

Isle of Anglesey County Council

Report to:	The Executive
Date:	6 January 2026
Subject:	Objection report on the outcome of the statutory consultation on the proposal to: “Relocate Ysgol Uwchradd Caergybi learners to a new school building for 11–18-year-olds.”
Portfolio holder(s):	Councillor Dafydd Roberts
Head of service / director:	Aaron C. Evans Director of Education, Skills and Young People
Report author:	Emrys Bebb williambebb@ynysmon.llyw.cymru
Local members:	Councillor Glyn Haynes Councillor Robert Llewelyn Jones Councillor Jeff M. Evans Councillor Pip O'Neill Councillor Trefor Lloyd Hughes Councillor Keith Roberts Councillor Dafydd Rhys Thomas Councillor Gwilym O. Jones Councillor Ken Taylor Councillor John I. Jones Councillor Arfon Wyn Councillor Douglas M. Fowlie Councillor Neville Evans

A – Recommendation(s) and reasons

Recommendation

1. Following consideration of the Objection Report, to proceed with the proposal to “Relocate Ysgol Uwchradd Caergybi learners to a new school building for 11–18-year-olds.”
2. To approve the submission of the Objection Report to Welsh Ministers for the final decision on this proposal to “Relocate Ysgol Uwchradd Caergybi learners to a new school building for 11–18-year-olds.”
3. To authorise officers to issue notice of the final decision in the form of a decision letter (in accordance with the School Organisation Code 011/2018) following the approval of the proposal by Welsh Ministers.
4. To commit to fund the Council’s contribution towards the project costs, as set out within section 7 of the [Proposal Paper](#), including transitional costs (section 7.6 of the Proposal Paper), which will be incurred from 2025/26 onwards.

Reasons

The School Organisation Code (11/2018) states that if the proposer (IoACC in this case) decides to proceed with a proposal, they must publish the proposal by way of a statutory notice. This was done for the proposal above on 6 November 2025. A 28-day objection

period followed which finished at 23:59 on 3 December 2025. In accordance with section 49 of the School Standards and Organisation (Wales) Act 2013, proposers, in this case the Isle of Anglesey County Council, must publish and respond to a summary of the statutory objections (“the objection report”) – which is this document. A total of 2 valid objections to the proposal were received and 1 objection received was deemed invalid.

B – What other options did you consider and why did you reject them and/or opt for this opinion?

As highlighted in section 6 of the consultation document, the following options were considered and rejected:

[YUC statutory consultation](#)

Other options considered	Main reasons for rejection
1. Retain the status quo – Leave Ysgol Uwchradd Caergybi (YUC) as it is.	Does not address the condition of the school especially Reinforced Autoclaved Aerated Concrete (RAAC).
2. Federate Ysgol Uwchradd Caergybi, with Ysgol Cybi.	Does not address the condition of the school especially RAAC.
3. Close Ysgol Uwchradd Caergybi and transfer learners to the other secondary schools on Anglesey.	No secondary school in the island’s largest town. Not enough surplus places in the other secondary schools to accommodate all the YUC learners.
4. Federate Ysgol Uwchradd Caergybi, with Ysgol Uwchradd Bodedern.	Does not address the condition of the school especially RAAC.
5. Refurbish the current Ysgol Uwchradd Caergybi school building.	More disruption to learners' education. It would address the condition of the building for 30 years compared to 60 years for the proposal.
6. One new multi-site school (2 sites – current site of Ysgol Uwchradd Caergybi after refurbishment and Ysgol Cybi).	More disruption to learners' education. It would address the condition of the building for 30 years compared to 60 years for the proposal.
7. Build one new secondary school instead of Ysgol Uwchradd Caergybi and Ysgol Uwchradd Bodedern for 11–18-year-olds.	This option has the highest Capital Cost. There could be potential additional travelling time for learners dependent on the location. It could also be more difficult for learners to participate in extracurricular activities, or for the school to be used as a community resource. A School with a capacity of 1,750 learners may be considered too large for Anglesey by some stakeholders.
8. Review the school and service provision at Ysgol Uwchradd Caergybi looking at examples such as, clustering schools,	Does not address the condition of the school especially RAAC.

using the schools as community hubs to accommodate/ support community services e.g., health, childcare facilities, family and adult learning, community education, sport, recreation, social activity. Co-locating local services within schools to offset the costs of maintaining the school.	Possibility of additional child safeguarding issues, with other services sharing the school site.
---	---

C – Why is this a decision for the Executive?

