



# Community, Equality and

# Welsh Language Impact

# Assessment

May 2022

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### Introduction

Denbighshire County Council (DCC) is carrying out a formal consultation on the proposal to increase Ysgol Plas Brondyffryn's capacity from 116 to 220. The school will move into a brand new purpose built facility in the town of Denbigh to accommodate the increase.

Should the Local Authority wish to implement the Proposal following the Formal Consultation, such implementation will be subject to Welsh Language and Community Impact Assessments.

#### **National Context**

The Welsh Government School Organisation Code 2013 (revised 2018) requires the proposer to conduct a Community Impact Assessment and a Welsh Language Impact Assessment when proposing changes to school organisation.

The School Organisation Code stipulates that proposers need to consider the impact that a proposal may have on local families and the local community, through preparation of a community impact assessment and the effect of the Welsh language through the preparation of a language impact assessment if any school affected provides teaching through the medium of Welsh.

#### Local Context

DCC is committed to modernising education in Denbighshire to ensure all children and young people receive a first class education.

DCC recognises the importance of having modern and fit for purpose buildings that meet the needs of modern day education. Schools need to be able to provide the best possible learning experience to make sure that children and young people have the best opportunities available to them and that they are able to reach their full potential.

#### **Community Use of Schools**

DCC has a commitment to community focused schools, therefore we will conduct a community impact assessment when considering changes to school organisation.

#### **Promoting Bilingualism**

DCC recognises how important bilingualism is in the 21<sup>st</sup> Century Wales. It is DCC's aspiration that all children and young people leave full time education being competent and confident using both Welsh and English languages. This aspiration is in accordance with the Welsh Government's vision for 'A Million Welsh speakers by 2050.'

### Background

DCC is committed to providing a first class education for all children and young people in the county. As part of this commitment, the council agreed that modernising education provision was a priority because it recognises the importance of having school buildings, learning environments and resources that meet the needs of 21st century Wales.

Education provision in the county had to change because improvements in education could not be sustained without changes to the way education was provided.

Consideration has been given to the potential impact on the Welsh Language and on the local communities resulting from the Proposal.

#### **Sources of Information**

The following sources of information have been used for the purposes of this document:

- Impact Assessment questionnaire undertaken by the head teacher of Ysgol Plas Brondyffryn
- PLASC 2021 Data;
- Statistical data stored by Denbighshire County Council;
- 2011 Census Information;
- A draft Welsh in Education plan 2022-2032.

### **Ysgol Plas Brondyffryn**

#### **School details**

School Name	Ysgol Plas Brondyffryn
School Location	4 locations in Denbigh: Primary Site- LL16 3DP
	Secondary site- LL16 3DR
	Ty'r Ysgol- LL16 4ST
	Residential – Gerddi Glasfryn- LL16 4ST
Age Range	3-19
School Category- Community, Voluntary Aided, Voluntary Controlled, Special	Special School
Language Medium Category	English Medium

#### Number of pupils

As of September 2021 the school had 136 pupils. The pupil numbers over recent years are illustrated below:

Year	Jan 16	Jan 17	Jan 18	Jan 19	Jan 20	Jan 21
Pupil Numbers	124	128	140	133	137	137

Ysgol Plas Brondyffryn is located across Denbigh. 3 Wards cover Denbigh- Denbigh Central, Denbigh Lower and Denbigh Upper. The new school site will be within the Denbigh Lower ward.

Denbigh Town Council also cover this area.

Please note that pupils attend special schools from all over the County and from neighbouring authorities:

Map below shows the spread of where pupils are coming from- for the purpose of this exercise we used the Park Street site in Denbigh:



Pupil data from Jan 2022:

Distance	Number of pupils	% of school population
Under 1 mile	6	4.5
1-5 miles	10	7.6
5-10 miles	32	24.2
10-20 miles	69	52.3
Over 20 miles	15	11.4

### Assessment

Total	132	100
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#### Fluency of pupils at the school

	Full-time
Total Number of Pupils on Roll:	133
Number of Pupils from Welsh speaking homes:	2
Number of Pupils from English speaking homes:	118
Number of Pupils from Bilingual (Welsh & English Parents) homes:	13

Data from Dec 2021

### Governing body details

Number of Parent Governors:	5
Number of Community Governors*:	3
Total Number of Governors:	15

### Assessment

Number of Welsh speaking Governors:	4
Language in which minutes are recorded	English

#### Parent and teacher association

There is a parent and teacher association called Friends of Plas Brondyffryn. They meet once every half term- sometimes more if needed. The meetings take place in English.

