



CONSULTATION REPORT

CATHOLIC EDUCATION PROPOSAL

- Close St Anthony's Catholic VA Primary School in Saltney, which will cease to operate by 31 August 2027.
- Amalgamate St David's Catholic VA Primary School in Mold, St Mary's Catholic VA Primary School in Flint and St Richard Gwyn Catholic VA High School in Flint.
- Amalgamation would see:
 - the individual schools close by 31 August 2027,
 - a new amalgamated English medium 3-18 Catholic Voluntary Aided school, with a new name and school number, open 01 September 2027,
 - the new school operating over the three current sites until such time a new school building is constructed (anticipated 01 September 2030).

Summer-Autumn 2026

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PART A. OVERVIEW

A.1. Introduction

Recently, the Catholic Diocese of Wrexham (“*the Diocese*”) and Flintshire County Council (“*the Council*”), published a proposal to reorganise the Catholic education provision in Flintshire.

Following the conclusion of the statutory consultation period, and in accordance with School Organisation Code 2026 (“*the Code*”), this report will:

- summarise each of the issues raised by consultees;
- respond to these by means of clarification, amendment to the proposal or rejection of the concerns, with supporting reasons;
- set out Estyn’s response to the consultation in full; and
- respond to Estyn’s response by means of clarification, amendment to the proposal or rejection of the concerns, with supporting reasons.

Under the Code, this report may also make recommendations about how to proceed, such as to:

- publish the proposals as consulted on, with any appropriate modifications;
- abandon the proposals and retain the status quo; or
- significantly recast the proposals and re-consult.

The results from the consultation process should be considered by decision-makers prior to determining any recommendation relating to the proposal.

A.2. The Proposal

It is proposed to:

- Close St Anthony’s Catholic VA Primary School in Saltney, which will cease to operate by 31 August 2027.
- Amalgamate St David’s Catholic VA Primary School in Mold, St Mary’s Catholic VA Primary School in Flint and St Richard Gwyn Catholic VA High School in Flint.
- Amalgamation would see:
 - the individual schools close by 31 August 2027,
 - a new amalgamated English medium 3-18 Catholic Voluntary Aided school, with a new name and school number, open 01 September 2027,
 - the new school operating over the three current sites until such time a new school building is constructed (anticipated 01 September 2030).

PART B. CONSULTATION PROCESS

B.1. Timeline

B.1.i. Development and Statutory Proposals June 2025 – April 2026

During November 2023, the Diocese began discussions with the headteachers and the chair of governors from each of the six Catholic schools in Flintshire. Due to the sensitive nature of the discussions and to ensure all schools remain stable, meetings were conducted in the strictest of confidence until a potential way forward had been agreed.

There were many meetings over many months where all options were considered. The advantages and disadvantages of each option were identified to determine how the future of Catholic education in Flintshire could look. When an option was identified as the best way forward, the Diocese sought help from the Council to deliver the statutory process.

In June 2025 a consultation was launched to obtain the views of stakeholders on the proposal. Many people and various organisations engaged with the process and provided feedback on several areas detailed in the consultation document.

Following the consultation, the Council's Cabinet decided to continue the process, and a Statutory Notice was issued in November 2025, this was followed by a 28-day objection period.

However, prior to the final determination the first statutory process was paused due to a late legal challenge. Exercising due diligence, the Council sought legal advice, and it was necessary to take sufficient time to consider the advice received. The Council sought legal advice in response, and the time required to properly consider that advice meant that the statutory timescales set out in the second edition of the Code could no longer be met. As the Code requires strict adherence to these timescales, this resulted in the original proposal 'lapsing' and being undetermined.

B.1.ii. Pre-Consultation

In line with the Code, as the proposal involves the reorganisation of schools for which land and/or buildings are held on trust or which have a designated religious character, a consultation with trustees and/or appropriate religious body was required before the consultation document was published.

No new options emerged during the consultation with trustees, and the preferred option was supported.

B.1.iii. Cabinet Approval to Consult

On Wednesday 13 May 2026, the Council's Cabinet decided:

- That Cabinet approves to commence consultation with relevant stakeholders on the proposal to close St Anthony's Catholic Primary School, St David's Catholic Primary School, St Mary's Catholic Primary School and St Richard Gwyn Catholic High Schools and open a new 3-18 all-through Catholic school to provide for learning provision for the Catholic community. Cabinet also notes any proposal, should it be approved following completion of the required statutory processes, would be implemented by September 2027.

B.1.iv. Consultation Period

The consultation opened on Tuesday 16 June 2026 and closed 11:59pm, Wednesday 29 July 2026. This allowed at least 42 days for responses to be received, of which at least 20 were school days.

B.2. Documents

The following documents were produced, in Welsh and English, for consultees to consider and enable them to fully participate in the consultation process:

- Statutory Consultation
- Statutory Consultation Overview
- Children & Young Person's Consultation Document
- Welsh Language Impact Assessment
- Community Impact Assessment
- Additional Learning Needs Impact Assessment
- Integrated Impact Assessment
- Response Form

To allow children and young people to participate in the consultation process, their consultation document was designed using age-appropriate graphics and text.

Included the Children's document was an adapted, more user-friendly version of the response form so that children and young people could provide their views on the proposal.

All documents were published electronically on the Council's website.

Each of the six Catholic schools were provided with a consultation pack that contained a hard copy of every document. This allowed people to view the information should they be unable to access the electronic versions.

Hard copies and alternative versions (large print, Braille etc) were also made available upon request.

All documents can be found in the School Modernisation section page on the Flintshire County Council website at the following link:

<https://www.flintshire.gov.uk/en/Resident/Schools/School-Modernisation-Related/Catholic-Education-Proposal.aspx>

B.3. Engagement

B.3.i. Consultees

On the day of the consultation opening, 16 June 2026, key stakeholders were notified via email.

The email contained a link to the page on the Councils' website where the documents could be viewed and where the response form could be accessed.

A list of the key stakeholders can be found in Appendix E.1.

B.3.ii. Events

Staff and governors at each of the four schools directly involved in the proposal were invited to attend separate, dedicated consultation events with senior members of the Diocese and of the Council (8 sessions in total).

In addition, governors of the two Catholic schools not directly involved in the proposal were also invited to attend one joint session.

Events provided attendees with a brief overview of the proposal and reasons why it has been brought forward. Participants could then ask questions, make comments or raise any concerns relating to the proposal and its potential implementation.

All staff and governor events were held virtually and lasted up to one hour.

No public consultation events were held.

B.3.iii. Children and Young Person's Events

Sessions with pupil representatives from each of the six Catholic schools were delivered during the consultation period.

During the pupil sessions, Officer's delivered a short presentation summarising the proposal, asked questions to stimulate debate and recorded the views of participants regarding the proposal (see Appendix E.2).

A session was also held with the Young Flintshire Forum, which is formed from representatives across all Flintshire's Secondary schools. The session involved a presentation of the proposal, group discussions and noting of views given (Appendix E.2.vii).

B.4. Response Forms

The response form (Appendix E.3) asked consultees to indicate whether they agree or disagree with each aspect of the proposal. In addition, the form also:

- provided a comment box to allow responders the opportunity to provide more detailed feedback on their choices.
- asked people which school(s) they were associated with. And,
- in what capacity they were responding (e.g. parent/carer, pupil, governor, staff, community member etc).

Other sections in the form included questions on how the proposal may impact Welsh language standards and equalities information.

B.4.i. Submission Options

Consultees were provided with the following ways by which they could submit a copy of the response form:

- Online via a link, which was available in the consultation document and on the Council's website.
- Online via a QR code, which was also available in the consultation document and on the Council's website.
- Online via a dedicated email address.
- Posting a hard copy into a dedicated 'post box', located at each of the six Catholic schools.
- Posting a hard copy direct to the Council at the address specified in the consultation document.
- Hand deliver a hard copy to a Council office.

B.4.ii. Other Response Options

People were also encouraged to participate in the consultation by:

- Submitting a comment, query or request via the dedicated email address or by post;
- Request information by telephone.

Correspondence was welcomed in Welsh and English, with responses given in the same language without delay.

PART C. CONSULTATION OUTCOMES

C.1. Method of Communications

In total the Council received **2,813** submissions from consultees during the consultation. These communications were gathered in the forms of:

Method of Submission / Representations Made	Count
Response Form via Link	2,722
Response Form via QR Code	12
Response Form Hard Copies (via Post, School Post Box, Hand Delivered)	11
Children and Young Person's Response Form (Hard Copies)	41
Petitions	0
Emails	20
Letters (Individual & Collective)	3
Estyn	1
School Governing Body's	1
Unions	0
Members of the Senedd (MS) and Members of Parliament (MP)	2
Total	2,813

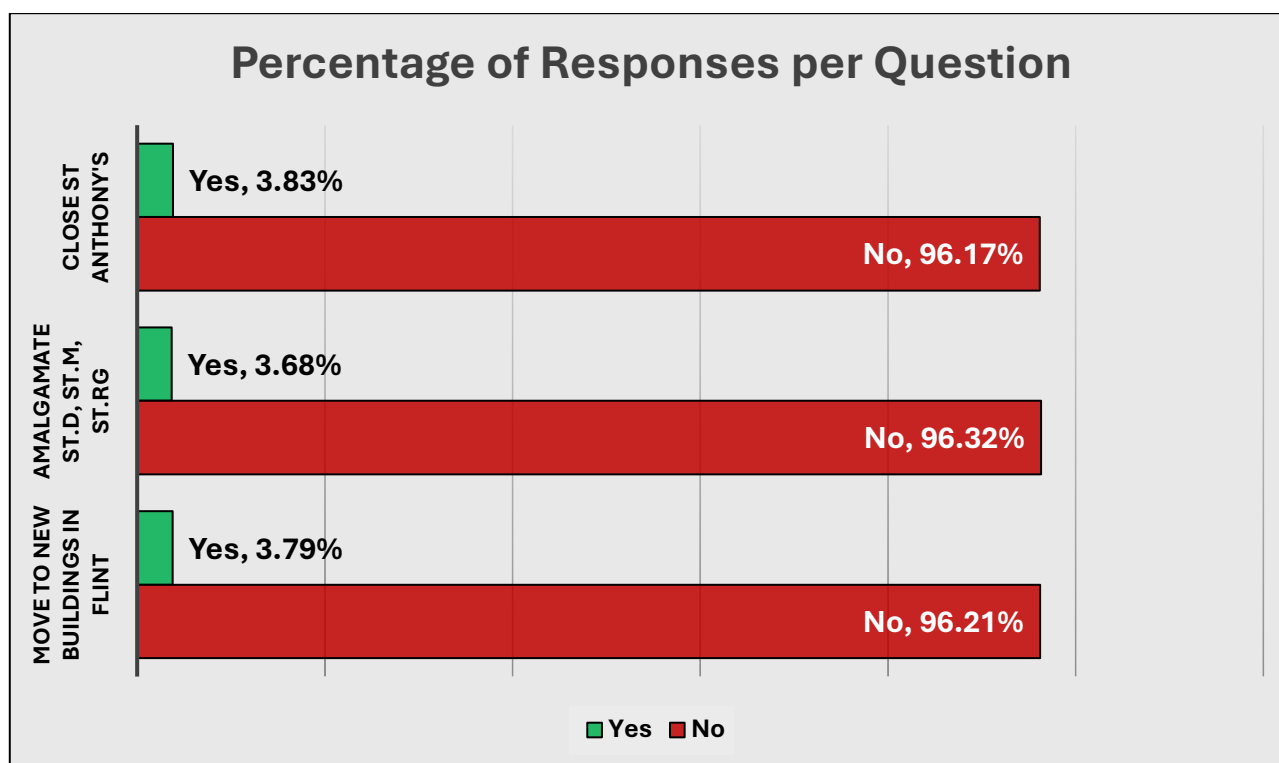
C.2. Response Form Results

The tables and figures below show responses given to questions 1, 3 and 4 on the response form.

C.2.i. Support for the Proposal

Please indicate whether you agree or disagree with each aspect of the proposal

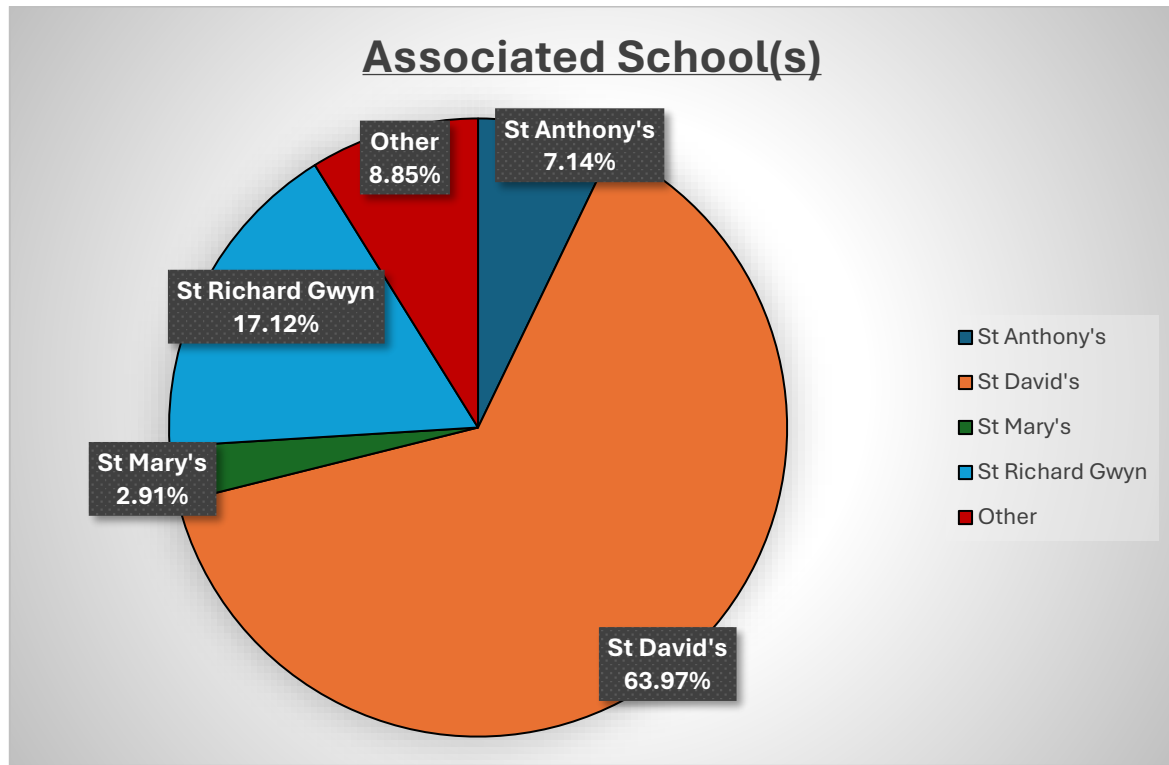
Answer Choices	Yes	No	Total
Close St Anthony's Catholic VA Primary School in Saltney by 31 August 2027	105	2,640	2,745
Amalgamate St David's Catholic VA Primary School in Mold, St Mary's Catholic VA Primary School in Flint, and St Richard Gwyn Catholic VA High School by 31 August 2026 operating over the three current sites. The new amalgamated English medium 3-18 Catholic Voluntary Aided school will open with a new name and school number, opening in September 2027	101	2,644	2,745
New school operating over the three current sites until such time a new school building is constructed (anticipated 01 September 2030)	104	2,641	2,745



C.2.ii. School Association

Which school/s do you associate yourself with?