The Executive can approve the submission of the objection report to Welsh Ministers. However, in line with section 5.2 of the School Organisation Code, as this proposal affects sixth form education, the proposal requires approval by Welsh Ministers, who must be notified within 35 days of the end of the objection period. The 35 days ends at 23:59 on 7 January 2026.

Ch – Is this decision consistent with policy approved by the full Council?

It is in line with the Modernising Learning Communities and Developing the Welsh Language Strategy (adopted by the Executive in July 2023).

D – Is this decision within budget approved by the Council?

The estimated cost of the proposal is £66million, the majority of which will be funded through a [Mutual Investment Model](#). The Council's contribution (estimate) towards annual service cost for 25 years (MIM) from the date of opening the new school building (September 2030) is estimated to be £1,238,218 which is considered affordable. This will need to be budgeted for from 2030/31 onwards.

There will also be some costs (£5.163m) which are not eligible to be funded through the Mutual Investment Model and will be treated as a Capital scheme. The Welsh Government grant intervention rate for these costs is 65%. The remaining 35% (£1.8m) will be funded from Capital Receipts from the sale of the existing site, and through unsupported borrowing. The annual repayments have been calculated using the annuity method, meaning the amount which would be repaid would be lower in the initial loan period and will be higher during the latter stages of the loan period. It is estimated that the annual repayments will start at £60,324 from 2028/29 onwards, which also need to be budgeted for.

Dd – Assessment of potential impacts (if relevant)

1. How does this decision affect our long-term needs as an island?

This potential decision will ensure the long-term sustainability of secondary education in the Holyhead area and ensure that there are sufficient school places to meet the needs now and into the future. It will also ensure that new school buildings are fit for purpose and meet BREEAM standards and the standards of the Welsh Government's Modernisation of Learning Communities programme.

2. Is this a decision that is anticipated to prevent future costs/dependencies on the Council? If so, how?

Yes - The Council would avoid having to pay the current and projected maintenance cost of almost £29 million (2024) in the old building.

As the project will be funded out through the Mutual Investment Model (MIM) the proposal could lead to savings in the central repairs and maintenance budget for the next 25 years.

3. Have we collaborated with other organisations to come to this decision? If so, with whom?

A statutory consultation on the proposal was held 5 June 2025 - 17 July 2025 and the following stakeholders were consulted:

- Staff (Teaching and Ancillary) of Ysgol Uwchradd Caergybi
- Governors and Parents/Guardians of Ysgol Uwchradd Caergybi
- Headteachers and Chair of Governors of Primary Schools in the catchment area
- Local Elected Members
- Local Member of Parliament
- Local Senedd Member
- Regional Senedd Members
- Welsh Government-Sustainable Communities for Learning
- Estyn
- Police and Crime Commissioner
- Welsh Language Commissioner
- Grŵp Llandrillo Menai
- MEDR-Commission for Tertiary Education and Research
- Neighbouring Local Authority
- Local Town and Community Councils
- Teaching and staff trade unions representing Ysgol Uwchradd Caergybi
- Canolfan Addysg Y Bont
- Church in Wales
- Catholic Diocesan Authority

4. Have the citizens of Anglesey played a part in drafting this way forward, including those directly affected by the decision? Explain how.

Yes. The Council from 5 June 2025 to 17 July 2025 held a statutory consultation process in respect of the following proposal to:

“Relocate Ysgol Uwchradd Caergybi learners to a new school building for 11-18 year olds”.

The purpose of the statutory consultation was to seek the views of stakeholders/ interested parties on the proposal.

The Council received a total of 1,023 responses to the statutory consultation via the on-line response form. The following table provides a further breakdown.