#### Additional provision

The additional school provision offered out of school hours is a daily breakfast club both at the primary and secondary sites. There are no after school clubs at present. There is a Summer Holiday Enhancement Programme that the school runs.

#### Childcare/ pre-school provision

The school does not have nursery provision.

#### **Community Facilities**

The following community facilities are available in Denbigh outside of the school:

- Denbigh Town Hall
- Eirianfa Community Centre
- Denbigh Rugby Club
- Denbigh Football club
- Denbigh Leisure centre
- Denbigh Bowling Club
- Denbigh Skate park

- Denbigh Tennis club
- Denbigh Cricket club

#### **Community Activities- School building**

No community activities currently take place in the school.

#### **Community Activities- other**

There are a large number of community facilities in the town of Denbigh, which a variety of groups use for a range of community activities.

### Additional considerations set out in the Code

There are certain matters set out in the Code which the proposer should consider when assessing the impact of the proposal on the community and language. However, some of them apply only where a school is to be closed and its pupils will have to rely on existing alternative provision. It is not relevant for the purposes of this document to consider:

- a. whether other facilities in the immediate local or wider community will or could be enhanced in the event of closure;
- b. information about the facilities and services provided at any alternative school;
- c. information about the distance and travelling time involved in attending an alternative school;
- d. how parents' and pupils' engagement with the alternative school and any facilities it may offer could be supported;
- e. information about any wider implications the changes would have on public transport provisions;
- f. information on wider community safety issues;
- g. information about standards in the Welsh language in the school and any alternatives;
- h. information about after school activities which provide additional opportunities to use Welsh in the school and any alternative school;

- i. whether it might be appropriate to provide additional after school facilities at any alternative school to further secure standards in the Welsh language; and
- j. how parents' and pupils' engagement with any alternative school and any specific language enhancement it offers could be supported.

### **Equality Impact Assessment/ Well-being Impact Assessments**

As a Council we now undertake Well-being Impact Assessments on proposals. Our Wellbeing Impact Assessment is an integrated impact assessment and is designed to assess the likely impact of the proposal on the social, economic, environmental and cultural wellbeing of Denbighshire, Wales and the world. The assessment considers impact on: equality, vulnerable groups, the economy, the environment, health, Welsh language and culture, community cohesion and on global issues.

The assessment looks at the sustainability of the proposal and the likely consequences and impact on the proposal. The impact assessment is used more than once, throughout the development of proposals and is continually reviewed and updated.

Please see Appendix A for the Wellbeing Impact Assessment for this proposal.

### Welsh Language Impact Assessment

This impact assessment is to consider the potential impact on the Welsh language of the Proposal.

#### **Census Data**

The following data is taken from the 2011 Census and provides information on the proportion of Welsh speakers within the wards that Ysgol Plas Brondyffryn sites are currently located in:

### Assessment

Ward	Population	Number of Welsh Speakers	Proportion of Welsh Speakers
Denbigh Lower	4,561	1,777	38.9%
Denbigh Upper/ Henllan	3,165	998	31.5%

#### **Risk Assessment**

In order to assess the potential impact on the Welsh language consideration has been given to the following areas (as set out in the table below):

- Language of the school;
- Access to Welsh Medium education;
- Education Provision / Educational standards;
- Access to non-statutory provision;
- Access to pre / after school activities;
- Use of Welsh within the community.

