, Ysgol Pennant, Ysgol Llanrhaeadr

- Ysgol Pennant and Ysgol Llanrhaeadr to continue to operate as standalone schools. Support Ysgol Llanrhaeadr to move along the language continuum
- To consider, when appropriate, the possibility of establishing a dual sited school in future.
- To close Ysgol Bro Cynllaith, Powys-based pupils to transfer to Ysgol Llanrhaeadr. Trochi support to be provided to enable pupils to transfer to the Welsh-medium stream if they wish to do so.

### Brynhafren C.P. School, Ardleen C.P. School, Carreghofa C.P. School, Llandysilio C. in W. School

- To close Brynhafren C.P. School, pupils to transfer to their nearest alternative schools in Powys
- To explore with Ardleen C.P. School, Carreghofa C.P. School and Llandysilio C. in W. School the possibility of establishing a new multi-sited school in the area, with the potential of a new build at a later stage
- To explore the possibility of establishing Welsh-medium early years/primary provision in the area.

### Ysgol Llanfyllin and Ysgol Meifod

- Provide a new community campus for pupils aged 4-18 in Llanfyllin, replacing the current Ysgol Llanfyllin buildings, when capital funding is available.
  - To support Ysgol Llanfyllin to move along the language continuum.
  - Options for Ysgol Meifod to be considered alongside the building development in Llanfyllin.
- ii) To bring back proposal papers in respect of Llangedwyn C. in W. School and Brynhafren C.P. School in October 2023.
- iii) To bring back a proposal paper in respect of Ysgol Bro Cynllaith early in 2024.
- iv) To undertake further activity to implement the indicative preferred way forward in accordance with the timeline outlined in 2.33.

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