Respondent category	Percentage	Response total
Learner / pupil	32.3%	329
School governor	1.2%	12
Staff	6.6%	67
Parent / guardian	22.5%	229
Elected member	1.2%	12
Town and community councillor	0.6%	6
Local resident	42.1%	429
Other* (e.g. former pupil) or did not specify	3.4%	35

Some stakeholders responded in more than one capacity e.g. responded as a parent/guardian and a school governor, which has been recorded as one response in the overall total of 1023.

5. Note any potential impact this decision would have on the protected groups under the Equality Act 2010.

The Authority will ensure equal opportunities for all pupils and staff regardless of their ability and background. See the Impact Assessment for more information.

[Impact assessment](#)

6. If this is a strategic decision, note any potential impacts the decision would have on those experiencing socio-economic disadvantage.

See the Impact Assessment for more information.

[Impact assessment](#)

7. Please note any potential effects that this decision would have on opportunities for people to use Welsh and not treat the language less favourably than English.

It is anticipated that the proposal will have a positive impact on the Welsh language.

[Impact assessment](#)

E – Who did you consult with and what were their comments?

1. Chief Executive / Leadership Team (mandatory)	Incorporated in this report.
2. Finance / 151 Officer	Incorporated in this report.
3. Legal / Monitoring Officer (mandatory)	Incorporated in this report.
4. HR	Any HR issues arising from the recommendations should be dealt with in accordance with other recognised HR and HR processes.
5. Property	Property officers have been estimating the potential costs of the project and would continue to be a key part of the team moving forward.
6. IT	If the proposal is approved and the potential project is approved, business cases would be prepared in accordance with the Welsh Government's Sustainable Learning Communities guidelines. Potential expenditure on "Furniture, Fittings and Equipment / Information Technology" is projected to be in line with the Welsh Government's cost benchmark in that guidance.
7. Procurement	If the proposal is approved, then further discussions would be required in terms of funding via the Mutual Investment Method (MIM).
8. Scrutiny	Not applicable
9. Local members	No comments received.

F – Appendices

Appendix 1 - Ysgol Uwchradd Caergybi objection report.
--

Ff – Background papers (contact the report author for more information)

<ul style="list-style-type: none"> • Impact Assessment (which assesses Equality, Language, Community) Impact assessment • School Organisation Code (11/2018) school-organisation-code-second-edition.pdf • IACC's Modernising Learning Communities and Developing the Welsh Language Strategy (July 2023) Modernising Learning Communities.pdf • Strategic Outline Programme – Rolling Programme (SOP) (March 2024) Strategic Outline Programme (SOP) – Rolling Programme

SCHOOL ORGANISATION

OBJECTION REPORT ON THE PROPOSAL TO:

“Relocate Ysgol Uwchradd Caergybi learners to a new school building for 11–18-year-olds”

**Mae'r ddogfen hon hefyd ar gael yn Gymraeg /
This document is also available in Welsh.**

**Hard Copies of this report are available by emailing
angleseyschools@ynysmon.gov.wales**

CONTENTS

		Page
1	Background	3
2	Summary of objections	3
3	Table – Summary of Objections and the Council’s responses	4
4	Response considered to be invalid	9

New school building for Ysgol Uwchradd Caergybi - Objection Report

1. Background

In order to comply with the School Standards and Organisation (Wales) Act 2013 and the School Organisation Code 2018, the Isle of Anglesey County Council (herein after the “Council”) issued a **Statutory Notice** of its intention to:

“Relocate Ysgol Uwchradd Caergybi learners to a new school building for 11–18-year-olds”

The **Statutory Notice** was published on 6 November 2025 followed by a statutory period of 28-days for objections to the proposal. The statutory objection period ended at 23:59 on 3 December 2025. **A total of 2 valid objections to the proposal were received and 1 objection received was deemed invalid.**

2. Summary of Objections

In accordance with section 49 of the School Standards and Organisation (Wales) Act 2013, proposers, in this case the Council, must publish a summary of the statutory objections and the proposer’s response to those objections (the “**Objection Report**”). This document is the Objection Report.

The Council received 2 valid responses objecting to the proposal. The responses included more than one reason for objecting. Each of these reasons for objecting and the Council’s corresponding responses are listed in the table below.