Impact Criteria	Comments	Impact (positive, neutral or negative)	Measures to reduce negative impact	Residual Impact
Language of the school	The school are committed to promoting the Welsh language as an	NEUTRAL	N/A	N/A

	integrated part of school life.			
Access to Welsh Medium education	The majority of the pupils come from homes where English is the first language; however the school promotes an ethos where Welsh culture and heritage is supported and celebrated. A proportion of the staff are first language Welsh speakers and therefore Welsh is used as a language of communication throughout the school. Governors and SLT are committed to developing the Welsh language skills of all the staff and provide training to achieve this. Welsh is not used as a language of instruction in any Key Stage or subject, but the school welcomes pupils whose first language is Welsh and	NEUTRAL	N/A	N/A

	provides the necessary resources for them to access the whole curriculum through the medium of Welsh. The proposal would not change the access to Welsh medium education.			
Education Provision / Educational standards	The proposal will improve the facilities for the school as well as bringing all staff and pupils onto the same site. Additional staff will be employed to accommodate for the increase in capacity when required.	POSITIVE	N/A	N/A
Non-statutory provision	The governors and management of the school are seeking to significantly raise the profile of the school in the local community and to ensure that the whole community is able to benefit from the facilities	POSITIVE	N/A	N/A

	a new school build would offer. The inclusion of a 'community cafe in the new build plans is one example the school are committed to extending this to the sports facilities (muga), the large indoor spaces (main and secondary hall), conferencing facilities and specialist teaching and			
Pre/After school activities	learning facilities. The school would continue to have a breakfast club. The proposal may see an increase in numbers attending the provision, which the school will accommodate.	POSITIVE	N/A	N/A

### Assessment

Use of Welsh within the communities	Ysgol Plas Brondyffyn is an English medium school, which would continue should the proposal be approved, accordingly this would have a neutral impact on the use of Welsh within the community.	NEUTRAL	N/A	N/A
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#### **Overview- Potential initial impact on Welsh Language**

		Positive	Neutral	Negative
Overall Impact F	Current Proposal	3	3	0
	Residual Impact	0	0	0

#### Summary of Potential Impact on the Welsh Language

It should be noted that attempting to gauge the potential impact from the proposal on the Welsh language is a difficult undertaking.

The main positives emerging from the impact are on the educational provision. Providing an improved educational provision represents an opportunity to strengthen Welsh education in the area and as a result strengthen the Welsh language.

Conclusion: Overall the proposal would not have a negative impact on the Welsh language.

### **Community Impact Assessment**

This impact assessment is to consider the potential impact on families and the local community of the Proposal.

In order to assess the potential impact on families and the local community consideration has been given to the following areas:

- School Designation;
- School links to the local community;
- Impact on neighbouring schools;
- Impact on parents and families;
- Travelling Implications for pupils/parents;
- Impact on community activities;
- Impact on community facilities;
- Impact on community demographics

Impact Criteria	Comments	Impact (positive, neutral or negative)	Measures to reduce negative impact	Residual Impact
School Designation	The school is currently categorised as a Special school and will continue to be Special if the proposal is taken forward.	NEUTRAL	N/A	N/A

School links to the community	The school has good links within the community it currently serves and these links will be maintained. The school have inspirations that the new building can also be utilised by the community after school hours.	POSITIVE	N/A	N/A
Impact on neighbouring schools	As this is a Special school catering for pupils with ASC the impact on neighbouring schools is not a consideration due to the specialist nature of the school. There is a growing demand for places within the School, resulting in the Local Authority having to operate a waiting list for some year groups within the school.	NEUTRAL	N/A	N/A
Impact on pupils	The current proposal will have a positive impact on pupils through an improved education provision. Pupils	POSITIVE	N/A	N/A

	<ul> <li>will have facilities fit for the 21<sup>st</sup> Century and an environment that will inspire and motivate them in their learning.</li> <li>Having all pupils and staff on one site will be beneficial and ensure transition between keystages can be better facilitated.</li> </ul>			
Impact on parents and families	There should be no major impact on parents and families due to the proposal. The additional pupil places will support families whose child needs this specialist place.	POSITIVE	N/A	N/A
Travelling implications for pupils/parents	The new building will still be in Denbigh and therefore travel time will remain the same. The proposed location is more central and better links with public transport.	POSITIVE	N/A	N/A

Impact on community activities	Currently no community activities take place at any of the school sites. The school have an aspiration that the new build will be accessible to community use out of hours.	POSITIVE	N/A	N/A
Impact on community facilities	The inspiration is for the new build to be accessible for community use out of hours, this will give the community of Denbigh more options and the school will need to look at any gaps they could potential fill in terms of community use.	POSITIVE	N/A	N/A
Impact on community demographics	There should be no impact on community demographics due to the proposal. The proposed increase is to accommodate an increase in pupils who	NEUTRAL	N/A	N/A

### Assessment

require a place in ASC		
school.		

