

**Pembrokeshire County Council
Cyngor Sir Penfro**



EDUCATION DIRECTORATE

**Proposal for the Discontinuation of Manorbier
Church in Wales Voluntary Controlled School**

OBJECTION REPORT

**Steven Richards-Downes
Director of Education**

June 2026

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Foreword

Pembrokeshire County Council is responsible for promoting high educational standards and for delivering efficient primary and secondary education. Having the right schools in the right places and ensuring that they are fit for the 21st century learner is considered central to this and is a challenge facing councils across Wales.

Meeting this challenge involves reviewing the number and type of school the Council has in its area and assessing whether or not best use is being made of these schools to deliver effective education to meet the needs and aspirations of learners in Pembrokeshire.

The Council reviews its provision on the basis of:

- Quality and future sustainability of educational provision
- Sufficiency and accessibility of school places
- The condition, suitability and standard of school buildings
- Value for money.

The Statutory Notice to discontinue Manorbier Church in Wales VC School was published on 14th April 2026 and resulted in 62 objections.

This Objection Report is published under Section 49 of the School Standards and Organisation (Wales) Act 2013 which states that proposers must publish a summary of the statutory objections and the proposer's response to those objections.

Steven Richards-Downes
Director of Education

1. Introduction

Pembrokeshire County Council undertook a statutory consultation between 5 November 2025 and 19 December 2025, with a proposal to discontinue Manorbier Church in Wales VC School.

Subsequently, the Consultation report was considered by the County Council at its meeting of 5 March 2026. The decision of Council was as follows;

That the Director of Education be authorised to publish a Statutory Notice to discontinue Manorbier Church in Wales Voluntary Controlled School.

A Statutory Notice was subsequently published on 14th April 2026 in accordance with the School Organisation Code. The statutory objection period for the notice ended on 11th May 2026. 62 objections were received.

This document represents the County Councils responsibility as part of the School Standards and Organisation (Wales) Act 2013 to publish an Objection Report and provides:

- A summary of the statutory objections received, and
- the Councils response to those objections

2. Distribution of Objection Report

The Governing Bodies, Parents/Carers/Guardians and Staff of:	
Manorbier VC School	
The Governing Bodies of other schools which the proposer considers are likely to be affected by the proposals	
Tenby VC School St Florence VC School Lamphey VC School Sageston CP School Stepaside CP School	Ysgol Hafan Y Mor St Teilos Catholic Primary School Saundersfoot CP School St Oswalds VA School Greenhill School Ysgol Bro Preseli
Elected Members:	
• Paul Davies – MS Ceredigion Penfro • Claire Archibald - MS Ceredigion Penfro • Kerry Ferguson - MS Ceredigion Penfro • Rt.Hon. Elin Jones - MS Ceredigion Penfro • Paul Marr – MS Ceredigion Penfro • Anna Nicholl – MS Ceredigion Penfro • Henry Tufnell MP (Mid and South Pembrokeshire)	• Cllr S Skyrme-Blackhall • Cllr M Williams • Cllr P Kidney • Cllr V Thomas • Cllr Rh Jordan • Cllr T Hodgson
Relevant Town and Community Councils:	
Manorbier CC, St Florence CC, Penally CC, Tenby TC, Lamphey CC, Carew CC	
Trades Unions:	
NEU, NASUWT, UCAC, NAHT, ASCLE, UNISON, UNITE, GMB	
Church in Wales and Roman Catholic Diocesan Authority.	
St Davids	The United Archdiocese of Cardiff-Menevia
Others	
The Welsh Ministers, Estyn Dyfed Powys Police and Crime Commissioner	The Welsh Language Commissioner Partneriaeth – Regional Education Consortium Hywel Dda Health Board
Independent / Voluntary Early Years / Childcare Provider	
Playgroup Settings • Sageston Playgroup • Teilo Tots • Cylch Meithrin Tonnau Bach • Tiny Treasures	Childminders • JS – Sageston • AD – St Florence • CH – Tenby • AMR – Tenby • SM – Tenby

3. Objections Received and Council response

62 objections to the proposal were received during the statutory objection period, and these are included in full at **APPENDIX 1**.

This section of the report summarises the objections to the proposal and provides a Council response to them.