The table below (section 3) contains a summary of each reason for objection and the Council's response to each of those reasons.

One objection received was deemed invalid. This objection and the Council’s response is available in section 4.

New school building for Ysgol Uwchradd Caergybi – Objection Report

3. Table – Summary of Objections and the Council’s Responses

	Summary of Objections	The Council’s response to the objections
3.1	<p>The distance of the proposed new Ysgol Uwchradd Caergybi building is too far “out of town”.</p> <p>Most children will live within 3 miles of the proposed new site, so will not qualify for transport. It is unfair to expect children to walk just under 3 miles to and from school every day, especially in winter months.</p> <p>There is also increased risk of accidents / poor road safety for children with additional needs, who cannot be expected to walk such a distance without support.</p>	<p>Prior to seeking approval to consult on the proposal under consideration, Council officers conducted a detailed options appraisal of potential sites for the new secondary school building in the Holyhead area. The site near the Holyhead Leisure Centre was the only site meeting all the requirements according to the Area Guidelines for Schools in Wales – Building Guidance, issued in March 2025, including being large enough (over 19 acres). However, as the site is just over a mile away from the current Ysgol Uwchradd Caergybi site, it is likely that there will be additional travelling times and distances for some learners but less for others.</p> <p>The Council has a duty to provide travel assistance in accordance with the Learner Travel (Wales) Measure 2008. The Council provides free school transport for full time secondary school learners residing 3 miles or more from the school in whose catchment area they reside (except for 6th form learners / further education students Further information is available in the Council’s School Transport Policy, which is available here: https://www.anglesey.gov.wales/en/Residents/Schools-and-learning/School-transport/School-Transport-Policy.aspx</p> <p>The Sustainable Communities for Learning programme is linked to the Active Travel (Wales) Act 2013. The Act sets a clear ambition to improve walking and cycling routes to help the Council satisfy its environmental and health objectives. If the proposal is approved, active travel plans will be reviewed and prepared in accordance with the Act for the new Ysgol Uwchradd Caergybi building once the new site and proposal are confirmed.</p> <p>If the proposal is approved by Welsh Government, a Traffic Impact Assessment or Traffic Flow Surveys will be undertaken and will form part of the planning application should the proposal be approved. The planning application will be developed with Council staff, a Traffic Impact Advisor, a Landscape Architect and a Civil Engineer. The Traffic Impact Assessment or Traffic Flow Surveys will also be developed in consultation with officers from the Highways Department, prior to submitting the planning application to the Planning and Orders Committee.</p> <p>A Traffic Impact Assessment is a comprehensive study that evaluates the potential impacts of a proposed development on existing and future traffic conditions. See also section 3.3.</p>

	Summary of Objections	The Council's response to the objections
3.2	Significance of the site of the current Ysgol Uwchradd Caergybi: the original building has been there for many decades and holds significant local history.	<p>The Consultation Document (as published on the Council's website here: YUC statutory consultation) listed, in detail, the issues with the condition of the current Ysgol Uwchradd Caergybi building such as:</p> <ul style="list-style-type: none"> its condition rating (Condition Grade C – defined by Welsh Government as “Operational but major repair or replacement needed in the short to medium term”) a lack of suitable playing fields accessible to learners on the current site the presence of Reinforced Aerated Autoclaved Concrete (RAAC) in the school, the problems this caused in 2023 and the fact that current safety mitigations are only medium-term solutions the current and projected future maintenance spend of £28,985,743. the school building only partially meeting the requirements of the Equality Act 2010 and thus having significant accessibility issues. <p>These issues highlight the problems with the current Ysgol Uwchradd Caergybi building.</p> <p>Section 9.4 of the Consultation Document described how the Council thinks the potential project would be financed. Capital receipts from the potential sale of the current site and building would be used as a contribution against the cost of the new school building. Whilst the secondary school has been at its current location for decades, there is no obligation on the Council to keep the current site or the current building. However, as the proposal has not been formally approved, no decision has been made as to any potential future use of the current Ysgol Uwchradd Caergybi building or the site.</p>
3.3	<p>Children would feel unsafe / uncomfortable walking to and from school in the darker months and would also be uncomfortable with public transport.</p> <p>Many parents do not have a car to get to and from the new site.</p>	<p>If the proposal is approved, a Traffic Impact Assessment or Traffic Flow Surveys will be undertaken and will form part of the planning application. The planning application will be developed with Council staff, a Traffic Impact Advisor, a Landscape Architect and a Civil Engineer. The Traffic Impact Assessment or Traffic Flow Surveys will also be developed in consultation with officers from the Highways Department, prior to submitting the planning application to the Planning and Orders Committee.</p> <p>A part of the Traffic Impact Assessment would involve assessing travel routes to school which would include pedestrian access to the potential new school. It would also assess current school bus routes. See also section 3.1.</p>
3.4	Unsure if the Council had performed an impact study into the effect this proposal will have on the residents of Kingsland.	As with any potential new project, the Council assesses the possible impact of the potential development on the local community. This was done through a Community Impact Assessment which was issued in June 2025, as part of a composite impact assessment (the Impact Assessment also contained an Equality Impact Assessment and a Welsh Language Impact Assessment) with the Consultation Document. Council officers referred to Welsh Government guidance in Annex C of the School Organisation Code 011/2018 in developing the Community Impact Assessment.