#### Overview- Potential initial impact on families and the local community

		Positive	Neutral	Negative
Overall Impact	Current Proposal	6	4	0
	Residual Impact	0	0	0

#### Summary of Potential Impact on families and the local community

It should be noted that attempting to ascertain the potential impact from school organisation on families and the local community is a difficult undertaking.

The school are already over their capacity and have a waiting list for some year groups. This demand for these types of places will only increase given the number of learners currently being assessed and currently awaiting assessments. The pandemic has seen delays in learners being assessed, current numbers indicate that there could potentially be 25 additional pupils who will need a place at the school. The impact the pandemic has had on children is yet to be fully realised but it is predicted that there will be an increase of learners being referred and assessed.

Conclusion: The proposal will have a positive impact on pupils, parents and their families. The proposal has considered impact on the local community, along with the demand for places.

The proposal could see a new community facility added to the options for the community of Denbigh.

Throughout the consultation period if there are any justified impacts noted the impact assessment will be reviewed and measures will be considered so that any impact is minimised.

### Appendix A

#### New build- Ysgol Plas Brondyffryn:

#### Well-being Impact Assessment Report

This report summarises the likely impact of the proposal on the social, economic, environmental and cultural well-being of Denbighshire, Wales and the world.

#### Assessment Number: 860

#### **Brief description:**

The impact of bringing Ysgol Plas Brondyffryn together on one site in a new purpose built building in Denbigh. The school is currently over 3 sites in the town.

#### **Date Completed:**

22/04/2022 11:03:24 Version: 2

**Education & Children Services** 

#### Localities affected by the proposal:

Denbigh,

#### Who will be affected by the proposal?

Staff and pupils at the school

#### Was this impact assessment completed as a group?

No

#### **Summary and Conclusion**

Before we look in detail at the contribution and impact of the proposal, it is important to consider how the proposal is applying the sustainable development principle. This means

that we must act "in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs."

#### Score for the sustainability of the approach

#### 3 out of 4 stars

Actual score : 28 / 36.

#### Summary for each Sustainable Development principle

#### Long term

A new building for Ysgol Plan Brondyffryn will see its capacity increase by approx 100 places and will give the school an opportunity to design the school how they want to and ensure flexibility for the future in terms of the curriculum delivery and pupil numbers. It will bring all staff and pupils onto one site in a purpose build school fit for 21st Century learning. This proposal does not include the residential provision Gerddi Glasfryn.

#### Prevention

The increase in places at the school is needed- currently there is waiting list for the school and this September they Year 7 pupils were unable to move to the secondary due to lack of room and have and to remain in the primary site. As the proposal develops the impact of the build on the environment and on energy use moving forward will be considered.

#### Integration

We need to increase the capacity at the school significantly as demand increases for pupil places of this nature. If we do not local pupils will have to travel into other Local Authority areas to access these places or stay in unsuitable schools that cannot cater for their needs. By building a brand new build nearby to the current school- delivery on all current sites will not be disrupted.

#### Collaboration

We are already engaging with the school at a management level- with the senior staff and governors.

#### Involvement

As mentioned we are already engaging with the school and as we move forward parts, carers and pupils will be consulted in what they would like to see in the new school. As the project develops pre planning consultation will be undertaken with local residents.

#### Summary of impact

#### Well-being Goals Overall Impact:

- A prosperous Denbighshire- Positive
- A resilient Denbighshire -Positive
- A healthier Denbighshire- Positive
- A more equal Denbighshire- Positive
- A Denbighshire of cohesive communities- Positive
- A Denbighshire of vibrant culture and thriving Welsh language- Neutral
- A globally responsible Denbighshire- Positive

#### Main conclusions

The project to bring together Ysgol Plas Brondyffryn on one site in a brand new building links with the Corporate priority of Young People and will enhance pupils learning. All the well being goals have positive impacts except one which is neutral. As the business case for the proposal develop there will be a requirement for an on-going assessment process to ensure that potential impacts are appropriately addressed- i.e. if we need to undertake bat surveys for example.

The build itself will help the local economy and will have a strong emphasise on community benefits.

Once the school is completed the pupils and staff will have a modern purpose built facility that will match their needs and allow more pupils to access this type of school in the locality. The transition process for pupils will be managed in partnership with the school and staff and will be planned for in a detailed manner as will the decant of each site.