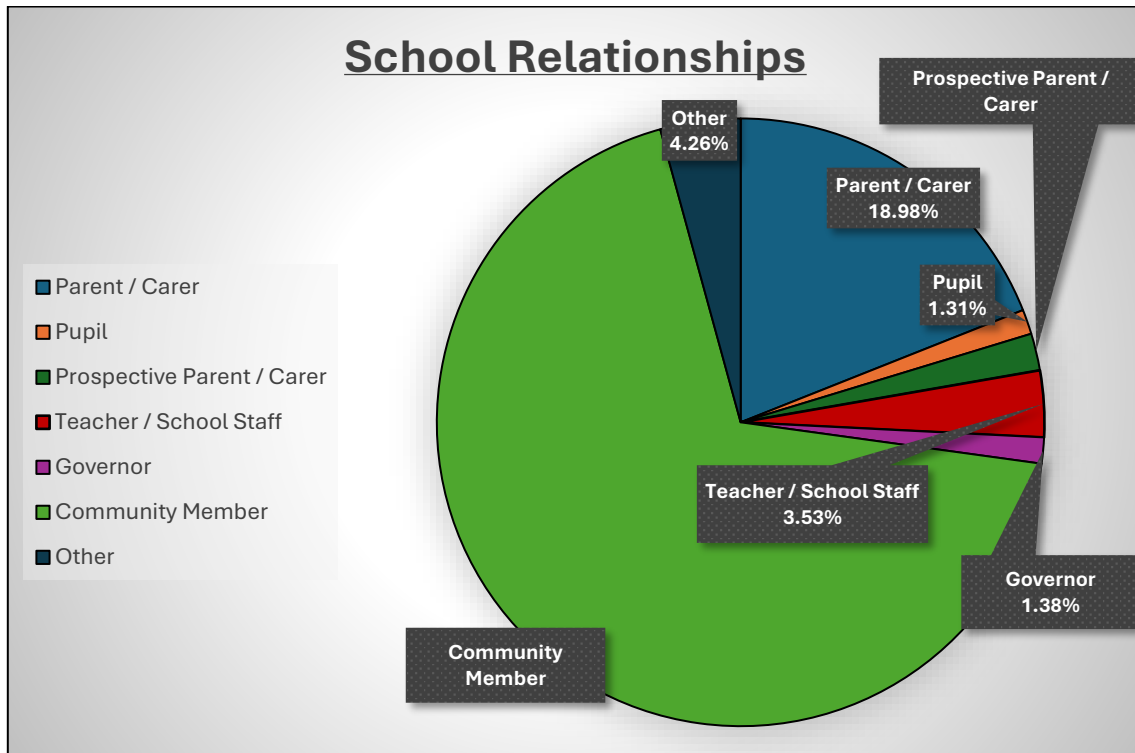
Answer Choices	Number	Percentage
St Anthony's Catholic VA Primary School	196	7.14%
St David's Catholic VA Primary School	1,756	63.97%
St Mary's Catholic VA Primary School	80	2.91%
St Richard Gwyn Catholic VA High School	470	17.12%
Other	243	8.85%
Total	2,745	100.00%



C.2.iii. School Relationships

What is your interest/relationship with the school/s you identify with?

Answer Choices	Number	Percentage
I am a parent/carers of a pupil at the school	521	18.98%
I am a pupil at the school	36	1.31%
I am a prospective parent/carers of a pupil at the school	54	1.97%
I am a teacher/other member of staff at the school	97	3.53%
I am a governor at the school	38	1.38%
I am a member of the community	1,882	68.56%
Other (please specify):	117	4.26%
Total	2,745	100.00%



C.2.iv. Response Form Themes

People were provided with a comment box and asked to provide observations or explain which element of the proposal they did or did not support. Alternative proposals were also welcomed. Comments made have been summarised and grouped together into themes.

Each theme has been given a heading, a short description and examples of the comments received.

As required by the Code, the Council has responded to each theme by means of clarification, amendment to the proposal or rejection of the concerns, with supporting reasons.

Theme 1: Learner Travel, Transport and Safeguarding

Key Points

- Concerns about young children travelling significant distances to Flint.
- Potentially lengthy journeys and longer school days.
- Safeguarding concerns regarding transport and mixed-age travel.
- Difficulties for parents attending school events and responding to emergencies.
- Lack of clarity regarding transport arrangements, particularly for nursery-age children.

Examples

- *"I don't propose to put my young children on a bus with older children when there is no adequate safeguarding provision."*
- *"Would you put a 4 year old on a bus with older rowdy children?"*
- *"Transportation of young children from town to town is a major safeguarding issue."*

Council's Response

Concerns raised regarding travel arrangements for younger learners are understandable and the importance of ensuring that transport is safe, suitable and proportionate to pupils' ages and needs is something that is of the utmost importance to the Council.

When considering transport provision, the Council seeks to ensure that journey times for primary-aged children are kept within reasonable limits. Current guidance indicates that journeys should not exceed 45 minutes each way for primary-aged learners, and many of the options considered fall well below this threshold.

The Council does not routinely transport very young children alongside significantly older pupils. Where mixed-age transport arrangements are necessary, appropriate measures would be considered, including the provision of a passenger assistant where required. In determining whether transport arrangements are suitable, the Council must take account of the age of learners and the nature of the journey. Transport arrangements would not be regarded as suitable if they were considered unsafe, caused unreasonable stress to learners, or resulted in unreasonable journey times.

It should be noted that local authorities are only required to provide home-to-school transport at the normal start and finish of the school day. As is the case currently, parents and carers would remain responsible for making arrangements should a child need collecting due to illness, emergencies, or attendance at additional school events and activities.

The Council is not required to provide home-to-school transport for nursery-aged children, as nursery education is non-statutory. Any transport arrangements implemented would be subject to detailed planning and risk assessment to ensure they are appropriate, safe and meet the needs of learners.

Theme 2: Community Identity, Belonging, Cultural and Spiritual Impact

Key Points

- Schools viewed as integral parts of local communities.
- Concern that closures would weaken community cohesion and belonging.
- Importance of schools as community hubs.
- Impact on parish life, local identity and spiritual development.
- Perceived inconsistency with the Council's Belonging Strategy.

Examples

- *"Primary schools should be local, they are part of the community."*
- *"Schools form part of the fabric of a community. They are interwoven into daily way of life."*
- *"St David's is more than just a school; it is a cornerstone of the community."*

Council's Response

The Council recognises that schools are often at the heart of their communities and understands the concerns that can arise when changes to local school provision are proposed. Schools can play an important role in bringing people together, supporting community activities, contributing to local identity and, in faith settings, supporting parish and spiritual life.

However, while these wider community benefits are valued, the primary purpose of a school is to provide the best possible education for children and young people. In considering this proposal, the Council's foremost responsibility is to ensure that learners have access to high-quality, sustainable educational provision that meets their needs both now and in the future.

It is accepted that a school's presence can contribute to community cohesion and a sense of belonging. However, these qualities are not dependent on a school alone and can continue to be fostered through churches, community groups, local organisations and other shared community facilities.

The proposal aims to safeguard the provision of Catholic education in Flintshire for years to come, albeit by removing two primary schools from important communities whilst enhancing the offering in the Flint area.

The educational benefits of the proposal remain the primary consideration. However, the Council and Diocese also recognise the importance of maintaining community identity, parish relationships, shared traditions and a sense of belonging. Should the proposal proceed, consideration will be given to how the histories, values and identities of the existing schools can be reflected and preserved within the new school community.

Theme 3: Viability of Existing Schools and Proposed School Closures

Key Points

- St David's repeatedly described as successful, viable and sustainable.
- Questions regarding the rationale for closure.
- Concerns that uncertainty is undermining school viability.
- Existing schools viewed as valued and effective.
- Perception that closure is unnecessary.

Example Comments

- *"St David's School is a viable school operating within its budget and has been rated as good in its Estyn assessments."*
- *"I have not seen any information to suggest that St David's RC Primary School is not financially viable."*
- *"This prolonged uncertainty at St David's has caused some parents to remove their children."*

Council's Response

The Council recognises and appreciates the positive comments made about St David's Catholic VA Primary School. It is acknowledged that the school is valued by its community, has been recognised by Estyn as a good school, and continues to provide a positive educational experience for its pupils.

However, the proposal is not driven by concerns about the quality of education at St David's. Rather, it forms part of a broader review of Catholic education across Flintshire, taking into account factors such as pupil numbers, surplus capacity, the suitability of school buildings, and the long-term sustainability of provision.

Although St David's is currently operating successfully, the school has experienced a decline in pupil numbers over recent years, from 80 pupils in 2020 to 60 pupils in 2025. Forecasts indicate that numbers could reduce further to around 45 pupils by 2030. During the same period, surplus places are projected to remain high. The Council must consider these longer-term trends when planning future school provision.

The Council also notes that, while the school building is assessed as being in satisfactory condition, its suitability rating remains poor, indicating limitations in how effectively the accommodation can support modern teaching and learning requirements.

Concerns have also been raised that the prolonged uncertainty has affected parental confidence and pupil numbers. The Council understands these concerns and recognises the impact that uncertainty can have on school communities. However, pupil forecasts and demographic information continue to indicate challenges relating to future demand and sustainability which the Council must carefully consider.

The proposal seeks to provide a sustainable long-term future for Catholic education in Flintshire by reducing surplus places, improving learning environments and creating an all-through 3-18 school that supports continuity of learning from nursery through to sixth form.

While the Council acknowledges the strong support for St David's and recognises its many strengths, it believes the proposal should be considered in the context of securing high-quality and sustainable Catholic education provision across Flintshire for future generations.

Theme 4: Catholic Education, Parental Choice and Parish-School Links

Key Points

- Desire to retain Catholic education within local communities.
- Reduction in parental choice if schools close.
- Importance of church-school relationships.
- Value placed on faith-based education by Catholic and non-Catholic families.
- Concerns regarding loss of local Catholic provision.

Example Comments

- *"The closure would also mean the loss of the only Catholic school in Mold."*
- *"Catholic Education needs to be preserved in Flintshire south of the A55."*
- *"The proximity to and the link between St David's Primary School and St David's Church is beneficial to both school and parish."*

Council's Response

The Council and the Diocese recognise the strength of feeling regarding the importance of Catholic education, parish links, and maintaining a Catholic presence within local communities. The proposal has been developed to secure the long-term future and sustainability of Catholic education in Flintshire, rather than diminish it.

While St Anthony's and St David's would close, Catholic education would continue to be available across Flintshire, including through the new 3-18 Catholic school in Flint, alongside existing Catholic schools elsewhere in the county. The proposal is intended to provide a sustainable Catholic education model that addresses falling enrolments, surplus places and significant building maintenance challenges.

The new all-through school would strengthen Catholic education by bringing pupils together within a single Catholic learning community from ages 3 to 18, supported by shared leadership, governance, curriculum development and pastoral care. This model is expected to improve continuity of learning and ease transition between primary and secondary phases while preserving the Catholic ethos throughout a child's educational journey.

In addition, pupils would benefit from a new, modern, net-zero-carbon school building designed to support high-quality teaching and learning, providing facilities that cannot be achieved within the current ageing school estate. The proposal is therefore considered a long-term investment in Catholic education, ensuring that future generations continue to have access to high-quality faith-based education in Flintshire.

The Council acknowledges the value of the close relationships between schools and their local parishes and will continue to work with the Diocese and local Catholic communities to ensure that these important links remain central to the delivery of Catholic education.

Theme 5: Financial Implications, Funding, Asset Ownership and Value for Money

Key Points

- Concerns regarding project affordability and funding arrangements.
- Uncertainty around Welsh Government and Diocese contributions.
- Concern regarding long-term taxpayer costs.
- Questions regarding ownership of publicly funded assets.
- Belief that smaller investments in existing schools may represent better value.

Example Comments

- *"How is the Diocese providing the funding for the 15% contribution?"*
- *"The £55m estimate is based on an outline design only."*
- *"I object to my council tax being used to fund any school developments that will then be given to the Catholic Church."*

Council's Response

The Welsh Government intervention rate for funding the Sustainable Communities for Learning programme is 65% for schools, 75% for Pupil Referral Units (PRUs) and Additional Learning Needs (ALN) provision, 81% for Mutual Investment Models (MIM), and 85% for Voluntary Aided (VA) schools.

Based on the estimated cost of the scheme at an initial feasibility stage, the total cost of the modernisation of the Catholic schools estate is £55m. The Council's contribution towards the scheme would be £8.250m, representing the remaining 15% of the total scheme cost, funded through prudential borrowing.

This intervention rate represents the most advantageous funding arrangement available to the Council. The financial implications are significantly more favourable than those associated with other capital investment schemes, substantially reducing the Council's borrowing requirement and associated debt servicing costs over the life of the project. The approach ensures that the majority of the capital investment is externally funded, reducing financial risk and preserving the Council's ability to invest in other priority areas.

Over the last five financial years, an average of £0.489m per annum has been invested in repairs and maintenance across the existing school's estate, with approximately two-thirds of this expenditure attributable to the Catholic secondary school.

In the long-term, the creation of a modern, efficient school building is expected to deliver some operational savings from the removal of four school buildings. Savings are anticipated through reduced maintenance, improved energy efficiency, and lower lifecycle costs compared to maintaining multiple ageing facilities, allowing more funding to be directed toward learning and support services.

The new building will meet modern environmental standards and contribute to Flintshire's carbon reduction goals. The new school will also be future proofed; designed with flexibility to adapt to changing educational needs and population trends over time. However other costs, such as business rates, are likely to increase, with the potential for this to be offset from the closure of the other sites.

To provide further clarity on the estimated revenue borrowing costs associated with the scheme, the projected costs over a 50-year period, covering both interest payments and the Minimum Revenue Provision (MRP) have been incorporated into the Council's current Medium Term Financial Strategy (MTFS). This reflects the standard accounting treatment for capital

expenditure financed through borrowing and ensure that the full lifetime cost of the investment is transparently planned for, within the Council's financial framework.

Borrowing costs will increase gradually over a five-year period as the project progresses through feasibility, design and construction stages. These financial pressures have already been built into MTFs projections. The average annual financing cost over the 50-year borrowing period is estimated at £0.639m.

The Council has made limited use of prudential borrowing in recent years and its ratio of net financing costs to net revenue stream has remained, and is forecast to remain, relatively stable.

Any alternative approach involving smaller-scale investments at individual schools would not qualify for Welsh Government intervention funding. As a result, the Council would be required to fund the full cost of any such works through prudential borrowing, increasing the financial burden on the authority.

