



Mr Owain Lloyd (Director of Education & Lesiure)
Carmarthenshire County Council
Castle Hill
County Hall
Carmarthen
SA31 1JP

Date: 22 December 2025

Subject: Formal Objection to the Proposed Closure of Ysgol Llansteffan

Dear Mr Owain,

On behalf of Llansteffan and Llanybri Community Council, we submit this **formal objection** to the proposed closure of **Ysgol Llansteffan**.

Our objection is grounded in the statutory framework governing school organisation and public decision-making in Wales. In brief, the proposal **does not satisfy the presumption against the closure of rural schools**, has **not demonstrated lawful consideration of alternatives**, and fails to evidence compliance with **equality, well-being/sustainability, learner travel, ALN, Welsh-language, and admissions/capacity** duties. We therefore ask the Cabinet to **pause** the proposal and remedy these defects before any further decision is taken. (School Organisation Code 2018; appointed day order; Code consultation status).

Executive Summary

1. **Presumption against closure of rural schools (statutory).** Ysgol Llansteffan is a designated rural school and benefits from the **presumption against closure**. Under the *School Organisation Code (2018)*, proposers must *conscientiously consider* all viable alternatives - including collaborative/community use, and other configuration options - **before** progressing to consultation and again **during** it. No closure should be pursued unless it is truly the **last resort** and the case for closure is **strong**, evidenced and proportionate. The proposal does not demonstrate this.
2. **Decision-maker duties and lawful process.** Since the *School Standards and Organisation (Wales) Act 2013*, **local authorities determine most closure proposals** (with certain exceptions, e.g., some sixth-form cases), but they must **act in accordance with the Code** and keep a robust record of compliance. Where process or compliance is in doubt, **Welsh Ministers retain powers to intervene** and oversee school organisation arrangements.
3. **Equality, well-being, sustainability and learner travel** have not been **properly evidenced**. The decision must have **due regard** to the three aims of the Public Sector Equality Duty (PSED) (s.149 Equality Act 2010) and comply with the **Welsh specific duties** (impact assessment, objectives, engagement). It must also reflect the **Well-being of Future Generations (Wales) Act 2015** (the five ways of working towards the seven well-being goals) and the **Learner Travel**

(Wales) Measure 2008 and statutory guidance (needs assessment; sustainable modes; safe and suitable arrangements; transparency). The documentation to date does not satisfy these tests.

4. **Educational standards.** Estyn's most recent inspection is recorded as **"no follow-up"**. In Estyn's own framework, follow-up is only applied where inspectors identify serious shortcomings; absence of follow-up indicates no such concerns at inspection. Closing a school that **meets standards** is not educationally necessary and is not in pupils' best interests.
5. **Capacity/admissions risks at the receiving school.** You must evidence **admission number/capacity calculations** using the Welsh Government methodology and demonstrate compliance with **infant class size limits (30)** in Reception/Years 1–2. No child can be refused until the admission number is reached; equally, admitting beyond that number risks breaching limits absent lawful exceptions. Current papers do not transparently show capacity headroom, capital implications, or timelines. It is suggested that building work will have to be undertaken at Ysgol Llangain to accommodate the additional numbers without taking account of the additional further social housing in both villages likely to push numbers ever higher.
6. **Transport, cost and environmental impacts under-assessed.** The **Learner Travel** regime requires assessing needs, safety, suitability, sustainable modes, and transparent arrangements; "travel arrangements" can include an **escort** where necessary, but this must follow risk assessment and policy - not assumption. Full costs (including potential escorts for young children if risk assessed), environmental impact, journey times and safety have not been provided. These costs alongside the cost of further building work may not be economically viable when judged against retaining the existing school in Llansteffan.
7. **Welsh-language and cultural duties.** Decisions must uphold the **official status of the Welsh language** and treat Welsh **no less favourably** than English; school organisation must consider continuity and strengthening of **Welsh-medium** education in the area. This analysis is currently incomplete.
8. **Additional Learning Needs (ALN) learners.** Under the **Additional Learning Needs and Education Tribunal (Wales) Act 2018**, pupils with ALN have statutory rights to appropriate provision, usually set out in an **Individual Development Plan (IDP)**. Disruption to a small, nurturing environment must be assessed for **impact and mitigation**; this is currently unclear.

Detailed Grounds for Objection

1. Legal and Procedural Non-Compliance

- **Rural presumption not satisfied.** The Code's **Section 1.8** requires a strengthened presumption against closure of rural schools and explicit, evidenced consideration of **all alternatives, before and during** consultation. We have not seen a complete options appraisal, feasibility work or costed modelling for alternatives.
- **Determinative obligations.** As decision-maker, the Council **must act in accordance** with the Code (s.38–39 of the 2013 Act and Appointed Day Order) and maintain a clear audit trail. The strengthened regime has applied since **1 November 2018**.

2. Evidence Base and Transparency

- **Pupil numbers and projections.** Material decisions cannot rest on volatile or partial data. Proposers must **reassess** current roll (currently 14 not 8), intake trends and demographic pressures with **transparent methodology** and publish the data sources used. The Code anticipates robust evidence on **need for places** and **accessibility**, not headline numbers devoid of context.
- In addition, the allocation of a significant number of permanent 2 and 3-bed local social housing should be factored into increasing school rolls.

3. Educational Standards

- **Estyn's status.** The school's status as **not requiring follow-up** indicates that inspectors **did not** identify serious shortcomings warranting statutory follow-up. This weighs strongly against an "educational necessity" rationale for closure.