Comments have been categorised by theme with an indication of the number of respondents who objected to the proposal on these grounds:

No	Theme	No of responses
1	Impact on Community (identity, well-being, economic effect)	36 (58%)
2	Rural Sustainability	32 (51%)
3	General objection school closure	24 (39%)
4	Rebuild / Restate and Future Demand	24 (39%)
5	Impact on Additional Learning Needs, Vulnerable Learners, Well-being and Trauma	22 (35%)
6	Fire, Insurance and Liability	18 (29%)
7	Concerns regarding consultation process	17 (27%)
8	Financial Considerations	16 (26%)
9	Transport / Travel Concerns	16 (26%)
10	Broken promises and Loss of Trust	15 (24%)
11	Staff impact and employment	12 (19%)
12	Faith provision and Diocese interests	10 (16%)

NB: More than one theme was raised in each objection, which means that the total number of responses exceeds the number of objections received.

The concerns raised are outlined in greater detail in the table below, together with the Council's responses.

Objection comments	Response
Impact on Community, (identity, well-being, economic effect)	
This was the most frequently raised concern. Respondents consistently describe the school as a central part of community life, often referred to as the “heart” or “hub” of the village. There is a strong and widely shared view that closure would: • weaken community cohesion • reduce opportunities for social interaction and volunteering • discourage families from remaining in or moving to the area • contribute to longer-term decline in the vitality of the village Respondents also link this to wider impacts, including: • reduced attractiveness of the area for young families • potential changes in housing patterns • loss of intergenerational connections tied to the school These views are expressed both emotionally and practically, reflecting the school’s role beyond education.	The Council acknowledges the strength and consistency of views expressed regarding the role of the school as a valued community asset. Feedback, gathered as part of the Consultation Report, similarly identified the school’s contribution to community cohesion and local identity. The Council recognises that the loss of a local school can have wider social implications. However, in fulfilling its statutory duties, the Council must consider the sustainability and quality of education provision across the wider area. This includes ensuring that resources are used effectively and that provision is aligned with current and projected demand. Whilst the community role of the school is an important consideration, it must be balanced alongside educational standards, long-term viability, and the equitable distribution of resources. Evidence presented in the Consultation Document indicates that the majority of pupils in the catchment area already attend alternative schools, with only 20.9% attending Manorbier VC School. Furthermore, prior to the fire in October 2022, Manorbier VC school had a significant number of surplus places, with a 30.7% decline from 2015 to 2022. Surplus places in the year prior to the fire were 50% in 2021 and 54.7% in 2022.
Rural Sustainability	
The majority of respondents emphasise the importance of maintaining local access to education, particularly in a rural context.	The Council acknowledges the importance placed on local access to education. These issues have been considered in detail as part of the

Objection comments	Response
Key concerns include: - increased travel distances for young children - loss of locally accessible provision - reduced equality of access compared to urban areas - broadier implications for the sustainability of rural communities Respondents often connect this theme with community impact and long-term demographic change.	consultation process, including accessibility and the availability of alternative provision. While the school is valued locally, it is not designated as a rural school under the School Organisation Code, and the level of surplus places (even before the fire) were significant. The Council must therefore consider the distribution and sustainability of provision across the wider area to ensure equitable access to high-quality education.
General Objection to School Closure	
A significant number of respondents expressed a general objection to the closure of the school in principle. Many respondents felt the school should remain open and that closure is not supported under any circumstances. Respondents expressed their objections in terms of strong local opposition, emotional attachment to the school and a belief that closure would represent a loss to the community and local identity. Many felt that the strength of opposition against the closure should be a determining factor in the decision-making process.	The Council acknowledges the strength of feeling expressed by respondents who object to the proposal. As part of the statutory process, the Council is required to consider a wide range of factors, including educational standards, the sustainability of provision, financial consideration and the efficient use of resources, in addition to the views and objections of consultees. Whilst the views expressed make an important contribution to the decision-making process, decisions are not made solely on the basis of the number of respondents who do not support the proposal, or the number of objections received.
Rebuild / Restate and Future Demand	
A substantial number of respondents argue that the school should be rebuilt rather than closed, noting that: - the loss of the building resulted from an exceptional event - the school community has remained viable in temporary accommodation	The Council acknowledges that reinstatement was the most frequently proposed alternative during the consultation period, and was one of the options considered during the review process. However, the costs, condition of the site, and long-term sustainability, particularly in the context of significant levels of surplus places (even before the fire), meant that it was not considered the most viable