Maintaining all schools in their current forms and on separate sites is not financially sustainable. Moreover, pursuing significant investment under single sites would not satisfy the Welsh Government business case criteria, making it an unviable option for long-term educational and community development.

Welsh Government expects local authorities to work collaboratively with VA schools in the development and delivery of school investment projects. This principle is a key consideration within the Sustainable Communities for Learning Programme.

The proposed capital expenditure supports the delivery of the Council's statutory education responsibilities by providing educational facilities that serve the community.

Although the resulting asset will not be owned by the Council, it will create and maintain an ongoing beneficial interest through the continued provision of statutory education services.

Below are some Direct & Indirect Benefits that have been quoted in Capital Reports

Direct Benefits:

- Maximises external investment in schools from WG, which in this case equates to 85% of the total build cost, based on the WG intervention rate
- Strategic opportunity to improve the overall efficiency and effectiveness of the education system
- Continuing to improve learning environments which contributes to the raising of educational standards
- Reduction in backlog maintenance costs for unsustainable school buildings and supporting infrastructure. Removes school buildings which are beyond their life expectancy
- Reduction in fixed costs associated with buildings and leadership refocuses investment directly on learners
- Enhanced outdoor spaces to support the full range of curriculum activities, including an outdoor classroom and a 'forest schools' area
- Reduction of the number of surplus places which diverts resources away from front line delivery to pupils. This enables the redistribution of funding more equitably across the entire schools' network, benefitting all Flintshire pupils
- Addresses the issue of schools with large numbers of unfilled places, which is financially unsustainable and can lead to diluted education experiences. Small schools create challenges for teachers who have to teach classes with increased age ranges, making appropriate differentiated learning to meet individual pupil needs more difficult
- Energy efficiency improvements contributing to reduced running costs and supporting the Council's Carbon reduction strategy

Indirect Benefits:

- Contributing to the improvement of learner outcomes by ensuring that school buildings are effective in creating the conditions for staff to deliver their roles effectively which supports learners to succeed
- Alignment with the Council's School Modernisation Strategy to ensure schools are fit for purpose
- A more secure school estate because of improved construction methods and technological support e.g. CCTV, Alarms, Communication systems
- Upgrading ICT provision and enabling new methods of curriculum delivery
- Provision of appropriate capacity across the school network
- Economic benefits of local contractor and sub-contractor spend
- Opportunities to derive social value e.g. work experience, apprenticeships, community benefits, educational experiences for learners
- Supports with the Council's net zero carbon aims of building assets designed and built to withstand the impacts of a changing climate

Theme 6: Additional Learning Needs (ALN), SEND and Inclusion

Key Points

- Smaller schools viewed as better suited to some learners.
- Concerns regarding transitions to larger environments.
- References to autism-friendly and neurodiverse provision.
- Potential impacts on wellbeing, confidence and attainment.
- Concerns that vulnerable learners may be disproportionately affected.

Example Comments

- *"The impact on SEND children would likely be detrimental as a small school environment is probably more suited to their needs."*
- *"The smaller, familiar setting is ideal for many children."*
- *"Putting him in a large environment would have a catastrophic effect."*

Council's Response

There were many concerns raised about the potential impact of school reorganisation on learners with Additional Learning Needs (ALN), including autistic and neurodiverse learners. Many respondents highlighted the importance of familiar environments, established relationships and smaller school settings in supporting vulnerable children and young people.

Flintshire's schools differ quite significantly in size. Evidence from Estyn inspections of our larger schools demonstrates that strong relationships can be formed and maintained, and that staff can have a good understanding of children's individual needs and are able to meet these effectively in these settings. This indicates that children with ALN in larger schools are not necessarily disadvantaged compared with those in small schools, with many children attending larger settings feeling included in their school communities and making positive progress.

Evidence also indicates that positive outcomes for learners with ALN are determined less by the size of a school and more by the quality of inclusive practice, specialist expertise, effective leadership and coordinated support. Effective provision is characterised by early identification of need, strong partnerships with families, consistent approaches to support and a culture that promotes inclusion and belonging.

The Council acknowledges that transitions can be particularly challenging for some learners and understands concerns about the effect that moving to a larger school environment may have on wellbeing, confidence and attainment. These issues have been carefully considered throughout the consultation process and the ALN Impact Assessment.

All schools have a statutory duty to identify and support learners with ALN, and any existing Individual Development Plans (IDPs) would continue to be implemented throughout the transition process. No learner with ALN would transfer without appropriate planning and support arrangements being put in place.

The proposed all-through 3-18 Catholic school in Flint provides opportunities to strengthen support through a single, coordinated educational pathway. Potential benefits include improved tracking of learner progress, earlier identification of need, greater consistency of support between primary and secondary phases, and enhanced communication with families. A single organisational structure would also support more consistent approaches to planning and delivering interventions.

Concerns about whether the proposed provision being suitable for children who are neurodiverse were also raised. It is acknowledged that for some children with sensory regulation difficulties, the larger environment may prove to be challenging, e.g. busier corridors

etc. Alternative arrangement to mitigate the impact will also need to be considered for those children who need it such as accessing quieter spaces or transitioning between lessons just before/after others.

The proposed new school would provide modern, purpose-designed facilities that have the potential to support a wide range of needs. This includes dedicated teaching and intervention spaces, low-stimulation environments, improved accessibility and learning environments designed to promote wellbeing and inclusion. Access to a wider range of staff expertise and specialist support may also strengthen provision for learners with more complex needs.

When it comes to transition to a different environment can be a challenge for children and adults. All schools are very experienced in supporting children in transition, e.g., into nursery/Reception and from primary to secondary school. A key part of this work is identifying those who need an enhanced transition experience and implementing that. The Council has significant experience of working with schools on transition as part of its school modernisation work. Recent projects have included transitioning 2 primary schools and a secondary school onto a shared campus. All schools had specialist provision for children with ALN who were effectively supported to transition into the new school environment. This was a result of the collaborative planning between the schools and the Council which ensured that individual needs were understood and catered for.

It is recognised that successful transition arrangements will be critical. If the proposal proceeds, personalised transition plans would be developed in partnership with learners, families, schools and relevant professionals. These arrangements could include enhanced visits, opportunities to meet staff in advance, visual supports, social stories and phased transition programmes, where appropriate.

The key consideration is therefore not simply whether provision is delivered in a smaller or larger school, but whether individual needs remain central throughout implementation. With careful transition planning, continuity of support and strong collaboration between schools and families, the proposals have the potential to maintain personalised support whilst improving educational, social and wellbeing outcomes for learners with ALN.

The Council appreciates that change can be challenging for many children including those with ALN and their families. The importance of working in collaboration with schools and communities to provide appropriate support, particularly in relation to the most vulnerable, is recognised to ensure this is planned and appropriate for individual needs. It is envisaged that this support alongside the educational benefits outlined within the proposal will ultimately result in positive learning experiences for children which impact positively on their confidence, wellbeing and attainment.

Theme 7: School Capacity, Demography and Future Demand

Key Points

- Housing growth in Mold cited repeatedly.
- Questions regarding pupil projections.
- Concerns about future demand for places.
- Potential pressure on neighbouring schools.
- Concerns that the proposal underestimates future population growth.

Example Comments

- *"Has the fact that Mold has a predicted population growth of 7% been taken into account?"*
- *"There is an expected population growth with 320+ new homes being built within walking distance of St David's school."*
- *"There is insufficient information on how the local authority has estimated future pupil numbers."*

Council's Response

The Council acknowledges the concerns raised regarding housing growth, pupil forecasts and future demand for Catholic school places, particularly in Mold. The proposal has been informed by demographic analysis, pupil forecasting data and consideration of Local Development Plan allocations and known housing developments. Where planned housing growth has been identified, including sites in the Mold area, this has been recognised within the assessment process. However, the evidence indicates that St David's currently has a significant level of surplus capacity, with forecasts showing that this surplus is expected to remain despite potential future growth.

The consultation document explains that forecasting future pupil numbers takes account of a range of factors and is reviewed against actual admissions data. It also notes that, while housing developments may generate additional pupils, parental preference means it is not possible to determine with certainty which schools those pupils will attend. The Council therefore considers it appropriate to base its assessment on the best available evidence at time of publication.

Concerns regarding pressure on neighbouring schools are recognised. The consultation document states that sufficient capacity exists within the wider Catholic school network to accommodate pupils affected by the proposal and that schools likely to receive additional learners are not expected to experience a significant adverse impact.

In addition, should parents choose non-faith-based education for their child to remain within the Mold community, there are sufficient places available at the three other primary schools in the area to accommodate the current cohort. This is also the case for Saltney pupils, whether the proposal in that community is implemented or not.

Whilst future population growth cannot be predicted with complete certainty, the Council remains satisfied that the proposal provides a sustainable approach to Catholic education, addressing high levels of surplus capacity whilst maintaining sufficient places to meet anticipated future demand.

Theme 8: The 3-18 Through-School Model

Key Points

- Concerns about educating very young children alongside teenagers.
- Questions regarding the suitability of the model.
- Safeguarding concerns within shared campuses.
- References to challenges experienced in similar schools.
- Suggestions that separate schools sharing a site may be preferable.

Example Comments

- *"I object to very young children being at the same school as teenagers."*
- *"Primary schools need to be separate from high schools."*
- *"Are these super through schools offering education from 3 to 18 year olds on one site the answer?"*

Council's Response

A number of respondents raised concerns about the suitability of a 3-18 school, particularly in relation to safeguarding, the interaction of younger children with older pupils and whether primary-aged learners would lose the benefits of a distinct primary school experience.

The Council recognises these concerns and acknowledges that the success of any all-through school depends on effective planning, leadership and implementation. However, evidence from educational research and school inspection findings shows that transition between primary and secondary school can be challenging for many learners. Differences in curriculum delivery, expectations, assessment methods and pastoral arrangements can disrupt learning and affect wellbeing at a key stage in a child's education.

One of the main aims of the proposed 3-18 school is to create a continuous educational pathway from early years through to post-16 education. This would support stronger curriculum progression, improved tracking of learner progress, greater collaboration between staff and more consistent teaching, support and expectations across all phases of education. The proposal is also intended to reduce the disruption often associated with transfer from a separate primary school to a secondary school.

The consultation document identifies a number of benefits associated with an all-through school, including a "through-school experience" that can ease transition, shared curriculum development, shared leadership and governance, and improved opportunities for staff collaboration and professional development.

Concerns regarding safeguarding are fully understood. The proposed school would operate under a single safeguarding framework, with consistent policies, procedures and expectations across all age groups. The consultation document states that a shared approach to safeguarding, behaviour and personal development would support positive relationships and a safe and inclusive learning environment. Enhanced pastoral systems, learner support arrangements and wellbeing provision would also help ensure that pupils receive age-appropriate care and support.

It is important to note that the proposed model is not based on young children and older pupils learning together. The new school would be designed with distinct primary and secondary provision, including dedicated age-appropriate accommodation and facilities. The consultation document confirms that the primary and secondary elements will have their own teaching and support spaces, while the final design will be developed to provide a safe, accessible and supportive learning environment.

The phased implementation of the proposal would further reduce disruption. From September 2027, the new school would initially operate across the existing sites, allowing pupils to remain in familiar surroundings while shared leadership, governance, curriculum and pastoral arrangements are established. The consultation document states that these transitional arrangements would be carefully planned to maintain continuity of learning, wellbeing and pastoral support.

The Council recognises that some stakeholders believe separate primary and secondary schools on a shared site may be preferable. However, the strongest examples of all-through schools are those that operate as genuinely integrated institutions rather than separate schools sharing accommodation. Where curriculum progression, safeguarding, wellbeing and learner support are carefully planned and coordinated, a 3-18 model has the potential to provide greater continuity, smoother transitions and improved long-term outcomes for pupils.

The Council considers that the proposed 3-18 school offers an opportunity to combine the strengths of primary and secondary education within a single educational journey, while maintaining appropriate safeguards, age-appropriate provision and strong pastoral support for learners at every stage of their education.

Theme 9: Educational Standards, Leadership, Governance and School Improvement

Key Points

- Risks to educational standards during transition.
- Concerns regarding leadership capacity within a 3-18 school.
- Questions regarding governance arrangements.
- Need to maintain high-performing schools.
- Concerns that school improvement could be disrupted.

Example Comments

- *"A school of this size, spanning ages 3 to 18, is an exceptionally complex organisation to lead."*
- *"The key objective of continual improvement in teaching and attainment may be undermined."*
- *"Leadership is sometimes under strain."*

Council's Response

The Council recognises concerns about maintaining educational standards during a period of change. However, the proposal has been developed with the aim of maintaining and strengthening education provision across Flintshire's Catholic schools.

Educational standards during transition

The new 3-18 school would initially operate across the existing sites, allowing most pupils to remain in their current learning environment until the new building opens. The consultation document states that transitional arrangements would be carefully planned to ensure continuity of learning, wellbeing and pastoral support, and that the Council does not anticipate a detrimental impact on educational standards. Ongoing monitoring would identify and address any emerging issues.

Leadership capacity in a 3-18 school

While an all-through school is a significant organisation, the proposal is expected to strengthen leadership and school improvement. The document highlights that a more cohesive leadership structure would support effective strategic planning, stronger school improvement processes, better use of staff expertise and resources, and improved outcomes for learners.

Governance arrangements

A temporary governing body would be established in line with Welsh Government regulations to oversee the creation of the new school. This body would work with the Council and the Diocese to put appropriate leadership, staffing, policies and operational arrangements in place before a permanent governing body is established. Governance arrangements are intended to provide effective scrutiny, accountability and oversight of school improvement priorities.

Maintaining high-performing schools

The proposal is not driven by concerns about the quality of education currently provided. The consultation document notes that St Anthony's, St David's and St Mary's are recognised by Estyn as good schools, and that the proposal forms part of a wider strategy to ensure long-term sustainability, strong leadership and consistently high standards across Catholic education provision.

School improvement and continuous improvement

The proposal is expected to support, rather than hinder, school improvement through shared professional learning, consistent self-evaluation processes, improved tracking of pupil progress, and closer collaboration between staff across all age phases. These arrangements are intended to strengthen the capacity for continuous improvement and raise standards over time.

It is considered that the proposal would provide stronger leadership, robust governance arrangements, improved collaboration between staff, and a more seamless educational journey for learners, while ensuring educational standards are maintained and strengthened throughout the transition period.

Theme 10: Consultation Process, Stakeholder Engagement and Confidence in Decision-Making

Key Points

- Perception that previous consultation outcomes have not been reflected.
- Concerns that decisions have already been made.
- Repeated references to previous opposition levels.
- Concerns regarding engagement with governing bodies and stakeholders.
- Lack of confidence in the consultation process.