	Summary of Objections	The Council's response to the objections
		<p>The Community Impact Assessment listed the possible effect of the proposal on the local community in the following matters:</p> <ul style="list-style-type: none"> • Learner forecasts (5 years) for Ysgol Uwchradd Caergybi as well as projections if the proposal goes ahead • Learners who travel between catchment areas • Information about the school's "after school" activities available to learners at Ysgol Uwchradd Caergybi • School facilities at Ysgol Uwchradd Caergybi used by local groups • Pre-school and after school care available at Ysgol Uwchradd Caergybi • Community activities held locally near Ysgol Uwchradd Caergybi • Distance and travelling time <p>In summary, the Assessment found that there is some community use of the facilities at Ysgol Uwchradd Caergybi.</p> <p>To determine the potential impact of the proposal on the community, the proposal was assessed against the criteria listed below. Its impact was identified as positive if deemed to be beneficial, negative if deemed detrimental and neutral if the proposal was deemed not to have a significant impact.</p> <ul style="list-style-type: none"> • Services provided by the school for the community including after school activities • Community facilities provided by the school and activities held on school grounds • Potential impact on transport • Potential impact on public transport <p>The Community Impact Assessment concluded that at this stage, prior to officers being authorised to conduct a statutory consultation process on the proposal, the proposal would seem to have little or no impact on the community. However the Impact Assessment is a live document, which will continue to be updated as the proposal progresses. See the link below to the Impact Assessment:</p> <p>Impact assessment</p>
3.5	<p>What will be the effect on the amount of traffic passing through the Kingsland area of Holyhead?</p> <p>(1 response)</p>	<p>If the proposal is approved, a Traffic Impact Assessment or Traffic Flow Surveys will be undertaken and will form part of the planning application. The planning application will be developed with Council staff, a Traffic Impact Advisor, a Landscape Architect and a Civil Engineer. The Traffic Impact Assessment or Traffic Flow Surveys will also be developed in consultation with officers from the Highways Department, prior to submitting the planning application to the Planning and Orders Committee.</p> <p>Further Work to Support Planning Application</p> <p>Welsh Government policies on Transport Assessment (TA) contained in Planning Policy Wales (November 2016), states that a Transport Assessment be provided for all new schools (as set out in Chapter 8, Section 8.7.2). Furthermore, this is also stated within the Council's local planning guidance as a requirement.</p>