#### The likely impact on Denbighshire, Wales and the world.

#### A prosperous Denbighshire

#### **Overall Impact**

Positive

#### Justification for impact

The new build will bring all pupils of the school together on one site with improved facilities and outdoor areas. The project will also increase the schools current capacity- the school is currently over its capacity and demand for places continues to increase.

#### Further actions required

Work closely with the appointed contractor on how we can reduce any carbon emissions during the build stage.

#### Positive impacts identified:

#### A low carbon society

Reduce the carbon footprint of the school as 3 buildings will be vacated and the new building will employ new technologies.

#### Quality communications, infrastructure and transport

Utilise existing transport links. New build will have new ICT infrastructure which will improve the ICT delivery at the school.

#### Economic development

Building phase of the project will have Community benefits and use of local labour, apprentices etc.

#### Quality skills for the long term

The schools new facilities could provide pupils with opportunities to develop practical life and work skills- for example an operational cafe.

#### Quality jobs for the long term

The new provision will secure and increase the number of jobs at the school. Better facilities will also increase staff morale and improve staff retention.

#### Childcare

The new school will increase the amount of places available at this special school for pupils with Autistic Spectrum Condition.

#### Negative impacts identified:

#### A low carbon society

The construction of the new build will create carbon emissions.

#### Quality communications, infrastructure and transport

N/A

#### **Economic development**

N/A

#### Quality skills for the long term

N/A

Quality jobs for the long term

N/A

#### Childcare

N/A

#### A resilient Denbighshire

**Overall Impact** 

Positive

#### Justification for impact

The site of the new building will be on an existing playing field and therefore we do not see a major disruption to the eco system. As described above any issues will be mitigated for in the relevant manner.

#### Further actions required

Waste management plan will be requirement of the procurement process.

#### Positive impacts identified:

#### Biodiversity and the natural environment

The project will ensure all relevant biodiversity studies are undertaken and any mitigation actions followed.

#### Biodiversity in the built environment

If required new habitat areas would be developed within the school grounds.

#### Reducing waste, reusing and recycling

Appointed contractor will have a waste management plan.

#### Reduced energy/fuel consumption

The new building will be designed to minimise energy costs. Consideration will be made on how the transportation of materials will be delivered to the site, sourcing locally where possible to reduce emissions.

#### People's awareness of the environment and biodiversity

Scope during the construction phase to involve the local community and the school.

#### Flood risk management

The issue of flooding will be examined during the design and planning stages.

#### Negative impacts identified:

#### Biodiversity and the natural environment

N/A

#### Biodiversity in the built environment

N/A

#### Reducing waste, reusing and recycling

N/A

#### Reduced energy/fuel consumption

N/A

#### People's awareness of the environment and biodiversity

N/A

Flood risk management

N/A

#### A healthier Denbighshire

**Overall Impact** 

Positive

#### Justification for impact

Improved facilities for the school will assist in pupil and staff overall emotional and mental wellbeing.

The building will be fit for purpose and will be flexible enough to adapt when it needs to.

#### Further actions required

Ensure all residents are informed and kept up to date in regards to build progress by the contractor.

Work with staff and pupils will be undertaken at an early stage in terms of getting used to the new building- visits will be arranged with the contractor and the school especially as the move in date approaches.

#### Positive impacts identified:

#### A social and physical environment that encourage and support health and wellbeing

Improved facilities and learning environment will improve staff, pupil and community morale.

#### Access to good quality, healthy food

The school will have a dedicated dining area for all pupils.

#### People's emotional and mental well-being

Improved external areas for play. All pupils on one site- no transition when pupils move from the primary to the secondary section of the school and any siblings at the school would be at the same site at all times.

#### Access to healthcare

N/A

#### Participation in leisure opportunities

Improved access to outdoor areas as well as improved external areas overall with more space and play equipment.

#### Negative impacts identified:

A social and physical environment that encourage and support health and wellbeing

N/A

#### Access to good quality, healthy food

N/A

#### People's emotional and mental well-being

Disruption for residents living near the site during the construction of the new build. The change in surroundings for the pupils when they move into the new building.