Objection comments	Response
future demand is likely to increase due to housing development There is a strong perception that closure represents a missed opportunity to reinvest in local provision.	option when compared against other options and the availability of suitable nearby alternative provision. Whilst the rebuild option has been considered, as highlighted in the consultation report, the insurance settlement available falls significantly below the estimated cost of reinstatement. The conclusion remains that reinstatement does not represent a sustainable or best-value solution. In addition to reinstatement, alternative options including federation and collaborative models were considered as part of the options appraisal process. While such options may offer certain benefits, they were not considered to provide a sustainable long-term solution when assessed against financial viability, surplus capacity across the wider area, and the availability of suitable alternative provision. The Council is satisfied that all reasonable alternatives were explored in accordance with the School Organisation Code.
Impact on Additional Learning Needs, Vulnerable Learners, Well-being and Trauma	
A significant number of respondents raise concerns about the impact on pupils, particularly those with Additional Learning Needs (ALN) or vulnerabilities. Key issues include: - loss of a small, nurturing environment - potential difficulties in larger school settings - impact on emotional wellbeing	The Council recognises the importance placed on the school's small and nurturing environment, particularly for vulnerable learners. It also acknowledges the disruption and uncertainty experienced by pupils following the fire. The Council has considered these factors. Receiving schools are required to meet the needs of all learners, including those with

Objection comments	Response
• disruption caused by transition This is frequently linked to the trauma associated with the fire and the prolonged period of uncertainty experienced by pupils and families.	Individual Development Plans, and have established systems in place to provide appropriate support. Comprehensive transition arrangements will be implemented, including tailored support for individual pupils, to ensure continuity of care and minimise disruption to well-being and learning.
Fire, Insurance and Liability	
Respondents raised concerns regarding: • the cause of the fire • insurance coverage • accountability and responsibility • ongoing condition and deterioration of the site These concerns are often linked to perceptions of fairness and responsibility in relation to the proposal.	The Council acknowledges that a number of respondents, including Trade Unions, have expressed concerns regarding the cause of the fire, insurance cover, liability, and the handling of the site. Matters relating to insurance, liability, and any potential claims are being managed in accordance with established legal and insurance processes. Due to legal and commercial sensitivity, it is not appropriate to provide detailed commentary within this report. However, the level of settlement offered from insurance falls far below the estimated cost of reinstating the school to a suitable operational standard. Concerns regarding site condition and deterioration are acknowledged. While appropriate steps have been taken to manage the site, it is recognised that unoccupied buildings are susceptible to deterioration over time. While these issues are important, they do not alter the Council's responsibility to consider the long-term sustainability of education provision based on current and projected need.

Objection comments	Response
Concerns regarding consultation process	
Respondents raise significant concerns about the process followed, including: • perceived lack of transparency • a belief that the outcome was predetermined • questioning how consultation responses have been taken into account • justification for closure is based on inaccurate information • references to the high level of opposition expressed • questioning whether Councillors were discouraged from making direct visits to school These concerns reflect both procedural and broader issues of trust and confidence in decision-making.	The Council confirms that the statutory consultation process has been undertaken in full accordance with the School Organisation Code (Wales). All responses received during the consultation period were made visible to Members as part of the Consultation Report. In addition, this document and associated annex, gives full visibility over all objections received, allowing Members to make an informed decision. The purpose of consultation is to inform decision-making by presenting a range of views and evidence; it does not determine outcomes solely on the basis of the highest number of responses received with a preference for a particular outcome. Decisions are required to take into account a broad range of factors, including educational, financial, and strategic considerations, as well as the views of statutory consultees. The Council notes that several respondents, including Trade Unions, have challenged the accuracy and interpretation of data within the Consultation Document, including pupil numbers, capacity figures, attendance data, and forecasts. The Council confirms that all data used within the Consultation Document was drawn from recognised datasets and internal projections used consistently across school organisation reviews. It was stated that the majority of FOI requests throughout the process have been refused. In the last 12 months, 4 FOI/EIR requests have been received by the Council. 2 of these requests were responded to in full, 1 request was a partial disclosure (some information was provided, with exemptions applied under Regulation 12(5)(d) and 12(5)(e) of the Environmental Information Regulations (EIRs)) and