Example Comments

- *"95% of people who responded do not want this to happen."*
- *"The people have clearly voted and yet you don't care."*
- *"The proposals were developed without adequate engagement with either the Governing Body or of St David's School."*

Council's Response

The Council recognises that stakeholders hold a range of views regarding the proposal, and the consultation process itself. Firstly, as explained in the revised consultation document, When the first consultation was paused due to legal questions being raised, in exercising due diligence to seek the appropriate legal advice the Council could not make a final determination within the required statutory timescales of the School Organisation Code 2018.

Since the original process was paused, a third edition of the Code been published (March 2026) which means that any new consultation had to follow the revised Code. Due to this being a new consultation and under a new iteration of the Code, the views of stakeholders could not be 'carried over' from the first consultation. The new consultation gave stakeholders up-to-date information and provide a fair opportunity to engage and comment.

Also emphasised in the new consultation document was the fact that the outcome is not pre-determined. Each stage of the statutory process must be formally considered and decided by the Council's Cabinet. At every stage, Cabinet will receive the relevant information, including the feedback and evidence gathered during that part of the process.

The purpose of the new consultation was to gather and consider the views of all interested parties before any determination is reached. Feedback received through the consultation has been included in this report and presented to elected members as part of the decision-making process. Any future decisions will be made only after the relevant evidence, including consultation responses, has been fully considered.

Throughout the consultation process key stakeholders have been provided with ample opportunities for engagement to ensure all views are noted. There were dedicated pupil events delivered to explain the proposal and gather their thoughts about the idea and what could be done instead.

Staff of the four directly affected schools were invited to separate sessions to allow give a safe space where open discussions could take place and questions raised directed to the Council and the Diocese.

Separate meetings were also convened for Governors of the four directly affected schools to talk through the proposals, as well as one joint meeting for the Governors of the remaining two Catholic primary schools.

Other key stakeholders including parents, guardians, carers, members of the community, staffing unions, politicians and more, were able to use the dedicated response form (online or hard-copy) to submit their views, could write to the Council via the dedicated email address, could send correspondence by post, could hand-deliver their opinions to any council office, whilst also being able to request further information or make a general comment.

The consultation has been conducted in accordance with the School Organisation Code 2026, with the objective of providing clear information and meaningful opportunities for stakeholders to express their views. The Council remains committed to ensuring that the process is transparent, fair, and accessible, and that all responses received are carefully considered before any decisions are taken.

Theme 11: Equality, Inclusivity, Welsh Language and Cross-Border Impacts

Key Points

- Concerns regarding access to Welsh language Catholic education.
- Potential movement of pupils into English schools.
- Questions regarding faith-based admissions and equality.
- Concerns regarding equitable access to educational provision.
- Debate regarding public investment in faith education.

Example Comments

- *"The closure of St Anthony's would leave no Welsh language Catholic school on this side of Flintshire."*
- *"The majority of Saltney residents will be forced to go to English schools for Catholic education."*
- *"Using baptism to decide access is debatable even when a school is oversubscribed; using it for any other purpose is discriminatory."*

Council's Response

Concern: Access to Welsh language Catholic education

It is accepted that the proposal to close St Anthony's in Saltney and St David's in Mold will remove access to Welsh language Catholic education in those communities. However, it is believed that implementation of the proposal will deliver a stronger, sustainable Catholic offering that will at maintain or enhance the current Welsh language Catholic education provision, albeit in a more concentrated area. Maintaining Catholic primary schools in Shotton and Holywell widens the access to other places within the county.

Concern: Pupils may move to English schools in England

The Council recognises that some families in border communities, particularly around Saltney, may consider schools in England. However, a range of education options will continue to be available within Flintshire, including Catholic schools in Shotton, Holywell and the proposed new 3 to 18 Catholic school in Flint. The proposal aims to secure the long-term sustainability of Catholic education in Flintshire by concentrating resources into stronger and more viable provision.

Concern: Faith-based admissions and equality

Admissions to Catholic voluntary aided schools must operate within the School Admissions Code and equality legislation. Where a school is oversubscribed, faith-based oversubscription criteria may be applied in accordance with approved admission arrangements. These arrangements are lawful and are commonly used by faith schools across Wales. The proposal does not introduce any new admission criteria and the new school would be required to comply with all relevant legislation and admissions requirements.

Concern: Equitable access to educational provision

The Integrated Impact Assessment concludes that the proposal would provide access to a broader curriculum, enhanced facilities and improved educational opportunities in a modern learning environment. The new school would be designed to be fully accessible and inclusive, with improved facilities for learners with additional learning needs and disabilities. While some families may need to travel further to access Catholic education, transport eligibility would continue to be assessed in line with the Council's policies.

Concern: Public investment in faith education

The proposal seeks to safeguard Catholic education in Flintshire for the long term by replacing several schools with declining numbers and ageing buildings with a sustainable 3 to 18 model. The investment forms part of the Sustainable Communities for Learning Programme and is intended to provide modern, efficient and high-quality learning environments for current and future generations. The proposal has been developed in partnership with, and is supported by, the Catholic Diocese.

Theme 12: Benefits of the Proposal (Supportive Responses)

Key Points

- Support for new and modern educational facilities.
- Opportunity to improve teaching environments.
- Financial sustainability and reduction of surplus places.
- Long-term viability of Catholic education.
- Potential benefits of an all-through school model.

Example Comments

- *"A new, purpose-built school represents a more sustainable and forward-looking solution."*
- *"A through school will help with transition to high school."*
- *"Smaller sites with extremely low rolls are not value for money."*

Council's Response

The feedback received highlights several important advantages associated with the proposed opening of a new school for learners aged 3 to 18. The Council acknowledges and welcomes these positive comments and recognises the opportunities that a purpose-built all-through school could provide for pupils, families, staff and the wider community.

Respondents highlighted the advantages of providing learners with a new, purpose-built school and that modern educational facilities can create high-quality learning environments that support teaching and learning, improve accessibility, enhance wellbeing and provide facilities that meet the needs of current and future generations of learners.

Comments also noted that the proposal represents a more sustainable and forward-looking approach to educational provision, with modern school buildings viewed generally more efficient to operate and maintain, allowing resources to be focused on supporting educational outcomes rather than the upkeep of ageing facilities.

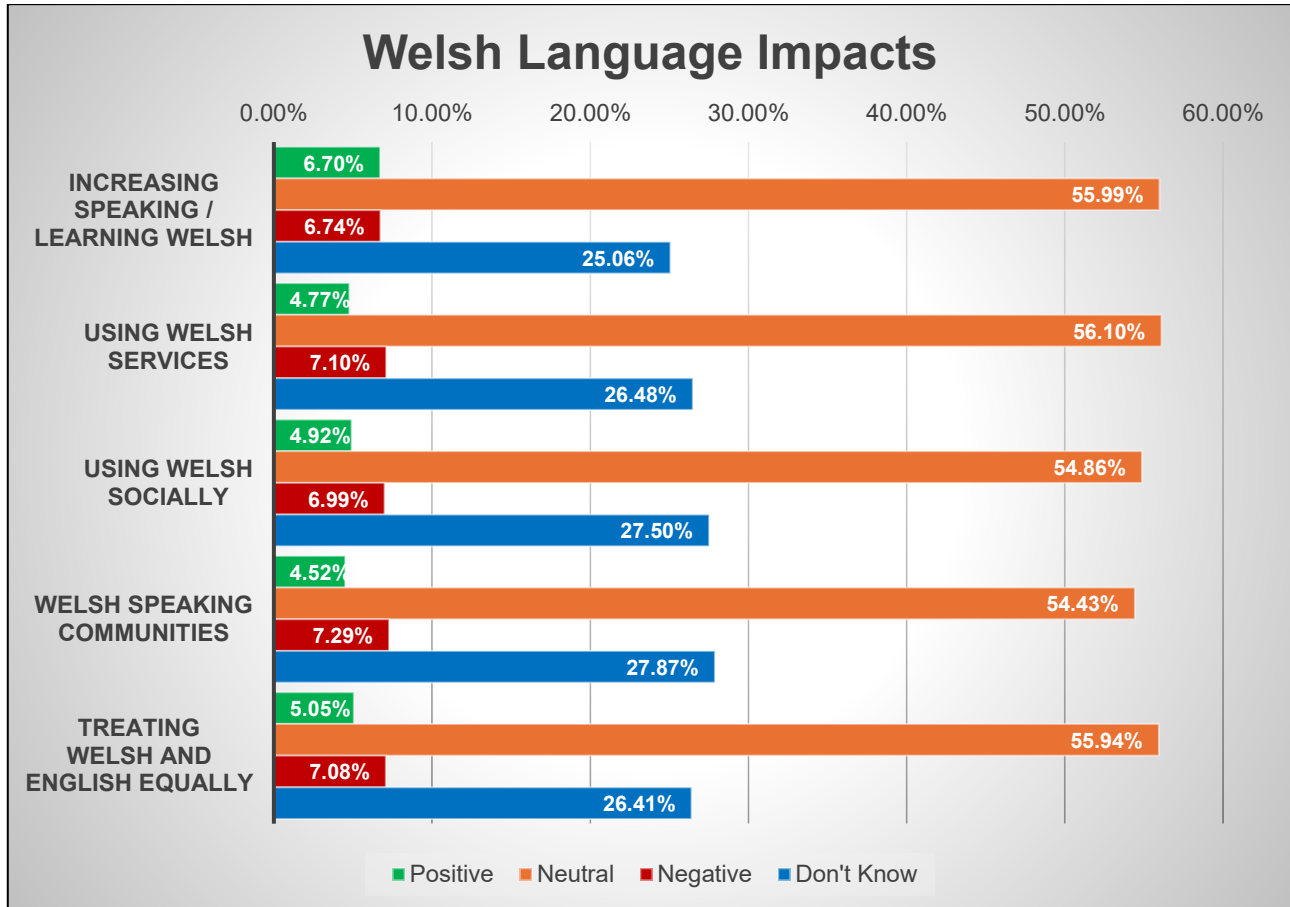
Financial reasons for the proposal were also highlighted, with responses noting the importance of financial sustainability and of reducing surplus places to make the most effective use of available resources. A more sustainable school model can help ensure that funding is used effectively to support learners, staffing, educational resources and wider school improvement priorities.

Other positive feedback on the proposal included stronger collaboration for curriculum delivery and staff development, smoother transition for pupils that will enhance wellbeing and a potential way of safeguarding Catholic education in Flintshire.

C.3. Welsh Language Impacts

The response form included a section requesting individuals to provide their views on the possible effects the proposal may have on the Welsh language.

The most popular response to each of the 5 questions was that the proposal would have a 'neutral' impact on the Welsh language.



C.3.i. Welsh Language Themes

People were provided with a comment box and asked how positive effects could be increased or negative effects could be reduced. Responses were grouped into themes and have been addressed in the tables below.

It should also be noted that further information on how the Council plans to mitigate some of the issues raised in the consultation, and how we hope to improve Welsh Language opportunities are provided in the Welsh Language Impact Assessment alongside the Consultation document.

Theme 1: Cross-Border Movement to England and Loss of Welsh Language Exposure

Key Points

- Closure of schools near the English border may encourage families to seek places in England.
- Pupils attending English schools may no longer receive Welsh language education.
- Reduction in the number of children educated within the Welsh education system.
- Concern that the proposal contradicts Welsh Government language ambitions.
- Particular concern regarding the impact on Saltney and St Anthony's School.

Example Comments

- *"Closing a school on the border with England will result surely in kids going to English schools."*
- *"Children will move to England for schooling so how will they even learn Welsh let alone speak it."*
- *"The likely result will be mass migration of pupils to Chester and therefore an English curriculum."*

Council's Response

The Council recognises that cross-border education is already a well-established feature of the area and that families have historically exercised their right to choose schools across the Wales-England border for a variety of reasons. Whilst parental decisions cannot be predicted with certainty, the proposal is focused on improving the long-term sustainability of Catholic education in Flintshire.

All schools involved are English-medium Catholic schools, where Welsh is taught as part of the Curriculum for Wales. Pupils attending the proposed new all-through Catholic school in Flint would continue to learn Welsh and experience Welsh culture as required by the national curriculum.

Flintshire remains committed to the Welsh Government's Cymraeg 2050 ambition and to increasing the number of Welsh speakers. The Council's Welsh in Education Strategic Plan (WESP) aims to increase Welsh language skills for all learners, including those attending English-medium schools.

The WESP includes actions to increase participation in Welsh-medium education, improve Welsh language attainment in English-medium schools, and support learners transferring into Welsh-medium education through immersion programmes.

While Saltney's location close to the English border is acknowledged, the Welsh Language Impact Assessment notes that Welsh language use in that area is already relatively low compared with other parts of Flintshire. The Council will continue to promote Welsh language learning and Welsh-medium education opportunities for local families regardless of the outcome of this proposal.

The proposal is not expected to reduce Welsh language learning opportunities. The Council will continue to deliver its WESP commitments, promote Welsh language development, and invest in Welsh-medium education across Flintshire.

Theme 2: Impact on Welsh Language, Culture and Community Identity

Key Points

- Welsh language seen as closely linked to local communities and cultural identity.
- Concern that moving children away from their communities weakens cultural connections.
- Schools regarded as important centres for Welsh culture and identity.
- Impact on opportunities to use Welsh within local communities.
- Concerns regarding the long-term sustainability of Welsh-speaking communities.

Example Comments

- *"This proposal will have a distinctly negative impact on the Welsh language and local culture by tearing children away from their immediate communities."*
- *"Moving children to a school outside their community weakens that connection and reduces their sense of belonging."*
- *"Children need to use Welsh in their local communities to embed it into their usage."*

Council's Response

The Council remains committed to the aims of the WESP, which seeks to increase the number of Welsh speakers, promote the use of Welsh in schools and communities, and create an increasingly bilingual county. These commitments continue regardless of the proposed reorganisation of Catholic education provision.

While some respondents are concerned that attending a different school could weaken community connections, pupils would continue to live within their local communities and have opportunities to use Welsh through community activities, local services and wider Welsh-language initiatives. The Council, through its WESP and Welsh Language Promotion Strategy, is committed to extending Welsh language use beyond the classroom and into community life.

The proposed new 3-18 Catholic school would provide continuity of education and opportunities for learners across all age groups on a single educational pathway. The proposal is not expected to have a significant adverse impact on opportunities to learn Welsh or on the Council's ability to support and promote the Welsh language.

The Council will continue to monitor the impact of the proposal on the Welsh language and will consider feedback received during the consultation process as part of the ongoing Welsh Language Impact Assessment.

Theme 3: Existing Schools Already Support Welsh Language Learning

Key Points

- Existing schools already provide Welsh language education and cultural opportunities.
- Welsh language promotion is viewed as successfully embedded within current schools.
- Concern that closure would remove established Welsh language provision.
- Existing Welsh language initiatives should be protected.
- Respondents questioned what additional Welsh language benefits the proposal would deliver.

Example Comments

- *"Schools can teach Welsh just as easily in a smaller school."*
- *"Historically St David's School has had a good record supporting speaking or learning Cymraeg."*
- *"How will a bigger school have a more positive impact on the Welsh language?"*

Council's Response

The existing schools already promote Welsh language learning and provide opportunities for pupils to engage with Welsh language and culture. The positive work currently undertaken by St Anthony's, St David's, St Mary's and St Richard Gwyn is valued and acknowledged.