#### Access to healthcare

N/A

#### Participation in leisure opportunities

N/A

#### A more equal Denbighshire

**Overall Impact** 

Positive

#### Justification for impact

The project will provide facilities that will support better teaching and an improved learning environment.

#### Further actions required

None

#### Positive impacts identified:

Improving the well-being of people with protected characteristics. The nine protected characteristics are: age; disability; gender reassignment; marriage or civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation

Improve access to education for those pupils with Autism Spectrum Condition.

#### People who suffer discrimination or disadvantage

Improve access to education for those pupils with Autism Spectrum Condition.

#### People affected by socio-economic disadvantage and unequal outcomes

N/A

#### Areas affected by socio-economic disadvantage

Pupils with ASC will have first class facilities to develop life and work skills.

Negative impacts identified:

Improving the well-being of people with protected characteristics. The nine protected characteristics are: age; disability; gender reassignment; marriage or civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation

N/A

#### People who suffer discrimination or disadvantage

N/A

#### People affected by socio-economic disadvantage and unequal outcomes

N/A

#### Areas affected by socio-economic disadvantage

N/A

A Denbighshire of cohesive communities

#### **Overall Impact**

Positive

#### Justification for impact

The proposal would bring the school community of Ysgol Plas Brondyffryn together in a brand new purpose built facility. The school already link in with Ysgol Tir Morfa and these links will be strengthened as facilities could also be accessed by these pupils. Facilities could also be offered out to community use where appropriate.

#### Further actions required

Keep residents informed of when any particular noisy works are to take place.

#### Positive impacts identified:

#### Safe communities and individuals

All pupils will be educated at one site rather than 3 separate sites which is how the school currently operates.

Safeguarding will be considered during the design stage to ensure clear demarcation between the public and private zones both within the new building itself and the overall site.

The new building will be designed to ensure pupil and staff safety.

#### Community participation and resilience

Pre-planning consultation events will be held with the community so they can view the plans and ask any questions they may have.

The facilities could include a cafe and more vocational opportunities that pupils from our other special school in Denbighshire Ysgol Tir Morfa can also utilise especially in the post 16 provision.

#### The attractiveness of the area

The design of the new build will look to enhance the area.

#### **Connected communities**

The new build will increase the capacity of the school which will ensure Denbighshire pupils will not need to go out of County to access this type of provision.

#### **Rural resilience**

N/A

#### Negative impacts identified:

#### Safe communities and individuals

N/A

#### Community participation and resilience

N/A

#### The attractiveness of the area

Noise and disruption through the build process.

#### **Connected communities**

N/A

**Rural resilience** 

N/A

#### A Denbighshire of vibrant culture and thriving Welsh language

**Overall Impact** 

Neutral

#### Justification for impact

The majority of the children that attend are from English speaking homes and Welsh is taught as a second language, however education can be provided through the medium of Welsh if requested by the family. It will be important for the contractor to ensure all communications to residents are bilingual.

#### Further actions required

None

Positive impacts identified:

#### **People using Welsh**

Insisting the contractors use bilingual signs and newsletters when communicating to the public.

#### Promoting the Welsh language

N/A

#### Culture and heritage

The new facility could be used for community events and social activities linked to the Welsh culture.

#### Negative impacts identified:

**People using Welsh** 

N/A

#### Promoting the Welsh language

N/A

#### Culture and heritage

N/A

#### A globally responsible Denbighshire

#### **Overall Impact**

Positive

#### Justification for impact

Overall the impact will be positive through encouraging the use of local supply chains.

#### Further actions required

As the proposal develops further the impact of the works on carbon emissions will be more apparent and it possible mitigation actions will be put in place. We will work closely with the contractor in designing an energy efficient building as we can within the budget.

#### Positive impacts identified:

#### Local, national, international supply chains

The procurement option for the project will allow access to local contractors.

Community Benefits will be evaluated at tender stage and monitored throughout the project.

#### Human rights

Ensure the contractor is a 'Considerate Contractor'.

#### Broader service provision in the local area or the region

N/A

#### **Reducing climate change**

The building will be designed so it is as energy efficient as it possibly can be.

Negative impacts identified:

Local, national, international supply chains

N/A

Human rights

N/A

#### Broader service provision in the local area or the region

N/A

#### Reducing climate change

The constructions of a new build will create carbon emissions.