4. Equality, Well-being and Sustainability Duties

- **Equality Act 2010 (s.149).** You must show **due regard** to eliminating discrimination, advancing equality of opportunity and fostering good relations; in Wales, **specific duties** require equality objectives and **impact assessments** to support compliance. We request publication of the full **Equality Impact Assessment** and engagement evidence.
- **Well-being of Future Generations Act 2015.** The Council must demonstrate the **five ways of working** (long-term, prevention, integration, collaboration, involvement) in moving towards the **seven well-being goals**, with transparent reasoning on long-term community viability and cultural impacts.

5. Travel, Safety and Environmental Impact

- **Learner Travel (Wales) Measure 2008 and Guidance.** A lawful decision requires an up-to-date **needs assessment**; safe, **suitable** travel arrangements; and consideration of **sustainable modes**. "Travel arrangements" can lawfully include providing **an escort** where needed; we therefore require your risk assessment and policy basis for any escort provision for younger children, rather than an uncoded assumption either way.

6. Capacity/Admissions and Class Size

- **Capacity and admission numbers.** Please publish the receiving school's **capacity calculation** and **admission number** derived per Welsh Government methodology, together with any planned capital works (costed) and timelines (to avoid unlawful over-admission or class-size breaches) taking **account of the six additional enrolments** at Ysgol Llangain this year and the further house building in the immediate vicinity.
- **Infant class size limit.** Reception/Years 1–2 are subject to the **statutory 30-pupil** limit per qualified teacher, with narrow exceptions. Your modelling must show continued compliance if displaced pupils are admitted.

7. Welsh-Language Duties

- **Treat Welsh no less favourably; maintain continuity.** The **Welsh Language (Wales) Measure 2011** and associated Standards require policy decisions to **promote and facilitate** the use of Welsh and to avoid detriment to Welsh-medium pathways. We ask for the Welsh-language impact analysis and mitigation plan.

8. ALN Learners

- **ALN Act and Code.** You must evidence how the transition would protect learners with **IDPs** and maintain access to **additional learning provision** that is “additional to, or different from” that generally available, including smaller-setting benefits where relevant.

Formal Requests from LLCC

We respectfully request that CCC:

1. Publish the final Community Impact Assessment, Equality Impact Assessment, Welsh-language impact assessment, and a proportionate environmental assessment, each compliant with the relevant statutory duties and guidance.
2. Undertake and publish a full options appraisal comparing federation, multi-use/community models, outdoor learning innovation, and age-range adjustments, with feasibility, revenue/capital modelling, and risk for each option, in line with the rural presumption.
3. Reassess and publish current roll and projections with methodology and sources (including housing/in-migration assumptions) and the need for places/accessibility analysis required by the Code.
4. Publish the receiving school's capacity and admission number calculations, infant class size compliance analysis, and any capital works and timelines necessary to accommodate additional pupils lawfully.
5. Publish a Learner Travel compliance pack: updated needs assessment, route/journey-time analysis, sustainable travel assessment, and the risk-based rationale for whether escorts will be provided for younger children, with a full lifetime cost profile and environmental impact.
6. Convene a co-design workshop with the Community Council, governors, staff, parents and residents to develop a viable alternative plan that preserves education in Llansteffan, consistent with the five ways of working under the Well-being Act.

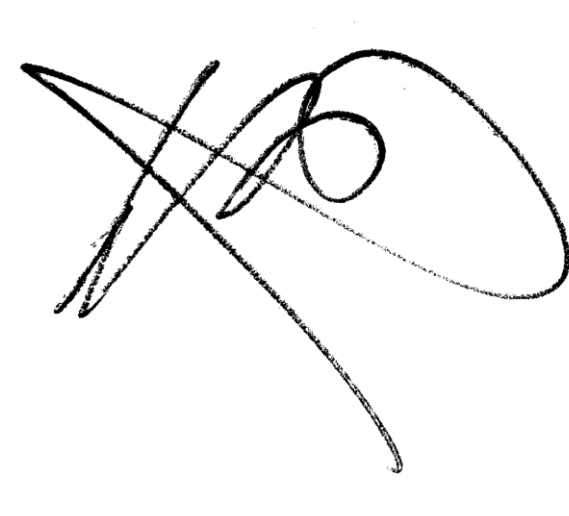
The Community Council respectfully requests that the current proposal be paused with immediate effect until the work set out above has been completed, published and fully considered. Ysgol Llansteffan is a high-quality rural school and a cornerstone of community life. The statutory framework in Wales places a clear emphasis on sustaining rural schools wherever possible and requires robust exploration of alternatives, alongside full compliance with duties relating to equality, well-being, learner travel, capacity and the Welsh language, before closure can be contemplated.

On the evidence provided to date, the Community Council does not consider that these requirements have yet been met. We remain keen to work constructively and collaboratively with the Authority to ensure that all statutory obligations are properly discharged and that the best interests of learners, families and the wider community are fully addressed.

We look forward to receiving your written response to the requests set out above by 21 January 2026.

While our strong preference is to resolve these matters through open dialogue and cooperation, the Community Council respectfully reserves the right to (i) invite the Welsh Ministers to scrutinise or call in matters within their remit under the School Organisation (Wales) Act 2013 and associated Code, and (ii) pursue appropriate legal remedies, including, if necessary, judicial review, should there be continued non-compliance with the Code or related statutory duties.

Yours faithfully,

A handwritten signature in black ink, consisting of a large, stylized 'X' followed by a loop and a long, sweeping tail stroke.

Cllr I. Roberts (Chair Llansteffan and Llanybri Community Council)

c/o Black Anchor

Llanybri

Carmarthen

SA33 5HL