The new 3-18 Catholic school would continue to deliver Welsh in line with the Curriculum for Wales and the Council's Welsh in Education Strategic Plan, which aims to improve Welsh language skills and increase opportunities for learners to use Welsh in school and everyday life.

While respondents have highlighted that smaller schools can successfully teach Welsh, the Council considers that a larger all-through school could provide greater opportunities to promote Welsh language learning through stronger collaboration between age phases, shared expertise, wider enrichment activities and a consistent Welsh language journey from age 3 to 18.

The Welsh Language Impact Assessment notes that the proposal should support the aims of Cymraeg 2050 and the Flintshire Welsh in Education Strategic Plan, including increasing opportunities for learners to use Welsh in different contexts and improving outcomes for Welsh second-language learners in English-medium schools.

The Council is committed to safeguarding and promoting the Welsh language through all school modernisation proposals and will continue to work with schools to ensure Welsh language initiatives, cultural activities and learning opportunities are maintained and developed.

Although Welsh language learning is already a strength within the existing schools, the proposal is expected to maintain those benefits while providing opportunities to further strengthen Welsh language experiences and progression for learners across the full 3-18 age range.

Theme 4: Welsh Language Opportunities Beyond the Classroom

Key Points

- Welsh language development depends upon participation in community and social activities.
- Concerns that increased travel time will reduce opportunities for pupils to use Welsh socially.
- Reduced participation in after-school activities, clubs and cultural events.
- Importance of friendships, peer groups and community interaction in promoting language use.
- Concern that longer journeys may reduce opportunities to engage with Welsh outside formal lessons.

Example Comments

- *"A child spent on a bus for over an hour a day is a child denied the opportunity to engage in local after-school activities."*
- *"Kids can't speak Welsh with their friends if they don't have any free time after getting to and from school."*
- *"Pupils will not have the same community opportunity to continue friendships due to geography of the pupils homes."*

Council's Response

The Council recognises that opportunities to use Welsh outside the classroom, including through friendships, clubs, activities and community events, are important for developing confidence and increasing everyday use of the language. This has been considered as part of the Welsh Language Impact Assessment and aligns with the aims of Cymraeg 2050 and Flintshire's WESP, which seek to increase both the number of Welsh speakers and opportunities to use Welsh socially.

The schools affected by the proposal are English-medium Catholic schools, and Welsh language teaching will continue within the new arrangements. The Council remains committed to improving Welsh language outcomes for learners in English-medium schools and creating more opportunities for learners to use Welsh in different contexts.

The WESP also places a strong emphasis on partnership working with schools, community organisations and services to promote bilingualism in both educational and social settings. This includes supporting learners to use Welsh beyond lessons and encouraging participation in cultural and community activities.

The Welsh Language Impact Assessment is a live document, and consultation feedback regarding travel, social use of Welsh, after-school participation and maintaining friendship groups will be considered as part of the assessment of the proposal's overall impact on Welsh language opportunities.

Theme 5: Strategic Growth of Welsh Language Education and Cymraeg 2050 Alignment

Key Points

- Concerns regarding alignment with Flintshire's Welsh in Education Strategic Plan (WESP).
- Questions regarding how the proposal supports Cymraeg 2050 ambitions.
- Concerns regarding the impact on future Welsh-medium education growth.
- Questions regarding the use of current demographic and language evidence.
- Requests for stronger assessment of the strategic Welsh language implications of the proposal.

Example Comments

- *"The Council should also demonstrate how the proposal supports the growth of Welsh-medium education."*
- *"How has the Council assessed the impact of major investment in a new all-age English-medium school on its ability to achieve its own target of 15% Welsh speakers by 2030?"*
- *"Assess the proposal against the targets of the WESP and the Welsh Language Promotion Strategy 2025-2030."*

Council's Response

Welsh language implications of the proposal have been carefully considered as part of the dedicated Welsh Language Impact Assessment, in line with the School Organisation Code 2026. The assessment specifically considers the proposal's impact on the Welsh language, Cymraeg 2050 and Flintshire's WESP.

The schools affected by this proposal are all English-medium Catholic schools. The proposal does not reduce Welsh-medium educational provision, close any Welsh-medium schools, or remove access to Welsh-medium education in Flintshire.

The Council remains fully committed to the objectives of Cymraeg 2050 and the WESP 2022-2032, which aim to increase the number of Welsh speakers and expand Welsh-medium education across the county.

The proposal has been assessed against local Welsh language priorities and existing demographic evidence. The Welsh Language Impact Assessment references Census 2021 data, local Welsh language trends, the Council's target to increase Welsh speakers to 15%, and the distribution of Welsh-medium provision across Flintshire.

The Council's assessment recognises that Welsh speaker numbers in Flintshire are below the national average but also notes that participation in Welsh-medium education is increasing and is expected to continue growing.

Significant investment in Welsh-medium education has continued alongside this proposal. Recent investments include Ysgol Croes Atti in Flint, improvements at Ysgol Glanrafon in Mold, support for the Trochi immersion programme, and plans for additional Welsh-medium provision in the Buckley/Mynydd Isa area. More than £20 million has been invested in Welsh-medium education since 2020.

As the proposal relates to English-medium schools, the Council considers that it is unlikely to have a significant adverse effect on the delivery of the WESP or the achievement of Cymraeg 2050 objectives. The Council will continue to promote Welsh language learning and Welsh-medium education through its existing WESP commitments and investment programme.

Theme 6: Opportunities to Strengthen Welsh Language Provision (Supportive Theme)

Key Points

- Some respondents believed the proposal could improve Welsh language provision if properly planned.
- Opportunity for a consistent approach to Welsh language learning from ages 3-18.
- Greater collaboration between primary and secondary phases.
- Opportunity to create a stronger bilingual environment.
- Potential for enhanced community learning opportunities and Welsh language promotion.

Example Comments

- *"A new purpose-built school presents an opportunity to create learning environments where Welsh is more visible."*
- *"Welsh would be embedded within the school and could be worked on collaboratively within the primary through to the sixth form."*
- *"A new school would be able to coordinate and concentrate Welsh capabilities and make better use of scarce resources."*

Council's Response

The views of respondents who believe the proposal could provide opportunities to strengthen Welsh language provision within Catholic education are welcomed.

The proposed new 3-18 Catholic school would create opportunities for closer collaboration between primary and secondary phases, supporting a more consistent approach to Welsh language learning as pupils progress through their education. This aligns with the aims of Flintshire's WESP, which seeks to improve Welsh language outcomes for learners in English-medium schools and increase opportunities to use Welsh in different contexts.

A new school environment could provide greater opportunities to promote the visibility and use of Welsh across the campus. Through the design of future learning environments, bilingual signage, resources and school communications can help support Welsh language development and reinforce the principle of treating Welsh no less favourably than English.

The Welsh Language Impact Assessment identifies opportunities for the new school to contribute positively to local and national Welsh language ambitions, including Cymraeg 2050 and Flintshire's WESP. The proposal would enable staff to work collaboratively across age phases to strengthen Welsh language provision and share expertise, helping learners achieve the highest possible outcomes in Welsh as a second language.

The Council is committed to promoting bilingualism and increasing opportunities for learners, families and the wider community to engage with the Welsh language. As the proposal develops, consideration will be given to how Welsh language use can be encouraged throughout school life and through wider community engagement activities.

The proposal does not reduce access to Welsh-medium education. Welsh-medium schools remain available in the Mold and Flint areas, and the Council continues to invest significantly in Welsh-medium education across the county in support of its long-term objective of increasing the number of Welsh speakers and creating a more bilingual Flintshire.

Should the proposal proceed, the Council and Diocese will work with school leaders to identify opportunities to strengthen Welsh language provision and support delivery of the Welsh in Education Strategic Plan. This may include enhanced visibility of Welsh throughout the school environment, collaborative Welsh language curriculum planning across age phases, increased Welsh language enrichment opportunities and professional learning opportunities for staff.

Progress against these ambitions will be monitored through future school improvement arrangements and Welsh in Education Strategic Plan activities.

C.4. Children and Young Person's Response Forms

C.4.i. Response Forms

In total, 41 hard copies of the children and young person's response form were received, all from St David's VA Catholic Primary School, Mold.

Of the 41 responses, 31 described the proposal as "bad" in some way, whilst 10 were "unsure".

Some of the reasons given for thinking the proposal is bad were:

- "because our school is big enough and I don't want to move school"
- "because we have a really good school"
- "don't know"
- "Because kids who have special needs won't like big spaces"
- "it is a small school so it is ok for you or if you don't like big places"

Alternative suggestions included:

- "see more pepole comeing to our school"
- "Yes, keep the school! Please!!"
- "Keep the School!"
- "Honestly, I would just leave it"
- "don't bild a super school and keep the school"

C.4.ii. Pupil Events

During the individual sessions at each of the six Catholic schools, groups of pupils were invited express their views by answering the following questions:

- What do you like about your school?
- What would you change?
- What might be good about a brand-new school?
- What might be difficult or worrying?
- Is there anything else you think should happen instead?

The proposal was also presented to the Young Flintshire's Forum who were asked their overall view of the proposal as well as to consider the benefits and drawbacks for learners and the community respectively.

Extracts of the responses given at each session are included in the appendices (E.2)

C.4.iii. Key Messages from Children and Young People

The Council and Diocese place significant importance on the views expressed by children and young people throughout the consultation process.

Across all consultation activities, pupils identified a number of potential benefits associated with the proposal, including access to modern facilities, larger learning environments, enhanced resources, improved sporting opportunities, access to specialist teaching facilities and opportunities to develop new friendships.

Children and young people also expressed concerns regarding travel arrangements, moving away from familiar teachers and friends, adapting to larger school environments, potential bullying, safeguarding, and maintaining the individual identities of existing schools.

A recurring theme across consultation sessions was the importance pupils place on their existing school communities, relationships and familiar learning environments.

The Council and Diocese have carefully considered these views when assessing the proposal and recognise the importance of learner wellbeing, safeguarding, age-appropriate provision and effective transition arrangements throughout any future implementation process.

C.4.iv. Children and Young Person's Consultation Report

An age-appropriate summary of this Consultation Report will be produced and shared with children and young people who participated in the consultation process. This summary will explain the consultation outcomes and how the views expressed by children and young people have been considered by decision-makers.

C.5. Estyn's Response

Below is Estyn's response to the proposal, in full.

Each comment has separated where necessary to allow the Council to provide a response.

The full response, without the Council's replies, is included in Appendix E.4.

Summary / Conclusion

Estyn considers that the proposal is likely to, at least, maintain the standard of education provision in the area.

Council's Response:

Noted.

Description and benefits

The local authority has set out a clear rationale for its proposal. This identifies plainly and reasonably the expected benefits and disadvantages when compared with the status quo and other alternatives, and how they will manage any risk.

Council's Response:

Noted.

The local authority provides a clear description of the proposal and a projected timetable for statutory procedures and implementation. The local authority has provided a Welsh language Impact Assessment and a Community Impact Assessment as part of its proposal.

Council's Response:

Noted.

The schools directly affected by the proposal are four of the six English-medium Catholic VA schools in the local authority, the others being Venerable Edward Morgan Catholic VA Primary School, Shotton, and St Winefride's Catholic VA Primary School, Holywell.

Council's Response:

Noted.

The proposal identifies a steady decline in pupil numbers across three of the four schools over the last five years. This decline is steepest at St Anthony's where numbers have more than halved since 2020, resulting in 69% surplus places by September 2025. Despite a modest increase in pupil numbers at St Mary's over the last five years, overall surplus places across the four schools are projected to rise from 31% in September 2025 to 47% in September 2030. This projected increase is most acute at St Anthony's and St David's where surplus places in September 2030 are forecast to be 79% and 69% respectively.

Council's Response:

Noted.

The Council rightly identifies that its proposal to close St Anthony's will reduce the number of surplus places across the Catholic provision. The proposer also argues, not unreasonably, that

given the overall rising trend in surplus places, the long-term sustainability of the other three schools may be enhanced by their potential amalgamation. In particular, the proposal identifies that amalgamation may enable schools to pool resources and benefit from economies of scale. The proposal also suggests, fairly, that the subsequent opening of a new 3-18 Catholic VA school building in 2030 would, in the longer term, address identified shortcomings in the suitability of existing accommodation across these schools. The overall capacity of the proposed new building would be 1185 full-time pupil places; 315 in the primary phase and 870 in the secondary phase. The local authority's current forecast of pupil numbers for 2030 across the four schools indicates that this would leave 16% surplus places in the primary phase and 37% surplus places in the secondary phase.

Council's Response:

Noted.

The local authority sets out six possible options in its proposal, and these include maintaining the status quo. The four further alternative options present different possible models of closure, amalgamation and federation, all of which include significant investment to remodel or rebuild on the St Richard Gwyn site to create a new 3-18 school. Each of these models addresses, to a greater or lesser extent, the number of surplus places and the current and future maintenance costs associated with continuing to operate a chosen number of Catholic VA primary schools in their existing locations. The proposer appears to have considered the advantages and disadvantages of each appropriately with the principal reason for discounting each being failure to address the high number of surplus places. This appears to be reasonable.

Council's Response:

Noted.

The proposal identifies the need to improve the learning environment of some Catholic VA schools as part of its aim to achieve long-term sustainability and highlights this with the inclusion of information as to the current condition and suitability rating for each school. The identified backlog of maintenance across the four schools is £1.45 million. While a new 3-18 school building would provide an improved environment for pupils and staff, the proposal does not specify the likely anticipated cost of ongoing maintenance at the schools in the years prior to its planned opening. Although the proposed closure of St Anthony's would reduce this backlog, the school's associated costs make up less than 2% of this total.

Council's Response:

It is accepted that the consultation document does not provide the likely anticipated cost of ongoing maintenance at the schools in the years prior to its planned opening.

As stated above as part of the response to financial themes collated during the consultation, over the last five financial years, an average of £0.489m per annum has been invested in repairs and maintenance across the existing school's estate, with approximately two-thirds of this expenditure attributable to the Catholic secondary school.

As with all schools, the Council, Diocese and governing bodies would continue to monitor building conditions and undertake essential maintenance and health and safety works to ensure the sites remain safe and operational, which would be the case during this interim period, with St David's, St Mary's and St Richard Gwyn continuing to operate from their existing sites.

Whilst the closure of St Anthony's removes a relatively small proportion of the total backlog maintenance liability (approximately £20,831, less than 2% of the overall £1.45 million), the proposal should be viewed in its entirety. The preferred option would ultimately remove four ageing buildings from the Catholic school estate and replace them with a modern, net zero

carbon in operation school, significantly reducing future maintenance liabilities, recurring maintenance costs and energy expenditure.