Objection comments	Response
	one request was withheld in full, with all information considered exempt under Section 36 (prejudice to the effective conduct of public affairs), Section 41 (information provided in confidence), and Section 40(2) (personal information) of the Freedom of Information (FOI) Act. It is acknowledged that, due to the exceptional circumstances following the fire and the use of temporary accommodation, some data points may be subject to differing interpretation. However, the Council is satisfied that the overall conclusions drawn are based on a robust evidence base and that variations in individual data points do not materially alter the position regarding sustainability. The Council did not restrict or prevent Councillors from visiting the school site, and Members were free to attend the site independently should they have wished. The Council is satisfied that the process has been fair, transparent, and compliant with statutory requirements.
Transport / Travel Concerns	
Respondents raised concerns regarding • length and complexity of journeys to alternative schools • rural road conditions, including narrow lanes and flooding • limited public transport options • challenges for families without access to a vehicle • changes to the catchment area leaving some pupils not eligible for school transport These concerns are often linked to both practical and well-being impacts.	There is only approximately 2 miles by road between Manorbier and St Florence, with an approximate journey time of 6 to 8 minutes. The increase in distance is generally modest and is not considered unreasonable given the geographical context. Eligible pupils will receive free home to school transport in accordance with the Councils transport policy. Transport arrangements will prioritise safety and well-being, and appropriate transition support will be provided to minimise disruption. The only change to the catchment area is the proposal to merge the existing Manorbier catchment with the Saint Florence catchment.

Objection comments	Response
Broken Promises and Loss of Trust	
Many respondents refer to earlier indications that the school would be rebuilt and expressed concerns that this has not been fulfilled. This has led to a clear sense of • Disappointment • Frustration • Reduced trust in the Authority.	The Council acknowledges that, following March 2023 Cabinet, there may have been a general perception that a decision had been made to reinstate the school. However, the decision of Cabinet was to undertake a feasibility study to determine approximate costs, as part of an options appraisal. A decision to reinstate the school was subject to the findings of the feasibility study and business case process. This work, including financial, structural, and strategic evaluation, concluded that reinstatement would not represent a sustainable or viable long-term solution. The Council acknowledges that this has been very disappointing for the community and has contributed to a loss of trust.
Financial Considerations	
Some responses challenge the financial rationale for closure, suggesting that cost savings are short-term and do not account for wider impacts such as transport costs and pressure on other schools. Respondents raised concerns regarding the financial implications associated with the return of the building and responsibility for reinstatement costs.	Financial considerations form part of strategic planning and Council decisions, alongside other factors. PCC must ensure the effective use of public funds while maintaining high-quality education provision. Long-term sustainability and affordability are key factors in decision-making. The legal position regarding ownership, liability, and any associated obligations in respect of the site will be addressed through separate legal and property processes between the relevant parties. These matters do not form part of the statutory determination of the school organisation proposal, which must focus on the provision of education and the most sustainable long-term solution

Objection comments	Response
Staff impact and employment	
Concerns raised regarding: • staff morale and wellbeing • job security • handling of employment processes There is recognition of staff commitment and concern regarding ongoing uncertainty.	The Council acknowledges that Trade Unions raised similar concerns during consultation regarding staff well-being and uncertainty. The Council recognises and values the contribution of staff, and will ensure that all processes are managed in accordance with HR policy. The Council notes the concern raised that engagement has taken place with staff regarding potential employment outcomes, including redundancy. No discussions have been initiated by the Council directly with staff in relation to potential employment outcomes. The Council remains committed to following due process and, should the proposal proceed, will engage with affected staff in accordance with statutory requirements, relevant employment legislation, and agreed workforce policies. In the event that future discussions with staff need to take place these will be at the appropriate time and in a formal and structured manner, ensuring transparency and adherence to consultation obligations.
Faith provision and Diocese interests	
A number of responses highlight: • the importance of maintaining a Church in Wales school • the role of the Diocese as a stakeholder • the value of the school's ethos	If the proposal was to proceed, all pupils would transfer to St Florence VC School, ensuring continuity of Christian ethos and collective worship. All VC schools operate under the same governance framework and retain Diocesan oversight.