	Summary of Objections	The Council's response to the objections
		<p>A Transport Assessment should include, but not be limited to, the following assessment:</p> <ul style="list-style-type: none"> • Details of sustainable modes of travel to the site, including public transport accessibility analysis. • An outline of the highway network conditions • A review of the existing site and operations, including parking provision. • A parking capacity assessment • Preliminary design of any proposed accesses and pedestrian crossing. • Assessment of the overall impacts of the proposal on the operation of the local road network. • An assessment should also be made onto whether any off-site highways work including pedestrian crossing and footway provision is required to facilitate access of staff/pupils/visitors to the school site. <p>A Travel Plan may be prepared alongside the Transport Assessment to support the proposal. A Construction Traffic Management Plan is expected to be required. Liaison with the highways authority will confirm whether a Car Park Management Plan and Delivery and Servicing Plans will also be required.</p> <p>It is likely that access for vehicles (cars and buses) to the potential new school building will be from the B4545. Vehicle drivers would be encouraged to use the A5153 to travel to and from the potential new school site. This would help ensure that any increase in traffic near the potential new school site would be minimal.</p>
3.6	<p>Why are you proposing a new school when the carbon footprint will be a great deal more than the redevelopment of the existing school. The added pollution arising from the potential development will have an effect on the people of Kingsland.</p> <p>The proposal will affect the quiet area of Kingsland. Don't want anti-social behaviour in our community. Council is not taking into account the detrimental effect this development will have on</p>	<p>The current school building is in the Council's top 10 buildings in terms of high carbon emissions. (See section 4.10 of the Consultation Document for further information). The Council is of the opinion that nothing further can be done to reduce decarbonisation at the building in its current condition. The new school building would be a net zero carbon school once in operation. The proposal would mean that the potential new Ysgol Uwchradd Caergybi building would cause considerably less carbon emissions than the current building. The Council would also look to improve biodiversity on the possible site and to offset carbon emissions.</p> <p>If the proposal is approved, it is envisaged that school buses that currently take the pupils to the current Ysgol Uwchradd Caergybi building would enter the proposed new school site from the B4545. This would mean that these buses would travel about a mile less each school day. School buses would not have to travel to the centre of Holyhead. Therefore, carbon emissions from school buses may be reduced.</p> <p>The current Ysgol Uwchradd Caergybi building is located in the Parc a'r Mynydd ward in Holyhead. Statistics regarding anti-social behaviour offenses for this ward are listed below and compared to the same statistics for the Kingsland ward, in which the proposed new Ysgol Uwchradd Caergybi building would be located:</p>

Summary of Objections	The Council's response to the objections											
the residents of the Kingsland area.	<table><tr><th>Ward</th><th>Last 12 months (from November 2024 to October 2025)</th><th>Last 3 years</th></tr><tr><td>Kingsland</td><td>33</td><td>102</td></tr><tr><td>Parc a'r Mynydd</td><td>20</td><td>56</td></tr></table>			Ward	Last 12 months (from November 2024 to October 2025)	Last 3 years	Kingsland	33	102	Parc a'r Mynydd	20	56
	Ward	Last 12 months (from November 2024 to October 2025)	Last 3 years									
	Kingsland	33	102									
	Parc a'r Mynydd	20	56									
	Source: North Wales Police crime statistics											
Parc A'r Mynydd Police.uk Kingsland Police.uk												
These statistics for the last 12 months and the last 3 years show that anti-social behaviour offences are already occurring are more prevalent in the Kingsland ward than in the Parc a'r Mynydd ward.												
As stated above, if the proposal is approved by Welsh Government, a Traffic Impact Assessment or Traffic Flow Surveys will be undertaken and will possibly form part of the planning application should the proposal be approved. The planning application will be developed with Council staff, a Traffic Impact Advisor, a Landscape Architect and a Civil Engineer. The Traffic Impact Assessment or Traffic Flow Surveys will also be developed in consultation with officers from the Highways Department, prior to submitting the planning application to the Planning and Orders Committee.												

4. Response considered to be invalid

One respondent objected to the construction of this new building on the site of the existing school. They felt that such a structure will create a significant amount of noise and disruption for children, especially those with highly sensory difficulties.

This is not considered to be a valid objection as the stakeholder is under the impression that the new secondary school building will be built on the site of the existing secondary school. The Consultation Document for the proposal stated that the location for the potential new secondary school building will be “land near Holyhead Leisure Centre, contingent upon successful land acquisition.” This site is just over a mile away from the current school building and so would not create any disturbance or noise for any children attending Ysgol Uwchradd Caergybi.