The most significant maintenance liabilities are associated with St Mary's (£401,702) and St Richard Gwyn (£853,422), both of which have buildings assessed as Condition Grade C (poor). These two schools account for the vast majority of the identified backlog maintenance. The proposal therefore provides a long-term solution to the schools with the greatest need for investment, rather than relying on continued expenditure on ageing buildings.

In addition, the consultation document explains that addressing backlog maintenance alone was considered as an option and discounted because it would not address surplus places, declining pupil numbers or the long-term sustainability of Catholic education provision. The preferred option was selected because it delivers modern learning environments, reduces maintenance liabilities, improves energy efficiency and provides a sustainable future model for Catholic education in Flintshire

The proposer appears to have considered the financial aspects of the proposal suitably and this includes recognition that grant funding is yet to be secured and that the proposal cannot be implemented without it.

Council's Response:

Noted.

The proposal outlines that the construction of a new 3-18 school building would require significant capital investment. A feasibility study completed in 2024 estimated this cost to be £55 million, though up to date cost modelling will be required to provide a more accurate estimate based on current market conditions. The proposal identifies that future potential costs savings would derive from the reduction in surplus places and increased efficiency associated with operating a single, larger school.

Council's Response:

Noted.

The proposal identifies a potential annual reduction in staffing costs across the schools of £209,000, based on 2025 pupil numbers. However, the proposal does not make clear how this saving would be achieved, or more specifically how the staffing structure would be altered as a result of reorganisation. For example, the proposal does not consider the likelihood of voluntary or compulsory redundancy or the impact of changes to leadership roles. The proposal does state that any savings released through reorganisation would be removed from the Council's overall school's budget, allowing fairer distribution across the whole school network

Council's Response:

Accepted.

At this stage, it is not possible to specify the final staffing structure or identify precisely where savings would fall, including whether voluntary or compulsory redundancies would be necessary. Under the School Organisation Code, a temporary governing body will be established for the new school. Following the appointment of a headteacher, the governing body, working with the Diocese and the Council, will determine the staffing structure required to operate the new school.

The consultation document recognises that, during the initial phase, the amalgamated school will continue to operate across the existing sites. Consequently, it is anticipated that structural staffing changes will be minimal in the short term, with the most significant immediate change

being the move to a single leadership arrangement, including the appointment of one headteacher for the new all-through school.

The proposal also notes that overall staffing numbers may not change significantly if pupils remain within Flintshire's Catholic education provision, as staffing requirements are largely driven by pupil numbers.

Any changes to staffing, including leadership roles, would be managed through established employment procedures, in consultation with staff and recognised trade unions, and in accordance with statutory and contractual requirements.

The Council and Diocese remain satisfied that the indicative staffing savings identified within the proposal are reasonable estimates based upon the consolidation of functions, leadership arrangements and longer-term operational efficiencies. Detailed staffing structures will be developed at the appropriate stage of implementation once pupil numbers, operational arrangements and curriculum requirements are confirmed.

The proposal involves four voluntary aided schools owned by the Catholic Diocese. It details suitable arrangements to transfer ownership of the buildings and sites at appropriate stages during the process. In the event that sites are no longer required for education purposes, the buildings and land would be declared surplus to requirements of the Education & Youth portfolio and control would be transferred to the Council's Capital Programme and Assets department.

Council's Response:

Noted.

The proposer appears to have considered the impact of the changes on learner travel arrangements suitably. It is anticipated that average journey times for pupils currently attending St Anthony's would increase from 15 minutes to a maximum of 45 minutes. These pupils will be eligible for school transport to Venerable Edward Morgan, in line with the local authority's home to school transport policy, resulting in a potential increase in costs of £60,000 per annum.

Council's Response:

Noted.

Following the proposed amalgamation, pupils from St David's and Mary's would initially continue to access the same school buildings as previously. Given the proximity of St Mary's and the St Richard Gwyn sites, when the proposed single, new 3-18 building opens in Flint there would be no significant impact on the walking distances or journey times for these pupils and transportation costs would remain unchanged. However, most pupils who attend the St David's site as part of the 3-18 provision would then be faced with longer walking distances and travel times. Significantly, although nearly half of pupils currently attending St David's reside more than two miles distant from the school, for many the new 3-18 school building would no longer be the nearest Catholic primary provision (this would be Venerable Edward Morgan). Consequently, many St David's pupils who continue to attend the amalgamated school on the Flint site would not be eligible for home to school transport. While this would create a potential annual saving for the local authority of between £33,000 to £40,000, the proposer recognises that the removal of free home to school transport would make transition to the new site difficult. The proposal states that the local authority would work with impacted families to establish suitable arrangements to help facilitate attending the new school site, although it does not provide details of what these may be.

Council's Response:

Noted.

The loss of free transport could make the transition to the Flint site challenging for some St David's families. For this reason, the Council has committed to working directly with affected families to explore suitable arrangements that would support pupils in accessing the new school and help minimise disruption during the transition period. Any transition planning will be tailored to individual families.

However, it is important to note that pupils from St David's and St Mary's will continue to be educated on their existing sites following amalgamation in September 2027. The move to a single new building is not anticipated until approximately September 2030.

Given the nature of the proposal, there are no anticipated changes to admission arrangements which would be administered by the new governing body. The current sixth-form provision that is on offer at St Richard Gwyn will be similar to what will be provided as part of the new school, including retaining delivery in English. With the proposal reducing the overall capacity of Catholic secondary education, the number of sixth-form places has been marginally reduced as well.

Council's Response:

Noted.

The proposal recognises appropriately that the closure of St Anthony's and, subsequently, provision on the St David's site, would have a negative impact on wraparound provision in the Saltney and Mold areas. In addition, third-party childcare providers may see demand decrease if pupils from these school's transfer to the proposed alternative schools.

However, the proposer notes that childcare providers in the Flint area may see increased demand if pupils from other schools transfer to the new school.

Council's Response:

Noted.

The proposal assumes, reasonably, that the planned change in school status will have a broadly neutral impact on the Welsh language. Language provision in the amalgamated school will continue to support the objectives in the local authority's Welsh in Education Strategic Plan (WESP). The proposal does note that closure of St Anthony's may result in some pupils transferring to alternative, closer Catholic provision across the border meaning that those pupils will have no opportunity to learn Welsh.

Council's Response:

Noted.

Educational aspects of the proposal

The local authority gives appropriate consideration in its proposal to the impact of the change on the quality and standards in education. For example, it evidences each of the school's most recent Estyn inspection report, noting specifically the relevant recommendations. However, in relation to St Anthony's (January 2019) and St David's (March 2020), this information is quite old, and the proposer does not provide a more recent evaluation that identifies these school's main strengths and areas for development. Neither does the proposer provide any information arising from inspection visits by the Catholic School's Inspectorate.

Council's Response:

Both St. Anthony's and St. David's benefit from strong leadership from the current headteacher, who has a clear understanding of each school's strengths and priorities for improvement. Governance has also strengthened, with governors becoming more actively involved in monitoring and self-evaluation. Since their previous Estyn inspections, both schools have made good progress in addressing recommendations.

At St. Anthony's, planning for the teaching of Welsh has improved and attendance monitoring procedures have been strengthened. Teachers provide greater opportunities for pupils to take responsibility for their own learning and develop independence. Curriculum planning has also been refined to increase opportunities for pupils to develop numeracy and ICT skills across different areas of learning.

At St. David's, curriculum planning has been reviewed to ensure appropriate challenge for all pupils and to give learners greater influence over what and how they learn. Senior leaders have sharpened monitoring procedures with a stronger focus on pupil outcomes, while systems for supporting pupils with special educational needs have been strengthened to provide a clearer picture of progress. The school is also focusing on improving challenge and progression of skills, particularly within foundation learning.

Despite these strengths, both schools face similar challenges. Falling pupil numbers have resulted in mixed-age classes across both schools, with some classes containing up to four year groups. As a result, curriculum planning continues to be developed to ensure clear progression of skills across age ranges. A shared priority is also the development of pupils' independent learning skills so that learners become increasingly confident, resilient and self-directed.

St. David's was inspected by the Catholic Schools Inspectorate (Section 50 Inspection) in December 2025. The inspection highlighted the school's strong relationships, effective pastoral support and strong sense of community. Inspectors recognised the opportunities provided for pupils to put their faith into action and acknowledged the headteacher's effective work with governors and staff to secure improvement. However, the report noted that some developments were still at an early stage and required further embedding.

In response, recommendations from the Section 50 inspection have been incorporated into the School Development Plans for both schools. Priorities include establishing a more consistent cycle of monitoring, evaluation and review to strengthen links between improvement planning and professional learning. The schools are also working together to improve teaching consistency through shared professional learning focused on effective pace, higher-order questioning and adaptive teaching strategies. In addition, staff are developing a wider range of meaningful acts of worship, including greater opportunities for pupils to plan, prepare and lead worship activities.

The proposal considers the possible impact of the changes on teaching and learning, including for those pupils with additional learning needs (ALN) and those eligible for free school meals suitably. The proposal also considers the impact on the school's leadership and its provision for pupils' care, support and guidance. The proposal identifies, fairly, a number of potential benefits arising from the provision of a new, purpose-built facility including access to specialist teaching spaces that support the effective delivery of a broad curriculum across all ages. In particular, the proposal highlights how the provision of small-group teaching and intervention rooms, low-stimulation spaces and specialist hygiene and accessibility facilities may enhance the progress and well-being of pupils with ALN and others. However, the proposal does not focus specifically on how the proposed changes may support common areas for improvement identified through Estyn inspections, such as the need to improve opportunities for younger pupils to show initiative and independence in their learning, or to strengthen provision for developing pupils' Welsh language skills.

Council's Response:

Staff at St. Anthony's and St. David's have responded positively to guidance on developing foundation learning. Both sites have the potential to develop high-quality outdoor learning provision, although this remains at an early stage. The proposed changes provide opportunities to build on progress already made and address areas for improvement identified through recent Estyn inspections. A closer partnership and the sharing of expertise would support the continued development of independent learning skills, particularly among younger pupils. Shared curriculum planning and professional learning would help staff establish more consistent approaches to pupil-led learning, enquiry-based activities and learner decision-making. This would enable pupils to take greater ownership of their learning while developing confidence, resilience and independence.

The proposed arrangements would also strengthen Welsh language development. Through collaborative planning, staff could share expertise, resources and effective practice, promoting greater consistency in Welsh language teaching and creating more opportunities for pupils to develop and apply their Welsh skills across the curriculum and in a wider range of contexts. Leaders at St Richard Gwyn High School have identified transition as an important vehicle for improving learner's standards in Welsh; the proposed arrangements would allow for a more coordinated and cohesive approach to progression in the Welsh language.

The proposals would support improvements in curriculum progression and challenge. By working together to address the complexities of primary phase mixed-age classes, staff could develop shared progression frameworks and planning approaches that ensure pupils build knowledge and skills systematically as they move through the school. Opportunities to moderate work and share best practice both within and across phases would help maintain high expectations, consistent standards and ensure a shared understanding of progression.

In addition, increased collaboration across both primary and secondary phases has the potential to strengthen monitoring, evaluation and school improvement processes. Shared leadership structures and joint professional learning would contribute to a more robust cycle of self-evaluation, helping leaders and governors identify strengths and areas for development more effectively. This is particularly important in light of the Catholic Schools Inspectorate recommendation to strengthen monitoring and evaluation and link findings more closely to professional learning and as identified by Estyn, the ongoing need for leaders at St Richard Gwyn to continue to ensure that self-evaluation and improvement planning processes are impactful.

Finally, the proposed changes would enhance opportunities for staff collaboration and professional development. Joint training focused on effective teaching strategies, higher-order questioning, adaptive teaching and faith development would improve the consistency and quality of teaching across all schools. As a result, pupils would benefit from high-quality learning experiences, improved outcomes, and continued support for their academic, personal and spiritual development.

The proposal argues, reasonably, that its 3-18 model offers opportunity to provide clear strategic direction across phases and to provide a more coherent approach to professional learning. However, while the proposal identifies potential benefits such as improved consistency in the quality of teaching, smoother transition for pupils and a more inclusive and engaging curriculum, it does not detail specific measures or arrangements by which it will ensure these goals are achieved. In addition, while the proposal emphasises the significant role the physical environment plays in pupils' learning and development, at this stage information about the new building is insufficiently detailed to consider objectively how it may impact on pupils' experience.

Council's Response:

Noted.

The new school will operate under a single leadership and governance structure, with shared policies, planning and professional learning. This will support greater consistency in teaching, learning and school improvement across all age phases.

Specific arrangements that will support delivery of these benefits include the development of an all-through curriculum framework, shared professional learning opportunities for staff across all phases, common approaches to assessment and learner progression, consistent wellbeing and safeguarding arrangements, and coordinated transition planning. These measures are intended to ensure that the educational benefits identified within the proposal are embedded throughout implementation rather than arising solely as a consequence of organisational change.

The all-through model will strengthen transition by allowing pupils to progress through the same school community, supported by consistent teaching approaches, pastoral arrangements and learner tracking systems. This is expected to reduce disruption and support continuity in learning and wellbeing.

A more inclusive and engaging curriculum will be supported through greater collaboration between staff, access to specialist facilities and teaching expertise, enhanced learner support, and improved provision for pupils with Additional Learning Needs. The proposal sets out that the new school will provide modern, purpose-built facilities designed to support the Curriculum for Wales, including specialist teaching areas, wellbeing and ALN facilities, outdoor learning spaces, sports facilities and nursery provision. The design will be developed with stakeholders and will deliver a safe, accessible, net zero carbon learning environment that promotes learning and wellbeing.

The building will conform to the relevant area guidelines for schools in Wales and, whilst detailed layouts will be developed through the next stage of the project, the Council is satisfied that the proposed educational model and design principles provide a clear framework for improving learners' educational experience and outcomes.

The proposal to amalgamate St David's, St Mary's and St Richard Gwyn ahead of constructing a new 3-18 building means that pupils will remain at their current site for at least the first three years of the new 3-18 school. Therefore, there will be limited disruption to pupils' education whilst construction of the new building is ongoing. This is likely to also provide suitable opportunity to establish a shared leadership and governance structure across the three sites that will help to ease transition onto one site and when pupils move from primary to secondary education during the interim.

Council's Response:

Noted.

C.6. Assessment of the Proposal Following Consultation

In accordance with the School Organisation Code 2026, the Diocese and the Council have reviewed all consultation responses received, including those submitted by pupils, parents, carers, staff, governors, community representatives, Estyn and other stakeholders.

The consultation responses highlighted a number of issues, including learner travel arrangements, community identity, Catholic education within local communities, Additional Learning Needs provision, school sustainability, Welsh language impacts, the operation of a 3-18 school and confidence in the decision-making process.

A number of alternative approaches were also suggested during consultation, including retaining existing schools in their current form, undertaking investment in individual school sites,

maintaining Catholic provision within Mold and Saltney, and pursuing alternative amalgamation arrangements.

The Council and Diocese have carefully considered these suggestions alongside the options previously assessed during development of the proposal. Whilst consultation responses have provided additional information regarding stakeholder concerns and the strength of local opinion, no new evidence has been identified that materially alters the assessment contained within the consultation document.

The Council and Diocese remain satisfied that the alternative options previously considered do not address, to the same extent, the challenges associated with declining pupil numbers, surplus places, building suitability, maintenance liabilities and the long-term sustainability of Catholic education provision within Flintshire.

Having considered all consultation responses and alternative suggestions, the Council's and Diocese's assessment of the proposal remains unchanged.

The Council and Diocese continue to consider implementation of the proposal to be the most appropriate response to the issues identified through the review of Catholic education provision. This conclusion is based upon the need to provide sustainable Catholic education, improve learning environments, reduce surplus capacity, strengthen leadership arrangements, improve educational continuity from ages 3 to 18 and ensure the efficient use of public resources whilst maintaining educational standards for current and future learners.

PART D. NEXT STEPS

D.1. Approval to Proceed

On **Friday 18 September 2026**, a draft of the Consultation Report was presented to the Council's Education, Youth & Culture Overview & Scrutiny Committee.

Details of the meeting can be found via the following link:

<https://committeemeetings.flintshire.gov.uk/ieListDocuments.aspx?CId=512&MId=6254&Ver=4&LLL=0>

On **Tuesday 06 October 2026** the Council's Cabinet approved to proceed with issuing a statutory notice to commence a 28-day period for objections.

Details of the meeting can be found via the following link:

<https://committeemeetings.flintshire.gov.uk/ieListDocuments.aspx?CId=391&MId=6255&Ver=4&LLL=0>

At this meeting, Cabinet also considered a legal letter submitted on behalf of the Governing Body of St David's. Cabinet decided that a summary of the Council's response to the letter should be published as an appendix to this report (Appendix E.5).

The Cabinet decision was 'called-in' for further review by the Education, Youth & Culture Overview & Scrutiny Committee, and debated on **Thursday 15 October 2026**.

Details of the meeting can be found via the following link:

<https://committeemeetings.flintshire.gov.uk/ieListDocuments.aspx?CId=512&MId=6258&Ver=4&LLL=0>

D.2. Statutory Notice and Objection Period

Following the decision to proceed with the proposal, a statutory notice will be published.

Any person may object to published proposals. To be considered as statutory objections, objections must be made in writing (including by email) and sent to the Council before the end of 28 days beginning with the day on which the notice was published ("the objection period").

Any outcomes of the objection period will be considered by Cabinet to determine whether to move forward with implementation.

PART E. APPENDICES

E.1. Key Stakeholders

The following were advised by letter or email of the availability of the consultation documents and that, if they wished, they could request a hard copy:

- parents (and where possible prospective parents), carers and guardians of learners currently attending schools which are the subject of the proposals and any other school the proposer considers is likely to be affected by the proposals;
- in the case of proposals affecting secondary provision, parents, carers and guardians of learners attending primary schools from which learners normally transfer to that secondary school;
- staff members of schools which are the subject of the proposals and any other school the proposer considers is likely to be affected by the proposals;
- the maintaining or proposed maintaining authority for schools which are the subject of the proposals and any other school the proposer considers is likely to be affected by the proposals (including relevant transport and highways teams);
- any other local authority (including those in England, where appropriate) the proposer considers is likely to be affected by the proposals, including in the case of dedicated ALP any authority placing or likely to place learners with ALN in the school which is subject to the proposals;
- the Church in Wales and Roman Catholic Diocesan Authority for the area in which any school which is the subject of the proposals and any other schools the proposer considers are likely to be affected by the proposals are located;
- any other appropriate religious body for any school which is the subject of the proposals and any other school the proposer considers is likely to be affected by the proposals;
- the governing body of any school which is the subject of the proposals and any other school the proposer considers is likely to be affected by the proposals;
- the Welsh Ministers;
- Members of the Senedd (MS) and Members of Parliament (MPs) representing the area served by/intended to be served by any school which is the subject of the proposals;
- Estyn;
- teaching and staff trade unions representing teachers and other staff at any school which is the subject of the proposals;
- the relevant school improvement services;
- the Police and Crime Commissioner for the area served by/intended to be served by any school which is the subject of the proposals;
- any community or town council for the area served by or intended to be served by any school which is the subject of the proposals;
- in the case of proposals affecting nursery provision, the Children and Young People's Partnership and/or the Early Years Development and Childcare Partnerships where present;
- the local authority Family Information Service, any independent or voluntary providers who are likely to be affected and the national umbrella organisations supporting them, Mudiad Meithrin, NDNA Cymru, Clybiau Plant Cymru, Early Years Wales, PACEY Cymru and Play Wales;

- in the case of proposals affecting Additional Learning Provision (ALP), any relevant health or third sector bodies that the proposer considers have an interest;
- in the case of proposals affecting secondary provision, any further education institutions serving the area of the school which is the subject of the proposals;
- in the case of proposals affecting school sixth forms, Medr; and
- in the case of proposals affecting Welsh language provision, the Welsh Language Commissioner and Mentrau Iaith.
- Other - All Flintshire Council Councillors



E.2. Children's Consultations

E.2.i. St Mary's – Monday 29 June 2026

1. What do you like about your school?

"Football, topic, breaks"

"We get to make friends"

"School's fun"

2. What would you change?

"More technology, bigger school, bigger classrooms"

"We could have more outdoor learning and a quiet area in class"

"Bigger football pitches and bigger library and yard"

"The size because we are getting lots of pupils"

3. What might be good about a brand-new school?

"New teachers, more modern technology, more space"

"New friends and friends from different schools"

"Bigger eating space and better supplies"

"It would be modern"

4. What might be difficult or worrying?

"New people, losing your best friends, favourite teachers retiring"

"More classes and getting lost"

"Leaving the school you have been at through childhood and losing siblings"

"The older children would be with the younger children and the bigger children might get rough with the younger children"

5. Is there anything else you think should happen instead?

"Keep the name and build a larger hall"

"Keep the uniform and the name and logos"

"Combine St Mary's and Richard Gwyn but not any other schools"

E.2.ii. St Richard Gwyn – Monday 29 June 2026

1. What do you like about your school?

“School times, teachers and teaching environments”

“Large space, classrooms, library and field”

“Some of our teachers”

“It’s not too big and people are friendly”

2. What would you change?

“Bigger drama room and theatre, bigger toilets and a more comfortable uniform”

“Toilets as no toilet lids and some broken doors”

“The buildings are old and there is no AC in classrooms”

3. What might be good about a brand-new school?

“It would be more modern, there would be more space and primary children would get to know the school and teachers from a young age”

“Easier transition from primary school to secondary school and get to meet new people and have new opportunities”

“New people to meet and mixing age groups”

“Rooms to support children that need it and more accessibility”

4. What might be difficult or worrying?

“Learning where to go in a larger building and transport for students who live further away”

“Younger years mixing with older years and old buildings being left abandoned”

“Paying for new uniform”

“Transport for little ones – how do you expect 3 year olds to behave on a bus for half an hour?”

5. Is there anything else you think should happen instead?

“Join only St Mary’s and St Richard Gwyn and improve the individual schools”

“Activities for summer holidays and old buildings could be left and not used for greater good”

“I think there should be a toilet for every year”

“More first aid rooms and first aiders who are trained to deal with severe situations and are there all day”



E.2.iii. Venerable Edward Morgan – Wednesday 01 July 2026

1. What do you like about your school?

“We like maths, food, good play times, drawing, colouring, doing work, writing, friends, reading, P.E.”

“Laptop and Ipads”

“Education, food football”

2. What would you change?

“Forest schools every week”

“a bigger school”

“Wear own clothes”

3. What might be good about a brand-new school?

“a big yard”

“more friends, more food, yr2-yr6 allowed own pencil case”

“better playgrounds longer play times”

4. What might be difficult or worrying?

“you will have no friends”

“getting lost”

“not knowing what to expect from teachers”

5. Is there anything else you think should happen instead?

“new uniform free”

“bring own deodorant”

“St David, St Mary Should Join up together not three schools”

E.2.iv. St Anthony's – Monday 06 July 2026

1. What do you like about your school?

"Our friends"

"We like the teachers, we like to see friends, the work we do is fun"

"School trips, it's not too crowded, I like my friends and teachers"

2. What would you change?

"The food and some of the rules to be changed and more equipment"

"Residential cheaper"

"Nothing"

3. What might be good about a brand-new school?

"Maybe better food and better learning environments"

"More teachers, meeting friends from different school"

"More friends, basketball hall, big playground"

4. What might be difficult or worrying?

"Too far away and in a far away school if you have to go there in a car you have to spend more money on petrol"

"Being bullied, not being kind, overwhelming, not seeing your friend"

5. Is there anything else you think should happen instead?

"Making a kind school, instead of knocking the school down make a high school on top of the primary school"

"Build a school closer"

"They should really think about where it should be, so if they do end up doing it will be close to all schools, we should all close our schools at the same time"



E.2.v. St David's – Monday 06 July 2026

1. What do you like about your school?

"We like forest school, The class rooms, the field and the building"

"I like that it is small and at PE we get to go on the field and we all like the forest school"

"Playing"

2. What would you change?

"We would like a class room for special needs, (name) (name) and (name) wan to change some of the food"

"More stuff like trim-tail, more equipment, less rubbish, more plants around"

Nothing!!!!"

3. What might be good about a brand-new school?

"You get different teachers for each subject, meating new people, being more social"

"New people would be there and new uniform"

"The food"

4. What might be difficult or worrying?

"New teachers and new people, it can affect some people, navigating around the larg place with small room to move"

"You're going to get lost. You could get bullied"

"To many people"

5. Is there anything else you think should happen instead?

"If shut-down, turn the school into a museum. Just Don't shut it down and keep it the same if it won't get shut-down"

"We think instead you should build it without our school. You should think about people with special needs."

"They should leave the school as it is"



E.2.vi. St Winefride's – Friday 10 July 2026

1. What do you like about your school?

“that there is not many rooms and that its smaller”

“The Teachers are nice”

“School dinner is good”

2. What would you change?

“More Play equipment”

“air conditioning”

“Bigger classrooms, more bathroom stalls”

3. What might be good about a brand-new school?

“More security”

“calm areas if you're sad or angry”

“new furniture, more windows”

4. What might be difficult or worrying?

“Getting to school”

“younger children might get bullied”

“School dinners might not be a good”

5. Is there anything else you think should happen instead?

“An extention on the schools”

“ingerlish and Welsh school together”

“Do not close schools because they haft to travel far”

E.2.vii. Young Flintshire – Wednesday 24 June 2026

At the Young Flintshire Forum, Council Officer's briefly explained the proposal and distributed questionnaires to obtain the thoughts of those in attendance.

1. Your Overall View of the Proposal (Count)

- I fully support the proposal (0)

No comments

- I mostly support the proposal (5)

"More modern school"

"I agree that the school should close if there aren't many students"

- I'm unsure (16)

"To me there is a balance of positives and negatives for it and I'm not being swayed either way"

"It may be easier for some, but people would have to travel from Mold to Flint and some parents/carers don't have time to"

"It a long distance for St Davids and there would be 3 year olds in the same building as 18 year old"

"I do support and I don't support so I'm not so sure"

"Children may get fed up of the school (3-18)"

- I mostly do not support the proposal (6)

"Pupils from Mold will have to either move school or travel very far to get to school, there would have to be multiple bus services, causing traffic"

"I think it is a risk of mixing age groups to such extent due to possible traits learned from older pupils by younger pupils that may be harmful"

- I do not support the proposal (1)

"A 3-18 school is an awful idea I currently go to one and really dislike it. Flint and Mold are too far away so many kids would be pulled out"

2. Impact on Learners

What do you think the proposal would mean for learners?

Consider learning, friendships, travel, wellbeing, opportunities, and daily routines.

Positive impacts:

"Learners from the primary school won't be moving to a different school building in year 7 and won't have an immediate large change"

"Friends will not be split when KS2 is complete"

"New learning opportunities but also new friends"

Negative or worrying impacts:

“Pupil may have further to travel”

“Lots of bullying may take place, effect their wellbeing”

“Not enough teachers for the school”

3. Impact on the Community

How might families, local services, and the wider area be affected?

Possible benefits:

“Less buses because one collective school doesn’t need many buses for travel”

“Easier for families”

“Better opportunities for learners to do activities that they couldn’t do before”

Possible challenges:

“More traffic”

“Governing a 3-18 school could be overwhelming, lots of decisions. Exams for Y6, Y10 & Y11 at same time”

“Uniform expenses”

E.3. Response Form

Note: no equalities info included in the example

Catholic Education Consultation

The Catholic Diocese of Wrexham and Flintshire County Council are seeking your views on a proposal to reorganise the Catholic education provision in Flintshire. It is proposed to:

- Close St Anthony's Catholic VA Primary School in Saltney, which will cease to operate by 31 August 2027
- Amalgamate St David's Catholic VA Primary School in Mold, St Mary's Catholic VA Primary School in Flint and St Richard Gwyn Catholic VA High School in Flint
- Amalgamation would see the individual schools close by 31 August 2027 and a new amalgamated English medium 3-18 Catholic Voluntary Aided school, with a new name and school number, opened in September 2027, operating over the three current sites;
- the new school operating over the three current sites until such time a new school building is constructed (anticipated 01 September 2030).

Please tell us what you think about the proposal by completing the questionnaire.

Your views matter.

Please note that negative responses made to this consultation will not be counted as objections to the proposal, they will be recorded as adverse comments. Objections can only be registered following the publication of a statutory notice.

If you would like to be notified of publication of the consultation report, you will be able to leave your contact details at the end of the survey form.

1. Please indicate whether you agree or disagree with each aspect of the proposal:

Close St Anthony's Catholic VA Primary School in Saltney by 31 August 2027.

☐ Yes ☐ No

Amalgamate St David's Catholic VA Primary School in Mold, St Mary's Catholic VA Primary School in Flint, and St Richard Gwyn Catholic VA High School by 31 August 2026 operating over the three current sites. The new amalgamated English medium 3-18 Catholic Voluntary Aided school will open with a new name and school number, opening in September 2027.

☐ Yes ☐ No

new school operating over the three current sites until such time a new school building is constructed (anticipated 01 September 2030).

☐ Yes ☐ No

2. Please use the box below to provide comments or explain which element of the proposal you do or do not support and any alternatives to this proposal.

3. Which school/s do you associate yourself with?

- ☐ St Richard Gwyn Catholic VA High School
- ☐ St Mary's Catholic VA Primary School
- ☐ St David's Catholic VA Primary School
- ☐ St Anthony's Catholic VA Primary School
- ☐ Venerable Edward Morgan Catholic VA Primary School
- ☐ St Winefride's Catholic VA Primary School
- ☐ St Clare's Catholic Primary School
- ☐ Chester Catholic High School
- ☐ Other (please specify):

4. What is your interest/relationship with the school/s you identify with?

- ☐ I am a parent/carer of a pupil at the school
- ☐ I am a pupil at the school
- ☐ I am a prospective parent/carer of a pupil at the school
- ☐ I am a teacher/other member of staff at the school
- ☐ I am a governor at the school
- ☐ I am a member of the community
- ☐ Other (please specify):

2. Welsh Language Standards

The Council is continually working to address its Welsh Education Strategic Plan WESP objectives and takes them into consideration when developing proposals in both our Welsh and English Medium schools, to mitigate any potentially negative actions on the Welsh Language; and continue to promote and raise the profile of Welsh medium education for all our learners. As this proposal relates to the re-organisation of faith-based education in the county we recognise there will be smaller contributions to Council targets. However, with any new school there is opportunity to grow Welsh language skills in the learning environment and the wider community.

Further information on the Welsh Language impacts can be found in our Welsh language Impact Assessment on the consultation page.

We would like to know your views on the effects that this proposal will have on the Welsh language, specifically on:

- opportunities for people to use Welsh; and
- treating the Welsh language no less favourably than English.

What effects do you think there would be ...?

5. Increasing the number of people speaking or learning Cymraeg.

- ☐ Positive
- ☐ Negative
- ☐ Neutral
- ☐ Don't know

6. Using Welsh services.

- ☐ Positive
- ☐ Negative
- ☐ Neutral
- ☐ Don't know

7. Opportunities to use Welsh socially.

- ☐ Positive
- ☐ Negative
- ☐ Neutral
- ☐ Don't know

8. Welsh speaking communities.

- ☐ Positive
- ☐ Negative
- ☐ Neutral
- ☐ Don't know

9. Treating Welsh equal to English.

- ☐ Positive
- ☐ Negative
- ☐ Neutral
- ☐ Don't know

10. How could we increase positive effects, or reduce negative effects?

E.4. Estyn's Response

This report has been prepared by His 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.

For the purposes of this document, the schools will be referred to by their shortened unique name. For example, St Anthony's Catholic Voluntary Aided Primary School, Saltney, will be referred to as St Anthony's.

Summary/ Conclusion

Estyn considers that the proposal is likely to, at least, maintain the standard of education provision in the area.

Description and benefits

The proposal is to:

- Close St Anthony's Catholic VA Primary School in Saltney, which will cease to operate by 31 August 2027
- Amalgamate St David's Catholic VA Primary School in Mold, St Mary's Catholic VA Primary School in Flint and St Richard Gwyn Catholic VA High School in Flint. The proposed amalgamation would see the individual schools close by 31 August 2027 and be replaced by a new amalgamated English medium 3-18 Catholic Voluntary Aided school (with a new name and school number) from 01 September 2027. The new school would operate over the three current sites until a new school building is constructed (anticipated 01 September 2030).

The local authority has set out a clear rationale for its proposal. This identifies plainly and reasonably the expected benefits and disadvantages when compared with the status quo and other alternatives, and how they will manage any risk.

The local authority provides a clear description of the proposal and a projected timetable for statutory procedures and implementation. The local authority has provided a Welsh language Impact Assessment and a Community Impact Assessment as part of its proposal.

The schools directly affected by the proposal are four of the six English-medium Catholic VA schools in the local authority, the others being Venerable Edward Morgan Catholic VA Primary School, Shotton, and St Winefride's Catholic VA Primary School, Holywell.

The proposal identifies a steady decline in pupil numbers across three of the four schools over the last five years. This decline is steepest at St Anthony's where numbers have more than halved since 2020, resulting in 69% surplus places by September 2025. Despite a modest increase in pupil numbers at St Mary's over the last five years, overall surplus places across the four schools are projected to rise from 31% in September 2025 to 47% in September 2030. This projected increase is most acute at St Anthony's and St David's where surplus places in September 2030 are forecast to be 79% and 69% respectively.

The Council rightly identifies that its proposal to close St Anthony's will reduce the number of surplus places across the Catholic provision. The proposer also argues, not unreasonably, that given the overall rising trend in surplus places, the long-term sustainability of the other three schools may be enhanced by their potential amalgamation. In particular, the proposal identifies that amalgamation may enable schools to pool resources and benefit from economies of scale. The proposal also suggests, fairly, that the subsequent opening of a new 3-18 Catholic VA school building in 2030 would, in the longer term, address identified shortcomings in the suitability of existing accommodation across these schools. The overall capacity of the proposed new building would be 1185 full-time pupil places; 315 in the primary phase and 870 in the secondary phase. The local authority's current forecast of pupil numbers for 2030 across the four schools indicates that this would leave 16% surplus places in the primary phase and 37% surplus places in the secondary phase.

The local authority sets out six possible options in its proposal, and these include maintaining the status quo. The four further alternative options present different possible models of closure, amalgamation and federation, all of which include significant investment to remodel or rebuild on the St Richard Gwyn site to create a new 3-18 school. Each of these models addresses, to a greater or lesser extent, the number of surplus places and the current and future maintenance costs associated with continuing to operate a chosen number of Catholic VA primary schools in their existing locations. The proposer appears to have considered the advantages and disadvantages of each appropriately with the principal reason for discounting each being failure to address the high number of surplus places. This appears to be reasonable.

The proposal identifies the need to improve the learning environment of some Catholic VA schools as part of its aim to achieve long-term sustainability and highlights this with the inclusion of information as to the current condition and suitability rating for each school. The identified backlog of maintenance across the four schools is £1.45 million. While a new 3-18 school building would provide an improved environment for pupils and staff, the proposal does not specify the likely anticipated cost of ongoing maintenance at the schools in the years prior to its planned opening. Although the proposed closure of St Anthony's would reduce this backlog, the school's associated costs make up less than 2% of this total.

The proposer appears to have considered the financial aspects of the proposal suitably and this includes recognition that grant funding is yet to be secured and that the proposal cannot be implemented without it.

The proposal outlines that the construction of a new 3-18 school building would require significant capital investment. A feasibility study completed in 2024 estimated this cost to be £55 million, though up to date cost modelling will be required to provide a more accurate estimate based on current market conditions. The proposal identifies that future potential costs savings would derive from the reduction in surplus places and increased efficiency associated with operating a single, larger school.

The proposal identifies a potential annual reduction in staffing costs across the schools of £209,000, based on 2025 pupil numbers. However, the proposal does not make clear how this saving would be achieved, or more specifically how the staffing structure would be altered as a result of reorganisation. For example, the proposal does not consider the likelihood of voluntary or compulsory redundancy or the impact of changes to leadership roles. The proposal does state that any savings released through reorganisation would be removed from the Council's overall school's budget, allowing fairer distribution across the whole school network.

The proposal involves four voluntary aided schools owned by the Catholic Diocese. It details suitable arrangements to transfer ownership of the buildings and sites at appropriate stages during the process. In the event that sites are no longer required for education purposes, the buildings and land would be declared surplus to requirements of the Education & Youth portfolio and control would be transferred to the Council's Capital Programme and Assets department.

The proposer appears to have considered the impact of the changes on learner travel arrangements suitably. It is anticipated that average journey times for pupils currently attending

St Anthony's would increase from 15 minutes to a maximum of 45 minutes. These pupils will be eligible for school transport to Venerable Edward Morgan, in line with the local authority's home to school transport policy, resulting in a potential increase in costs of £60,000 per annum.

Following the proposed amalgamation, pupils from St David's and Mary's would initially continue to access the same school buildings as previously. Given the proximity of St Mary's and the St Richard Gwyn sites, when the proposed single, new 3-18 building opens in Flint there would be no significant impact on the walking distances or journey times for these pupils and transportation costs would remain unchanged. However, most pupils who attend the St David's site as part of the 3-18 provision would then be faced with longer walking distances and travel times. Significantly, although nearly half of pupils currently attending St David's reside more than two miles distant from the school, for many the new 3-18 school building would no longer be the nearest Catholic primary provision (this would be Venerable Edward Morgan). Consequently, many St David's pupils who continue to attend the amalgamated school on the Flint site would not be eligible for home to school transport. While this would create a potential annual saving for the local authority of between £33,000 to £40,000, the proposer recognises that the removal of free home to school transport would make transition to the new site difficult. The proposal states that the local authority would work with impacted families to establish suitable arrangements to help facilitate attending the new school site, although it does not provide details of what these may be.

Given the nature of the proposal, there are no anticipated changes to admission arrangements which would be administered by the new governing body. The current sixth-form provision that is on offer at St Richard Gwyn will be similar to what will be provided as part of the new school, including retaining delivery in English. With the proposal reducing the overall capacity of Catholic secondary education, the number of sixth-form places has been marginally reduced as well.

The proposal recognises appropriately that the closure of St Anthony's and, subsequently, provision on the St David's site, would have a negative impact on wraparound provision in the Saltney and Mold areas. In addition, third-party childcare providers may see demand decrease if pupils from these school's transfer to the proposed alternative schools.

However, the proposer notes that childcare providers in the Flint area may see increased demand if pupils from other schools transfer to the new school.

The proposal assumes, reasonably, that the planned change in school status will have a broadly neutral impact on the Welsh language. Language provision in the amalgamated school will continue to support the objectives in the local authority's Welsh in Education

Strategic Plan (WESP). The proposal does note that closure of St Anthony's may result in some pupils transferring to alternative, closer Catholic provision across the border meaning that those pupils will have no opportunity to learn Welsh.

Educational aspects of the proposal

The local authority gives appropriate consideration in its proposal to the impact of the change on the quality and standards in education. For example, it evidences each of the school's most recent Estyn inspection report, noting specifically the relevant recommendations. However, in relation to St Anthony's (January 2019) and St David's (March 2020), this information is quite old, and the proposer does not provide a more recent evaluation that identifies these school's main strengths and areas for development. Neither does the proposer provide any information arising from inspection visits by the Catholic School's Inspectorate.

The proposal considers the possible impact of the changes on teaching and learning, including for those pupils with additional learning needs (ALN) and those eligible for free school meals suitably. The proposal also considers the impact on the school's leadership and its provision for pupils' care, support and guidance. The proposal identifies, fairly, a number of potential benefits

arising from the provision of a new, purpose-built facility including access to specialist teaching spaces that support the effective delivery of a broad curriculum across all ages. In particular, the proposal highlights how the provision of small-group teaching and intervention rooms, low-stimulation spaces and specialist hygiene and accessibility facilities may enhance the progress and well-being of pupils with ALN and others. However, the proposal does not focus specifically on how the proposed changes may support common areas for improvement identified through Estyn inspections, such as the need to improve opportunities for younger pupils to show initiative and independence in their learning, or to strengthen provision for developing pupils' Welsh language skills.

The proposal argues, reasonably, that its 3-18 model offers opportunity to provide clear strategic direction across phases and to provide a more coherent approach to professional learning. However, while the proposal identifies potential benefits such as improved consistency in the quality of teaching, smoother transition for pupils and a more inclusive and engaging curriculum, it does not detail specific measures or arrangements by which it will ensure these goals are achieved. In addition, while the proposal emphasises the significant role the physical environment plays in pupils' learning and development, at this stage information about the new building is insufficiently detailed to consider objectively how it may impact on pupils' experience.

The proposal to amalgamate St David's, St Mary's and St Richard Gwyn ahead of constructing a new 3-18 building means that pupils will remain at their current site for at least the first three years of the new 3-18 school. Therefore, there will be limited disruption to pupils' education whilst construction of the new building is ongoing. This is likely to also provide suitable opportunity to establish a shared leadership and governance structure across the three sites that will help to ease transition onto one site and when pupils move from primary to secondary education during the interim.

E.5. Summary of Legal Letter Response

The Council's position

- The claim is premature. The claimant itself accepts that judicial review proceedings would presently be premature because no final determination has been made. The Council reiterates that the Pre-Action Protocol cannot be used to circumvent the statutory process or require a parallel disclosure exercise.
- The consultation was lawful and sufficiently informed. The Council rejects the allegation that the 2026 consultation contained materially inaccurate, incomplete or outdated information. Consultees were given enough information to understand the proposals, reasons and implications and to respond meaningfully.
- The financial information was adequate for this stage. The Council rejects criticisms concerning the estimated £55 million capital cost, maintenance/backlog figures, borrowing, transport costs, savings, capital receipts and Welsh Government funding. Its central position is that consultation did not require a final construction cost or fully developed whole-life financial model. Estimates were appropriately identified and financial modelling can properly be refined as the proposal develops.
- There was a sufficient educational and strategic case. The Council says the consultation adequately addressed matters including the condition and suitability of existing schools, surplus places, curriculum delivery, ALN, well-being, leadership, Welsh language provision and long-term sustainability. The consultation did not need to amount to an exhaustive evidential dossier supporting every claimed benefit.
- Alternatives were considered. The Council denies overlooking alternatives, specifically noting that federation was considered for Winifreds and VEM but was not considered capable of addressing the underlying sustainability concerns. The Code does not require every conceivable alternative to be pursued or exhaustively detailed in the consultation document.
- Housing growth and pupil demand were considered. The Council says it took planned/proposed housing development, pupil projections, demographic trends, parental preference and capacity elsewhere in the school estate into account. The consultation was not required to reproduce every underlying dataset or calculation.
- There was no breach of the PSED. The Council recognises the continuing duty under section 149 of the Equality Act 2010 and says equality considerations, including disability, ALN and religion or belief, have been and will continue to be considered. Consultation is itself part of gathering evidence about impacts and possible mitigation, particularly concerning travel, accessibility and individual pupil needs.
- The Estyn findings do not establish unlawfulness. Across the various grounds, the Council's recurring answer is that the Estyn observations concern broader aspects of its education services and do not establish that this particular consultation was legally defective.

Disclosure

The Council is not required to undertake the broad disclosure request at paragraph 57(a)–(z). Paragraph 13 of the Judicial Review Pre-Action Protocol requires proportionate requests for information necessary to understand the challenged decision/proposed claim, rather than providing a general entitlement to the Council's underlying working material.

However, the Council leaves the door open to specific, targeted requests for particular documents or clearly defined categories where the claimant explains why the material is necessary to understand a particular alleged public law error.

The Council also reserves all rights on standing, prematurity, promptness, limitation, alternative remedy, relief and costs and concludes that it is not necessary to issue an addendum or reopen/repeat the consultation, alter the statutory timetable or give an assurance that it will not take a delay/time-limit point, specifically relying on CPR 54.5.

Further letter of 17th September

The Council rejects the proposition that Cabinet members must be given the Claimant's Letter before Claim, the Council's response to that letter and access to the Council's legal advice. Relevant decision-makers will receive the necessary information and advice through the Council's proper governance arrangements and the claimant cannot dictate the form or content of internal or legal advice, particularly as the Council expressly maintains legal professional privilege and the claimant circulating correspondence directly to elected members does not alter that position.

Ultimately:

1. no final decision has yet been made;
2. the Council considers the consultation lawful and sufficiently evidenced for its present stage;
3. the Council rejects each proposed public law ground;
4. the wider Estyn findings do not demonstrate defects in this particular consultation;
5. the Council are not required to undertake the claimant's extensive and unwarranted disclosure exercise, reopen the consultation or suspend the statutory process; and
6. the Council reserves its position on any future judicial review, including limitation and procedural arguments.